The Drax Power (Generating Stations) Order

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

Applicant's Response to Off-Site Mitigation Strategy Submitted by the Local Authorities

(Submitted for Deadline 6)

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

Drax Power Limited

Drax Repower Project

Applicant:	DRAX POWER LIMITED
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1 INTRODUCTION

1.1 Purpose of this Document

1.1.1. Drax Power Limited ("Drax" or "the Applicant") submitted an Application for a Development Consent Order (DCO) on 29 May 2018, which was accepted for Examination on 26 June 2018.

1.1.2. This paper has been prepared by the Applicant in response to the "Drax Re-Power Off-Site Mitigation Strategy" (draft) by Martin Woolley Landscape Architects, which was issued to the Applicant on 5 December 2018 and accepted into the Examination by the Examining Authority on 14 December 2018 (Examination Library Reference REP4-016). The document, referred to as the Off Site Mitigation Strategy ("OSMS") in the remainder of this paper, was endorsed by both North Yorkshire County Council ("NYCC") and Selby District Council ("SDC") at the Issue Specific Hearing on 5 December 2018 (although no representative from SDC was at the hearing, the officers from NYCC indicated they represented both NYCC and SDC, and therefore the endorsement is understood to have been given from both Councils).

1.1.3. Discussions have taken place between the Applicant, NYCC and SDC subsequent to the submission of the OSMS. The OSMS has been revised since Deadline 4 and the Applicant understands that this will be resubmitted by NYCC and SDC for Deadline 6. This paper responds to the OSMS as revised by NYCC and SDC and given to the Applicant (this version of the OSMS is appended to this paper at Appendix 1). The LPAs have stressed that the OSMS has been prepared to demonstrate that contrary to the position outlined in the Applicant's paper "Landscape and Visual Amenity Effects – Appropriateness of Proposed Mitigation" submitted at Deadline 2 (Examination Library Reference REP2-033), opportunities exist to provide off site mitigation proposals to compensate for the significant adverse landscape effects predicted in the Landscape and Visual Impact Assessment (Examination Library Reference APP-078).

1.1.4. This paper responds to the points of disagreement in the OSMS (REP4-016) and expands on comments made in the Written Summary of the Applicant's Oral Case at the Issue Specific Hearing (Examination Library Reference REP4-012). This paper also responds to a request for a detailed response to the OSMS by the Examining Authority in their Second Written Questions (reference LV2.3). The Applicant's Responses to the Examining Authority's Second Written Questions (Applicant Document Reference 8.5.17) refers to this paper which provides a more detailed response to the OSMS.

1.1.5. The Applicant disagrees with a number of points made in the OSMS, namely:

- Policy references.
- The extent of significant effects.
- Nomenclature – mitigation versus enhancements.
- Planning tests.
- Recommendations for mitigation (supported by an assessment of effects in Appendix 2).
- The proposed financial contribution.

1.1.6. This paper rejects the recommendations proposed by NYCC and SDC as they are not considered to meet the relevant planning tests for the reasons set out in this paper and are not deliverable. Indeed, it must also be remembered, that the landscape and visual effects are reversible in nature, with the Proposed Scheme decommissioned at the end of its operational life, in accordance with the DCO Requirement.

1.1.7. However, this paper presents two areas of additional mitigation land which have been discussed with NYCC and SDC. The first area of mitigation, referred to as the "Bingley Land", seeks to introduce through a land agreement further planting on land within the Order limits and also adjacent to the Order limits on land outside the ownership of the Applicant (the Applicant and the landowner are in advanced discussions over such planting), whilst the second area of mitigation / enhancement relates to the resurfacing of the Trans Pennine Trail within 3 km of the Proposed Scheme. The resurfacing of the Trans Pennine Trail was referred to in the OSMS. The findings of the assessment of the two areas of additional mitigation land are summarised further in Section 2 with supporting Figures in Appendix 3 and an assessment of effects in Appendix 4. The Applicant's position is that these proposals are appropriate and proportionate. Measures introduced on the Bingley Land would reduce visual effects, albeit that such effects would remain significant. The resurfacing works associated with the Trans Pennine Trail, whilst not responding to direct landscape and visual effects, would support objectives identified in the Leeds City Green and Blue Infrastructure Strategy.

1.1.8. The Applicant notes that the OSMS appears to accept that *"it is not possible to eliminate the visual impacts associated with a fossil fuel generating station"* (EN-2, paragraph 2.6.5), as aside from Figures on page 5 and 6 of the OSMS which relate to visual effects, the focus of the OSMS relates only to impacts on landscape character rather than visual effects.

2 REVIEW OF THE OFF SITE MITIGATION STRATEGY

2.1 Overview

2.1.1. The Applicant notes the aspirations identified in the OSMS and agrees that landscape management objectives provide the foundation for informing mitigation / enhancement measures. However, as mentioned in previous reports namely the "Appropriateness of Proposed Mitigation" (Examination Library Reference REP2-033) and the "Applicant's Response to the Local Impact Report" (Examination Library Reference REP3-026), the Applicant is constrained by the need to avoid the loss of Best and Most Versatile Land, the extent of its land ownership and the need to avoid the compulsory acquisition of land when the purpose of that acquisition would have no or little impact on reducing the level of significance of adverse effect.

2.1.2. This section responds to concerns the Applicant has over the OSMS under the headings below.

2.2 Policy

2.2.1. The Applicant notes that the OSMS does not contain adequate reference to or acknowledgement of the policies set out in the relevant NPSs, which include the Government's objectives for the development of nationally significant infrastructure projects. The relevant NPSs for the Proposed Scheme are the Overarching NPS for Energy (EN-1), the NPS for Fossil Fuel Generating Infrastructure (EN-2), the NPS for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4) and the NPS for Electricity Network Infrastructure (EN-5), prepared in 2011 by the Department of Energy and Climate Change (DECC), now Business, Energy and Industrial Strategy (BEIS).

2.2.2. The Applicant notes reference to paragraph 5.9.23 of EN-1 in the OSMS, which states that *"Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site. For example, filling in gaps in existing tree and hedge lines would mitigate the impact when viewed from a more distant vista".* The Applicant however considers that the observations, conclusions and recommendations in the OSMS are not in accordance with paragraph 5.9.8 of EN-1, which requires an assessment of landscape effects to be based on the *"existing character of the local landscape, its current quality, how highly it is valued and its capacity to accommodate change. All of these factors need to be considered in judging the impact of a project on landscape"*. EN-1 goes on to recognise that *"virtually all nationally significant energy infrastructure projects will have effects on the landscape"*.

2.2.3. The Applicant reiterates that the note on Landscape and Visual Effects – Appropriateness of Proposed Mitigation submitted at Deadline 2 (Examination Library Reference REP2-033) demonstrates how the Applicant has addressed the test in EN-2 paragraph 2.6.5, which states that *"[i]t is not possible to eliminate the visual impacts associated with a fossil fuel generating station. Mitigation is therefore to reduce the visual intrusion of the buildings in the landscape and minimise impact on visual amenity as far as reasonably practicable."* A response to whether the proposals in the OSMS meet the relevant planning tests is outlined in section 2.5 below.

2.2.4. Compliance of the Proposed Scheme with the applicable policies within the relevant NPSs is assessed along with local planning policy considerations set out in Sections 5, 6 and Appendix 2 to the Planning Statement (Examination Library Reference APP-062). In response to specific references to Selby District Council Policies SP12, SP18 and SP19 in the OSMS, the Applicant's detailed assessment against these policies is provided in Appendix 2 to the Planning Statement, Chapter 10 of the Environmental Statement (Landscape and Visual Amenity) (Examination Library Reference APP-078) and Appendix 10.1 Local Policies to Chapter 10 (Examination Library Reference APP-117).

2.2.5. Relevant extracts from NPS EN-2 (paragraphs 2.6.4 to 2.6.10) are stated below:

"2.6.4 The applicant should also consider the design of the plant, including the materials to be used, and the visual impact of the stack, as set out in Section 5.9 of EN-1 in the context of the local landscape.

[Secretary of State] decision making

2.6.5 It is not possible to eliminate the visual impacts associated with a fossil fuel generating station. Mitigation is therefore to reduce the visual intrusion of the buildings in the landscape and minimise impact on visual amenity as far as reasonably practicable.

2.6.6 Applicants should design fossil fuel generating stations with the aim of providing the best fit with the existing local landscape so as to reduce visual impacts. This may include design of buildings to minimise negative aspects of their appearance through decisions in areas such as size, external finish and colour of the plant as far as compliance with engineering and environmental requirements permit. The precise architectural treatment will need to be site-specific.

2.6.7 Reduction of visual impacts may often involve enclosing buildings at low level as seen from surrounding external viewpoints. This makes the scale of the plant less apparent, and helps conceal the lower level, smaller scale features of the plant. Earth bunds and mounds, tree planting, or both may be used for softening the visual intrusion and may also help to attenuate noise from site activities. Where the existing landscape is more industrial, design may involve other forms of visual impact mitigation.

2.6.8 As stated in EN-1, the applicant should have undertaken an appropriate landscape and visual assessment using recognised methodologies and have taken measures to minimise the effects of the fossil fuel generating station on landscape and visual amenity as far as reasonably practicable. In considering whether the measures proposed are sufficient to achieve these objectives the [Secretary of State] should take advice from the relevant statutory consultees.

2.6.9 - In requiring any design adjustments to minimise adverse effects, the [Secretary of State] needs to be aware of the statutory and technical requirements that inform plant design and may require the incorporation of certain design details for example chimney stack height, as set out in Section 5.9 of EN-1.

2.6.10 For the reason given in paragraph 2.6.5 above if, having regard to the considerations in respect of other impacts set out in EN-1 and this NPS, the [Secretary of State] is satisfied that the location is appropriate for the project, and that it has been designed sensitively

(given the various siting, operational and other relevant constraints) to minimise harm to landscape and visual amenity, the visibility of a fossil fuel generating station should be given limited weight."

2.2.6. It is noted that the NPSs acknowledge that main structures for fossil fuel generating stations are large and will have an impact on the surrounding landscape and visual amenity, The NPSs do not set an expectation that development proposals will be completely concealed from views. Accordingly, the priority in design terms is to reduce, rather than prevent, adverse landscape and visual impacts where possible. The OSMS fails to acknowledge this.

2.3 Extent of Significant Effects

2.3.1. The Applicant questions why the "off site mitigation proposals" proposed in the OSMS extend up to 10 km from the Proposed Scheme rather than the 3 km area that is most affected. Whilst the 10 km Study Area (for the purposes of assessment in the Environmental Statement) was agreed with NYCC,SDC as well as East Riding of Yorkshire Council and Doncaster Metropolitan Borough Council, it was also agreed that the extent of *significant* landscape effects would be more pronounced within 3 km and diminish with distance as acknowledged by NYCC and SDC in the draft Statement of Common Ground between North Yorkshire County Council and Selby District Council (Examination Library Reference REP4-008):

> *Paragraph 3.16.6 - "It is agreed that there would be significant adverse effects on landscape character, including on LCT 23 Levels Farmland, LCT 24 River Floodplains, LCT 4 River Corridors including LCA 4A Derwent Valley, LCA 4B River Ouse Corridor and LCA 4D River Aire Corridor, local landscape character and the Lower Derwent Important Landscape Area. Such effects would be more pronounced within 3 km of the Site and would diminish with distance. For local landscape features, and subject to proposed mitigation, some effects would diminish once planting has matured (by 15 years post Stage 3)."*

2.3.2. Furthermore, paragraph 3.16.7 of the draft Statement of Common Ground states that "*It is agreed that there would be significant adverse effects on visual amenity and more specifically on visual receptors within a 3 km radius of the Proposed Scheme.....*"

2.3.3. This is evidenced in the Environmental Statement Chapter 10, Landscape and Visual Amenity (Examination Library Reference APP-078) (LVIA) and Table 2-1 below which goes further by stating that for landscape character beyond 3 km the effects would not be significant:

Table 2.1 - Relevant extracts from Chapter 10 Landscape and Visual Amenity

Stage 2 Operation of Unit X and Construction of Unit Y:	**Stage 3 Operation of Unit X and Unit Y:**
Landscape Character:	***Landscape Character:***
Paragraph 10.5.48 *"Outside of a 3 km radius of the Site it is anticipated that whilst the presence of the Proposed Scheme would*	Paragraph 10.5.69 *"Outside of a 3 km radius of the Site it is anticipated that whilst the presence of the Proposed Scheme would*

Stage 2 Operation of Unit X and Construction of Unit Y:	Stage 3 Operation of Unit X and Unit Y:
affect the aesthetic and perceptual qualities of the local landscape from certain locations, the effects would not be significant. The Proposed Scheme would be barely perceptible when viewed against the western elevation of the Existing Drax Power Station Complex, whereas views beyond 3 km across to the eastern elevation would be read in the context of other large scale industry and power generation which are a well-established land-use within the study area and the relative proximity of many LCTs and LCAs to the power station."	*affect the aesthetic and perceptual qualities of the local landscape from certain locations, the effects would not be significant. The Proposed Scheme would be barely perceptible when viewed against the western elevation of the Existing Drax Power Station Complex, whereas views beyond 3 km across to the eastern elevation would be read in the context of other large scale industry and power generation which are a well-established land-use within the study area and the relative proximity of many LCTs and LCAs to the power station."*
Lower Derwent ILA: Paragraph 10.5.55*: "The sensitivity of the Lower Derwent Corridor ILA is high and the magnitude of change prior to mitigation is considered to be medium. Therefore, there is likely to be a direct, permanent, long-term effect on the Lower Derwent ILA of moderate to major adverse significance prior to the implementation of secondary mitigation measures. It should be noted that effects would be concentrated within a 3 km area of the ILA and diminish with distance. The LVIA considers that there would be no significant effects on any other local landscape designation within the study area."*	***Lower Derwent ILA:*** Paragraph 10.5.78 *"The sensitivity of the Lower Derwent Corridor ILA is high and the magnitude of change prior to mitigation is also considered to be medium. Therefore, there is likely to be a direct, permanent, long-term effect on the Lower Derwent ILA of moderate to major adverse significance prior to the implementation of mitigation measures. It should be noted that effects would be concentrated within a 3 km area of the ILA and diminish with distance. The LVIA considers that there would be no significant effects on any other local landscape designation within the study area.*

2.3.4. The Applicant also disagrees with the presentation of the figures in the OSMS demonstrating the significant effects and covering landscape character and visual effects associated with Public Rights of Way and the Trans Pennine Trail. The figures presented on Pages 4, 5 and 6 of the OSMS provide a "blanket cover" to landscape and visual effects to a distance of 10 km which as outlined above, and in the LVIA, diminish with distance and beyond a 3 km radius. Chapter 10, Landscape and Visual Amenity of the ES makes it very clear that significant effects are based on a "worst case scenario" and there would be effects which are less than the level predicted. Comments relating to each of the figures are summarised in the table below with reference to relevant paragraphs from the ES.

Table 2.2 - Relevant extracts from Chapter 10 Landscape and Visual Amenity

Relevant Figure in the OSMS	Key comments and relevant paragraphs from the ES
Figure on Page 4 illustrates "significant effects on landscape character areas where no off site mitigation / enhancement proposed"	Such effects are based on a "worst case scenario", and would diminish with distance and beyond a 3 km radius of the Proposed Scheme as outlined in the paragraphs above. Figure on page 4 "reads" as if entire landscape character types defined as moderate – major or moderate adverse would experience significant effects when this is not the case.
Figure on Page 5 illustrates "significant visual effects on Public Rights of Way".	The LVIA makes it very clear that effects on PRoW are based on a "worst case" scenario and are more noticeable to the northeast, east and southeast of the Existing Drax Power Station Complex and the Proposed Scheme. Effects are dependent on the nature of the view; a direct unfiltered view resulting in a higher level of magnitude of change and therefore significance compared to a view filtered / obscured by intervening built form and vegetation. This is demonstrated in the paragraphs relating to Stage 3 below: Local recreational users within 1 km using the local PRoW network, recreational facilities and sports grounds): Paragraph 10.5.205: *"The sensitivity of other recreational users utilising the PRoW network, recreational facilities and sports grounds is medium. Based on a worst case direct and unfiltered view experienced by users within 1 km of the Site, the magnitude of change prior to mitigation would be large to medium. Therefore, there is likely to be a direct, long term effect on immediate residential receptors of moderate - major and moderate adverse significance prior to the implementation of secondary mitigation measures."* Paragraph 10.5.206: *"A proportion of other recreational receptors within 1 km have partial screening by other development or vegetation or are oriented away from the site. For these, the magnitude of change would vary from small to negligible resulting in a direct, long term effect of minor adverse to negligible adverse significance prior to the implementation of secondary mitigation measures. Such effects are not considered significant."* Local recreational users between 1 and 3 km using the local PRoW network, recreational facilities and sports grounds:

Relevant Figure in the OSMS	Key comments and relevant paragraphs from the ES
	Paragraph 10.5.208: *"The sensitivity of other recreational users utilising the PRoW network, recreational facilities and sports grounds and who would experience a direct view is considered to be medium. Based on a worst case view, the magnitude of change prior to mitigation experienced by such users between 1 & 3 km of the Site who have a direct and unfiltered view is medium. Therefore, there is likely to be a direct, long term effect on recreational users of moderate adverse prior to the implementation of mitigation measure and this is considered a significant effect. As above remaining recreational users would experience a range of effects from minor adverse to negligible adverse significance prior to the implementation of secondary mitigation measures."*
Figure on Page 6 illustrates "significant visual effects on Trans Pennine Trail".	The LVIA makes it very clear that effects on the Trans Pennine Trail are based on a "worst case" scenario and that effects would be based on a direct, unfiltered view as demonstrated in the following paragraphs relating to Stage 3: Local recreational users within 1 km of the Site: Paragraph 10.5.204: "*The sensitivity of recreational users using the TPT and NCN to the north of the River Ouse is high. Based on a worst case direct and unfiltered view the change arising from Stage 3 would be of medium magnitude. This would give rise to a direct, long term moderate – major adverse significant effect on recreational users of the TPT and NCN prior to the implementation of secondary mitigation measures.*" Local recreational users between 1 and 3 km of the Site: Paragraph 10.5.207 "*The sensitivity of recreational users on the TPT and NCN to the north of the River Ouse is considered to be high. Based on worst case views, the change arising from Stage 3 would be of medium magnitude. This would give rise to a direct, long term moderate - major adverse significant effect on recreational users of the TPT and NCN prior to the implementation of secondary mitigation measures.*" In addition, the Applicant questions why the entire 1 and 3 km radius for the figure on Page 6 is shown as significant when effects solely relate to 1 and 3 km distances from the Trans Pennine Trail and considers the figure has

Relevant Figure in the OSMS	Key comments and relevant paragraphs from the ES
	overexaggerated the extent of effects visually.

2.4 Nomenclature - Mitigation versus Enhancement

2.4.1. The Applicant disagrees that the proposals outlined in the OSMS should be referred to as mitigation measures, but rather should be termed as “enhancements”. These measures do not directly respond to the effects of the Proposed Scheme in relation to the aesthetic and perceptual qualities of the landscape resource.

2.4.2. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 set out the requirements for what an Environmental Statement must consider, which include "*a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment*". The Guidelines on Landscape and Visual Impact Assessment (GLVIA)[1] paragraph 3.39 state (referring to the EIA Regulations[2]) that:

“Enhancement is not a formal requirement of the regulations. It is often referred to incorrectly as an outcome of proposed mitigation measures – for example where planting is proposed to mitigate landscape and / or visual effects but will also achieve an enhancement of the baseline condition of the landscape. In practice enhancement is not specifically related to mitigation of adverse landscape and visual effects but means any proposal that seeks to improve the landscape and/ or visual amenity of the proposed development site and its wider setting beyond its baseline conditions”.

2.4.3. Paragraph 4.35 of the GLVIA goes on to state that enhancement can be by *“improved land management or restoration of historic landscapes, habitats and other valued features, enrichment of impoverished agricultural landscapes, measures to conserve and improve the attractiveness of town centres; and creation of new landscapes, habitats and recreational areas”.*

2.4.4. The GLVIA in paragraph 4.38 adds that “*it is essential to demonstrate that any measures included as part of the mitigation proposed to respond to adverse landscape and visual effects can be delivered in practice….. Similar considerations apply to enhancement measures proposed for inclusion in the scheme, where a firm commitment to and method of delivery must be included.”*

2.4.5. The measures proposed in the OSMS are clearly not deliverable. Putting aside whether or not the measures proposed satisfy the planning tests, no or very little weight could be given to the measures as all they amount to is funding to enable NYCC and SDC, or another

[1] Guidelines for Landscape and Visual Impact Assessment, third Edit, Landscape Institute and Institute of Environmental Management and Assessment, 2013
[2] The Guidelines refer to the previous, 2009 EIA Regulations, which include a similar requirement to the current Regulations: "A description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects". It is clear neither requirements refer to enhancement.

body, to try and find land to acquire. There is absolutely no certainty that any land is, or will become, available.

2.4.6. Measures proposed are unreasonable in part because of the means by which they would need to be secured, . In addition, such extensive off site mitigation as proposed in the OSMS would result in the loss of privately owned agricultural land which includes extensive areas of Best and Most Versatile land (Grade 1 and 2), the resultant sterilisation of land, which would generate a negative effect on farmers' livelihoods. No assessment has been carried out by NYCC and SDC on the impacts of changing agricultural land to planting in the OSMS, both in terms of negative impact on farming but also on the landscape itself. Furthermore, the examples shown on page 14 of the OSMS are not examples following a search for where planting "may" have a benefit in terms of mitigating the Proposed Scheme, rather they are examples of land that is for sale before any consideration has been given as to whether planting on that land would have any impact. In essence, this is a search the wrong way around. The OSMS is simply not credible, even before one has looked at the planning tests. The benefits of providing further mitigation would be disproportionately low (the significance of effects would not change) compared to the disbenefits outlined above (as demonstrated in Section 6.2 of the Applicant's paper "Landscape and Visual Amenity Effects – Appropriateness of Proposed Mitigation" submitted at Deadline 2 (Examination Library Reference REP2-033)).

2.4.7. Even if NYCC and SDC argue that such measures would constitute "offsetting", the GLVIA states in paragraph 4.32 that the aim of offsetting "*should be, as far as possible, to replace like with like or where this is not possible, to provide features of equivalent value*". It goes on to state that it is "*increasingly common for offsetting measures to be offered that are not closely related to the lost or damaged features. Such measures may sometimes be actively sought by local communities or local authorities to offset unavoidable negative effects. They might include, for example, the provision of new local amenity areas, parks or green spaces, of the creation or provision of a work of art. Such measures should normally be linked to the development in some way.*"

2.5 Planning Tests

2.5.1. The Applicant considers that the request for over £10 million towards landscape enhancement and the other proposals in the OSMS which range from £8.4 to £11.4 million in value fail to meet the planning tests for development consent obligations defined in paragraph 4.1.8 of EN-1, which must be *"relevant to planning, necessary to make the proposed development acceptable in planning terms, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects"*. The reasons why the Applicant considers the proposals in the OSMS fail to meet the planning tests are described in the following sections 2.6 and 2.7.

2.5.2. The three examples of off site mitigation funds to major projects summarised in the OSMS are:

- Woodsmith Polyhalite Mine, North Yorkshire.
- Goole Fields Wind Farm, East Riding of Yorkshire.

- Allerton Waste Recovery Park, North Yorkshire.

2.5.3. It is considered that these projects are not relevant for the following reasons:

- All three projects are community fund projects, with some funds available for landscaping. Furthermore,
- Both Woodsmith Polyhalite Mine and Allerton Waste Recovery are for mitigation rather than offsetting; both projects have particularly sensitive issues - the Mine is located within a National Park and the Waste Recovery adjacent to a Grade II Registered Park and Garden.

2.5.4. The main generating aspects of the Proposed Scheme that give rise to the landscape and visual effects are, by comparison with the projects outlined above, located on an existing brownfield, power station site utilising existing power generation infrastructure. NYCC and SDC have agreed that the Existing Drax Power Station Complex is an appropriate location given the Proposed Scheme's objectives relating to reutilising existing infrastructure, re-using as much existing operational land as possible and maximising the efficiency of Drax Power Station. In addition, there are a number of constraints that affect what is reasonably practicable for this project. Engineering issues constrain the design and land within the affected area is either Grade 1 or 2 agricultural land; refer to "Appropriateness of Proposed Mitigation" (Examination Library Reference REP2-033).

2.6 Recommendations for Mitigation

2.6.1. The OSMS argues that opportunities exist to provide off site mitigation to compensate for the significant adverse landscape effects predicted in the Landscape and Visual Impact Assessment (Examination Library Reference APP-078). The Applicant has reviewed Recommendations 1 to 4 of the OSMS and undertaken an assessment of effects of each recommendation on the basis that they would be implemented (which is questionable given deliverability concerns). A summary of the nature of each recommendation, the estimated fund value and the Applicant's assessment of landscape character effects as a result of the proposed recommendation is outlined below. Refer to Appendix 2 for the detailed assessment.

Recommendation 1: Theoretical Landscape Character Enhancement Works

2.6.2. Recommendation 1 (termed Option 1 in the OSMS and presented on page 8 and 9) presents theoretical landscape enhancement works based on the Derwent Valley ILA and a landscape tract within 3 km of the Existing Drax Power Station Complex. The objectives are to develop an off site mitigation fund based on a range of typical landscape character enhancement works to compensate for predicted significant effects on local landscape character areas / types.

2.6.3. The Recommendation has an estimated fund value of £11.4 million which has been rounded down by NYCC and SDC to £10 million to provide a benchmark value.

2.6.4. The Applicant's assessment of effects concludes that whilst the recommendations have the potential to slightly reduce the magnitude of change, this slight reduction is insufficient to change the category of magnitude and thus the findings of significance would remain

unchanged for landscape character, the Lower Derwent ILA and local landscape character and features. Refer to Table 2-3 below.

Table 2.3 - Summary of landscape effects based on the original Application and for Recommendation 1

Landscape resource	Original Application with proposed mitigation	Effects based on the Recommendation (unchanged)
Landscape Character	Moderate adverse and minor - moderate adverse (year 0 and year 15)	Moderate adverse and minor - moderate adverse (year 0 and year 15)
The Lower Derwent ILA	Moderate to major adverse (year 0 and year 15)	Moderate to major adverse (year 0 and year 15)
Local landscape character and features	Moderate adverse (year 0) Minor beneficial (year 15)	Moderate adverse (year 0) Minor beneficial (year 15)

*All effects are based on a "worst case scenario".

2.6.5. It is considered that Recommendation 1 is disproportionate to the extent of significant landscape character effects which are concentrated within a 3 km radius, the minor reduction in the magnitude of change which would result from spending £10 million and fails to meet the planning tests on the basis that a fund of circa £10m would not change the effects and so cannot be said to be necessary to make the proposed development acceptable in planning terms. Furthermore, the sum is clearly not fairly and reasonably related in scale and kind to the proposed development and is not reasonable in all other respects. It must also be remembered, that the landscape and visual effects are reversible in nature, with the Proposed Scheme decommissioned at the end of its operational life, in accordance with the DCO Requirement. Accordingly, such sums are simply not justified.

Recommendation 2: Planned works associated with the Trans Pennine Trail, Trans Pennine Trail Cycle Route and Yorkshire Wildlife Trust

2.6.6. Recommendation 2 (termed Option 2 in the OSMS and presented on page 10 and 11) identifies a programme of current and planned environmental works for the Trans Pennine Trail, Trans Pennine Trail Cycle Route and work associated with the Community Trust Fund to support Yorkshire Wildlife Trust. The Recommendation anticipates that the proposals would have the potential to contribute to existing regional and local green infrastructure and improve landscape character. The Recommendation spans a 10km radius compared to the Applicant's proposal which is to resurface the Trans Pennine Trail within 3 km of the Proposed Scheme for a cost of approximately £50,000.

2.6.7. The Recommendation has an estimated fund value of £8.4 million; £1.7 million towards the Trans Pennine Trail and £6.7 million towards current Yorkshire Wildlife Trust projects with 25 years maintenance.

2.6.8. The Applicant's assessment of effects concludes that the proposals associated with habitat improvements and creation instigated by the Yorkshire Wildlife Trust have the potential to slightly reduce the magnitude of change. However, this slight reduction is insufficient to change the category of magnitude and thus the findings of significance would remain unchanged for landscape character, the Lower Derwent ILA and local landscape character and features. Refer to Table 2-4 below.

Table 2.4 - Summary of landscape effects based on the original Application and for Recommendation 2

Landscape resource	Original Application with proposed mitigation	Effects based on the Recommendation (unchanged)
Landscape Character	Moderate to negligible adverse (year 0 and 15)	Moderate adverse to negligible adverse (year 0 and year 15)
The Lower Derwent ILA	Moderate to major adverse (year 0 and year 15)	Moderate to major adverse (year 0 and year 15)
Local landscape character and features	Moderate adverse (year 0) Minor beneficial (year 15)	Moderate adverse (year 0) Minor beneficial (year 15)

*All effects are based on a "worst case scenario".

2.6.9. It is considered that Recommendation 2 is disproportionate to the extent of significant landscape character effects which are concentrated within a 3 km radius and fails to meet the planning tests on the basis that a fund of circa £8.4m would not change the effects and so cannot be said to be necessary to make the proposed development acceptable in planning terms. Furthermore, the sum is clearly not fairly and reasonably related in scale and kind to the proposed development and is not reasonable in all other respects. It must also be remembered, that the landscape and visual effects are reversible in nature, with the Proposed Scheme decommissioned at the end of its operational life, in accordance with the DCO Requirement. Accordingly, such sums are simply not justified.

2.6.10. In contrast, the Applicant considers that improvements to the Trans Pennine Trail within a 3 km radius of the Proposed Scheme at a cost of £50,000 can have social and well-being benefits to the host community and is fairly and reasonably related in scale and kind to the proposed development and reasonable in all other respects.

Recommendation 3: A Woodland Based Project

2.6.11. Recommendation 3 (termed Option 3 in the OSMS and presented on page 12) seeks to establish a "Woodland Based Project", including land purchase, which could contribute to improving landscape character and achieving objectives in key green infrastructure projects. The proposal would require the establishment of a community fund to deliver partnership objectives around floodplain and riparian woodland, public access corridors, education in schools, all to provide significant health and well-being with a fund value of £10 million.

2.6.12. In terms of landscape character, the Applicant's assessment concludes that given the extensive nature of planting (which is substantially more than proposed in the Applicant's Appropriateness of Proposed Mitigation), the proposals would reduce the visual intrusion of the Proposed Scheme and associated aesthetic and perceptual impacts. In doing so, the proposals would also reduce the visibility of the Existing Drax Power Station Complex and an appreciation of its existing symmetry as well as the sense of openness and inter visibility with other landscape character areas which is characteristic of many LCTs. In essence, the planting would change the existing character of the area.

2.6.13. Planting proposed by NYCC and SDC would not just run alongside PRoW, National Trails, cycle routes, local roads and properties (as described in the Appropriateness of Proposed Mitigation), but extend across agricultural land. This would result in a dramatic change to landscape character throughout the area, generating new landscape character types / areas along with their key characteristics and management objectives. Like all the other recommendations, the ability to implement such proposals is uncertain and would be reliant on the purchase of land and resultant loss of agricultural land which is predominately Grade 1 and 2 within a 3 km radius. As far as we can tell, this impact has not been assessed by NYCC and SDC, again emphasising the undeliverability of the proposal.

2.6.14. The assessment of the original Application found that the sensitivity of the LCTs within a 10 km Study Area was medium to negligible. The magnitude of change following mitigation would range from medium to negligible in Year 0 and remain unchanged in Year 15. The significance of effect ranges from moderate to negligible adverse.

2.6.15. The Recommendation for proposed woodland planting would be substantial in nature and considerably alter the characteristics of some of the LCTs where the sense of openness and inter visibility is a key feature, resulting in a medium to large magnitude of change,

2.6.16. This is a change which may be appreciated by some and not by others. It is therefore considered that there would be a neutral effect[3] associated with this change. However based on the level of change which is greater than that assessed as part of the original Application there would be a moderate - major to major significant effect by Year 15 and once planting has matured, compared to a localised moderate to major adverse significant effect (diminishing with distance) for both Year 0 and Year 15 based on the original Application. The Applicant's assessment concludes that given the extensive planting, effects on the Lower Derwent ILA would reduce from localised moderate - major adverse (diminishing with distance) and unchanged for Year 0 to 15 based on the original Application, to localised minor - moderate adverse effects by Year 15.

2.6.17. There would be no change in effects associated with local landscape character and landscape features. Due to required easements, tree planting could not be introduced within 10 m of the Gas Pipeline, refer to Table 2-5 below.

[3] As referred to in Appendix 10.3 LVIA Methodology (Examination Library Reference APP-119) paragraph 1.4.*19* states that *"effects can be either positive or negative and in some cases neutral (neither positive, nor negative)".* Paragraph 1.2.8 also states that *"[A]n effect is understood to be neutral when the predicted residual change would, on balance, result in neither an improvement, nor a deterioration of the landscape and visual resource compared with the existing situation."*

Table 2.5 - Summary of landscape effects based on the original Application and for Recommendation 3

Landscape resource	Original Application with proposed mitigation	Effects based on the Recommendation
Landscape Character	Moderate to negligible adverse (year 0 and 15)	Moderate to negligible adverse (year 0) Moderate to Major Neutral (Year 15)
The Lower Derwent ILA	Moderate to major adverse (year 0 and year 15)	Moderate to major adverse (year 0 and year 15) Minor moderate adverse effects (year 15)
Local landscape character and features	Moderate adverse (year 0) Minor beneficial (year 15)	Moderate adverse (year 0) Minor beneficial (year 15)

*All effects are based on a "worst case scenario"

2.6.18. It is considered that Recommendation 3 is disproportionate to the extent of significant landscape character effects which are concentrated within a 3 km radius and fails to meet the planning tests on the basis that a fund of circa £10m cannot be said to be necessary to make the proposed development acceptable in planning terms. Furthermore, the sum is clearly not fairly and reasonably related in scale and kind to the proposed development and is not reasonable in all other respects. It must also be remembered, that the landscape and visual effects are reversible in nature, with the Proposed Scheme decommissioned at the end of its operational life, in accordance with the DCO Requirement. Accordingly, such sums are simply not justified.

Recommendation 4: Conversion of Grade 3b agricultural land

2.6.19. Recommendation 4 (termed Option 4 in the OSMS and presented on page 13 to 15) proposes the purchase of Grade 3b agricultural land within the 10 km Study Area and the conversion of such land to woodland, floodplain meadow or wetland. The proposal seeks to meet the aims and objectives of a number of cross boundary organisations. It is understood from the OSMS that such measures would contribute to landscape character and to natural flood management, habitat diversity and climate change measures such as carbon sequestration.

2.6.20. The Recommendation has an estimated fund value of £10 million which would result in the purchase of approximately 140 ha of Grade 3b land and conversion from agricultural land to native woodland with public access (as well as meadowland, floodplain meadow or wetland).

2.6.21. The extent of Grade 3b land is focused to the north, north east and north west, and to the south, south west and west of the Proposed Scheme and within the 10 km Study Area, with

small pockets elsewhere and on this basis would not reduce the direct impact on the aesthetic and perceptual effects associated with landscape character. In addition, the extent of the change in terms of woodland versus wetland is uncertain and therefore it is assumed that there would be no change in the landscape characteristics of the wider landscape character of the Study Area.

2.6.22. The Applicant has assessed Recommendation 4 considering the siting of any proposals on Grade 3b land and concluded that there would be no change in effects on landscape character, the Lower Derwent ILA and local landscape character. Refer to Table 2-6 below.

Table 2.6 - Summary of landscape effects based on the original Application and for Recommendation 4

Landscape resource	Original Application with proposed mitigation	Effects based on the Recommendation
Landscape Character	Moderate adverse and minor - moderate adverse (year 0 and year 15)	Moderate adverse and minor - moderate adverse (year 0 and year 15)
The Lower Derwent ILA	Moderate to major adverse (year 0 and year 15)	Moderate to major adverse (year 0 and year 15)
Local landscape character and features	Moderate adverse (year 0) Minor beneficial (year 15)	Moderate adverse (year 0) Minor beneficial (year 15)

*All effects are based on a “worst case scenario”

2.6.23. It is considered that Recommendation 3 is disproportionate to the extent of significant landscape character effects which are concentrated within a 3 km radius and fails to meet the planning tests on the basis that a fund of circa £10m would not change the effects and so cannot be said to be necessary to make the proposed development acceptable in planning terms. Furthermore, the sum is clearly not fairly and reasonably related in scale and kind to the proposed development and is not reasonable in all other respects. It must also be remembered, that the landscape and visual effects are reversible in nature, with the Proposed Scheme decommissioned at the end of its operational life, in accordance with the DCO Requirement. Accordingly, such sums are simply not justified.

General Comments

2.6.24. The Applicant’s assessment of the OSMS’ recommendations concludes that whilst the OSMS is aspirational in its proposals to redress landscape impacts, the level of mitigation / enhancement measures proposed would be disproportionate with the landscape and visual impacts associated with the Proposed Scheme and which are concentrated within a 3 km radius of the Existing Drax Power Station Complex and would be reversible , as well as largely ineffective in achieving any improvement in the significant adverse effects predicted by the Applicant to occur as a result of the Proposed Scheme.

2.6.25. As stated in the Applicant's paper on Landscape and Visual Amenity Effects – Appropriateness of Proposed Mitigation, submitted at Deadline 2 (Examination Library Reference REP2-033), there is uncertainty over whether proposals are achievable given that many of the recommendations are on privately owned Best and Most Versatile Grade 1 and 2 agricultural land and the negative effect this could generate on farmers' livelihoods. No one body or partnership can guarantee that purchase could be agreed, and for some proposals uncertainty exists over whether measures duplicate existing vegetation.

2.6.26. To conclude, the Applicant has concerns over the proportionality of the measures proposed and how such proposals can be justified as being in the public interest, particularly given the expenditure required for minimal, if any, reduction in significant effects. Such measures are outside the scope of mitigation as per the EIA Regulations and fail to meet the relevant planning tests. As referred to in the GLVIA, the recommendations in the OSMS seek to improve the landscape of the Proposed Scheme Site and its wider setting beyond its baseline conditions rather than being linked to the Proposed Scheme in some way and do not include a practicable method of delivery.

2.7 Financial contributions

2.7.1. The OSMS makes references to contributions of £9.5 to £14 million based on four recommendations assessed in further detail in Appendix 2. The Applicant considers this figure to be excessive and seeks an explanation as to how such a figure is derived when, as outlined previously, significant effects are concentrated within a 3 km radius of the Proposed Scheme. As indicated by the Examining Authority, and reported in the Applicant's oral case at the Issue Specific Hearing (Examination Library Reference REP4-012) *"the amount of money proposed did appear to be significantly more than was usual for off site landscaping".*

2.7.2. The Applicant considers that the £10 million fund requested is not proportionate to the landscape and visual impacts associated with the Proposed Scheme and fails to meet the planning tests for development consent obligations defined in paragraph 4.1.8 of EN-1. To illustrate this point, this figure is 11 times more than the contribution for a new nuclear power station at Hinkley Point C which is situated near an Area of Outstanding Natural Beauty and where £960,000 was secured to provide landscape mitigation, and 66 times more than Eggborough's Combined Cycle Gas Turbine plant where a Section 106 contribution of £151,000 has been secured to deliver biodiversity enhancement measures. Measures for Eggborough are proposed within the Lower Aire Valley and would be delivered by the Yorkshire Wildlife Trust in partnership with the Environment Agency.

2.8 Assessment of additional mitigation measures

2.8.1. Whilst the Applicant rejects the recommendations proposed within the OSMS, we have, as requested, given further consideration to what more could be offered in addition to the measures proposed through the Outline Landscape and Biodiversity Strategy (Applicant's document reference 6.7 Rev 003). The Applicant recommends instead of the proposals outlined in the OSMS two additional areas of mitigation / enhancement referred to as:

- Bingley Land; and
- Trans Pennine Trail Resurfacing (within 3 km of the Proposed Scheme).

2.8.2. Such proposals are appropriate and proportionate. Measures introduced on the Bingley Land would reduce visual effects whilst the resurfacing works associated with the Trans Pennine Trail would support objectives identified in the Leeds City Green and Blue Infrastructure Strategy and tie in with Recommendation 2 in the OSMS.

Bingley Land

2.8.3. The Applicant, in discussions with the landowner (also owner of plots 9, 9a, 9b, 18, 25, 26, 27, 28, 29 and 30 within the Order Limits), is seeking to reach a land agreement in relation to the land at and adjacent to plot 11 and 12, refer to Figure 1.1, Appendix 3.

2.8.4. The proposal is being supported by the landowner and would not prejudice any other agricultural land; land to the north and south of the proposed planting would continue to be farmed.

2.8.5. It is noted that this land is located largely outside the Order limits. However, the Applicant is not proposing to include the land outside the Order Limits in the Book of Reference, or seek any rights over this land through the Development Consent Order. Instead, the Applicant is in active discussions with the landowner to reach a private agreement (confirmation of agreement between the parties will be provided to the Examining Authority prior to the end of the Examination). The aim of the private agreement is to introduce mitigation measures on land between the Gas Receiving Facility (GRF) and Wren Hall Lane. Proposals include:

- A 25 m wide area of broadleaved woodland to the south of the proposed Gas Pipeline. Approximately 14 m of woodland would be planted within the Site Boundary and within the Order Limits, whilst the remainder is on an arable field to the south (0.82 ha – 0.45 ha within the Order Limits and 0.37 ha outside of the Order Limits).
- An area of broadleaved woodland planting to the east of the GRF, set back from the overhead powerlines (0.16 ha).
- A native hedgerow planted along the northern perimeter of the proposed woodland (150 linear metres).
- Infill hedgerow planting and hedgerow trees to the west of Wren Hall Lane (0.03 ha).
- Semi improved grassland under the overhead powerlines and between the two areas of woodland outlined above (0.39 ha).
- The retention of two access points between arable fields for maintenance.

2.8.6. Final design details would be prepared and included within the detailed Landscape and Biodiversity Strategy(s) to be submitted to and approved by Selby District Council under requirement 8 of the DCO.

2.8.7. In addition to providing specific mitigation measures to respond to visual impacts, the proposals would support objectives identified within the Leeds City Green and Blue Infrastructure Strategy 2017-2036 (LCGBIS)[4] and the Dales to Vale River Network Catchment Partnership (DtVRNP)[5]:

- *"Effective water management and flood risk reduction" (LCGBIS) (DtVRNP)*

[4] Leeds City Region Enterprise Partnership, April 2018, Leeds City Green and Blue Infrastructure Strategy 2017-2036
[5] Dales to Vale Rivers Network Catchment Partnership (http://dvrn.co.uk)

- *"Build green and blue infrastructure into physical development and housing" (LCGBIS)*
- *"Enhance green and blue corridors and networks" (LCGBIS)*
- *"Plant and manage more trees and woodland" (LCGBIS) (DtVRNP)*

2.8.8. The DtVRNP also highlights on their webpage the potential for floodplain woodland and a high susceptibility to fluvial flood risk on the Bingley land.

Trans Pennine Trail

2.8.9. The TPT works are associated with resurfacing of the trail within 3 km of the Proposed Scheme and for a cost of approximately £50,000. Refer to Figure 1.2, Appendix 3. The proposals would supplement works outlined in the OSMS Option 3 which cover footpath widening, resurfacing, new street furniture, signage and crossing points.

2.8.10. The mitigation measures would respond to objectives identified within the Leeds City Green and Blue Infrastructure Strategy 2017-2036 (LCGBIS):

- *"Enhance green and blue corridors and networks" (LCBIS)*
- *"Heighten community access to and enjoyment of green and blue infrastructure" (LCBIS)*

Assessment of effects

2.8.11. Appendix 4 assesses the landscape and visual effects associated with the additional areas of mitigation and concludes that for both proposals there would be no change in the significance of effects relating to landscape.

2.8.12. In terms of visual effects, such effects are likely to reduce as a result of the mitigation proposed on the Bingley Land, due to the extent of planting albeit such effects would remain significant. Receptors who would benefit following the implementation of mitigation and by Year 15 include residents of Wren Hall, users of Wren Hall Lane and users of PRoW 35.26/2/1 and 35.26/5/1.

2.8.13. The assessment of the Trans Pennine Trail concludes that there would be no change in visual effects since works would not result in a direct change in visual effects. The benefits of improving the Trans Pennine Trail relate to objectives identified in the Leeds City Green and Blue Infrastructure Strategy which is referred to in the OSMS and seeks *"to enhance green and blue corridor and networks"* and *"heighten community access to and enjoyment of green and blue infrastructure".*

2.9 Conclusion

2.9.1. The Applicant rejects the recommendations and associated funding contribution request on the basis that it is excessive and disproportionate to the landscape and visual impacts associated with the Proposed Scheme. The Applicant, whilst happy to continue a dialogue with both NYCC and SDC, proposes only to support the mitigation and enhancement measures associated with the Bingley land and the resurfacing of the Trans Pennine Trail. The Applicant considers the Bingley Land and Trans Pennine Trail proposals are proportionate to the effects, and proportionate to the improvement in the likely significant adverse effects that can be achieved. For that reason, the Applicant considers that taking the additional measures proposed here, in combination with the measures already proposed (as set out in the Applicant's Landscape and Visual Amenity Effects –

Appropriateness of Proposed Mitigation (Examination Library Reference REP2-033)) would minimise the effects of the Proposed Scheme as far as reasonably practicable.

APPENDICES

APPENDIX 1 – OFF SITE MITIGATION STRATEGY (OSMS)

DRAX RE-POWER

OFF-SITE MITIGATION STRATEGY

for

NORTH YORKSHIRE COUNTY COUNCIL & SELBY DISTRICT COUNCIL

November 2018

MARTIN WOOLLEY LANDSCAPE ARCHITECTS

The Assembly Rooms
29 Market Place, Bedale
North Yorkshire DL8 1ED

T: 07887 573222 E:admin@mwla.net

DOCUMENT CONTROL

TITLE: OFF-SITE MITIGATION STRATEGY

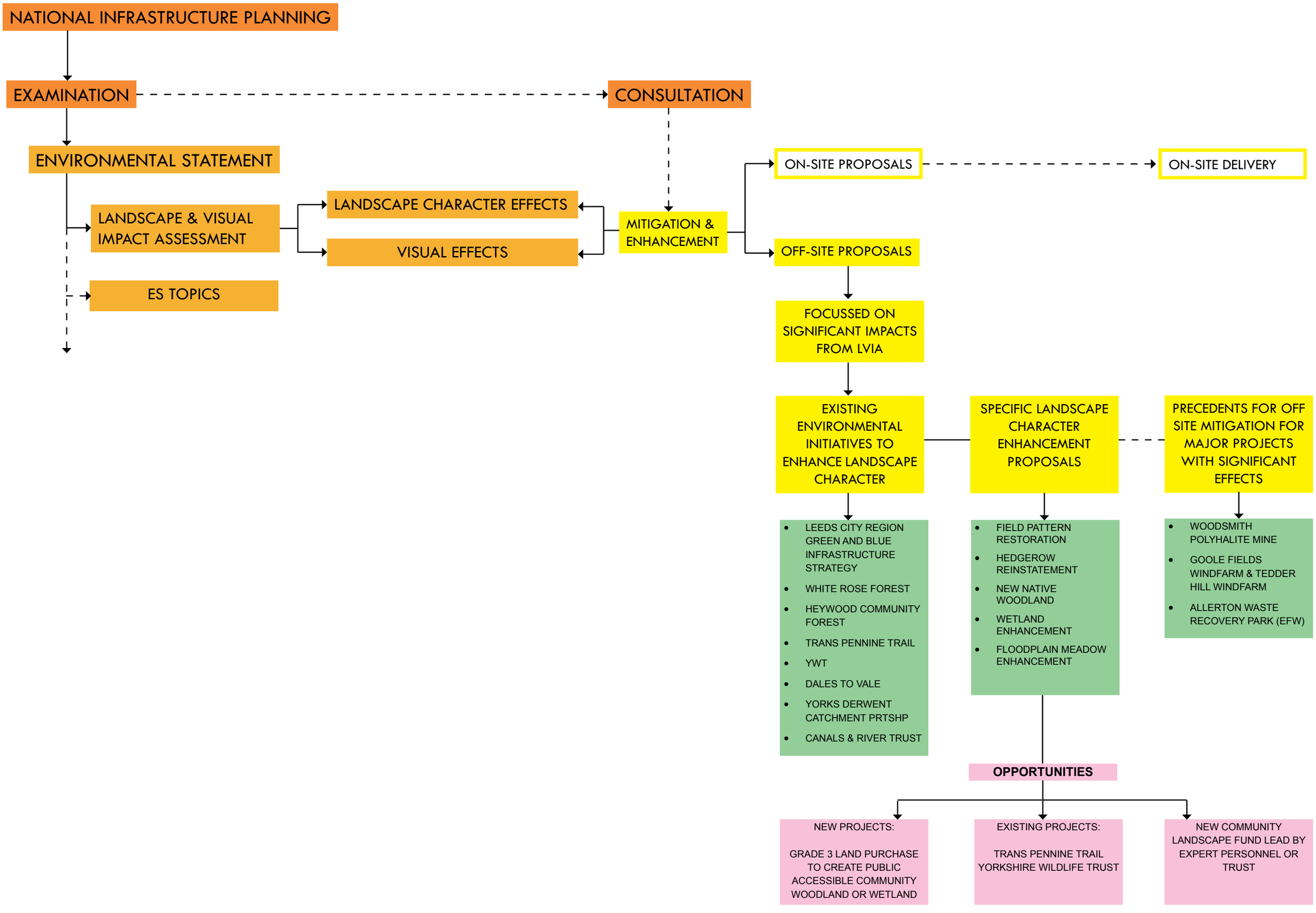
PROJECT: DRAX RE-POWER INFRASTRUCTURE PROJECT UNDER EXAMINATION

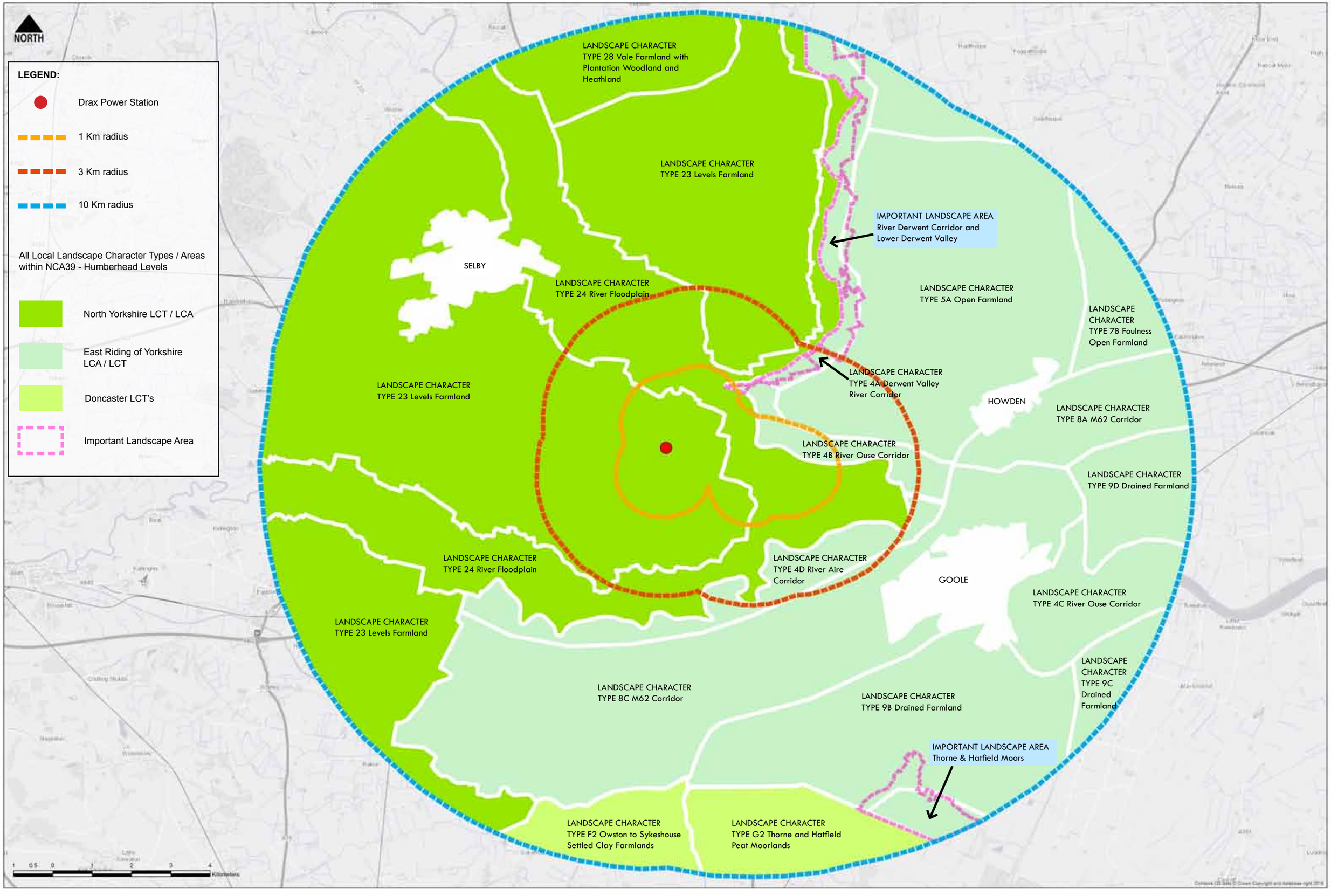
JOB NO: L2.460

CLIENT: NORTH YORKSHIRE COUNTY COUNCIL & SELBY DISTRICT COUNCIL

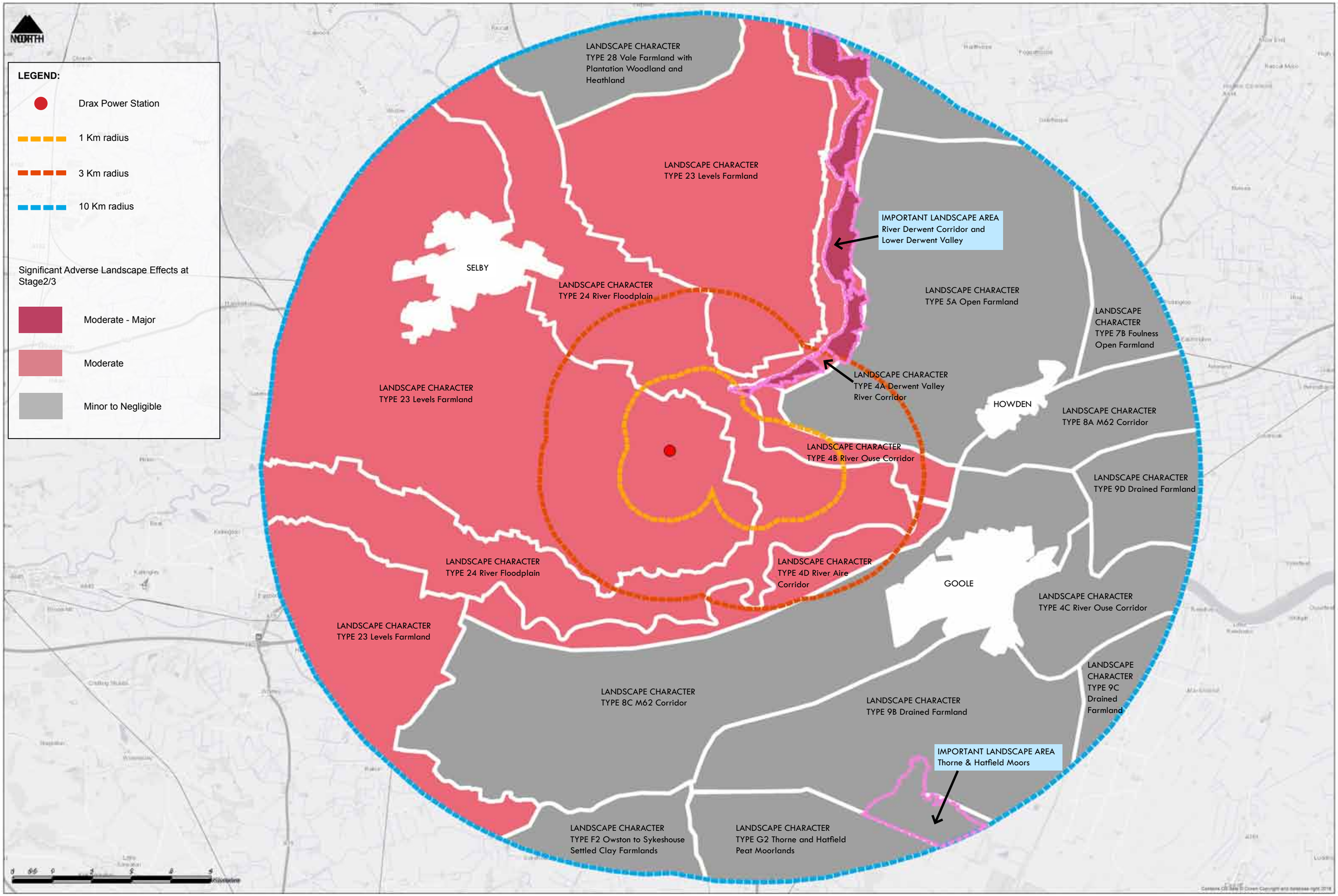
Status	Date	Notes	Revision	Approved
DRAFT	29 Nov 2018	For meeting with NYCC & Selby DC 3.12.18		MW
DRAFT	2 Dec 2018	For meeting with NYCC & Selby DC 3.12.18	1	MW
DRAFT	3 Dec 2018	For Examination	2	MW
DRAFT	7 Jan 2019	For meeting with Drax, NYCC and Selby DC	3	MW

CONTENTS


NATIONAL INFRASTRUCTURE PLANNING
EXAMINATION
CONSULTATION
ENVIRONMENTAL STATEMENT
LANDSCAPE & VISUAL IMPACT ASSESSMENT
LANDSCAPE CHARACTER EFFECTS
VISUAL EFFECTS
ES TOPICS
MITIGATION & ENHANCEMENT
ON-SITE PROPOSALS
ON-SITE DELIVERY
OFF-SITE PROPOSALS
FOCUSSED ON SIGNIFICANT IMPACTS FROM LVIA
EXISTING ENVIRONMENTAL INITIATIVES TO ENHANCE LANDSCAPE CHARACTER
SPECIFIC LANDSCAPE CHARACTER ENHANCEMENT PROPOSALS
PRECEDENTS FOR OFF SITE MITIGATION FOR MAJOR PROJECTS WITH SIGNIFICANT EFFECTS
LEEDS CITY REGION GREEN AND BLUE INFRASTRUCTURE STRATEGY
WHITE ROSE FOREST
HEYWOOD COMMUNITY FOREST
TRANS PENNINE TRAIL
YWT
DALES TO VALE
YORKS DERWENT CATCHMENT PRTSHP
CANALS & RIVER TRUST
FIELD PATTERN RESTORATION
HEDGEROW REINSTATEMENT
NEW NATIVE WOODLAND
WETLAND ENHANCEMENT
FLOODPLAIN MEADOW ENHANCEMENT
WOODSMITH POLYHALITE MINE
GOOLE FIELDS WINDFARM & TEDDER HILL WINDFARM
ALLERTON WASTE RECOVERY PARK (EFW)
OPPORTUNITIES
NEW PROJECTS:
GRADE 3 LAND PURCHASE TO CREATE PUBLIC ACCESSIBLE COMMUNITY WOODLAND OR WETLAND
EXISTING PROJECTS:
TRANS PENNINE TRAIL
YORKSHIRE WILDLIFE TRUST
NEW COMMUNITY LANDSCAPE FUND LEAD BY EXPERT PERSONNEL OR TRUST


NORTH
LEGEND:
Drax Power Station
1 Km radius
3 Km radius
10 Km radius
All Local Landscape Character Types / Areas within NCA39 - Humberhead Levels
North Yorkshire LCT / LCA
East Riding of Yorkshire LCA / LCT
Doncaster LCT's
Important Landscape Area
LANDSCAPE CHARACTER TYPE 28 Vale Farmland with Plantation Woodland and Heathland
LANDSCAPE CHARACTER TYPE 23 Levels Farmland
IMPORTANT LANDSCAPE AREA River Derwent Corridor and Lower Derwent Valley
SELBY
LANDSCAPE CHARACTER TYPE 24 River Floodplain
LANDSCAPE CHARACTER TYPE 5A Open Farmland
LANDSCAPE CHARACTER TYPE 7B Foulness Open Farmland
LANDSCAPE CHARACTER TYPE 4A Derwent Valley River Corridor
LANDSCAPE CHARACTER TYPE 23 Levels Farmland
HOWDEN
LANDSCAPE CHARACTER TYPE 8A M62 Corridor
LANDSCAPE CHARACTER TYPE 4B River Ouse Corridor
LANDSCAPE CHARACTER TYPE 9D Drained Farmland
LANDSCAPE CHARACTER TYPE 24 River Floodplain
LANDSCAPE CHARACTER TYPE 4D River Aire Corridor
GOOLE
LANDSCAPE CHARACTER TYPE 4C River Ouse Corridor
LANDSCAPE CHARACTER TYPE 23 Levels Farmland
LANDSCAPE CHARACTER TYPE 8C M62 Corridor
LANDSCAPE CHARACTER TYPE 9B Drained Farmland
LANDSCAPE CHARACTER TYPE 9C Drained Farmland
IMPORTANT LANDSCAPE AREA Thorne & Hatfield Moors
LANDSCAPE CHARACTER TYPE F2 Owston to Sykeshouse Settled Clay Farmlands
LANDSCAPE CHARACTER TYPE G2 Thorne and Hatfield Peat Moorlands
1 0.5 0 1 2 3 4
Kilometers

LCA AFFECTED WITHIN 10KM	AREA (HA)	SIGNIFICANCE OF EFFECT	MITIGATION / ENHANCEMENT	MANAGEMENT OBJECTIVES FROM EXISTING LANDSCAPE CHARACTER ASSESSMENTS
CT 23 Levels Farmland	37,513	Moderate Adverse	None Proposed	• Use existing hedgerows and biomass planting to integrate built development in the landscape; • Maintain high water tables to prevent the drying out of soils and damage to archaeological evidence; • Encourage the re-creation of a wider range of habitats in arable areas, including the introduction of permanent grassland field margins, grass buffers along water courses, and linking them where possible to create a grassland habitat network; • Introduce a wide range of arable options to enhance habitats for birds and insects; • Incorporate miscanthus and short rotation coppice into the landscape, with particular consideration to landscape character, avoiding peatland sites and areas of historic field patterns; • Manage watercourses to encourage emergent vegetation, including rare species and to improve habitats for water voles; • Extend natural washlands to increase areas of wetland habitats and assist in flood risk management.
LCT 24 River Floodplain	15,268	Moderate Adverse	None Proposed	• Ensure effective catchment management to sustain water quality; • Encourage the creation of new woodland along appropriate riverbanks, which complements the existing woodland pattern; • Conserve the natural form of the rivers by avoiding engineered solutions to water management, such as canalisation, bank hardening and river straightening; • Conserve natural river floodplain features, such as meanders, oxbows, old river channels, ponds and islands; • Conserve valuable floodplain habitats (such as Ings) by encouraging low intensity grazing in the remaining semi-natural habitats (which include mire, fen, flushes, marshy grassland and wet • Restore and enhance wetland habitats; • Target agri-environment scheme support for management of broadleaved woodland, wetland pasture and meadow habitats; • Encourage conservation of existing key habitats and landscape features and expand the resource through habitat restoration and re-creation guided by ecological networks.
LCT 4 River Corridors LCA 4A Derwent Valley	593	Moderate Adverse	None Proposed	• Protect and enhance watercourse network • Create species rich grassland along floodplain landscape • Conserve medieval field pattern • Protect long distance views • Avoid impacts on remoteness and tranquillity • Encourage river corridor habitat diversity
LCT 4 River Corridors LCA 4B River Ouse Corridor	453	Moderate Adverse	None Proposed	• Protect and enhance watercourse network • Create species rich grassland along floodplain landscape • Conserve medieval field pattern • Protect long distance views • Avoid impacts on remoteness and tranquillity • Encourage river corridor habitat diversity
LCT 4 River Corridors LCA 4D River Aire	468	Moderate Adverse	None Proposed	• Protect and enhance watercourse network • Create species rich grassland along floodplain landscape • Conserve medieval field pattern • Protect long distance views • Avoid impacts on remoteness and tranquillity • Encourage river corridor habitat diversity
Lower Derwent Important Landscape Area	484	Moderate-Major Adverse	None Proposed	• Protect and enhance watercourse network • Create species rich grassland along floodplain landscape • Conserve medieval field pattern • Protect long distance views • Avoid impacts on remoteness and tranquillity • Encourage river corridor habitat diversity
TOTAL AREA (HA)	**54,779**			


NORTH
LEGEND:
Drax Power Station
1 Km radius
3 Km radius
10 Km radius
Significant Adverse Landscape Effects at Stage2/3
Moderate - Major
Moderate
Minor to Negligible
LANDSCAPE CHARACTER TYPE 28 Vale Farmland with Plantation Woodland and Heathland
LANDSCAPE CHARACTER TYPE 23 Levels Farmland
IMPORTANT LANDSCAPE AREA River Derwent Corridor and Lower Derwent Valley
SELBY
LANDSCAPE CHARACTER TYPE 24 River Floodplain
LANDSCAPE CHARACTER TYPE 5A Open Farmland
LANDSCAPE CHARACTER TYPE 7B Foulness Open Farmland
LANDSCAPE CHARACTER TYPE 23 Levels Farmland
LANDSCAPE CHARACTER TYPE 4A Derwent Valley River Corridor
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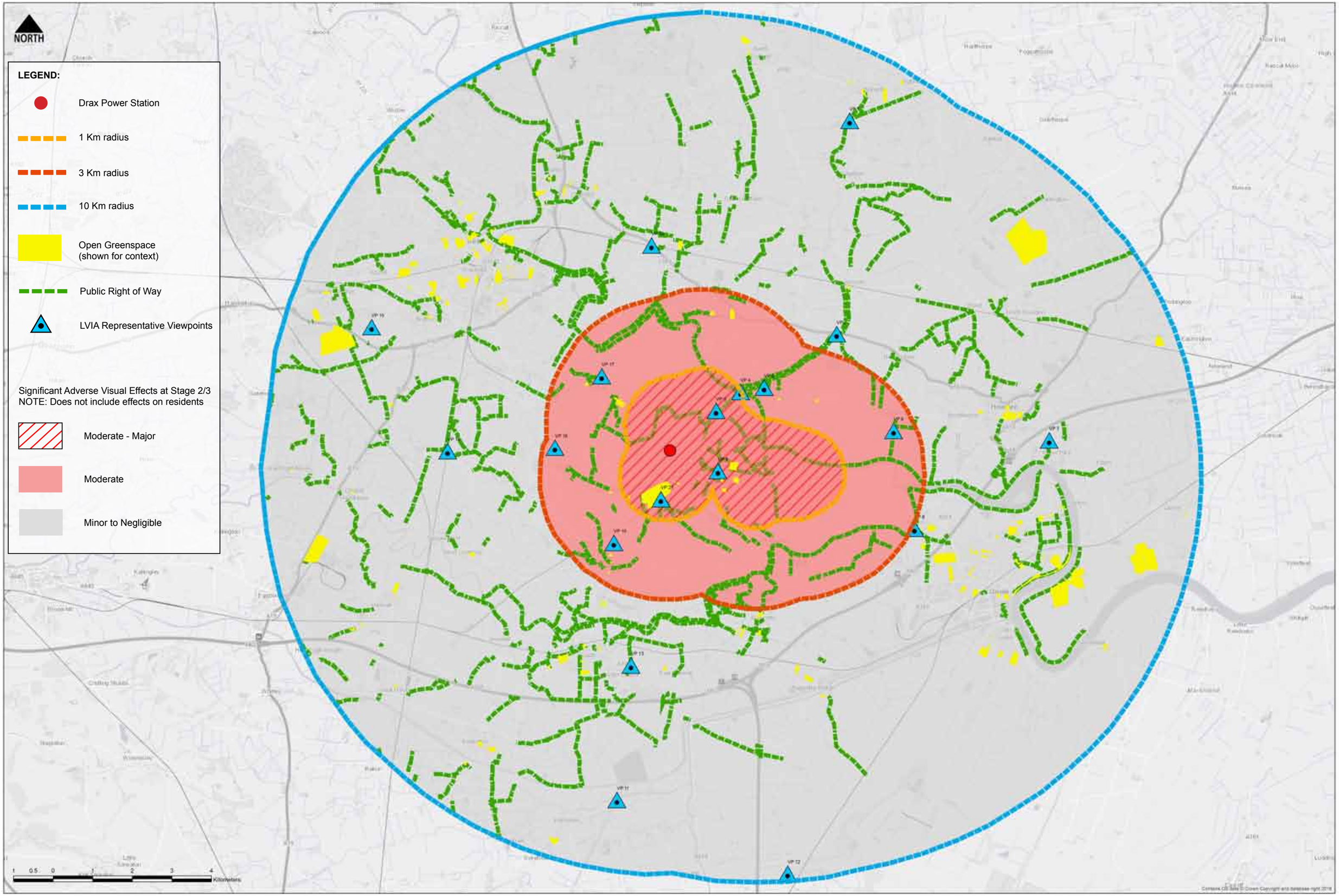
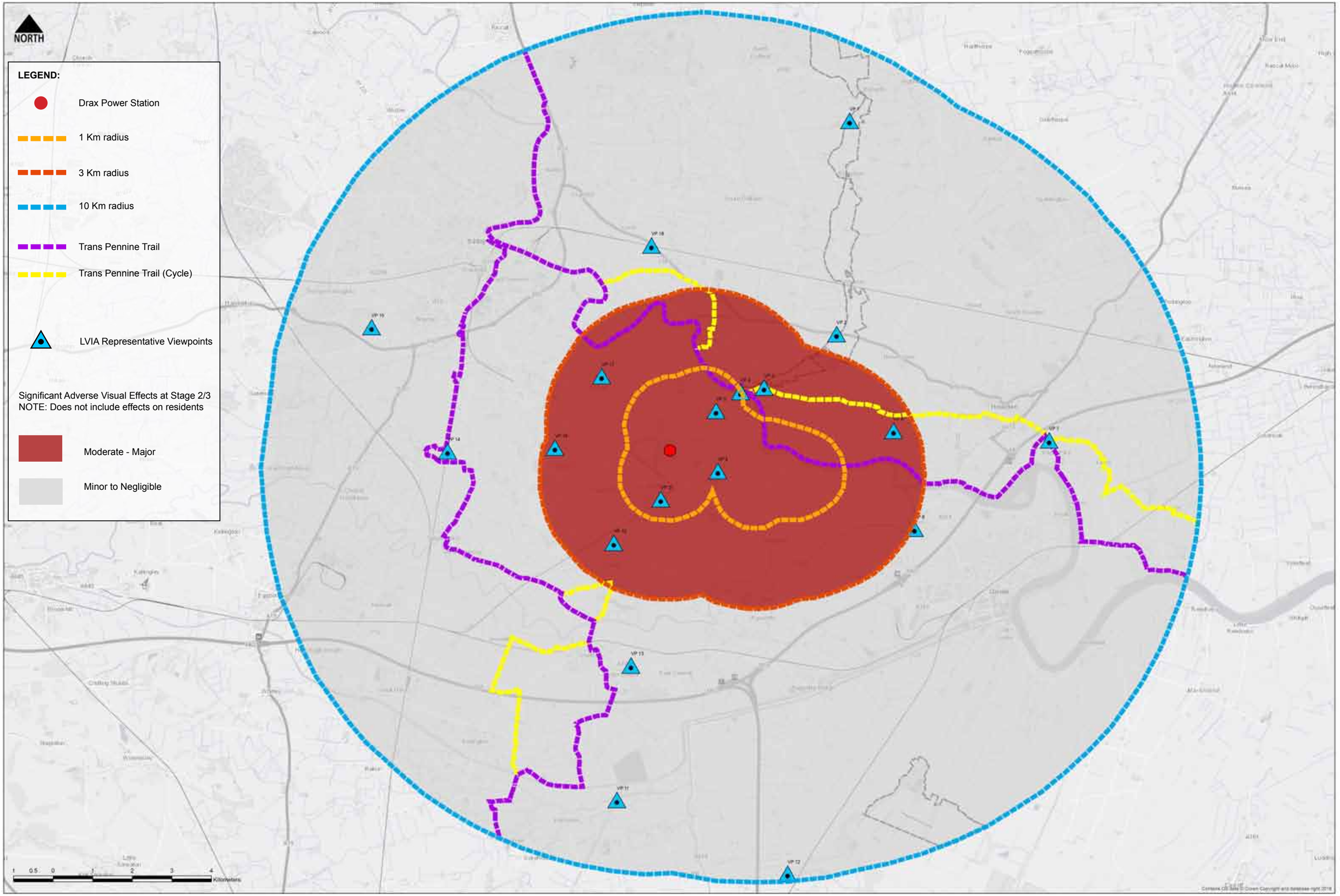
LANDSCAPE CHARACTER TYPE 8C M62 Corridor
LANDSCAPE CHARACTER TYPE 9B Drained Farmland
LANDSCAPE CHARACTER TYPE 9C Drained Farmland
IMPORTANT LANDSCAPE AREA Thorne & Hatfield Moors
LANDSCAPE CHARACTER TYPE F2 Owston to Sykeshouse Settled Clay Farmlands
LANDSCAPE CHARACTER TYPE G2 Thorne and Hatfield Peat Moorlands


NORTH
LEGEND:
Drax Power Station
1 Km radius
3 Km radius
10 Km radius
Open Greenspace
(shown for context)
Public Right of Way
LVIA Representative Viewpoints
Significant Adverse Visual Effects at Stage 2/3
NOTE: Does not include effects on residents
Moderate - Major
Moderate
Minor to Negligible
VP 1
VP 2
VP 3
VP 4
VP 5
VP 6
VP 7
VP 8
VP 9
VP 10
VP 11
VP 12
VP 13
VP 14
VP 15
VP 16
1 0.5 0 1 2 3 4
Kilometers


NORTH
LEGEND:
Drax Power Station
1 Km radius
3 Km radius
10 Km radius
Trans Pennine Trail
Trans Pennine Trail (Cycle)
LVIA Representative Viewpoints
Significant Adverse Visual Effects at Stage 2/3
NOTE: Does not include effects on residents
Moderate - Major
Minor to Negligible
VP 1
VP 2
VP 3
VP 4
VP 5
VP 6
VP 7
VP 8
VP 9
VP 10
VP 11
VP 12
VP 13
VP 14
VP 15
VP 16
1 0.5 0 1 2 3 4
Kilometers

WOODSMITH POLYHALITE MINE, NORTH YORKSHIRE

LPA: NORTH YORK MOORS NATIONAL PARK

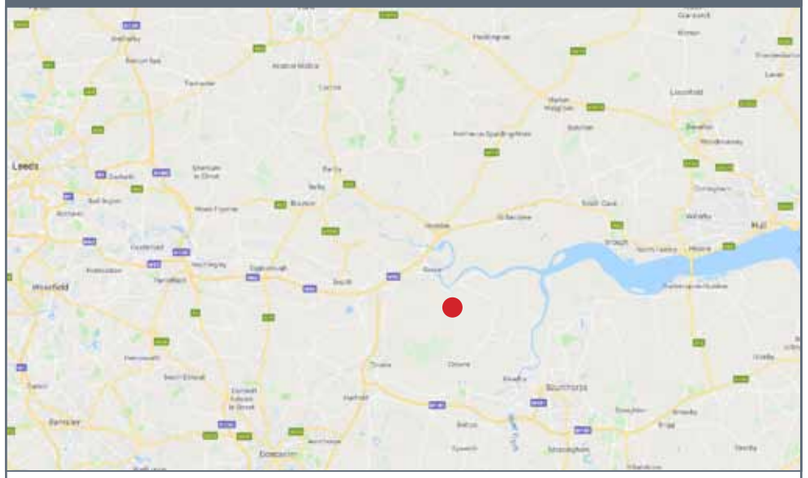
KEY FEATURES

The Sirius Minerals Foundation is an independent charity set up as a community fund to spend a share of revenues from Sirius Minerals' Woodsmith Mine near Whitby. The first funding of £2 million has become available following the recent commencement of construction of Sirius' mine. Sirius Minerals will contribute an annual royalty of 0.5% of sales from its Woodsmith Mine to the Foundation for 100 years. This commitment to the community will see the Foundation ultimately benefit from millions of pounds a year, with estimates putting the figure at over £10 million per year.

The fund includes landscape and ecology as a target to support Green Infrastructure initiatives and specifically includes tree planting for carbon sequestration, habitat improvements, ecology projects, traditional boundary restoration, and public access improvements.

GOOLE FIELDS WIND FARM, EAST RIDING OF YORKSHIRE

LPA: EAST RIDING OF YORKSHIRE COUNCIL

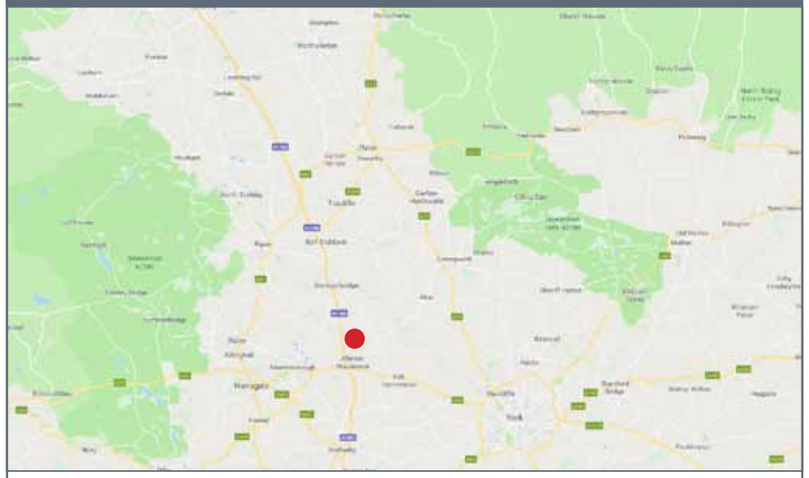


KEY FEATURES

The first Goole Fields Wind Farm started operating in 2014 which also saw the introduction of a community fund. Innogy Renewables UK (innogy), the wind farm operators made an annual donation to this fund, enabling it to support a wide range of projects which were of benefit to the local community. The commissioning of the second wind farm (Goole 2) in late 2016 brought with it a further donation. The Goole Fields Winds Farm Community Fund now receives a substantially increased funding from the operator. From January 2018 the annual donation from innogy will be nearly £250,000 per annum. A proportion of the additional Goole 2 funds will be ring fenced to a separate fund for an East Riding wide area of benefit which will be launched during 2018.

ALLERTON WASTE RECOVERY PARK, NORTH YORKSHIRE

LPA: NORTH YORKSHIRE COUNTY COUNCIL



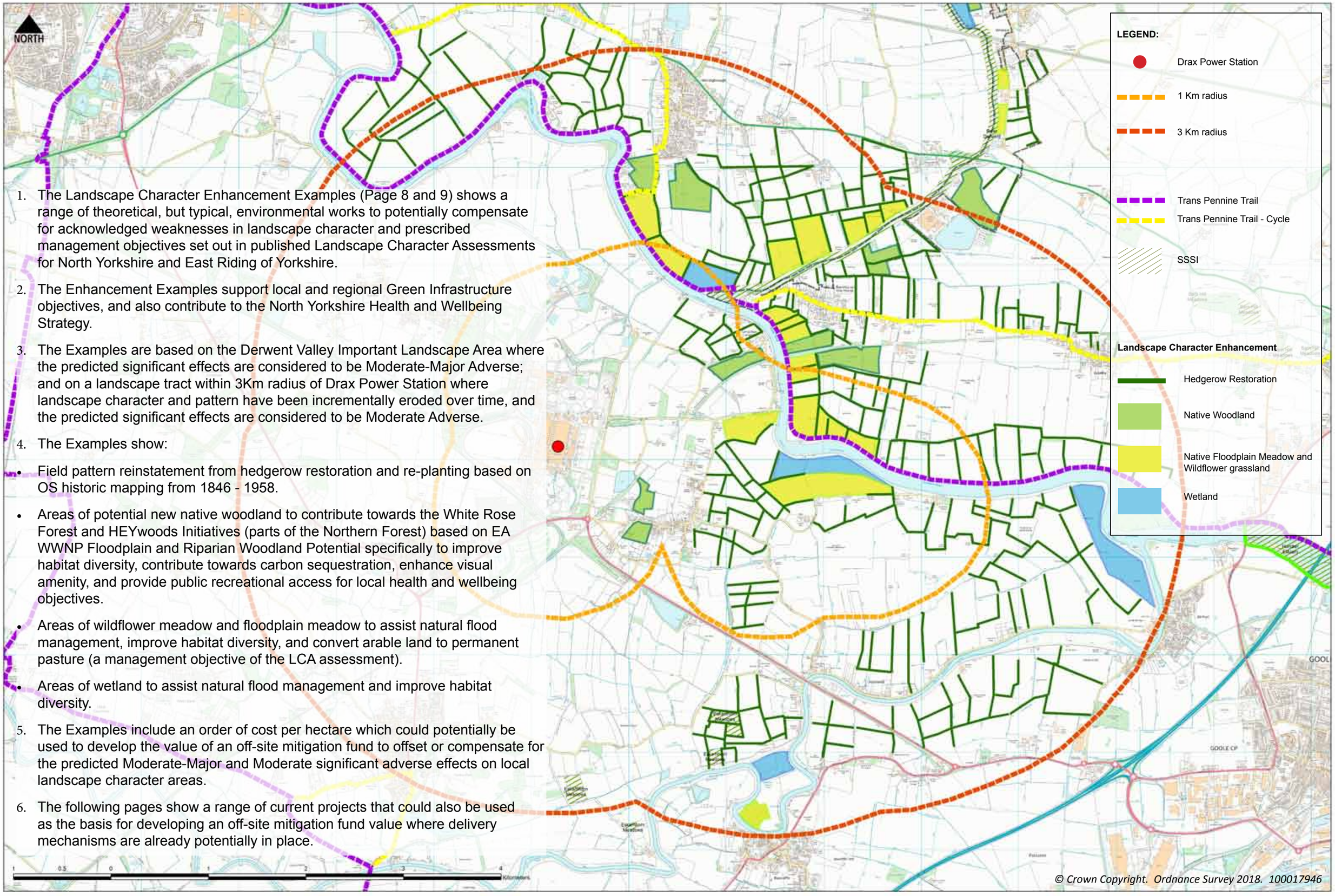
KEY FEATURES

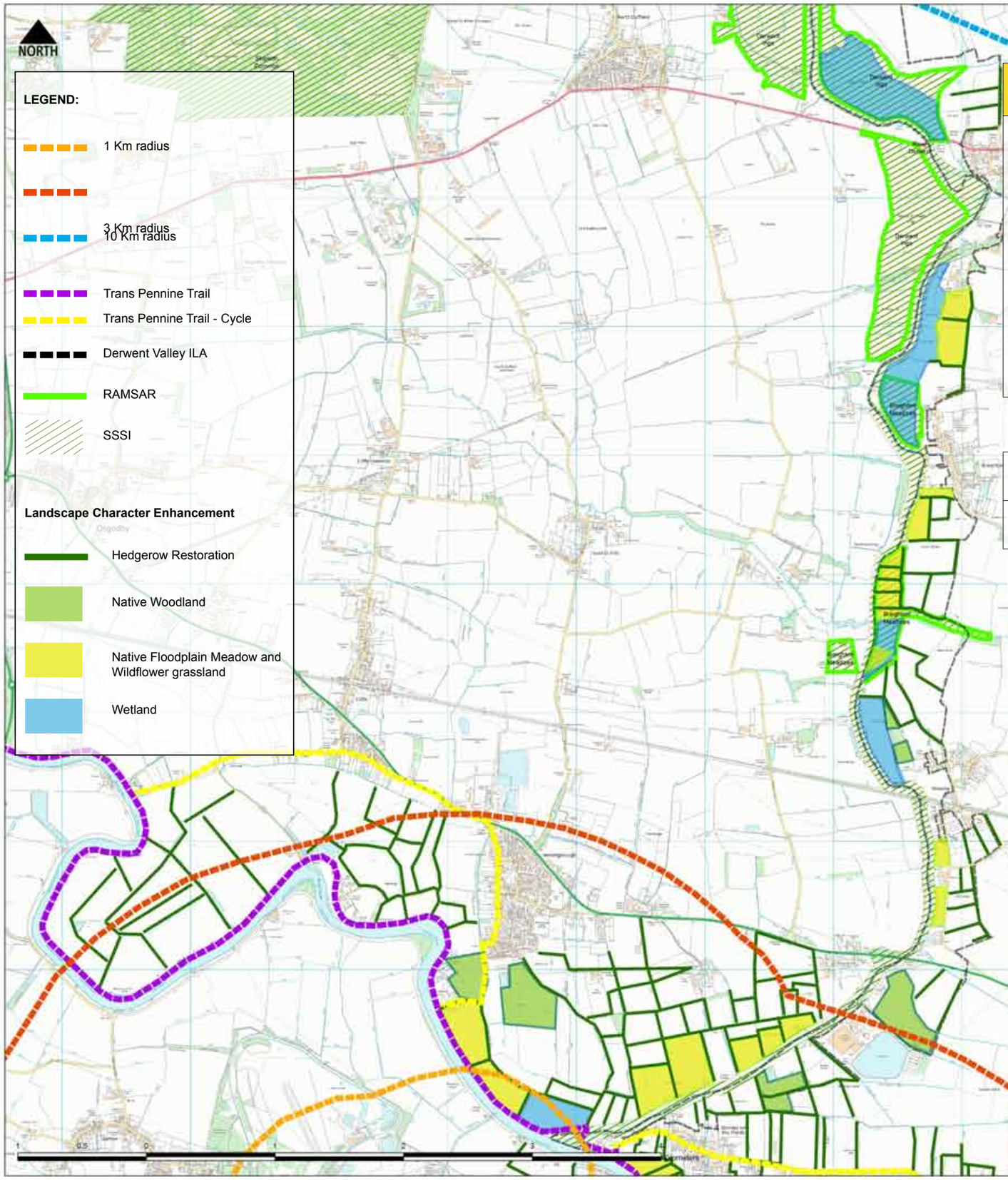
Allerton Waste Recovery Park was granted planning permission on 14 February 2013. A Landscape & Cultural Heritage Fund (LCHF) was established as part of the Section 106 planning permission to deliver proposals to enhance and strengthen landscape character, biodiversity, and cultural heritage interests. The fund value of £840,000 was calculated from a range of theoretical, but typical, landscape screening and enhancement projects designed to reduce landscape and visual impacts over the areas most affected by the development over a five year period.The fund is administered by Two Ridings Community Foundation (TRCF) on behalf of North Yorkshire County Council. The fund provides for a Small Grants Scheme (up to £1,000), a Medium Grants Scheme (£1,000 to £10,000), and a Large Grants Scheme (£10,000 to £50,000). The LCHF is in addition to a further S.106 fund of £1.3m to restore aspects of Allerton Park, a Grade II Registered Park and Garden.

1. The Landscape Character Enhancement Examples (Page 8 and 9) shows a range of theoretical, but typical, environmental works to potentially compensate for acknowledged weaknesses in landscape character and prescribed management objectives set out in published Landscape Character Assessments for North Yorkshire and East Riding of Yorkshire.
2. The Enhancement Examples support local and regional Green Infrastructure objectives, and also contribute to the North Yorkshire Health and Wellbeing Strategy.
3. The Examples are based on the Derwent Valley Important Landscape Area where the predicted significant effects are considered to be Moderate-Major Adverse; and on a landscape tract within 3Km radius of Drax Power Station where landscape character and pattern have been incrementally eroded over time, and the predicted significant effects are considered to be Moderate Adverse.
4. The Examples show:

- Field pattern reinstatement from hedgerow restoration and re-planting based on OS historic mapping from 1846 - 1958.
- Areas of potential new native woodland to contribute towards the White Rose Forest and HEYwoods Initiatives (parts of the Northern Forest) based on EA WWNP Floodplain and Riparian Woodland Potential specifically to improve habitat diversity, contribute towards carbon sequestration, enhance visual amenity, and provide public recreational access for local health and wellbeing objectives.
- Areas of wildflower meadow and floodplain meadow to assist natural flood management, improve habitat diversity, and convert arable land to permanent pasture (a management objective of the LCA assessment).
- Areas of wetland to assist natural flood management and improve habitat diversity.

5. The Examples include an order of cost per hectare which could potentially be used to develop the value of an off-site mitigation fund to offset or compensate for the predicted Moderate-Major and Moderate significant adverse effects on local landscape character areas.
6. The following pages show a range of current projects that could also be used as the basis for developing an off-site mitigation fund value where delivery mechanisms are already potentially in place.





LANDSCAPE CHARACTER ENHANCEMENT EXAMPLE - APPROXIMATE ESTIMATE (PAGES 8 and 9)

Item	Enhancement	Unit	Quantity	Rate	Total	Land Purchase @ £35K/Ha
1	Hedgerow creation to restore historic field pattern. Double row native species 60-80cms with spiral guards and 1m high post and mesh protective fencing	lin.m	116,207	£24.00	£2,788,968.00	
2	Native species woodland. 60-80cm transplants at 1m cts with 10% Feathered trees 2.5m high	Ha	84	£35,000.00	£2,940,000.00	£2,940,000.00
3	Wildflower meadow / floodplain meadow creation	Ha	165	£13,000.00	£2,145,000.00	£5,775,000.00
4	Wetland creation/enhancement	Ha	138	£10,000.00	£1,380,000.00	£4,830,000.00
				TOTAL	£9,253,968.00	£13,545,000.00
5	Equivalent Landscape Character Overall Area Enhancement	Ha	2,850	£3,247.00	£9,253,968.00	
6	Equivalent to:	m2		£0.32		

Landscape rates from Spon's External Works and Landscape Price Book and recent competitive landscape contracts based on NBS landscape specification

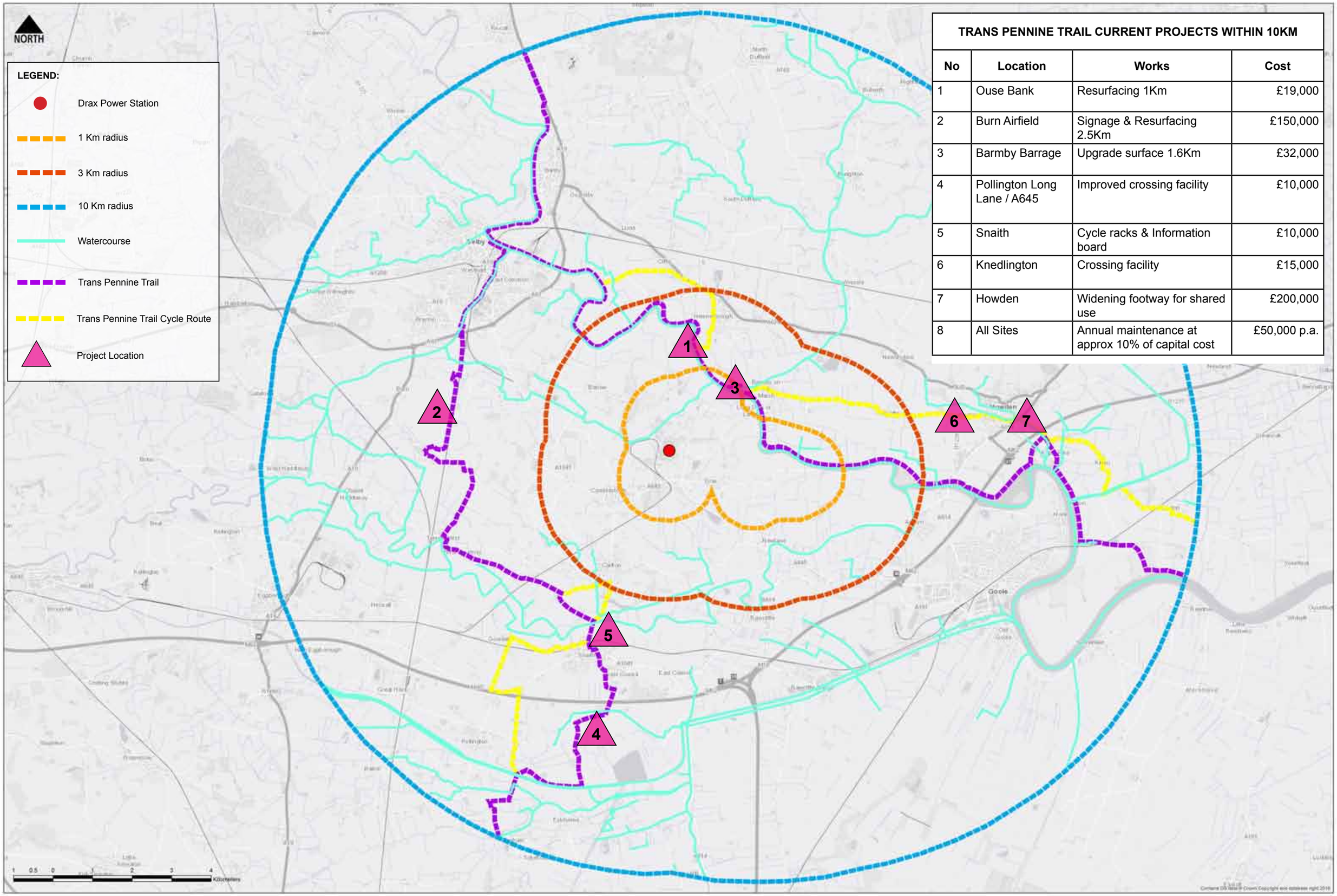
OPTION 1 OBJECTIVES

Develop off-site mitigation fund based on a range of typical landscape character enhancement works to compensate for the predicted Moderate-Major and Moderate significant adverse effects on local landscape character areas

Recommended Fund Value: 50% of Landscape Character Enhancement Example to be regarded as Benchmark for fund value

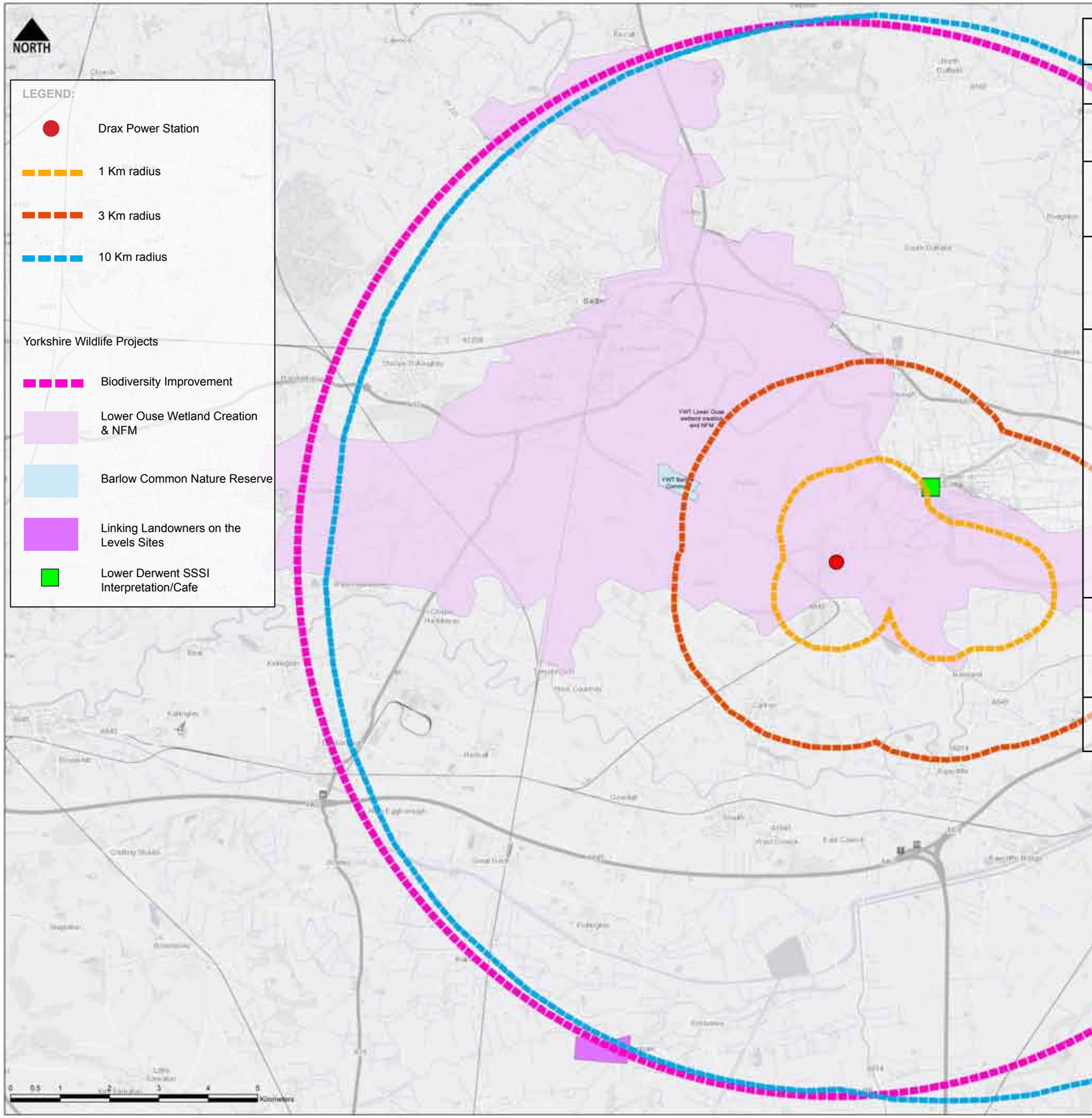
£9.25m + £13.55m = £22.8m x 50% = £11.4m.

Round down to £10m to provide Benchmark value



TRANS PENNINE TRAIL CURRENT PROJECTS WITHIN 10KM

No	Location	Works	Cost
1	Ouse Bank	Resurfacing 1Km	£19,000
2	Burn Airfield	Signage & Resurfacing 2.5Km	£150,000
3	Barmby Barrage	Upgrade surface 1.6Km	£32,000
4	Pollington Long Lane / A645	Improved crossing facility	£10,000
5	Snaith	Cycle racks & Information board	£10,000
6	Knedlington	Crossing facility	£15,000
7	Howden	Widening footway for shared use	£200,000
8	All Sites	Annual maintenance at approx 10% of capital cost	£50,000 p.a.



YORKSHIRE WILDLIFE TRUST CURRENT PROJECTS WITHIN 10KM

No	Location	Works	Cost	Other Partners
1	Biodiversity Improvement	Habitat Improvement Opportunities	£300,000	EA, NE
2	Lower Ouse Wetland Creation	Wetland development to assist Natural Flood Management (NFM)	£160,000 to £2m	EA, Landowners
3	Barlow Common Nature Reserve	Habitat creation and community engagement on LNR; community hub/ cafe	£200,000	Selby DC, One Selby (HWB)
4	Linking Landowners on the Levels project	Implement habitat creation on key farms within the Humberhead Levels to create priority lowland raised bog, wet grassland, reedbed, wet woodland, grazing marsh	£60,000 to £300,000	RSPB, Shire Group IDBs, Notts WT, Lincs WT, EA, NE, Hatfield Chase IDB, NFU, Doncaster Council, East Riding of Yorkshire Council, North Lincolnshire Council, Canal & River Trust,local landowners
5	Lower Derwent SSSI Interpretation Cafe		£150,000	Natural England, Environment Agency, Trans Pennine Trail
6	All Sites	Annual Maintenance	£191,000 p.a.	

OPTION 2 OBJECTIVES

Develop a Community Trust Fund to support existing and proposed Trans Pennine Trail and Yorkshire Wildlife Trust projects within a 10Km radius that achieve aims and objectives of Key Partnerships, and develop linkages to existing PROW network

Fund Value: £8.4m

Current TPT projects £436K + 25 years maintenance @ £50K per annum= £1.7m

Current YWT projects £1.91m + 25 years maintenance @ £191K per annum = £6.7m

NORTH

LEGEND:

- Drax Power Station
- 1 Km radius
- 3 Km radius
- 10 Km radius
- Trans Pennine Trail
- WWNP Floodplain Woodland Potential
- WWNP Riparian Woodland Potential

POTENTIAL DELIVERY VEHICLES:

- THE NORTHERN FOREST
- LEEDS CITY REGION BLUE GREEN INFRASTRUCTURE STRATEGY
- YORKSHIRE DERWENT CATCHMENT PARTNERSHIP
- NORTH YORKSHIRE AND YORK LOCAL NATURE PARTNERSHIP
- DALES TO VALE RIVERS NETWORK

THE NORTHERN FOREST

KEY OBJECTIVES OF THE NORTHERN FOREST

- *reducing flood risk;*
- *helping to adapt to and mitigate risks from projected climate change;*
- *improving health and wellbeing;*
- *increasing opportunities for access and recreation;*
- *improving the quality of place; and*
- *enabling increases to biodiversity and providing ecological networks.*

KEY OBJECTIVES OF LEEDS REGIONAL BLUE GREEN STRATEGY

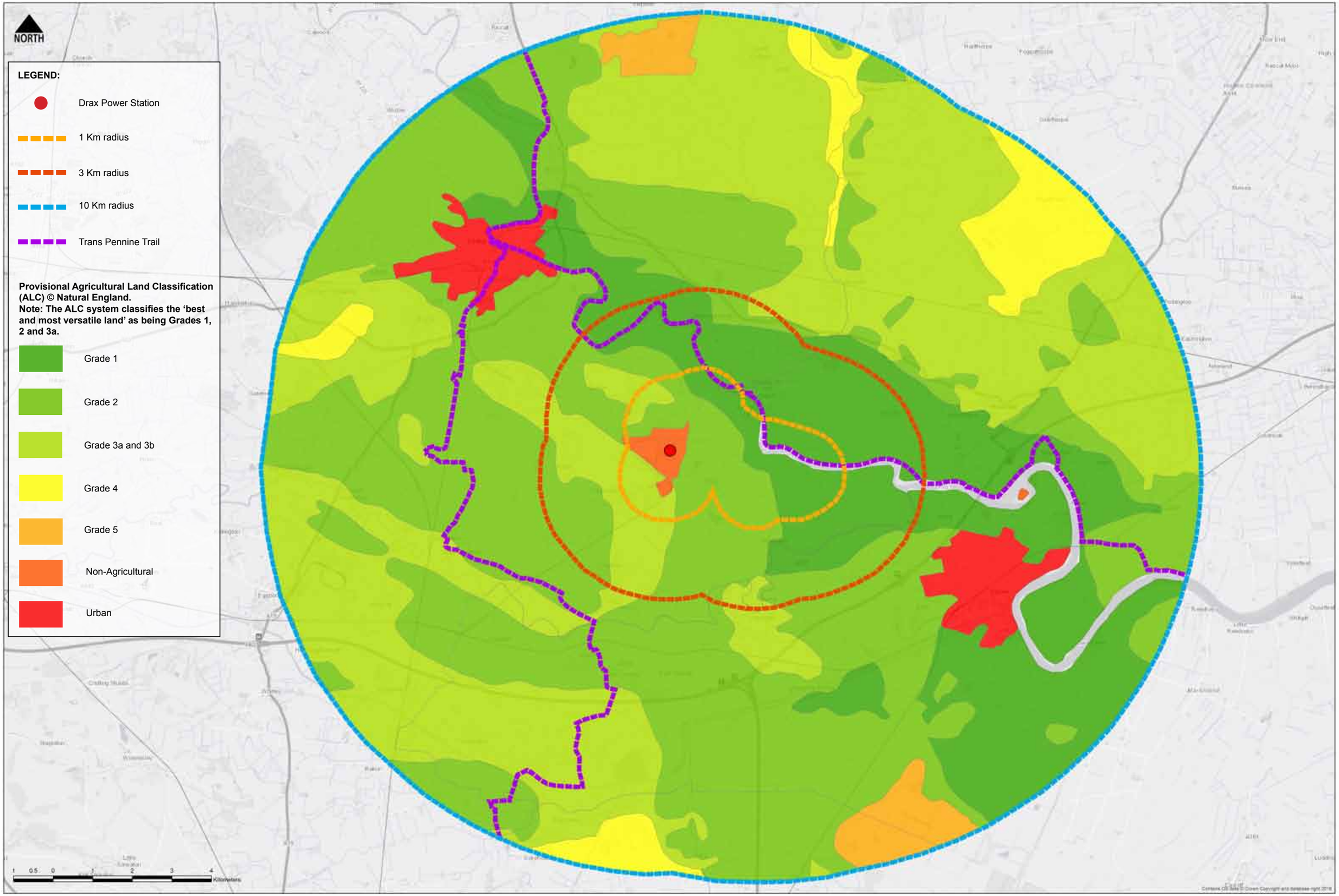
- *Effective water management and flood risk reduction*
- *Build green and blue infrastructure into physical development and housing*
- *Enhance green and blue corridors and networks*
- *Heighten community access to and enjoy-ment of green and blue infrastructure*
- *Plant and manage more trees and woodland*
- *Restore the uplands and manage them sustainably*
- *Business growth, jobs, skills and education*

OPTION 3 OBJECTIVES

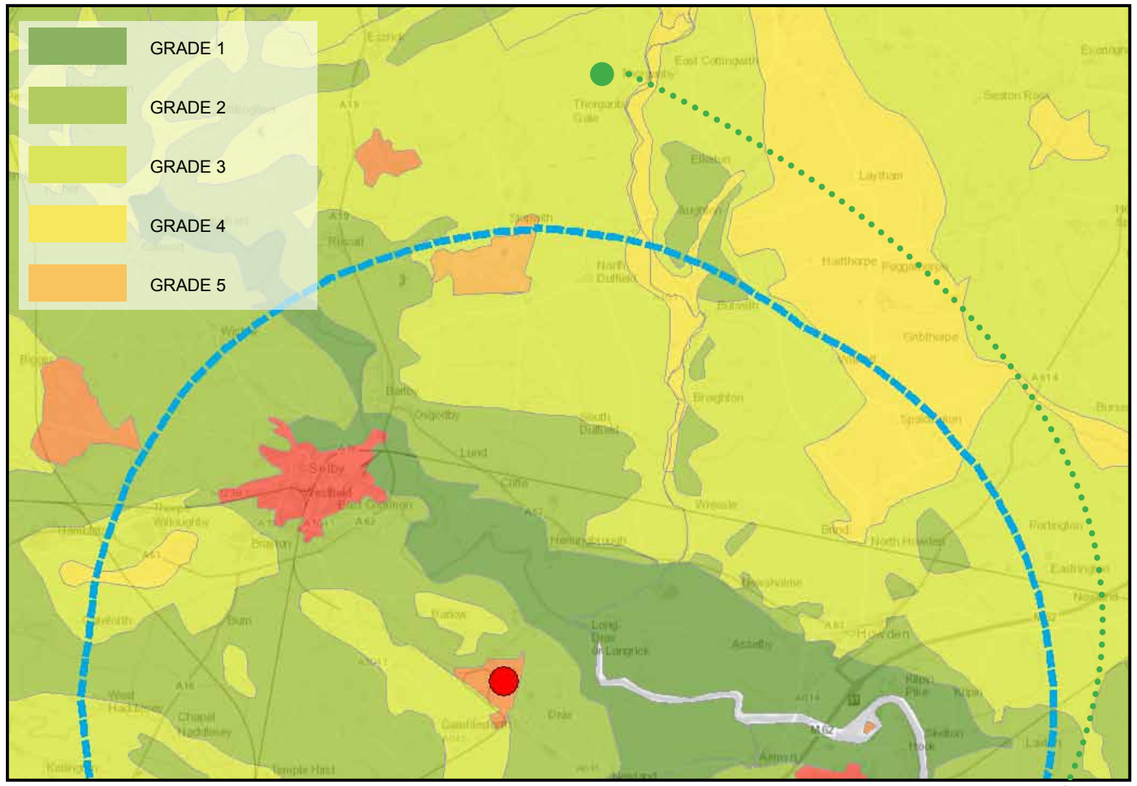
Develop a Community Trust Fund to establish a woodland based project to deliver Partnership objectives around floodplain and riparian woodland, public access corridors, education in schools, all to provide significant health and wellbeing outcomes.

£10m Fund Value: could provide 162Ha of new Floodplain/ Riparian Woodland including land purchase.

New native woodland - £35K/Ha
Land purchase £35K/Ha


NORTH
LEGEND:
Drax Power Station
1 Km radius
3 Km radius
10 Km radius
Trans Pennine Trail
Provisional Agricultural Land Classification (ALC) © Natural England.
Note: The ALC system classifies the 'best and most versatile land' as being Grades 1, 2 and 3a.
Grade 1
Grade 2
Grade 3a and 3b
Grade 4
Grade 5
Non-Agricultural
Urban
1 0.5 0 1 2 3 4
Kilometers

LOT 2:			
A parcel of permanent grassland accessed from Southmoor Road. The purchaser will be responsible for the western boundary.			
Field Number	**2017 Cropping**	**Ha**	**Ac**
5108	Permanent Grass	1.51	3.73
	LOT 2 TOTAL	**1.51**	**3.73**
LOT 3:			
A parcel of permanent grassland accessed from Westfield Lane. The purchaser will be responsible for the western boundary.			
Field Number	**2017 Cropping**	**Ha**	**Ac**
6108	Permanent Grass	3.23	7.98
	LOT 3 TOTAL	**3.23**	**7.98**
LOT 4: SOLD STC			
A parcel of permanent grassland accessed from Westfield Lane. The Purchaser will be responsible for establishing a new entrance at their own cost.			
Field Number	**2017 Cropping**	**Ha**	**Ac**
8201	Permanent Grass	1.52	3.75
	LOT 4 TOTAL	**1.52**	**3.75**

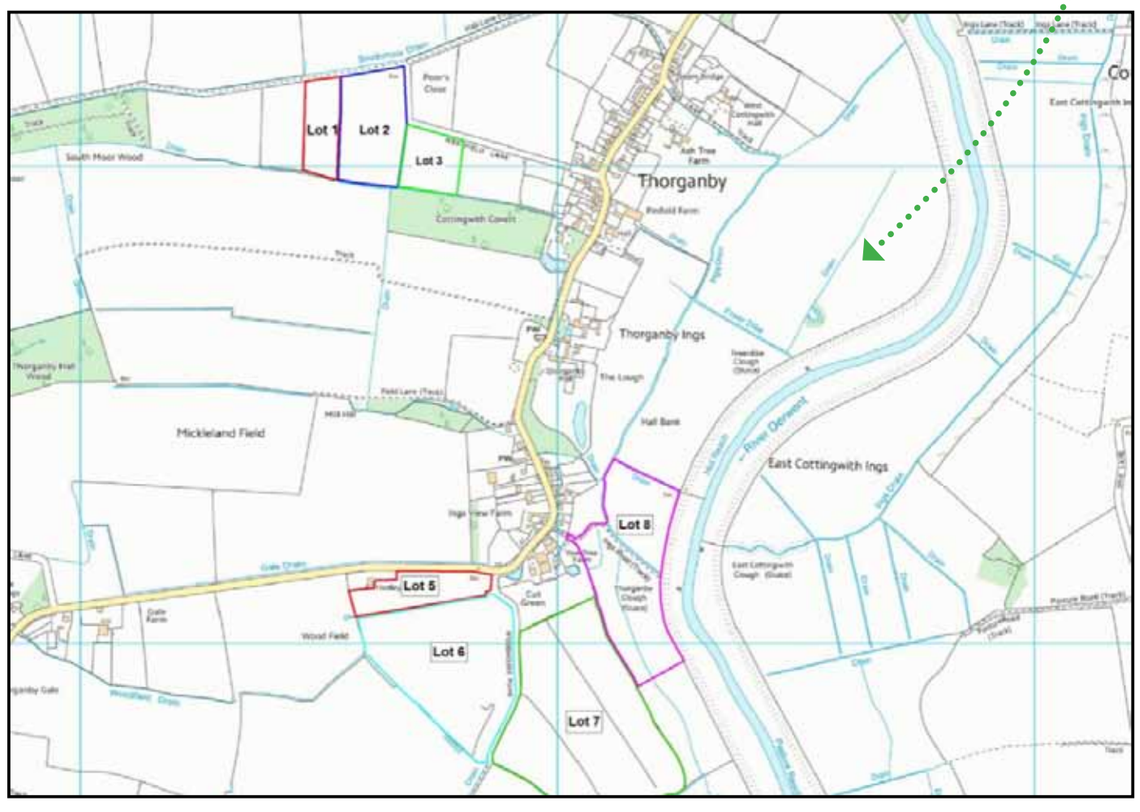


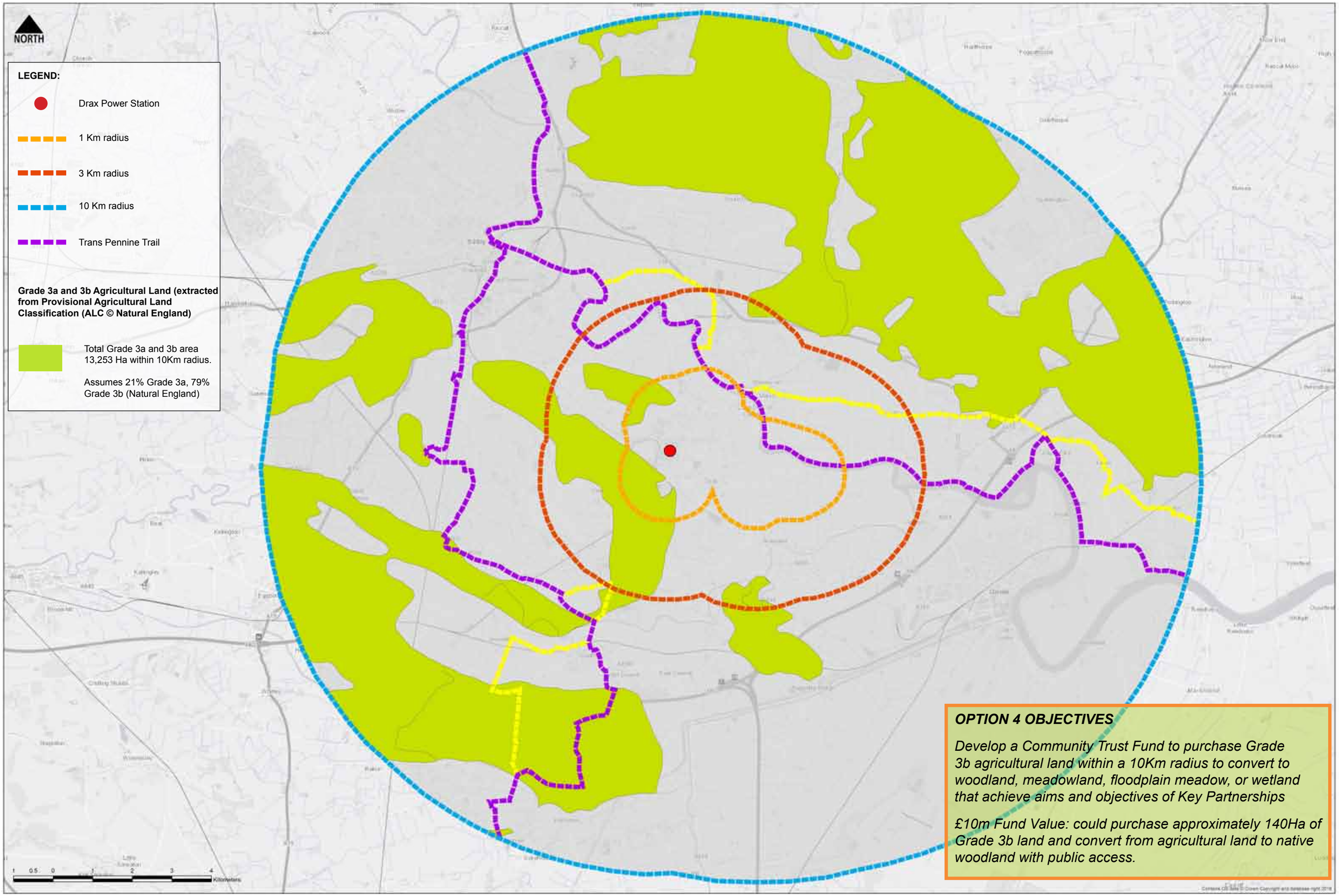
APPROXIMATE COST OF GRADE 3 LAND

DESCRIPTION	AREA (HA)	AREA (ACRES)	GUIDE PRICE	PRICE PER HA	PRICE PER ACRE
LOT 2	1.51	3.73	£50,000	£33,112	£13,405
LOT 3	3.23	7.98	£95,000	£29,411	£11,905
LOT 4	1.52	3.75	£50,000	£32,894	£13,333

ESTIMATE OF COSTS TO PURCHASE LAND AND TRANSFORM TO NATIVE WOODLAND

DESCRIPTION	AREA (HA)	PURCHASE	FENCING	PLANTING	TOTAL
LOT 2	1.51	£50,000	£9,650	£52,850	£112,500
LOT 3	3.23	£95,000	£18,000	£113,050	£226,050
LOT 4	1.52	£50,000	£10,000	£53,200	£113,200
					£451,750




NORTH
LEGEND:
Drax Power Station
1 Km radius
3 Km radius
10 Km radius
Trans Pennine Trail
Grade 3a and 3b Agricultural Land (extracted from Provisional Agricultural Land Classification (ALC © Natural England)
Total Grade 3a and 3b area 13,253 Ha within 10Km radius.
Assumes 21% Grade 3a, 79% Grade 3b (Natural England)
1 0.5 0 1 2 3 4
Kilometers
OPTION 4 OBJECTIVES
Develop a Community Trust Fund to purchase Grade 3b agricultural land within a 10Km radius to convert to woodland, meadowland, floodplain meadow, or wetland that achieve aims and objectives of Key Partnerships
£10m Fund Value: could purchase approximately 140Ha of Grade 3b land and convert from agricultural land to native woodland with public access.

1. Significant Major Adverse Effects on Landscape Character Areas are recognised in the LVIA but not mitigated or 'offset' in the application. National Policy Statement for Energy (EN-1) acknowledges it may be appropriate to undertake landscaping off site.

2. The Examining Authority may take into account any development consent obligations that an applicant agrees with local authorities. These must be relevant to planning, necessary to make the proposed development acceptable in planning terms, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects.

3. It is reasonable and appropriate that Significant Adverse Effects on existing landscape character areas should be compensated for in the form of landscape enhancement measures to address acknowledged weaknesses in landscape character, and management objectives described in North Yorkshire and East Riding of Yorkshire Landscape Character Assessments.

4. It is reasonable and appropriate that Significant Adverse Effects on PROW's and the Trans Pennine Trail should be compensated for in the form of measures that contribute to Green Infrastructure and Health and Wellbeing objectives.

5. It is also reasonable and appropriate to take account of Selby District Council Policy SP12 (Access to Services, Community Facilities and Infrastructure); Policy SP18 (Protecting and Enhancing the Environment); and Policy SP19 (Design Quality).

6. Further site survey and analysis work is required to produce detailed and costed landscape enhancement proposals tailored to individual character areas with input from landscape and ecology professionals taking account of existing important acknowledged biodiversity sites. (RAMSAR, SSSI, SINC, SAC, SPA)

7. Recent precedents for off-site mitigation exist in North Yorkshire and East Riding of Yorkshire for major projects to contribute towards landscape, tourism, cultural heritage, health and wellbeing, and climate change.

8. Regional initiatives are already in place that any off-site mitigation works would contribute towards, such as The Northern Forest (White Rose Forest and HEYwoods) and The Leeds City Region Blue Green Infrastructure Strategy that includes Selby District.

9. There are several existing environmental projects administered by YWT and Trans Pennine Trail that could provide an immediate delivery mechanism for off-site mitigation measures.

10. There is approximately 10,500 hectares of Grade 3b agricultural land within a 10Km radius of Drax Power Station that through acquisition could provide land for the creation of new native woodland, or establishment of native wildflower and floodplain meadows to enhance landscape character where affected, and also contribute to natural flood management, habitat diversity, and climate change measures such as carbon sequestration.

1. There are many cross boundary government and charitable agencies, that have interests within a 10Km radius of Drax Power Station with ongoing and planned projects. These include:

- Selby District Council
- East Riding of Yorkshire Council
- North Yorkshire County Council
- Environment Agency
- Natural England
- North Yorkshire and York Local Nature Partnership
- Yorkshire Wildlife Trust
- Yorkshire Dales Rivers Trust (Dales to Vale Rivers Network)
- Canal and Rivers Trust
- Trans Pennine Trail

2. Following consultation with these organisations, the Off-Site Mitigation Strategy has put forward four options to potentially offset or compensate for the significant adverse landscape and visual effects predicted by the Applicant's LVIA. Each Option, albeit in different ways, supports the wider objectives of The Northern Forest, The Leeds City Region Blue Green Infrastructure Stratgey, and the North Yorkshire Joint Health and Wellbeing Strategy.

3. This Strategy recommendation is to establish a Community Trust project lead by qualified and experienced personnel to 'grant aid' existing projects and future projects that contribute to the above strategies and that can be reasonably said to repair acknowledged weaknesses in landscape character and address the landscape character management objectives from the published North Yorkshire and East Riding of Yorkshire Landscape Character Assessments.

EXAMPLE OF DELIVERY MECHANISM:

- Delivery Organisation: North Yorkshire and York Local Nature Partnership
- Delivery Mechanism: Ring fenced Community Trust Fund
- Delivery Personnel: Ring fenced new expert officers within NY&YNP
- Fund: £10 million (from Option 1 Benchmark) + project setup costs of £250K
- Timescale: 25 Years with 25% of fund available at Year 1

- Priority Projects Yr1: TPT & YWT current projects
  Purchase Grade 3b land for woodland creation and public access
  Develop PROW network and links to open space network and TPT

APPENDIX 2 - ASSESSMENT OF RECOMMENDATIONS PRESENTED IN THE OSMS

Introduction

An assessment was undertaken of Recommendation 1 to 4 presented in the OSMS:

- Recommendation 1: Theoretical landscape character enhancement works.
- Recommendation 2: Planned works associated with the Trans Pennine Trail and Yorkshire Wildlife Trust.
- Recommendation 3: A Woodland Based Project.
- Recommendation 4: Conversion of Grade 3b agricultural land.

The Recommendations cover up to 10 km in extent, though vary in terms of their focus, described in further detail below.

The Applicant has assessed the changes that could result from the "mitigation" measures proposed in the OSMS in terms of the landscape resource to determine whether this would lead to a reduction in residual effects.

Methodology and Assessment

The methodology used to assess the effects is consistent with the method summarised in Environmental Statement Chapter 10 Landscape and Visual Amenity and Appendix 10.3 LVIA Methodology (Examination Library Reference APP-078 and APP-119 respectively) and this approach has been agreed with the LPAs.

This assessment considered firstly effects associated with Stage 3: Operation of Unit X and Unit Y on the basis that all Units are complete, i.e. the worst-case scenario (referred to as Year 0) and, secondly residual effects at Year 15 following the maturation of proposed vegetation.

Assessment of Recommendation 1

Recommendation 1 presents theoretical landscape enhancement works based on the Derwent Valley ILA and a landscape tract within 3 km of the Existing Drax Power Station Complex. The objectives regarding Recommendation 1 are to develop an off site mitigation fund based on a range of typical landscape character enhancement works to compensate for the predicted moderate-major and moderate significant effects on local landscape character areas / types.

The Recommendation has an estimated fund value of £11.4 million which has been rounded down in the OSMS to £10 million to provide a benchmark value.

Proposals in Figure 8 and 9 appear to be concentrated to the southeast, east, north, north east and north west of the Proposed Scheme.

It is assumed that proposals on Page 8 apart from the Lower Derwent ILA will be concentrated within a 3 km radius of the Proposed Scheme.

Landscape Character Types (LCT):

The sensitivity of the LCTs within which the Recommendation 1 proposals lie was found to be medium in the original Application. The magnitude of change following mitigation associated with the Proposed Scheme would remain unchanged as medium to negligible both in Year 0 and Year 15. Based on a worst case scenario there would be localised, moderate adverse effects on LCT23, 23,4A, 4B and 4D to minor - moderate adverse effects on LCT 5A, and as such effects would remain unchanged for both Year 0 and Year 15.

Following the implementation of Recommendation 1, proposals 1 cut across LCT 23 Levels Farmland, LCT 24 River Floodplains, LCT 4A / 4B / 4D River Corridors and LCT 5A Open Farmland. Proposals include the introduction of native woodland hedgerow restoration, native floodplain meadows and wildflower grassland and wetland.

Some of the proposals run counter to the some of the LCT's characteristics, sensitivities and / or management objectives (LCT23, 24 and 5A) which seek to maintain the sense of openness and inter visibility with other landscape character areas as outlined below:

LCT 23 Level Farmlands (within which the Proposed Scheme lies)

- Key characteristics: *"Large scale, open and rectilinear field pattern."*
- Sensitivity to change issues: *"High sensitivity as a result of the predominately open character and flat landform, which facilitates long distance open views across the landscape and promotes strong sense of inter visibility across other character areas."*
- Management objective: *"Protect the predominantly open character of this low lying landscape by maintaining long and unbroken views to distant horizons."*

LCT 24 River Floodplain (which includes the Gas Pipeline)

- Management objective: *"Conserve open views along and across the river floodplains towards adjacent Landscape Character Types."*

LCT 5A Open Farmland (Howden to Bubwith Farmland)

- Key characteristics: *"Open character with extensive views across the flat landscape"*
- Key characteristics: *"Few woodland blocks and relatively little tree cover contributing to extensive views that include Drax Power Station to the southwest".*
- Positive landscape features: *"Openness, long distance views over flat arable land", "the sky dominates views", "hedgerows reinforce landscape pattern where they are intact" and "hedgerows are not characteristic of all areas, e.g. Barmby on the Marsh"* [which lies within 3 km Study Area].

This assessment considers that whilst the introduction of planting would enhance the landscape to some degree and be in harmony with many of the Green Infrastructure and landscape character management objectives; the introduction of some features such as further woodland would conflict with the need to maintain a sense of openness within some LCTs.

The extent of planting (and in particular woodland planting) in locations where effects are most perceptible (namely to the north east, east and south east) is limited. Direct effects relating to the aesthetic and perceptual qualities of a change to the Existing Drax Power

Station Complex compared to the Proposed Scheme would remain, jarring with the simple symmetry of the Existing Drax Power Station Complex from certain elevations.

The practicality of implementing some of the proposals remains uncertain especially given that the majority of planting is on Best and Most Versatile land, (Grade 1 and 2) and acquisition of private (largely arable land) would be required.

It is therefore considered that for Recommendation 1 whilst there is the potential to slightly reduce the magnitude of change, this slight reduction is insufficient to change the category of magnitude and thus the findings of significance would remain unchanged based on a worst case scenario for both Year 0 and Year 15 with a localised, moderate adverse effects on LCT23, 23,4A, 4B and 4D to minor - moderate adverse effects on LCT 5A, and as such effects would remain unchanged for both Year 0 and Year 15.

Lower Derwent Important Landscape Area (ILA):

The original Application found the sensitivity of the Lower Derwent ILA to be high and that the magnitude of change following mitigation would be medium in Year 0 and Year 15. It is considered based on the mitigation associated with the Proposed Scheme the magnitude of change would remain unchanged both in Year 0 and Year 15. Effects were localised, moderate to major adverse significance (diminishing with distance) and remaining unchanged for both Year 0 and 15.

Proposals would respond to landscape strategy management objectives for LCT 4A and B River Corridors which include:

- *"Promote continued traditional management practices and reintroduction of those practices to arable fields. The returning of selected arable fields to meadow would potentially widen the river corridor landscape character type and strengthen its contribution to the overall character of the East Riding".*
- *"Maintain and plant riverside vegetation to promote diversity and help manage bank erosion. Woodland and hedgerow planting will help to reinforce the corridor character type and should reflect species distribution found in the river corridor."*
- *"Avoid built structures that would impact upon remoteness. Vertical structure would potentially detract from the flat character and small scale intimate nature of the river corridors and detract from their distinctive characteristic features."*

This assessment considers that whilst the introduction of planting would enhance the landscape to some degree and be in harmony with many of the Green Infrastructure and landscape character management objective, the extent of woodland in locations where effects are most perceptible is limited. Direct effects relating to the aesthetic and perceptual qualities of a change to the Existing Drax Power Station Complex compared to the Proposed Scheme would remain, jarring with the simple symmetry of the Existing Drax Power Station Complex from certain elevations.

In addition, the practicality of implementing some of the proposals remains uncertain especially given that the majority of planting is on Best and Most Versatile land (Grade 1 and 2) and acquisition of private land may be required.

It is therefore considered that for Recommendation 1 whilst the introduction of planting has the potential to slightly reduce the magnitude of change, this slight reduction is insufficient to change the category of magnitude and thus the findings of significance would remain based on a worst case scenario as localised moderate to major adverse significance (diminishing with distance) for both Year 0 and Year 15.

Local Landscape Character and Landscape Features associated with the Power Station Site and Pipeline Area:

The original assessment found the sensitivity of local landscape to be medium and the magnitude of change following mitigation as medium in Year 0 and small in Year 15. The original assessment concluded that there would be moderate adverse effects in Year 0 and minor beneficial by Year 15.

This assessment considers that based on Recommendation 1 whilst the introduction of planting in the form of new hedgerows would enhance the landscape to some degree and be in harmony with Green Infrastructure and landscape character management objectives for LCT, the extent of proposals directly related to the Power Station Site and cutting across the Pipeline Area is limited.

Uncertainty also exists over the practicality of implementing some of the proposals especially given that the majority of planting is on Best and Most Versatile land (Grade 1 and 2) and acquisition of private land would be required.

The proposals in Recommendation 1 therefore have the potential to slightly reduce the magnitude of change, this slight reduction is insufficient to change the category of magnitude and thus the findings of significance would remain as localised moderate adverse in Year 0 and minor beneficial by Year 15.

Assessment of Recommendation 2

Recommendation 2 identifies a programme of current and planned environmental works for the Trans Pennine Trail, Trans Pennine Trail Cycle Route and work associated with the Community Trust Fund to support Yorkshire Wildlife Trust. The Recommendation anticipates that the proposals would have the potential to contribute to existing regional and local green infrastructure and improve landscape character.

Proposals associated with the Trans Pennine Trail and Cycle Route relate to footpath widening, resurfacing, new street furniture, signage, new and improved crossing points as well as an annual maintenance allowance.

Proposals relating to Yorkshire Wildlife Trust support:

- Habitat improvements (throughout the area indicated on page 11 of the OSMS).
- Habitat creation and engagement in connection with Barlow Common Nature Reserve.
- Lower Ouse Wetland Creation.
- Linking landowners on the Humberhead Levels.
- Lower Derwent SSSI interpretation café.
- An annual maintenance cost.

The Recommendation has an estimated fund value of £8.4 million; £1.7 million towards Trans Pennine Trail and £6.7 million towards current Yorkshire Wildlife Trust Projects with 25 years maintenance.

Landscape Character Types

The sensitivity of the LCTs within the 10 km Study Area was found to be medium to negligible in the original Application. The magnitude of change following mitigation associated with the Proposed Scheme would range from medium to negligible in Year 0 and remain unchanged in Year 15. Based on a worst case scenario the significance of effects range from moderate to negligible adverse.

Whilst the proposals are extensive they do not respond directly to the aesthetic and perceptual impacts associated with landscape character. Uncertainty exists over the extent of measures proposed, whether implementation is achievable and the nature of planting which could provide screening and therefore reduce direct impacts associated with the Proposed Scheme.

In addition, whilst proposals cover the majority of the 1 km radius around the Proposed Scheme, they do not extend to cover the entire 3 km Study Area. Between 1 and 3 km, proposals tend to focus towards the western elevation of the Proposed Scheme where impacts would be less apparent. It is also unclear what proposals relate to the overarching pot of funding allocated towards “Biodiversity Habitat Improvement Opportunities” totalling £300,000 and which covers an area slightly smaller than the 10 km Study Area.

It is therefore considered that for Recommendation 2 whilst the introduction of such measures throughout the 10 km Study Area could support some of the landscape character management objectives and have the potential to slightly reduce the magnitude of change, this slight reduction is insufficient to change the category of magnitude and thus the findings of significance would remain unchanged, based on a worst case scenario.

Lower Derwent ILA

The original Application found the sensitivity of the Lower Derwent ILA to be high and that the magnitude of change following mitigation would be medium in Year 0 and Year 15. Effects would be localised moderate to major adverse significance (diminishing with distance) and effects would remain unchanged for both Year 0 and Year 15.

Aside from the interpretation café on the Lower Derwent little is presented in Recommendation 2 which extend along the River Derwent and in a 3 km radius of the Proposed Scheme, accepting that as discussed above the nature and extent of habitat improvement opportunities is unclear. It is therefore considered that there would be no change in effect for both Year 0 and 15 compared to the original application.

Local Landscape Character associated with the Power Station Site and Pipeline Area

The original assessment found the sensitivity of local landscape to be medium and the magnitude of change following mitigation medium in Year 0 and small in Year 15. It is considered that there would be no change in effect as a consequence of Recommendation 2. Proposals would not directly relate to either the Power Station Site or the Pipeline.

Effects would remain as per the original Application as localised, moderate adverse significance and unchanged for both Year 0 and 15.

Assessment of Recommendation 3

Recommendation 3 seeks to establish a "Woodland Based Project", including land purchase, which could contribute to improving landscape character and achieving objectives in key green infrastructure projects. The proposal would require the establishment of a community fund to deliver partnership objectives around floodplain and riparian woodland, public access corridors, education in schools, all to provide significant health and well-being with a fund value of £10 million. Work could provide 162 ha of new floodplain / riparian woodland including land purchase (totalling £35,000 per ha for new native woodland and a similar figure for land purchase). Figure on page 12 of the OSMS demonstrates the extent of proposed woodland relating to this Recommendation.

In terms of landscape character, the Recommendation would span across all LCTs and LCAs within a 10 km radius of the Proposed Scheme, each with different key characteristics and management objectives, refer to Figure 10.1 in LVIA (Examination Deadline Reference: APP -078) and Appendix 10.5 Landscape Character (Examination Deadline Reference APP-121).

It should be noted that when such proposals were reviewed against aerial photographs some areas of woodland planting were existing. In addition, in some locations woodland appears to run across properties, whereas the "mitigation" illustrated in Figure 1.1 of the Applicant's paper on Landscape and Visual Amenity Effects – Appropriateness of Proposed Mitigation submitted at Deadline 2 (Examination Library Reference REP2-033) aims to wrap woodland around existing properties.

The Applicant would like to understand whether existing woodland has been excluded from the areas and calculations outlined above as well as the width of riparian woodland planting proposed.

Like measures proposed in the Applicant's document, Appropriateness of Proposed Mitigation, this Recommendation would result in the loss of Best and Most Versatile Grade 1 and 2 agricultural land and generate a negative effect on farmers' livelihoods.

Landscape Character Types

The sensitivity of the LCTs within the 10 km Study Area was found to be medium to negligible in the original Application. The magnitude of change following mitigation associated with the Proposed Scheme would range from medium to negligible in Year 0 and remain unchanged in Year 15. The significance of effect ranges from moderate to negligible adverse.

Following the implementation of Recommendation 3, woodland cover would extend across the entire 10 km Study Area. Whilst proposals reflect some of the LCT's landscape characteristics and management objectives (LCT 4A and 4B), they either conflict with other LCT objectives which seek to maintain the sense of openness and intervisibility with other landscape character areas, or should be carefully balanced to ensure they do not erode the aesthetic and perceptual qualities of the relevant LCTs for example:

LCT 23 Level Farmlands (within which the Proposed Scheme lies)

- Aesthetic and perceptual management objective: *"Protect the predominantly open character of this low lying landscape by maintaining long and unbroken views to distant horizons."*

LCT 24 River Floodplain (within which the Pipeline lies)

- Aesthetic and perceptual management objective Management objective: *"Conserve open views along and across the river floodplains towards adjacent Landscape Character Types."*

This assessment considers that due to the extensive nature of planting (which is greater than the hypothetical measures considered in the Appropriateness of Proposed Mitigation paper) the proposals would slightly reduce the visual intrusion of the Proposed Scheme and associated aesthetic and perceptual impacts. In doing so the proposals would also reduce the visibility of the Existing Drax Power Station Complex and an appreciation of its symmetry.

The extent of planting however would also result in a dramatic change to landscape character throughout the area and the definition of new landscape character types / areas along with their key characteristics and management objectives. In addition, and as outlined above uncertainty would exist over whether such proposals could be implemented, resulting in the loss of agricultural land and generating a negative effect on farmer's livelihoods.

Again, proposals for woodland would conflict with some of the LCT's characteristics, sensitivities and / or management objectives (LCT23, 24 and 5A) which seek to maintain the sense of openness and inter visibility with other landscape character areas.

It is considered that given the substantial nature of woodland planting and the considerable change in key landscape characteristics relating to the sense of openness and inter visibility for some LCTs this recommendation would result in a medium to large magnitude of change compared to medium to negligible based on the original Application. This would generate a moderate to negligible adverse effect in Year 0 but a moderate-major to major neutral effect by Year 15 and once trees have matured, compared to a localised moderate to major adverse significant effect (diminishing with distance) for both Year 0 and Year 15 based on the original Application. Such effects are neither adverse nor beneficial and would depend on the attitude of the individual appreciating the landscape. This is a change which may be appreciated by some and not by others.

Lower Derwent ILA

The original Application found the sensitivity of the Lower Derwent ILA to be high and the magnitude of change following mitigation would be medium in Year 0 and Year 15. Effects would be localised moderate to major adverse significance (diminishing with distance) and effects would remain unchanged for both Year 0 and Year 15.

It is considered based on Recommendation 3, the magnitude of change would remain unchanged in Year 0, but alter to small by Year 15. Proposals are more extensive within the ILA than the hypothetical measures considered in the Appropriateness of Proposed

Mitigation and could contribute towards management objectives for both LCT 4A and 4B which seek to:

- *"Maintain and plant riverside vegetation to promote diversity and help manage bank erosion. Woodland and hedgerow planting will help to reinforce the corridor character type and should reflect species distribution found in the river corridor."*

The resultant effect would therefore be localised minor – moderate not significant effects. Proposals would reduce the impact of changes to experiential and perpetual qualities of the Existing Drax Power Station Complex associated with contrast in the existing and proposed structures in terms of their overall mass and symmetry but equally screen the Existing Power Station as well as reducing the extent of views of the existing power station and its symmetry.

Proposals however may be reliant on the acquisition of private land and loss of agricultural land which in this location is all Grade 1 within 3 km of the Proposed Scheme.

Local Landscape Character and Landscape features associated with the Power Station Site and Pipeline Area

Whilst the introduction of planting would tie the development into its surroundings and partially screen the Proposed Scheme in local views, easements associated with the pipeline would prevent woodland planting running across the pipeline. Uncertainty also exists over the implementation of proposals especially within a 3 km radius due to Best and Most Versatile (Grade 1 and 2) agricultural land.

The original assessment found the sensitivity of local landscape to be medium and the magnitude of change following mitigation medium in Year 0 and small in Year 15. It is considered that whilst the introduction of planting for Recommendation 3 has the potential to slightly reduce the magnitude of change, this slight reduction is not sufficient to change the category of magnitude and thus the findings of significance of effects would remain unchanged. Effects would remain as moderate adverse in Year 0 and minor beneficial in Year 15 as per the original Application.

Assessment of Recommendation 4

Recommendation 4 proposes the purchase of Grade 3b agricultural land within the 10 km Study Area and to convert this to woodland, floodplain meadow or wetland. The proposal seeks to meet the aims and objectives of a number of cross boundary organisations. It is understood from the OSMS that such measures would contribute to landscape character and to natural flood management, habitat diversity and climate change measures such as carbon sequestration.

The Recommendation has an estimated fund value of £10 million which would result in the purchase of approximately 140 ha of Grade 3b land and conversion from agricultural land to native woodland with public access.

The extent of Grade 3b land is focused to the north, north east and north west, and to the south, south west and west of the Proposed Scheme and within the 10 km Study Area, with small pockets elsewhere.

Whilst the proposal put forward on page 14 of the OSMS lies to the north of the Proposed Scheme and west of the River Derwent, this assessment of Recommendation 4 considers the siting of any proposals on Grade 3b land.

Landscape Character Types

The sensitivity of the LCTs within the 10 km Study Area was found to be medium to negligible in the original Application. The magnitude of change following mitigation and associated with the Proposed Scheme would range from medium to negligible in Year 0 and remain unchanged in Year 15. The significance of effect ranges from moderate to negligible adverse.

The introduction of proposed planting for Recommendation 4 would not alter the magnitude of change and thus the findings of significance would remain unchanged based on a worst case scenario. Grade 3b land either lies to the south, south west, west and north west of the Proposed Scheme where the impact on the aesthetic and perceptual qualities is limited, or on land beyond the 3 km radius where significant effects are less pronounced. Beyond 3 km the Proposed Scheme would be read in context of other well established large industrial and power generation land uses in the Study Area.

Lower Derwent ILA

The original Application found the sensitivity of the Lower Derwent ILA to be high and the magnitude of change following mitigation as part of the Proposed Scheme would be medium in Year 0 and Year 15. Effects would be localised moderate to major adverse significance (diminishing with distance) and effects would remain unchanged for both Year 0 and Year 15.

It is considered there would be no change on the ILA as consequence of Recommendation 4. Whilst Grade 3b land is identified on either side of the Derwent this is predominately outside the 3 km Study Area where the concentration of significant effects lie (as agreed through the draft Statement of Common Ground between North Yorkshire County Council and Selby District Council (Examination Library Reference REP4-008)).

Local Landscape Character associated with the Power Station Site and Pipeline Area

The original assessment found the sensitivity of local landscape to be medium and the magnitude of change following mitigation of the Proposed Scheme medium in Year 0 and small in Year 15. It is considered that there would be no change in effect as a consequence of Recommendation 4. Proposals would not directly relate to either the Power Station Site or the Pipeline. Effects would remain as per the original Application as localised moderate adverse significance and effects would remain unchanged for both Year 0 and Year 15.

APPENDIX 3 - FIGURES 1.1 AND 1.2

N

E

D

A

F

I

J

Sludge Lagoons
Sluice
Slurry Bed
Sluice
L Twr
L Twr
L Twr
L Twr
WB
NEW RD
3.9m
Drain
Drain
Drain
Drain
Drain
Drain
Pond
New Close Wood
CARR LANE
Met Sta
1.22m RH
WREN HALL LA
Track
Wren Hall
1.22m RI
4.5m
WREN HALL LANE
Def
Und
1.22m

Reinstate and enhance hedgerow lost through construction access and permanent access in accordance with detailed Landscape and Biodiversity Strategies

Overhead cables and pylon. Allow for easement of 8m on either side of cable.

Proposed hedgerow running along northern perimeter of proposed woodland

Access point

10m easement on either side of the pipeline within which no tree planting can be introduced

Reinstate hedgerow that may be lost to allow construction access. Introduce infill hedgerow trees and hedgerow planting to increase low level visual screening and increase habitat diversity

Access point

Infill hedgerow and tree planting

0 50 100 150 m

Key

- Site Boundary
- Development Parcel J
- Other Development Parcels

Existing (retained with management and/or enhancement)

- Hedgerow (enhanced with infill planting and hedgerow trees)
- Broadleaved parkland/scattered trees

Reinstated

- Arable land

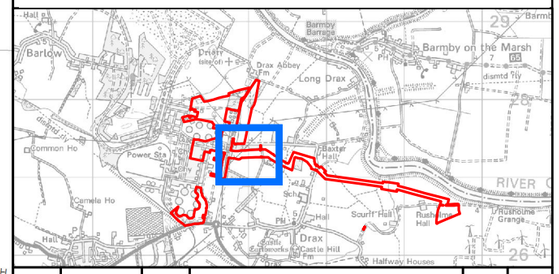
Proposed

- Semi-improved grassland
- Broadleaved woodland
- Hedgerow

Mitigation outside of the Proposed Scheme

- Broadleaved woodland

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 - Regulation 5(2)(a)



REV	DATE	BY	DESCRIPTION	CHK	APP
A	24/01/2019	RMcC	FIRST ISSUE	MB	CT

DRAWING STATUS: FINAL

wsp
Three White Rose Office Park, Millshaw Park Lane, Leeds, LS11 0DL, UK
Tel: +44 113 395 6200 Fax: +44 113 395 6201
wsp.com

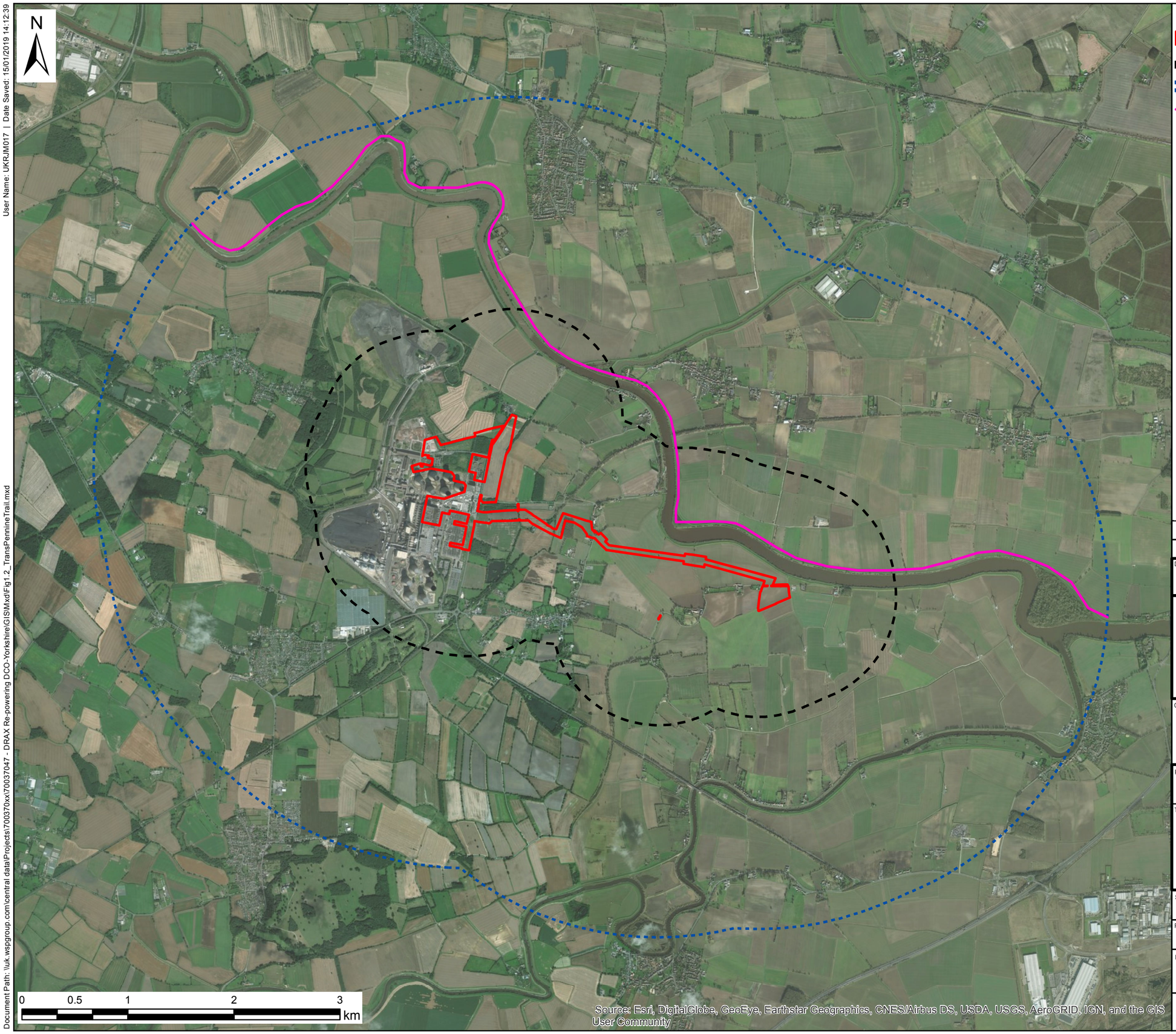
CLIENT: drax

PROJECT: The Drax Power (Generating Stations) Order

TITLE: Figure 1.1
Mitigation on Bingley Land

SCALE @ A3:	CHECKED:		APPROVED:
2,500 @ A3	MB		CT
PROJECT No:	DESIGNED:	DRAWN:	DATE:
70048144	MB	RMcC	24/01/2019

DRAWING No: 70048144-1.1 REV: A



Key

- Site Boundary
- 1km Study Area
- 3km Study Area
- Trans-Pennine Trail

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 - Regulation 5(2)(a)

REV	DATE	BY	DESCRIPTION	CHK	APP
A	15/01/2019	RMcC	FIRST ISSUE	MB	CT

DRAWING STATUS: FINAL

wsp
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wsp.com

CLIENT: drax

PROJECT: The Drax Power (Generating Stations) Order

TITLE:

Figure 1.2
Trans-Pennine Trail

SCALE @ A3:	CHECKED:	APPROVED:
35,000 @ A3	MB	CT

PROJECT No:	DESIGNED:	DRAWN:	DATE:
70048144	MB	RMcC	15/01/2019

DRAWING No:	REV:
70048144-1.2	A

APPENDIX 4 - ASSESSMENT OF ADDITIONAL MITIGATION PROPOSED BY THE APPLICANT

Introduction

The Applicant, through discussions with the landowner and following a review of the Off Site Mitigation Strategy (OSMS), has proposed two additional areas of mitigation referred to as:

- Bingley Land; and
- Trans Pennine Trail (within 3 km of the Proposed Scheme).

WSP has assessed the changes that could result from the mitigation measures proposed by the Applicant on both the landscape resource and visual receptors to determine whether this would lead to a reduction in residual effects.

Methodology

The methodology used to assess the effects is consistent with the method summarised in Environmental Statement Chapter 10 Landscape and Visual Amenity and Appendix 10.3 LVIA Methodology (Examination Library Reference APP-078 and APP-119 respectively) and this approach has been agreed with the LPAs.

Bingley Land

The Applicant, in discussions with the landowner (also owner of plots 9, 9a, 9b, 18, 25, 26, 27, 28, 29 and 30), is seeking to reach a land agreement in relation to the land located at and adjacent to at plot 11 and 12. It is noted that this land is largely located outside the Order limits. Therefore, the Applicant is not proposing to include this land in the Book of Reference, or seek any rights over this land through the Development Consent Order. The aim of the private agreement is to introduce mitigation measures on land between the Gas Receiving Facility (GRF) and Wren Hall Lane. Proposals referred to in Appendix 3, Figure 1.1 include:

- A 25 m wide area of broadleaved woodland to the south of the proposed Gas Pipeline. Approximately 14 m of woodland would be planted within the Site Boundary and within the Order Limits, whilst the remainder is on arable field to the south (0.82ha – 0.45ha within the Order Limits and 0.37ha outside of the Order Limits).
- An area of broadleaved woodland planting to the east of the GRF, set back from the overhead powerlines (0.16ha).
- A native hedgerow planted along the northern perimeter of the proposed woodland (150 linear metres).
- Infill hedgerow planting and hedgerow trees to the west of Wren Hall Lane (0.03ha).
- Semi improved grassland under the overhead powerlines and between the two areas of woodland outlined above (0.39ha).
- The retention of two access points between arable fields for maintenance.

The proposal is supported by the landowner and would not prejudice any other agricultural land; land to the north and south of the proposed planting would continue to be farmed.

Final design details would be prepared and included within the detailed Landscape and Biodiversity Strategy(s).

The proposals would support objectives identified within the Leeds City Green and Blue Infrastructure Strategy 2017-2036 (LCGBIS)[6] and the Dales to Vale River Network Catchment Partnership (DtVRNP)[7]:

- *"Effective water management and flood risk reduction" (LCGBIS) (DtVRNP)*
- *"Build green and blue infrastructure into physical development and housing" (LCGBIS)*
- *"Enhance green and blue corridors and networks" (LCGBIS)*
- *"Plant and manage more trees and woodland" (LCGBIS) (DtVRNP)*

The DtVRNP also highlights on their webpage the potential for floodplain woodland and a high susceptibility to fluvial flood risk on the Bingley land.

Trans Pennine Trail (TPT)

In terms of mitigation measures the TPT works propose resurfacing of the trail within 3 km of the Proposed Scheme and for a cost of approximately £50,000. The proposals would supplement works outlined in the OSMS Option 3 which cover footpath widening, resurfacing, new street furniture, signage and crossing points.

The mitigation measures would respond to objectives identified within the Leeds City Green and Blue Infrastructure Strategy 2017-2036 (LCGBIS):

- *"Enhance green and blue corridors and networks" (LCBIS)*
- *"Heighten community access to and enjoyment of green and blue infrastructure" (LCBIS)*

Assessment

This assessment considered firstly effects associated with Stage 3: Operation of Unit X and Unit Y on the basis that all Units are complete, i.e. the worst-case scenario (referred to as Year 0) and, secondly residual effects at Year 15 following the maturation of proposed vegetation.

This assessment focused on the changes to the original assessment as a consequence of the mitigation measures proposed which are concentrated within a 3 km radius of the Site.

Assessment of Landscape Effects:

Key significant landscape effects associated with the original application related to LCT 23 Levels Farmland, LCT 24 River Floodplains, LCT 4 River Corridors and in particularly LCA 4A Derwent Valley, 4B River Ouse Corridor and 4D River Aire Corridor. Equally there would be significant adverse effects on the Lower Derwent Important Landscape Area (ILA) and local landscape character. The nature of effects associated with the original Application is summarised in Table 3.1 below as well as the conclusions arising from this assessment of proposed mitigation.

[6] Leeds City Region Enterprise Partnership, April 2018, Leeds City Green and Blue Infrastructure Strategy 2017-2036
[7] Dales to Vale Rivers Network Catchment Partnership (http://dvrn.co.uk)

Bingley Land: Proposals on Bingley Land would replicate woodland to the north of the field. The planting would reinforce Weddle's original design in terms of overall scale and uniformity. Whilst the proposals would still retain some open views referred in LCT 23 Level Farmland's landscape management objectives (North Yorkshire and York Landscape Characterisation Project, 2011[8]) it would not be consistent with key landscape characteristics of this LCT which relate to *"dykes or ditches"* as field boundary features rather than blocks of woodland and hedgerows.

Landscape management objective of relevance includes:

- Cultural and historic character: *"Plan and site development carefully to maintain the predominately open character"*

Trans Pennine Trail (TPT): In terms of landscape character, the TPT (within a 3 km radius of the Proposed Scheme) cuts across LCT 24 River Floodplains (North Yorkshire and York Landscape Characterisation Project) and LCT 4B River Corridors (East Riding of Yorkshire Landscape Character Assessment)[9].

The proposals associated with resurfacing would not respond to landscape management objectives within the North Yorkshire and Yorkshire Landscape Characterisation Project relating to LCT 24 River Floodplains, one of which seeks to:

"Protect and enhance public enjoyment of the landscape, including appreciation of the sense of escapism it provides, through identifying opportunities to create new circular routes or links existing public rights of way."

Equally, strategy management objectives for LCT4 River Corridors would not be addressed through the resurfacing of the trail.

Proposals whilst beneficial in enhancing the green infrastructure do not directly respond to addressing landscape effects associated with aesthetic and perceptual character.

Landscape Character Types (LCT):

The sensitivity of the LCTs within which the mitigation measures lie was found to be medium in the original Application. The magnitude of change following mitigation associated with the Proposed Scheme would remain unchanged as medium in both Year 0 and Year 15. Given the extent of these LCTs it is considered that the level of mitigation outlined is insufficient to alter the balance of effects from localised moderate adverse significance to minor - moderate adverse, and as such effects would remain unchanged for both Year 0 and Year 15.

The landscape effects associated with the Proposed Scheme relate to the aesthetic, perceptual and experiential character of the Proposed Scheme. The effects on the simple symmetry of the Existing Drax Power Station Complex from certain elevations would remain.

[8] Chris Blandford Associates, 2011, North Yorkshire and York Landscape Characterisation Project, North Yorkshire County Council
[9] Carl Bro, 2005, The East Riding of Yorkshire Landscape Character Assessment, East Riding of Yorkshire Council

Lower Derwent Important Landscape Area (ILA):

The original Application found the sensitivity of the Lower Derwent ILA to be high and that the magnitude of change following mitigation would be medium in Year 0 and Year 15. It is considered based on the mitigation measures proposed that the magnitude of change would remain unchanged both in Year 0 and Year 15. It is considered that the mitigation measures proposed in this section would not reduce the impact of changes to experiential and perpetual qualities of the Existing Drax Power Station Complex associated with contrast in the existing and proposed structures in terms of their overall mass and symmetry.

Effects would remain as localised moderate to major adverse significance (diminishing with distance) and effects would remain unchanged for both Year 0 and Year 15.

Local Landscape Character and Landscape Features associated with the Power Station Site and Pipeline Area:

The introduction of further woodland, hedgerows and semi improved grassland on Bingley Land would tie the development into its surroundings and partially screen the Proposed Scheme within local, low level views.

The original assessment found the sensitivity of local landscape to be medium and the magnitude of change following mitigation medium in Year 0 and small in Year 15. It is considered that whilst the introduction of planting identified in this section has the potential to slightly reduce the magnitude of change, this slight reduction is not sufficient to change the category of magnitude and thus the findings of significance of effects would remain unchanged. Effects would remain as moderate adverse in Year 0 and minor beneficial in Year 15 as per the original Application and as outlined below.

Table A4.1 Summary of Landscape Effects in relation to Proposed Additional Mitigation

Landscape Character, Designations and Local Landscape Character		Stage 3 as the original application	Stage 3 with proposed mitigation / enhancement	Residual Effects as submitted	Residual Effects with proposed mitigation (unchanged)
LCT 23 Levels Farmland		Moderate adverse	Moderate adverse	Moderate adverse (year 0 and year 15)	Moderate adverse (year 0 and year 15)
LCT 24 River Floodplain		Moderate adverse	Moderate adverse	Moderate adverse (year 0 and year 15)	Moderate adverse (year 0 and year 15)
LCT 4 River Corridors	**LCA Derwent Valley 4A**	Moderate adverse	Moderate adverse	Moderate adverse (year 0 and year 15)	Moderate adverse (year 0 and year 15)

Landscape Character, Designations and Local Landscape Character		Stage 3 as the original application	Stage 3 with proposed mitigation / enhancement	Residual Effects as submitted	Residual Effects with proposed mitigation (unchanged)
	LCA 4B River Ouse Corridor	Moderate adverse	Moderate adverse	Moderate adverse (year 0 and year 15)	Moderate adverse (year 0 and year 15)
	LCA 4D River Aire	Moderate adverse	Moderate adverse	Moderate adverse (year 0 and year 15)	Moderate adverse (year 0 and year 15)
Lower Derwent ILA		Moderate to major adverse	Moderate to major adverse	Moderate to major adverse (year 0 and 15)	Moderate to major adverse (year 0 and 15)
Local landscape character		Moderate adverse	Moderate adverse	Moderate adverse (year 0) Minor beneficial (year 15)	Moderate adverse (year 0) Minor beneficial (year 15)

Assessment of Visual Effects:

The mitigation measures described in this section seek to reduce the visual impacts on a number of visual receptors namely:

- Residents of Wren Hall - within 1 km of the Proposed Scheme.
- Users of Wren Hall Lane - within 1 km of the Proposed Scheme.
- Users of PRoW 35.26/2/1 and 35.26/5/1 - within 1 km of the Proposed Scheme.

The nature of effects associated with the original Application is summarised in Table A4.1 below as well as the conclusions arising from this assessment of proposed mitigation. Any changes between the conclusions of the original Application and this assessment relate only to the specified visual receptors outlined above.

On the basis that the mitigation proposals respond to a separate set of visual receptors, this assessment is summarised under the following headings:

Bingley Land: Proposed mitigation measures would result in a change in view for following receptors:

- Residents of Wren Hall.
- Users of Wren Hall Lane.
- Users of PRoW 35.26/2/1 and 35.26/5/1.

The sensitivity of residents of Wren Hall is high and the magnitude of change from Wren Hall was found to be large in the original assessment. It is considered whilst there would be no change in magnitude in Year 0 based on the mitigation measures proposed in this section, there would be a change in magnitude to medium by Year 15 following the maturation of vegetation. This would result in a reduction in significant effects from major adverse as found in the original Application to moderate to major adverse.

From the curtilage and ground floor of Wren Hall, views of the GRF and lower elevations of Units X and Y would be partially screened by proposed planting in the form of new woodland and the extension / strengthening of the roadside hedgerow west of Wren Hall Lane. It is likely that the upper elevations associated with the Proposed Scheme and primarily the stacks and HRSGs would remain visible.

The sensitivity of both users of PRoWs and Wren Hall Lane is medium. Based on a worst-case scenario the original assessment found the magnitude of change for Year 0 and Year 15 would range from large to medium. Following the introduction of the mitigation measures proposed in this section, the magnitude of change would remain unchanged in Year 0 but reduce by Year 15 to medium to small following the maturation of vegetation.

Views of the GRF and lower elevations of Units X and Y would be partially screened by proposed planting in the form of new woodland and the extension / strengthening of the roadside hedgerow west of Wren Hall Lane. Views would be sequential; along the PRoWs and lane, the view experienced by users would change depending on the location, orientation of the user and direction of travel as well as intervening vegetation and built form in the foreground.

Consequently, the significance of effect experienced by both user groups would remain unchanged as moderate - major and moderate adverse significance in Year 0, but reduce in Year 15 from moderate - major and moderate adverse based on the original Application to moderate and minor effects following the maturation of mitigation measures.

Trans Pennine Trail (TPT): The sensitivity of recreational receptors on the TPT within 1 km and between 1 and 3 km is high. Based on a worst-case scenario the original Application found that the magnitude of change following mitigation would be medium in Year 0 and would remain unchanged at year 15. The LVIA of the original Application concluded that there would be a residual effect on trail users of moderate - major adverse significance both immediately following the implementation of mitigation measures and as planting matures.

The proposed measures in relation to resurfacing would result in no change in the level of magnitude of change experienced by users. The significance of effects following the implementation of such measures therefore remains unchanged from the original Application.

Table A4.2 below illustrates the change in residual effect. Please note where there is a change in effect this is only applies to the specific visual receptors outlined above.

Table A4.2 Summary of Visual Effects in relation to Proposed Mitigation

Visual Receptors		Stage 3 as submitted	Stage 3 with proposed mitigation /enhancement	Residual Effects as submitted and associated with all visual receptors	Residual Effects with proposed mitigation on specified visual receptors described above
Residents	Within 1 km radius	Major adverse	Major adverse	Year 0: Major adverse Year 15: Major, (specific to residents of Wren Hall Lane)	Year 0: Major adverse Year 15: Moderate - major Adverse (specific to residents of Wren Hall Lane)
	Between 1 to 3km radius	Moderate – major adverse	Moderate – major adverse	Year 0: Moderate-major adverse Year 15: Moderate-major adverse	Year 0: Moderate-major adverse Year 15: Moderate-major adverse
Recreational Users (TPT and NCN)	*Within 1 km radius*	*Moderate – major adverse*	*Moderate – major adverse*	*Year 0: Moderate-major adverse* *Year 15: Moderate-major adverse*	*Year 0: Moderate-major adverse* *Year 15: Moderate-major adverse*
	Between 1 to 3 km radius	*Moderate – major adverse*	*Moderate – major adverse*	*Year 0: Moderate-major adverse* *Year 15: Moderate-major adverse*	*Year 0: Moderate-major adverse* *Year 15: Moderate-major adverse*

Visual Receptors		Stage 3 as submitted	Stage 3 with proposed mitigation /enhancement	Residual Effects as submitted and associated with all visual receptors	Residual Effects with proposed mitigation on specified visual receptors described above
Recreational users (PRoW and other facilities)	*Within 1 km radius*	*Moderate - major and moderate adverse*	*Moderate - major and moderate adverse*	*Year 0: Moderate – major adverse and moderate adverse* *Y15: Moderate-major, moderate and minor adverse*	*Year 0: Moderate-major adverse* *Year 15: Moderate and Minor adverse*
	Between 1 to 3 km radius	Moderate-major adverse	Moderate -major adverse	Year 0: Moderate - major adverse Year 15: Moderate and minor adverse	Year 0: Moderate - major adverse Year 15: Moderate and minor adverse
Users of local road network	*Within 1 km radius*	*Moderate – major and moderate adverse*	*Moderate – major and moderate adverse*	*Year 0: Moderate – major and moderate adverse* *Year 15 Moderate – major, moderate and minor adverse*	*Year 0: Moderate-major adverse* *Year 15: Moderate and Minor adverse*
	Between 1 to 3 km radius	Moderate adverse	Moderate adverse	Year 0: Moderate adverse Year 15: Moderate and minor adverse	Year 0: Moderate adverse Year 15: Moderate and minor adverse

Visual Receptors		Stage 3 as submitted	Stage 3 with proposed mitigation /enhancement	Residual Effects as submitted and associated with all visual receptors	Residual Effects with proposed mitigation on specified visual receptors described above
Users of places of worship and educational facilities	Within 1 km radius	Moderate adverse	Moderate adverse	Moderate adverse (year 0 and year 15)	Moderate adverse (year 0 and year 15)

- The visual receptors which has been considered as part of this assessment and resultant residual effects are emboldened and italicised.

Conclusion

This assessment of proposed changes resulting from mitigation measures outlined in this section would result in no change in effects on landscape character covering LCTs, the Lower Derwent ILA and local landscape character. The proposals would however generate a localised reduction in visual effects for receptors associated with Bingley land and no change in relation to the proposals for the Trans Pennine Trail.