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Dawn Paton

From: Rob Smith
Sent: 01 September 2017 13:16
To: Planning
Subject: FW: Woodsmith Mine NYM/2017/0505/MEIA

From: Shannon Fraser
Sent: 01 September 2017 12:40
To: Rob Smith
Cc: Graham Lee
Subject: Woodsmith Mine NYM/2017/0505/MEIA

NYM/NPA
- 1 SEP 2017
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Dear Rob,

I have now had a chance to explore Historic England's concerns relating to this application with its Inspector, Keith Emerick. Following my discussion with him, I do not feel I need to add anything further to my comments below, as no issues were raised that I have not already considered.

Regards,

Shannon

From: Shannon Fraser
Sent: 25 August 2017 17:43
To: Rob Smith
Cc: Graham Lee
Subject: Woodsmith Mine NYM/2017/0505/MEIA

Dear Rob,

Following our various discussions regarding the nature of the modifications proposed within this revised planning application, and our site visit to the minehead location and the Whitby headland complex of monuments, my initial opinion is as follows:

Minehead site

In terms of the historic landscape, the retention of more of the tree cover at Haxby Plantation and Whinney Wood is to be welcomed, as sites which have seen continuous tree cover since at least the mid 19th

century and which provide screening for the mine infrastructure. The new proposals mean that one of the historic landscape features identified within the woodland will now remain undisturbed. However, there will still be a direct impact through groundworks on other identified features, and the potential for buried archaeological features in the development area remains unchanged. Therefore, if permission were to be granted for this revised scheme, the full archaeological condition placed upon the currently approved scheme NYM/2014/0676/MEIA would require to be applied again.

Wider landscape

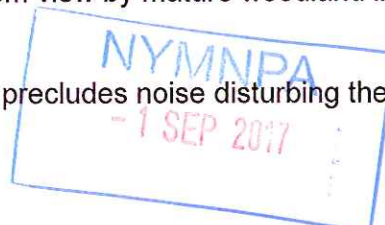
I have assessed the impact of the revised scheme upon the various historic sites and monuments in the wider landscape around the mine site, as identified within the original heritage impact assessment, environmental statement and prior consultation responses. During the construction phase, the reduction of the number of temporary winding towers from three to one lessens the mass of the visual impact; however, this is balanced by the increase in the number of associated 50m cranes from three to six, and the increased visibility from some angles, if for a limited time, of the infrastructural buildings given their earlier construction in relation to the development of screening. It appears to me, therefore, that the level of visual impact upon the setting of the sites will be similar, although somewhat different in nature. It should be noted that the cranes, being thinner and more 'transparent', individually present a lesser visual impact than the heavy mass of the winding towers; in terms of perception, they also have connotations of much greater impermanence, even though the remaining winding tower is also temporary. Additionally, the retention of more woodland should improve the aesthetic impact upon those monuments lying to the east and south, particularly those closest to the site. Overall, I do not feel that the level of impact on setting of historic features is likely to be greater than that identified in the approved scheme.

During the consultation process leading up to the approved scheme, particular emphasis was placed upon the audio-visual impact on the setting of the complex of historic buildings and monuments on the Whitby headland, centred on Whitby Abbey. Having taken some time on site, assessing the impact upon the Abbey and its immediate environs -- including from various levels within and around the terraced gardens of Abbey House -- I feel that again, during the construction phase the impact will be of a slightly different nature, but not of increased scale. In the terminology employed by Historic England in its consultation responses, the temporary 'harm' caused to the historic complex in terms of detrimental impact upon the setting during the construction phase does not appear to be greater than that occasioned by the approved scheme. The single remaining temporary winding tower will certainly be visible on the farthest horizon, but very close to a block of trees which stands on that horizon, so it will not be the sole interruption on that stretch of horizon. Further, due to the distance involved it will only be visible on the clearest of days; the supporting cranes are much less likely to be visible. The key point is that this horizon is not the main focus of the views south from the Abbey complex -- the eye is very much focused upon the foreground and middle distance, with views of the harbour and the town backed by a very 'domestic' landscape of rolling farmland and pasture; the far horizon is very much a distant backdrop.

Another key factor is the reduction of winding towers from three to one -- the clustering of these structures with their considerable mass may well have drawn the eye on a very clear day, but I find it very unlikely that the single tower will have such an effect, particularly with the presence of structures such as telephone masts in the near and middle distance which continually attract the eye at the moment. In addition, the modified scheme would see the duration of the winding tower phase much reduced, which thus reduces the duration of adverse impact.

The modified phasing does mean that screening of the infrastructural buildings develops slightly later in relation to construction; however, the development of the screening is intended to commence at the northeastern corner of the mine site, extending west and south over time -- this does mean that the views south from the Whitby headland complex will be screened at an early stage of development. In any case, the height of the infrastructural buildings, which is no higher than in the approved scheme, should not be discernable from the Abbey complex, as they will be screened from view by mature woodland immediately north of the mine site.

The distance of the mine site from the Whitby headland complex precludes noise disturbing the tranquility of the visitor experience at the monuments.



I note Historic England's comments in response to this consultation, in which concerns regarding temporary harm generated to the heritage assets on the Whitby headland during the construction phase of the scheme are reiterated, with particular reference to paragraph 128 of the NPPF. Following my assessment of the implications of this revised application for the historic environment, I do not believe that this Authority requires further information in order to fully understand the implications of the proposal for the historic environment, and I do not believe that the situation has changed with regard to the requirements set out in paragraph 134 of the NPPF. If other matters arise which do require the applicant to provide further information, then it might be helpful to request a revised photomontage of views from the Whitby Abbey complex, but I do not feel that this is a necessary prerequisite for determining this application. However, I would like to explore this particular issue further with Historic England to ensure that I fully understand their concerns; I shall come back to you with any final comments once I have done so.

Regards,

Shannon

Dr S. M. Fraser, FSA Scot., MCIfA
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