

APPENDIX C

**Report to the Helmdon, Stuchbury and Greatworth
Windfarm Action Group**

Wind Turbines at Spring Farm Ridge, South Northamptonshire:

Landscape and Cultural Heritage Issues

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1 Introduction

1.1 Brief and background

This report has been prepared by Alison Farmer Associates at the request of the Helmdon, Stuchbury and Greatworth Windfarm Action Group (HSGWAG). The brief was to advise the local residence group on landscape and cultural heritage issues associated with a planning application to South Northamptonshire District Council to construct five wind turbines and ancillary works between the villages of Helmdon and Greatworth. The application was submitted by Broadview. The work involved desk study of the applicant's Environmental Statement¹ (coordinated by TNEI services) and other relevant background material, a site visit on 10 September and preparation of this short report.

The development site is located on the slopes of a shallow valley which is defined by gentle interfluvies which rise to 172 meters AOD to the south and 163 meters AOD to the north. All of the turbines are located on the north facing slopes of the shallow valley – Turbine 1 being located at approximately 167m and Turbine 5 at approximately 155m with Turbines 2, 3 and 4 at levels in between. Turbine 1 is approximately 750 meters from the edge of the village of Greatworth (and approximately 1.2km from the village Conservation Area). Turbine 5 is approximately 1km from the village of Helmdon and approximately 800m from the Helmdon Viaduct. To the south of the site runs the B4525.

The site lies within the Undulating Claylands (Trove Catchment) as defined in the Northamptonshire landscape character assessment² and is regarded in the assessment as being of moderate scenic quality (pg 76) although it does not lie within an area of protected landscape. Notably this landscape, although settled, is deeply rural in character with few to no vertical structures other than church towers.

The turbines would each have a power output of 2-3 MW, a blade tip height of up to 125m and a hub height typically of 80m. The project would also entail the construction of 1.5 ha of new on-site access tracks and turning heads, a permanent 80m high meteorological mast, and a control building likely to be 14.7m by 5.7m by 4m high (located close to turbines 3, 4 and 5). Grid connections would be underground. During construction, a works compound located near to the site access would be required.

¹ Broadview, Spring Farm Ridge Renewable Energy Project: *Volume Two Environmental Statement*, October 2010.

² Northamptonshire County Council, *Northamptonshire Environmental Character and Green Infrastructure*, 2003.

1.2 Scope and structure of this report

The remainder of this report covers the following areas:

- **Section 2** highlights matters of planning policy context regarded as relevant to this proposal but which have not been given weight in the ES.
- **Section 3** reviews in general terms the landscape and visual impact and cultural heritage assessments in the Environmental Statement and highlights weaknesses in the analysis.
- **Section 4** summarises the planning, landscape and cultural heritage issues associated with the application in order to assist HSGWAG in preparing their representation to the local authority.

2 Planning Policy Context

The Environmental Statement (ES) provides a reasonable review of the planning context in relation to the proposed wind farm development. However a number of relevant documents relevant in terms of planning guidance do not appear to have been given sufficient weight.

2.1 *Supplementary planning guidance*

South Northamptonshire District Council has produced a supplementary planning document, *Wind Turbines in the Open Countryside*³ which is to be ratified by the Council on the 8 December. During the preparation of the ES the SPD was under consultation. The ES therefore “*afforded little weight [to this document] in the decision making process*” (Vol 2 ES page 52). The imminent ratification of this document means that it should be given greater weight.

The SPD guide sets out the approach that South Northamptonshire Council will take in supporting initiatives to promote renewable energy generally, and in dealing with specific proposals as planning authority. The guide is directly relevant to the Council’s corporate priorities, in particular:

Priority 2 “*To preserve what is special in South Northamptonshire*” – (Objective 2: *To protect the existing sense of place in our villages and landscape..*).

In relation to landscape impacts it states in para 8.6 that “*A local landscape sensitivity study will be required that considers both overall landscape sensitivity and landscape sensitivity to the proposed wind turbine development.*”

In para 8.9 it also asks the question in relation to landscape character – “*does the proposal respect and fit with the key characteristics of the landscape character area within which it is sited*”?

In relation to cultural heritage, para 11.4 highlights the need to consider designated as well as undesignated cultural heritage features, including the implications of development on their setting.

³ South Northamptonshire Council, *Wind Turbines in the Open Countryside*, December 2010.

2.2 Natural England Guidance

Natural England published guidance on wind energy development in 2010⁴. The ES does not appear to have made reference to this document.

The NE guidance was developed to be used to assess where [wind farm] development might be sustainably and successfully accommodated. Although the guidance was aimed at Natural England staff it was also hoped that it would enable proposals to come forward *“in locations that are more able to accommodate wind energy development”*. It states on page 14 that *“All potential scales of development should be considered when assessing the degree to which the natural environment can accommodate wind energy development”*. It sets out on page 15 in Table 6 the different factors which should be taken into account when making judgements as to the sensitivity of a given landscape to a wind farm development.

2.3 English Heritage Guidance

English Heritage has prepared guidance on defining the setting of heritage assets which has recently been out to consultation⁵. Whilst this document is only draft at this stage and must be considered in this light, it nonetheless helpfully sets out what factors should be taken into account when defining the setting of a heritage asset. It states that (para 18):

[Setting] “embraces all of the surroundings (land, sea, structures, features and skyline from which the asset can be experienced or that can be experienced from the asset.” (underline added).

It goes on to state that:

“The contribution of setting to the significance of a heritage asset is often expressed by reference to visual considerations including views.”

The ES acknowledges this document but does not appear to fully embrace the guidance in assessing impacts on setting. Importantly the guidance asks when assessing impacts on setting *“is a development of a particular type, scale, massing or prominence within the setting of an asset likely to be acceptable or unacceptable in terms of the degree of harm to its significance?”* It sets out a range of factors which should be considered in answering this question but the ES does not appear to have systematically considered these in its analysis.

⁴ Natural England, *Making Space for Renewable Energy: assessing on-shore wind energy development*, 2010.

⁵ English Heritage, *The Setting of Heritage Assets*, Consultation Draft, 2010.

3 Review of the Environmental Statement

3.1 Approach

Our approach to preparing advice on the landscape and cultural heritage issues associated with the proposed Spring Farm Ridge wind farm was, first, to critically review the landscape and visual assessment (Chapter 7 and associated appendix) and Cultural Heritage assessment (Chapter 8 and associated appendix) of the Environmental Statement following an earlier site visit.

Within the time available it was possible to undertake only a very rapid review and appraisal exercise, aimed at providing comments on the Environmental Statement and identifying a number of examples where issues have not been sufficiently taken into account.

3.2 Overview

The landscape and visual assessment and cultural heritage assessment appear at first sight to be thorough. The landscape and visual chapter presents material on planning context, methodology and baseline including landscape character, mitigation, impacts, residual effects and conclusions. Zone of theoretical visibility (ZTV) mapping is provided and the assessment is illustrated by a series of 18 viewpoint photographs and wireframes. Photomontages are also provided for the 18 viewpoints. The Environmental Statement indicates that the choice of viewpoints was agreed with South Northamptonshire District Council and adjoining planning authorities. The cultural heritage assessment also covers planning context, baseline assessment including historic evolution, and an assessment of impacts, residual effects and conclusions. Six viewpoints/wireframes were also provided to illustrate impacts from heritage assets.

In relation to the conclusions reached in the ES and based on the information available to date, I would broadly agree that in terms of landscape effects the landscape within 600-700m would become a wind farm landscape and that between 2-4km a new landscape sub-type would be created (Undulating Claylands with wind farm). I would add that between 700m and 2km there are also likely to be areas where the landscape would be a wind farm landscape.

I would also agree that significant adverse effects would be felt on the eight heritage assets identified in the ES.

However, on closer examination there appear to be weaknesses within the ES particularly in relation to the analysis and what remains unsaid.

Closer examination of the ES has revealed that:

- In the case of design iteration there appears to have been little review of the vertical scale of the proposal in relation to the scale of the receiving landscape. Focus tends to have been on turbine numbers and layout;
- In the case of landscape sensitivity there is limited analysis of the receiving landscape and its inherent sensitivity to the proposed development – this is relevant as it is important to articulate the nature of the impacts because it affects judgements on the acceptability of the proposal overall and whether the proposed development can be regarded as having a ‘good fit’ within its landscape context and therefore whether environmental impacts are satisfactorily addressed;
- In relation to heritage assets the effects on the setting of heritage assets has been poorly articulated and potential impacts downplayed. This is important as open acknowledgement of effects on setting would mean that the development is contrary to planning policy.

3.3 Design Iteration

The ES sets out in a number of places the importance of the design iteration which has taken place. This has reduced the scheme from one of originally seven turbines to five and has also resulted in a refined site layout. As a result of this process the layout of the scheme is judged to form a “*compact cluster arrangement*” (page 122) and to “*form a compact, balanced group of turbines which relates well to the grain and scale of the surrounding landscape*” (page 61) and “*relates well to local landscape character and respects the scale and composition of the landscape*” (page 62).

In the ES the landscape and visual impact assessment does not contain explicit analysis of the grain and scale of the receiving landscape. In particular there is no reference to the vertical scale of the turbines and their proportion in relation to the vertical scale of the receiving landscape. It is therefore not clear how the judgement that the scheme relates well to the local landscape character, is reached. This is important as planning policy indicates that development should be in keeping and in scale with its location, and sensitive to the character of the countryside and that there is a need to protect and enhance not only nationally designated areas but also the intrinsic character and beauty of the wider countryside.

3.4 Assessment of Landscape Sensitivity

The *significance* of landscape and visual effects depends primarily upon the *sensitivity* of the location or viewer, and the scale or *magnitude* of the effects that will occur. Significance is a function of the two, although it is not absolute and can only be finally defined in relation to each development and its

location⁶. To understand the sensitivity of a particular landscape, it is good practice to consider a range of criteria as set out in the table below. (this reflects the range of datasets highlighted under landscape character in NE guidance on wind energy⁷ and also best practice used elsewhere in the UK). In the ES sensitivity appears to have been assessed based on three broad headings namely landscape value, landscape quality and landscape capacity (Vol 2 ES, pg 66 and 67) and this is considered to be inadequate.

The table below highlights the inherent sensitivities of this landscape to the scale of development proposed. Text in the right hand column has, in the main, been taken from the Northamptonshire Landscape Character (quotes shown in italics) but also from local sources and site assessment/desk study.

Table 1: Criteria for Assessing Landscape Sensitivity to Wind Energy Development

Sensitivity Criterion	Explanation of Criterion	Specific sensitivities within 5km of the Spring Farm Ridge Wind Farm development proposal
Scale:	A large scale landscape, such as extensive rolling uplands or expansive plains, where the turbines may be in proportion with the landscape, is likely to be less sensitive to wind energy development than a small scale landscape where turbines may appear to dominate local landform and landcover elements. A large height differential between valley floors and summits may also help reduce sensitivity in upland landscapes by diminishing the perceived height of turbines.	<p><i>"The scale of the landscape varies...on some upland areas where undulations are gentle, the woodland sparse, wide panoramic views are possible giving the landscape an open, plateau like character"</i>.</p> <p><i>"In close proximity to numerous small villages...field patterns are more intricate and variations in colour, texture and land use pattern ensure that local character is more intimate than elsewhere."</i></p> <p>The vertical scale difference between the top of the interfluvium along which the B4525 runs (172m AOD) and the lowest point close to the Helmdon viaduct (126m AOD) is just 46 meters. The land to the north of the site similarly rises to just 163m AOD.</p>
Landform:	Landform that is smooth, convex and flowing, or flat and uniform, is likely to be less sensitive to wind energy development than dramatic or rugged landform. This is because the former types of landform tend to be less prominent and less distinctive in character. Convex landform may in addition provide partial screening for turbine structures.	<p><i>"soft, undulating landscape"</i></p> <p><i>"Gently flowing streams have eroded broad, gentle convex sloped valleys that are responsible for creating the landscape's undulating landform."</i></p> <p><i>"As the streams are of limited scale the subtle form of many of the undulations do not 'read' in the landscape as river valleys. This leads to the landscape appearing as a complex series of interlocking undulations"</i></p>
Landcover:	Simple, regular, uncluttered landscapes	<i>"Across much of the landscape there is....arable"</i>

⁶ This approach is in accordance with the Landscape Institute and Institute of Environmental Assessment, *Guidelines for Landscape and Visual Impact Assessment*, second edition, Spon, 2002, which is our principal point of reference.

⁷ Natural England, *Making Space for Renewable Energy: assessing on-shore wind energy development*, 2010.

<p>with extensive areas of consistent ground cover are likely to be less sensitive to wind energy development than areas with more complex, regular or intimate landscape patterns (for example ancient, irregular field systems). The latter areas tend to be more vulnerable to physical disturbance, which is likely to have greater effects on landscape fabric and landscape condition (for example affecting the integrity of landscape patterns). Intensive farming or commercial forestry may also reduce sensitivity.</p>	<p><i>and pasture farming.”</i></p> <p>Close to settlements <i>“field patterns are more intricate and variations in colour, texture and land use pattern ensure that local character is more intimate than elsewhere”.</i></p> <p><i>“Large to medium to large fields predominate ...particularly on more elevated areas, although this is not always the case...Small to small to medium sized fields are more common where rolling landform and steeper slopes are prevalent, and also in the vicinity of villages.”</i></p> <p><i>“sub regular field shapes are prevalent across the landscape”.</i></p>
<p>Built environment: Landscapes already affected by contemporary built structures such as masts, pylons, chimneys, major transport infrastructure (or by influences such as quarrying or landfill) may be less sensitive to wind energy development, provided care is taken to avoid visual conflicts where any existing structures are seen in close proximity to turbines. Conversely areas with a more established, traditional or historic built character, are likely to be more sensitive.</p>	<p><i>“numerous villages are located throughout this landscape”</i></p> <p><i>“The introduction of water towers has created prominent vertical elements across the landscape along with new infrastructure elements...lighting and signage.”</i></p>
<p>Skylines and settings: Landscapes with prominent, undeveloped skylines are likely to be more sensitive to wind energy development than landscapes with skylines that are less prominent or that have already been affected by built development. The presence of distinctive landscape features, such as hilltop monuments, church spires or designed landscapes, may also heighten sensitivity where turbines would be seen in the same view and/or would adversely affect the setting of the feature concerned.</p>	<p><i>“Prominent within many villages are church spires, providing local landmarks throughout the area and punctuating the horizon.”</i></p> <p><i>“To the north of Sulgrave is an oval-shaped mound know as Barrow Hill....Wide open views over the surrounding landscape are possible from this location and offer an opportunity to observe the landscape as a territory for which the monument was probably constructed to demarcate.”</i></p>
<p>Visibility and views: Landscapes that are visually contained by topography, buildings, trees or woodlands and hence have limited inward and outward views may be less sensitive than areas with extensive inward and outward views. Such features may give screening for the lower parts of turbines and for associated access and infrastructure. However trees and woodlands should be a long term feature if their screening effects are to be relied upon. Extensive close or middle range views from scenic routes, well-known vistas or tourist viewpoints may increase a landscape’s sensitivity to wind energy development, as may close proximity to settlement.</p>	<p><i>“wide panoramic views across elevated areas, though the undulating landform creates more contained and intimate views.”</i></p>
<p>Landscape quality (condition): Areas of countryside where the condition and integrity of landscape patterns, elements and features are relatively good may be more sensitive to wind energy development than areas where condition is relatively poor. In such areas the fabric and character of the landscape are likely to be more highly valued and also more vulnerable to physical damage as a result of wind energy development.</p>	<p><i>“Local variations in condition are apparent...frequently depend on the extent to which hedgerows are managed...a number of trees have also become stag headed.”</i></p>
<p>Scenic quality: Scenic quality, that is visual appeal</p>	<p><i>“a well maintained and managed landscape of</i></p>

<p>due to important views, visual interest and variety, contrasting landscape patterns, or dramatic topography, may increase landscape sensitivity to wind energy development. Land of high scenic quality occurs within designated landscapes (World Heritage Sites, National Parks, Areas of Outstanding Natural Beauty and Heritage Coasts) but also elsewhere. For example, the approaches to and settings of designated landscapes may be sensitive where they share or contribute to the scenic quality of those landscapes.</p>	<p><i>moderate scenic quality.”</i></p>
<p>Wildness and tranquillity: The presence of a relatively wild and/or tranquil character (due to remoteness, freedom from human activity and disturbance, and factors such as openness and perceived naturalness) tends to make the landscape more sensitive to wind farm development. The introduction of wind turbines may alter perceptions of wildness and tranquillity, introducing movement, sound and light effects and possibly bringing a more industrial character to the affected landscapes.</p>	<p><i>“The landscape is deeply rural and sparsely settled, with small villages and farmsteads”.</i></p> <p>Nevertheless within 2.5km of the proposed development there are three historic villages – Sulgrave, Helmdon and Greatworth.</p>
<p>Natural and cultural heritage features: The presence of natural and cultural heritage features such as interesting and valued habitats, wildlife, geological, archaeological, historical or built environment features that enhance the landscape experience may increase sensitivity to wind farms, particularly where these features may directly affected by construction works and/or access tracks; or where enjoyment of these features may be diminished.</p>	<p><i>“Industrial age sites are also an important landscape feature in places...numerous sections of disused railways criss-cross through this landscape.”</i></p> <p>The Helmdon viaduct is located approximately 800m from Turbine 5.</p> <p>To the north of the proposed development at approximately 450m are the manorial fishponds and associated earthworks of Stuchbury through with numerous public rights of way pass as well as a green lane (byway open to all traffic). These features add to the time depth perceived in this landscape and to sense of place.</p> <p><i>“Heritage features such as Barrow Hill also provide areas of interest.”</i></p> <p><i>“Sulgrave Manor also provides an important heritage feature within the landscape”.</i></p>
<p>Cultural associations: Specific cultural (ie historical, folklore, literary or artistic) associations relating to the landscape may result in increased sensitivity to wind energy development if the character or perceptions of the landscape concerned are likely to be significantly altered.</p>	<p>Helmdon Viaduct is iconic in the identity of Helmdon village and is regarded as a local landmark. Visible from within the village and particularly when traversing down Wappenham Road and at the war memorial. It is also the logo for the local school.</p>
<p>Amenity and recreation: Areas offering access to high quality landscapes, memorable places, and special experiences and to a range of opportunities for open-air recreation may be more sensitive to wind energy development due to potential effects on accessibility and/or on the quality of the recreational experience that will be obtained. Sensitivity may be raised by proximity to important recreational features such as National Trails and other long distance routes.</p>	<p>Many of the footpaths which cross the site link the local villages of Greatworth, Helmdon and Sulgrave and a number of them form historic routes. Many are used as circular walks and are promoted as ‘Health Walks’ under the national “Walking The Way to Health”, they are therefore used frequently and are highly valued locally.</p>

This table helps to articulate inherent sensitivities which are not clearly set out in the ES. Although I broadly agree with the overall conclusion of the landscape effects set out in the ES, I do not consider the sensitivity of the landscape and nature of change to have been clearly articulated. For example landscape effects on the Undulating Claylands landscape type are set out in section 7.7.6.3 of the ES and in relation to the viewpoints in table 7.5. The explanation for the medium sensitivity rating is limited and does not cover the sensitivity criteria noted in the table above. Similarly the magnitude of change or the nature of that change is not articulated or described in any detail (page 98). The ES concludes that the development is of a scale that justifies the associated impacts (page 317) however if the nature of the impacts is not fully articulated how can this judgement be made? This is important because it affects whether the environmental effects are judged to have been adequately addressed and whether the outstanding adverse effects outweigh the benefits of the scheme.

In our view landscape sensitivity is not adequately assessed and the nature of the impacts not clearly set out. Consequently, although significant effects are identified the conclusion that the scheme relates well to the surrounding landscape is questionable as is the balance of judgement as to whether the environmental impacts of the scheme are satisfactorily addressed.

3.5 Impacts on Cultural Heritage

A review of section 8 Heritage Assets and the associated appendix has been undertaken. The assessment concludes that there would be moderate impacts on eight designated heritage assets resulting in an effect that is moderate and significant overall. The assets affected are

- Greatworth Hall (Grade II Listed Building)
- Astwell Castle (Grade II* Listed Building)
- Listed buildings on the northern section of Helmdon (Grade II and II* Listed Buildings)
- Southern edge of the Sulgrave Conservation Area
- Castle Hill Ringwork, Sulgrave (SAM within Conservation Area and publicly accessible)
- Church of St James Sulgrave (Grade II* Listed Building)
- Sulgrave Bowl Barrow (SAM)
- Maston Hill Farmhouse (Grade II Listed Building).

Significantly the assessment makes no reference to the impacts on the Helmdon viaduct (undesigned heritage asset) which is located approximately 800m from Turbine 5. It states on pg 147 that *“There are no significant views from or across the site towards any heritage assets.”* Clearly this is not the case in relation to the viaduct and also arguably the earthwork remains at Stuchbury. The ES assess the impacts on the disused railway line as a whole and on the earthworks at Stuchbury as negligible and not significant. It states that *“there are no significant views from or across this site towards any heritage assets”*. Clearly this is not the case. It goes on to say that *“the setting of the 25 undesigned heritage assets within 1.5km of the*

site are not of significance in the appreciation or understanding of these assets. As a result whilst the construction of the proposed development will change the wider context of these assets, this would result in an effect that is negligible and not significant". We would question these conclusions. The proposed development would in our view impact on the setting and importantly the appreciation and understanding of the viaduct at Helmdon and earthworks at Stuchbury not least because of its scale and proximity.

In relation to designated heritage assets the ES states that:

"The site does not form part of the setting of any scheduled ancient monument or listed buildings, although views towards some of these heritage assets do include parts of the site or the skyline above the site. Similarly, the site does not form part of the setting of any Conservation Area, although some views out from the Western Conservation Area and the Sulgrave Conservation Area do include the skyline above the site."

What the ES does not explicitly state is whether the setting of any designated heritage asset is adversely affected by the proposed development, although it is implicit in the list of heritage assets acknowledged as significantly affected. This is considered in more detail below with specific reference to Castle Hill Ringwork, Sulgrave (SAM) and Sulgrave Conservation Area by way of example. There are of course other designated heritage features in relative close proximity to the proposed development where the impacts also appear to have been underestimated eg. Greatworth church and churchyard (Grade II* and Grade II) which lie within the village Conservation Area. Here the assessment considers the church and churchyard together with other listed buildings in the Conservation Area. This we believe has resulted in the underestimation of the effects on this heritage feature.

Castle Hill Ringwork, Sulgrave

The ES acknowledges that the Castle Hill Ringwork SAM is of high sensitivity and that the magnitude of effect on views from this heritage asset would be moderate resulting in a moderate to significant effect overall. In table 8.2 pg 151 of the ES it defines the setting of the monument as *"provided by the surrounding buildings in the village"*.

Castle Hill Ringwork, Sulgrave forms a local landmark feature within the village of Sulgrave and an area accessible to the public. From the top of the mound and open space to the south (known as Castle Green which formed part of the outer bailey and where local events are held e.g. Autumn Fair) there are views to the wider landscape to the south. These views are relevant to the monument's historical significance as a defence structure from which views would have been important. Although the nature of the outward views have altered over time due to development in the village and growth of tree vegetation, those which remain are of note and contribute to the perception, understanding and appreciation of this nationally valued heritage feature. In accordance with EH guidance on what constitutes a setting, the wider landscape and skyline which is visible from the monument are, in my view, part of the setting of this heritage asset. The development would have a

significant effect on these views as indicated in the ES although I disagree with the conclusion in the ES that the development will *“represent a change in the wider visual context but the turbines will simply be another feature within a landscape”* (Vol 2 ES, pg 125). The impacts relate to the breaking of the skyline by structures which are moving and would draw the eye, the turbines would appear on the skyline above trees and would appear considerably larger than the existing skyline vegetation, this in turn would give the impression that the turbines are located in the landscape surrounding the SAM and not in the landscape beyond and would affect perceptions of the distance over which there are views. There are no other similar vertical skyline features in the current landscape generally or in any of the views from this heritage asset. A large proportion of the south facing views from the monument would be affected. In my view the development would adversely affect the setting of the monument and therefore be contrary to planning policy.

Sulgrave Conservation Area

Sulgrave has a Conservation Area Appraisal although no reference of this is made in the ES. The appraisal states that:

“Immediately south of Castle Hill there is a small triangle of rough pasture...around the triangle of pasture there are views on the south side of the lane briefly to open countryside.”

“Sulgrave is a relatively compact village which has mercifully escaped the intrusion of large modern housing estates....the large open pasture areas beside the Manor and Church respectively provide an attractive contrast to the built environment around them.”

In table 8.2 the ES describes the setting of the Conservation Area as comprising *“surrounding buildings, fields, trees and hedgerows.”* It concedes that there would be views of the turbines from within the Conservation Area to the south east. The ES acknowledges that the Sulgrave Conservation Area is of high sensitivity (page 155) and that the magnitude of effect on views from southern edge would be moderate resulting in a moderate and significant affect overall.

Views of the development from within the Conservation Area would affect one of only two opportunities to appreciate the wider rural landscape context of the settlement as set out in the CA Appraisal. These views are afforded from publically accessible land within the Conservation Area and which provide a contrast to the build character of the rest of the area. The impact of the turbines in these views would affect the character of the Conservation Area in this locality and would therefore be contrary to planning policy.

Similarly from north of the village the land rises and from an old windmill and public right of way there are elevated views back across Sulgrave village to the proposed development site. In these views the church tower and the surrounding properties nestled around the church are clearly visible and make a notable contribution to local character and sense of place. In these views

the proposed development would be seen directly behind the village and church on the skyline and again would impact on the setting of the Conservation Area not to mention local landscape character.

4 Conclusions

The general thrust of planning policy and guidance in relation to the landscape impact of the development can be summed up as follows:

- The potential impact of the proposal on the character of the landscape is an important material consideration to be taken into account in determining the application according to both PPS7 para 14 and Local Plan policy G3 A and Policy EV1).
- Developments that harm the setting of a listed building or Conservation Area generally should not be permitted (EH Guidance, Local Plan Policy EV11 and G3 I and J).
- National planning policy (PPS 22) indicates that key tests in determining the application are whether the development is in keeping and in scale with its location, and sensitive to landscape character; whether it has been located where its landscape and visual impacts can be satisfactorily addressed. There is also a requirement that landscape and visual impacts should be objectively assessed and analysed.
- In determining whether or not the development has been sited appropriately, the South Northamptonshire District's supplementary planning guidance on wind energy development is a material consideration.

In relation to the landscape impacts of the development on the character of the receiving landscape and heritage assets, this study has found that there are weaknesses and omissions in the landscape and cultural heritage assessment. Principally a lack of clear analysis as to the inherent sensitivities of the receiving landscape and nature of effects that would occur as well as lack of analysis on the impacts on the setting of heritage assets means that judgements on the magnitude of change and hence the significance of the impacts that will occur are unreliable and in some cases we consider them to have been underestimated. Overall therefore the adverse effects of the proposed development set out in the ES are not clearly stated and or are unreliable.

This brief review has indicated that it is likely that the proposed development would run counter to national planning policy and local plan policy and that a clearer statement of impacts is required in order for them to be accurately weighed in the balance along with the benefits of the scheme. The local authority may therefore wish to go back to the developers to seek further clarification on matters raised in this report before making a decision.