

HSGWAG/AF/1.1

TOWN AND COUNTRY PLANNING ACT 1990, Section 78

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Spring Farm Ridge Wind Farm, Helmdon, South Northamptonshire

PROOF OF EVIDENCE

OF

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Landscape and Visual Effects and Cultural Heritage

On behalf of

Helmdon, Stuchbury and Greatworth
Windfarm Action Group

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Introduction

Qualifications and Experience

1. My name is Alison Farmer and I am the principal of Alison Farmer Associates. I hold a Bachelor of Arts Degree in archaeology from the University of Reading and a Masters in Landscape Design (with distinction) from the University of Manchester. I am a chartered landscape architect and a member of the Landscape Institute (MLI - Landscape Division).
2. I have worked in landscape architecture and environmental planning for more than twenty years. Prior to setting up my own practice in 2003, I was head of Protected Landscapes and Countryside at Landscape Design Associates and was instrumental in the development of Historic Landscape Characterisation (HLC) and its integration into landscape character assessment.
3. Since establishing Alison Farmer Associates I have continued to specialise in landscape character assessment, historic landscape and conservation, landscape and visual impact assessment, and protected landscapes. I advise many organisations on good practice in landscape character assessment and landscape and visual impact assessment and have provided landscape advice over the last 2 years to the South Downs National Park Authority on relevant planning applications. I have undertaken landscape character assessments at county, district and local level and prepared and reviewed landscape and visual impact assessments for a wide range of developments including wind farms. I have also prepared assessments on the sensitivity and capacity of landscapes to accommodate wind farm development in Northern Ireland and the South Pennines.
4. Embedded in my work is the recognition and understanding of the historic dimension of the landscape and its contribution to sense of place¹. Projects have included the integration of HLC into landscape character assessment, the development of conservation plans for heritage sites/landscapes to inform future change and appropriate development, and the preparation of conservation management plans. The nature of this work includes familiarity with key

¹ *Topic Paper 5: Understanding Historic Landscape Character*, Scottish Natural Heritage, Countryside Agency, Historic Scotland and English Heritage (para 1) and *Landscape Character Assessment Guidance for England and Scotland*, Scottish Natural Heritage and The Countryside Agency 2002 (paras 4.13 and 4.14).

- sources of data and guidance on cultural heritage assessment and landscape and visual impact assessment, the reading and interpretation of heritage in the landscape and its contribution to present day character, preparation of statements of significance and the assessment of impacts on the setting of cultural assets and significance.
5. Projects have included the preparation of Conservation Management Plans for Bosworth Battlefield, Leicestershire and the Castle Howard Estate, Yorkshire. The latter won an RTPI Heritage Award in 2009.
 6. I have prepared and given landscape evidence at various inquiries including the re-opened South Downs National Park Inquiry, Whinash Wind Farm Inquiry and Fullabrook Wind Farm Inquiry and most recently the extensions to the Lake District and Yorkshire Dales National Parks on behalf of Natural England. I have also undertaken reviews of consented wind farm schemes to understand real impacts against those predicted by professionals, as part of continued professional development. In undertaking these reviews I have looked particularly at the extent to which wind farms have a characterising influence on the receiving landscape and the extent to which setting and significance of heritage assets are affected.
 7. The evidence I have prepared and set out in this proof is given in accordance with the guidance of the Landscape Institute. I confirm that the opinions expressed are my true and professional opinions.

Background and Scope of the Evidence

8. The proposed development comprises 5 commercial wind turbines, each with a hub height of 80m and a height to blade tip of up to 125m (FEI para 5.2, page 38), orientated in an east-west line over a distance of approximately 1.2km. The development would sit on the southern side of a shallow valley (ES page 30) which forms one of a number of valleys that collectively comprise the upper reaches of the Tove Catchment. The upper rim of the valley forms the interfluvium between it and the next valley to the north in which the village of Sulgrave is located, to the southwest in which the village of Greatworth is located and southeast in which the village of Radstone is located.

9. In addition to 5 turbines, the development would also consist of a control building located between turbines 3 and 4. This building is likely to be 14.7m by 5.7m and 4m high (ES Figure 5.6). There would also be a considerable length (approximately 1.5km) of new access tracks which would be 5m wide (ES para 5.3.1 page 39). Whilst the main east west access tracks connecting the turbines would lie close to existing field boundaries the main track connecting to the B4525 would cut across an open field (FEI Figure 5.1). During construction a temporary works compound of around 0.5 ha would be required (ES para 5.3.3 page 39) and be located adjacent to the main access track south of turbine 3.
10. The permission sought for the proposed development is for 25 years at which time the site would be decommissioned. I have borne this characteristic of the development in mind when preparing this proof of evidence.
11. ***This proof of evidence will examine the impacts of the Spring Farm Ridge wind farm particularly on the landscape of the application site and its immediate setting, the wider surrounding landscape and cultural heritage assets within 4km² of the application site. This proof will also consider visual effects including effects on the amenity of the nearby residential properties, in particular Stuchbury Hall Farm, and public rights of way. Evidence is presented which shows that the development would bring considerable adverse change and unacceptable detriment to landscape character, cultural heritage assets and local amenity.***
12. The first section of my evidence considers the effects on landscape character looking specifically at the sensitivity of the receiving landscape, historic environment and its evolution over time, the predicted extent of effects and degree of fit. The second section considers the impacts of the scheme on specific heritage assets within 4km. It sets out considerations for defining heritage significance, determining importance, assessing effects on the setting of heritage assets, and the meaning of substantial harm. It includes a detailed review of impacts on designated and undesignated heritage assets where I consider many of the effects to have been under-estimated. The third section considers visual effects and effects on visual amenity, in particular on the

² Evidence in the ES and FEI indicates that the most significant effects of the proposed development will be felt within 4km. My own site assessment has confirmed this and I have therefore limited my evidence to this radius.

property of Stuchbury Hall Farm and public rights of way. Finally I summarise the reasons why, in my professional opinion, the development fails the relevant policy tests and should be refused.

13. I have made reference to inter alia the following documents:

- Spring Farm Ridge Renewable Energy Project: Environmental Statement 2010
- Spring Farm Ridge Renewable Energy Project: Further Environmental Information Feb 2012
- Guidelines for Landscape and Visual Impact Assessment 2013
- Landscape Character Assessment Guidance for England and Scotland 2002
- Northamptonshire Current Landscape Character Assessment
- Northamptonshire Historic Landscape Character Assessment
- Wind Energy and the Historic Environment, English Heritage
- PPS 5: Planning for the Historic Environment Practice Guide
- Conservation Principles: Policies and Guidance, English Heritage
- The Setting of Heritage Assets, English Heritage
- Proofs of evidence submitted to the previous inquiry
- Inspector Fieldhouse's Decision

14. I have also made reference to the series of photomontages prepared by the appellant and those prepared by HSGWAG including viewpoints provided at the last inquiry (Pack A and Pack B³) and supplementary viewpoints (SV1 to SV6). All of the HSGWAG photomontages are included in Appendix A to this proof.

15. I consider that the appellant's photomontages and those submitted by HSGWAG are acceptable and comply with current guidance and good practice.

16. In preparing this proof I have reviewed the previous landscape and visual impact assessment and cultural heritage assessment set out in the ES and FEI and have undertaken my own field assessment over four days. Where I have disagreed with an approach adopted or conclusions reached in the ES or FEI, I have set these out in my proof. At all times I have sought to avoid duplication, however where I have not mentioned something put forward by the appellant it should not be taken to mean I agree with it. I have discussed the case with the relevant witnesses for the local planning authority so as to limit overlap and repetition in evidence and to assist efficient conduct at the inquiry. I have been

³ Refer to Appendix A of this proof for full list

careful to ensure that the opinions expressed in this proof are my own - they remain consistent with the opinions I formed following my original site visit in September 2010.

17. I recognise that landscape character and heritage asset impact assessments are two different exercises and separate assessments as set out in the recently published GLVIA para 5.11 and guidance documents published by English Heritage. The GLVIA states that an understanding of landscape character and historic aspects of the landscape are related and can inform one another (paras 5.9 and 5.10). The recent 'Planning practice guidance for renewable and low carbon energy' recognises the relationship between historic landscape characterisation and landscape character assessment (para 43).
18. Landscape character can be influenced by cultural heritage, including the historic environment and individual heritage assets (GLVIA paras 5.9 and 5.10), and can increase the value of a landscape (GLVIA box 5.1 and para 5.30). Similarly the significance of the historic environment and heritage assets may be enhanced by the character of the landscape/townscape setting and context (EH, The Setting of Heritage Assets page 5). Aspects of landscape character which may contribute to significance include physical elements as well as perceptual and associational attributes pertaining to the heritage asset's surroundings (EH, The Setting of Heritage Assets page 7).
19. It follows therefore that where a change in character is predicted as a result of a proposed development, it may also inform the effect on the setting of a heritage asset and its significance. Effects on setting are predominately related to visual effects. Views of a particular development may adversely affect visitor appreciation of the heritage assets where views are an important contributor to the experience (GLVIA para 6.33). Thus characterising effects may adversely affect significance of an asset and may also have implications for public appreciation of significance. The two assessment processes of landscape impacts and cultural heritage impacts remain separate but the conclusions reached in one may inform the other (EH, The Setting of Heritage Assets page 28 last para).

Landscape Effects

20. In this section of my proof I look at four specific themes. Firstly the sensitivity of the receiving landscape within 4km of the proposed development, secondly the historic environment and its evolution over time, thirdly the extent of predicted significant effects and finally the degree of fit between the proposed development and receiving landscape. I focus on landscape effects where I disagree with the conclusions of previous assessments in the ES and FEI and where I believe effects have been under-estimated.

Sensitivity of the Receiving Landscape

21. Assessing sensitivity of the landscape is specific to the particular development proposed and to the location in question (GLVIA para 5.39). It is an important step in determining the significance of landscape effects.
22. In assessing the sensitivity of the receiving landscape I have had regard to the initial work I undertook in September 2010 where I referred to an accepted objective list of criteria used to assess landscape sensitivity and have made reference to independent assessment of the landscape such as the Northamptonshire Landscape Character Assessment. However, I have sought to avoid repetition and have not repeated a detailed table of sensitivity in this proof because similar tables have been prepared in the FEI and presented in evidence to the last inquiry, and I understand this material is likely to be submitted to this inquiry also.
23. In the ES, sensitivity was assessed based on three broad headings, namely landscape value, landscape quality and landscape capacity (Vol 2 ES, pg 66 and 67). This was then updated in the FEI in Appendix A, pages 10-44 where a much more detailed assessment of a range of landscape criteria was considered in relation to landscape sensitivity and value. It concluded that the sensitivity of the Undulating Claylands landscape type was medium overall (FEI, Appendix A, page 14).
24. A further and separate landscape character sensitivity assessment for the Undulating Claylands landscape was undertaken by LUC in April 2012 (K. Ahern Proof of evidence LPA/KA/1.5).

25. A comparison between the FEI assessment and the LUC assessment shows that the FEI did not sufficiently take into account the sensitivities of the landscape within 4km of the site where characterising influences are most likely to be felt. For example the qualities in terms of tranquillity and cultural heritage interest are not adequately described or taken into account and reference is made to features in the landscape that are in some cases approximately 14km away (such as the M1) and which have no bearing on the sensitivities of the more local landscape affected by the development.
26. Having reviewed these two assessments I concur with the conclusions reached in the LUC assessment that the sensitivity of the landscape surrounding the proposed wind farm development is medium to high and that the valley in which the appeal site sits tends towards high sensitivity by virtue of its valley side location and enclosed and small scale landscape patterns (K. Ahern Proof of evidence LPA/KA/1.5, page 18). Similarly I consider the small scale landscape patterns and valley character evident to the north of the site towards Sulgrave make this landscape more, rather than less, sensitive (see HSGWAG View 1, Appendix A). This contrasts with the simpler and flatter topography south of the development site towards Radstone which I consider to be less sensitive to the proposed development (see FEI Phontomontage 6).
27. Inspector Fieldhouse concluded that *"Due to its smaller scale and sense of enclosure the Helmdon Valley would be more vulnerable and have a higher sensitivity to change than the interfluves. The interfluves form a backdrop or setting to the valley with their intact settlements. The sensitivity to change of the interfluves would be medium although tempered by the width of the ridge and the proximity to settlements"*. I broadly agree with these conclusions and consider that they could equally apply to the Sulgrave valley to the north. Here the smaller scale and sense of enclosure is also evident and the interfluve plays an important role in defining the valley and provides a setting to Sulgrave village. This would also, in my view, increase the sensitivity of this landscape.
28. This analysis leads me to conclude that parts of the Undulating Claylands landscape within the vicinity of the site have a medium-high sensitivity to wind farm development of the scale proposed. Although this landscape is not formally recognised by national landscape designation, it contains features which are highly valued and which make an important contribution to landscape

character and sense of place which people enjoy (as acknowledged by the appellant at the last inquiry). The landscape valleys have a small to medium scale field pattern, enclosure, tranquillity, undisturbed character and historic features evocative of the medieval period. The valleys are defined by the interfluves which divide them and the skylines form an important part of the setting to historic settlements. The Cultural Heritage assessment in the ES states that "developments in the twentieth century are relatively limited" (page 124). I would agree with this, and consider that more recent features and land uses such as the water tower (2km south of the site) and Tanks-a-lot activity at Spring Farm (adjacent to the proposed wind farm development) have a minimal adverse effect on landscape character and do not in my view reduce the sensitivity of the landscape. For example, the movement of vehicles (tanks and military vehicles) at Tanks-a-lot is restricted to a single field and this activity is relatively infrequent.

Historic Environment and Evolution

29. The wider historic environment comprises all aspects of the environment resulting from the interaction between people and places through time, including designated and undesignated assets, all of which can be expressed in present day landscape character.

30. Within 4km from the proposed development there is a wealth of cultural heritage features which significantly contributes to the special qualities and character of the landscape. This is reflected in the integrated Northamptonshire Landscape Character Assessment which takes account of Historic Landscape Characterisation work (pages 72-9). The landscape is described as containing valued assets and distinctive patterns and features and for these reasons I do not consider the landscape to be simply 'ordinary'.

31. I accept that the landscape within 4km of the proposed development is made-up of elements and features from different periods of history and continues to evolve. However the changes that have occurred to date have retained the rural, tranquil, settled and small scale characteristics of this landscape which give rise to the area's sense of place. Although the area does contain occasional large scale structures, such as the Helmdon Viaduct, this is a static feature with a strong horizontal emphasis that nestles into the landscape and is not comparable to the vertical scale and character of turbines. The viaduct has

over time become a valued historic feature and, although people may get used to the proposed turbines over their life span of 25 years, the turbines will never, in my professional opinion, achieve the same historic value as the viaduct.

32. The proposed wind farm would not extend the legacy of human intervention in this landscape or illustrate continuity but rather would break with the area's historic evolution through the introduction of new elements of a wholly different order.

Extent of Landscape Effects

33. This section of my proof considers the creation of a wind farm landscape and local landscape with windfarm sub-type. The theory behind the creation of wind farm and sub-type landscapes is set out in the FEI and I am happy to adopt this general approach as an aid to understanding the extent of landscape impacts. The application of this theory to the proposed development and site in the FEI concluded that a wind farm landscape would be theoretically created up to 800m from the turbines while a wind farm sub-type would be theoretically possible up to 2.5km from the site⁴. Figures 6 and 7 of the FEI show the extent of wind farm and sub type landscapes extending uniformly out from the proposed development. Having undertaken my own assessment of the landscape I do not believe that this would be the reality on the ground. The simple concentric rings which spread out from the development do not reflect the local topography, both of the valley in which the development would sit, but also more widely, given the variation in elevation of the interfluves. This is explained further below. In undertaking my own assessment I recognise the importance of not conflating landscape and visual impacts and have sought to ensure that only when visual effects can be demonstrated to affect character that they are taken into account.
34. The nature of the receiving landscape is such that there are a series of shallow valleys and intervening interfluves or ridges. In my view this topography, aspect or orientation of views, in association with distance from the turbines, collectively have an influence on the extent to which a wind farm landscape and landscape with wind farm sub-type is created. This is noted in the recent Ministerial Guidance on wind turbines in paragraph 15 which states that local

⁴ Note that this differs from the conclusions reached in the ES where landscape characterising effects were considered to extent out to 3-4km (7.7.6.3).

topography is an important factor in assessing whether wind turbines could have a damaging effect on landscape. It is, in my view, obviously the case that drawing simple concentric rings in two dimensions on a plan out from the development would not reflect the three dimensional character of the real world landscape, especially a landscape like that around this appeal site.

35. Within the valley of the wind farm application site (Helmdon Valley) I agree that a wind farm landscape will be created but consider that it extends beyond 800m to the north and as far as the interfluvium along which the Helmdon Road and public right of way runs. This is due to the nature of the topography in which the wind farm site will sit. The valley landscape and the interfluviums collectively form the perceived valley unit. The turbines would occupy this valley unit as dominant elements. From the northern valley sides there would be clear views across the valley to the turbines which, by virtue of their height and movement, would appear considerably larger and at odds with other landscape elements that define the valley. The extent of the turbines would be great and when moving around and experiencing the valley landscape I consider that perceptions of the landscape would alter and that the wind farm would be the defining landscape characteristic determining how this part of the valley would be perceived and described. The turbines would be an additive element of significant scale and although arguably the landscape between them could still be seen and read, the presence of the turbines would result in the following changes:
- reduced tranquillity due to the introduction of movement and noise into an otherwise predominately static environment
 - perceived flattening of valley topography due to contrasting scale of turbine height with depth of valley
 - diminished presence of subtle landscape features/patterns which contribute to sense of place as a result of visual dominance of turbines
 - reduction in the relaxing and restorative qualities of this landscape, creating an environment which is considerably less comfortable and, in places, unsettling.
36. Inspector Fieldhouse concluded that the presence of the turbines within the valley would be dominating, that the peaceful tranquillity of the valley would be changed and that rotating blades would contrast harmfully with the modest

scale of parts of the landscape, its patterns, undulations and textures. The turbines would be a palpable feature (Inspector's Decision para 31).

37. Beyond the Helmdon valley, the wind farm landscape would extend a short distance to the south towards Greatworth due to the scale of the turbines and proximity of Turbine 1 to the top of the ridge.
38. FEI Viewpoints 1 and 2 from Grange Farm and Helmdon Road in Greatworth indicate the scale of the turbines within the context of the existing landscape further to the east and also to the south of the site. The wind farm landscape is unlikely to stop at precisely 800m and in my view would extend as far as these viewpoints, 842m and 953m from the nearest turbine respectively, and possibly a little beyond.
39. I agree broadly with the FEI (page 39) that, with distance, the characterising effect of the wind farm will reduce to a local landscape with wind farm sub-type. However I believe that the topography and aspect/orientation of landscape will also influence the extent to which the sub-type landscape will extend, for essentially the same reasons as I have given above. Figure 8 of the FEI indicates that in theory the wind farm sub type will extend into the valleys containing the settlements of Helmdon, Sulgrave and Greatworth. Having considered the landscape in detail I would broadly agree that this is the case for land to the east, west and south of the development. However, I am of the view that the wind farm sub-type landscape will extend over a greater distance to the north as a result of the character and topography of the Sulgrave Valley. Here the northern valley sides rise to 181m AOD and therefore above that of the interfluvium south of the development site (see topography drawing in Appendix B of this proof). The result is that from the northern valley sides north of Sulgrave, given the elevation and orientation, the proposed development would appear prominently on the skyline within this landscape. The extent to which the turbines would be seen backlit would also affect their visual prominence. There would not, in my judgement, be a sense of separation between the Sulgrave Valley landscape and the development due to the scale of the proposed development, and its physical extent and prominence. In the Sulgrave area the southern skyline which defines the valley is uninterrupted by vertical features and either open or treed; it defines the valley and acts as a setting to Sulgrave village. The pattern of vegetation, composition of small field enclosures and

settlement within the valley, along with no overt vertical features breaking the skyline, define local character. From the northern valley sides the turbines would be prominent, seen in the context of the village and from some locations within the same view as the church tower, altering the skyline and perceptions of scale, distance, rural remoteness and tranquillity. Inspector Fieldhouse concluded that in views from the north of Sulgrave (approximately 2.8km and 3.2km and elevations of 161m and 160m AOD respectively) the turbines would appear as 'dominating the skyline' and 'striking elements on the skyline' (para 27). I agree with these two descriptions.

40. This circumstance is not repeated to the same extent to the south of the development site because land does not reach the same elevation, and is dropping away from the site, and the topography is not as varied. This is illustrated in the photomontage from Radstone FEI viewpoint 6 where the nearest turbine is approximately 2.8km away and the elevation is 145m AOD. Across this area the landscape appears relatively flat and simple in composition with few built scale comparators. Although the turbines would be noticeable on the skyline, they would appear to sit more comfortably in this landscape and the landscape effects would be less significant.
41. The FEI states that *"it is possible to be in a position whereby.....a wind farm may be a visible but not a determinative or even substantive element within the pattern of elements that gives rise to the character of the area...."* (page71). Whilst this may be true (as seen in FEI viewpoints 8 and 9) it is also equally true that a landmark feature may not be visible from all areas of a landscape but can nonetheless, by virtue of its scale and contrasting character, stand out and be recalled in the memory (even when not visible) sufficiently to alter perceptions of a place and to be a defining element in terms of local character. In other words, a landscape element does not need to be constantly visible within a landscape to have a characterising effect. A landscape element can pass into and out of views, or not fill the complete view in the round, and yet still have an effect on perceptions of the landscape and sense of place, particularly if the development is of a significant scale or occurs in a visually prominent location. The landscape will feel different because of what people have seen and know to be in it, even if they cannot see it at that moment.

42. On this basis I do not believe that 2.5km, or any lesser distance, is the extent of the theoretical possible local landscape with wind farm sub type and that beyond this the turbines would be only apparent and their characterising effects subordinate to the original baseline landscape. Distance cannot be the only factor which affects the extent to which turbines have a characterising effect. Topography, elevation and perceptions must all play a part too. To the north of Sulgrave the turbines would continue to have an influence on landscape character due to the elevation/orientation of the landscape, the scale and prominence of the turbines on the skyline and the rural character of the area. The landscape would be perceived as less rural, less timeless; perceptions of scale and distance would be altered, and the prominence of Sulgrave church as a landmark would be undermined.

Degree of Fit

43. I conclude, therefore, that the landscape does not have the capacity to accept the proposed development without adverse effect on character. I do not agree with the conclusion in the EIA and FEI that the *"proposal will relate well to local landscape character and respect the scale and composition of the landscape"*.
44. The impact on landscape character of the valley in which the turbines would sit would be major adverse and substantial. Here the turbines would appear conspicuously out of scale and would become a dominant feature as confirmed by the appellant's acceptance of the creation of a wind farm landscape. The large scale of the turbines relative to other landscape features including trees and historic buildings and features, field enclosure patterns and the vertical scale of the valley, would be of a wholly different order and at odds with the current composition and qualities of the valley. The moving presence of the turbines, their scale, noise and shadows, all of which would be experienced in the valley, would undermine the current rural character and tranquillity of the area.
45. More widely a local landscape with wind farm sub-type would be created, which would extend further to the north into the Sulgrave Valley. Here the presence of the turbines would be prominent on the skyline and would undermine the current rural character and perceptions of scale and distance. I consider that the impacts on the historic environment would also be significant because many of the features which contribute to local character are visually subtle and the

addition of large scale features would diminish their perceived contribution to local sense of place.

Cultural Heritage Assets

Introduction

46. This section of my proof considers particular cultural heritage assets within 4km of the proposed development. I consider how the significance of heritage assets may be determined, then the relative importance of heritage assets, the setting of heritage assets and meaning of substantial harm. I then detail my assessment of the impacts of the proposed development on particular designated and undesignated heritage assets. I have covered undesignated heritage assets at some length in part because these are not covered by the Local Planning Authority. Reference to designated heritage assets is less detailed, to avoid unnecessary duplication with the Local Planning Authority's evidence.
47. I have referred to a number of published documents which assist with the assessment of harm to heritage assets including the PPS5 Practice Guide, "The Setting of Heritage Assets", "Conservation Principles: policies and guidance for the sustainable management of the historic environment", and "Wind Energy and the Historic Environment". Each contains useful information for defining the significance of a heritage asset, determining effects on the setting of an asset and determining the overall harm caused. I have also paid special attention to the provisions of the National Planning Policy Framework (NPPF) and borne in mind the statutory duty in s66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving the setting of listed buildings.

Significance of Heritage Assets

48. Determining the significance of a heritage asset and the contribution made by its setting enables effective management so as to sustain its overall value to society (EH PPS5 Practice Guide, page 9). It is therefore an important step in assessing impacts of a proposed development.
49. The NPPF defines significance in Annex 2. Essentially it is the value of a heritage asset, arising from its interest, which may encompass everything that contributes to that interest and the perception of it including archaeological,

architectural, artistic or historic interest. It may include the asset's setting as that influences how the asset is perceived. The recent 'Planning practice guidance for renewable and low carbon energy' shows that the Government regards setting and views as relevant to significance (paras 15 and 34). Although the terms used to define heritage value or significance in Conservation Principles is differently worded (it includes aesthetic, communal, historic and evidential value) these factors are broadly similar to those set out in the NPPF (refer to Appendix C of this proof). In reality there is little difference between them. The values in Conservation Principles are no more impressionistic and do not, in my view, embrace more intangible aesthetic and communal values than those set out in the NPPF. In any event the PPS 5 Practice Guide states that values listed in Conservation Principles are just another way of analysing significance (Page 9, Para 19). Although the NPPF takes precedence for present purposes over Conservation Principles, there is in practice little difference in what must be considered.

50. PPS 5 Practice Guide highlights the essential role of the historic environment in providing character and sense of identity to an area. It states *"Heritage assets play a key role in defining place and in building local pride. They can have a totemic value to a community, provide local focal points and can offer spaces for recreation or for people to meet"* (page 14, para 36). These different roles are relevant to determining the significance of a heritage asset.

Relative Importance of Heritage Assets

51. Heritage assets can be designated or undesignated. Although usually designated assets are regarded to be of highest importance, undesignated sites can also be important (Conservation Principles para 152 and NPPF paras 135 and 139). This is in a sense obvious as undesignated sites can become designated sites and their intrinsic value and interest would be the same before and after designation. More important undesignated assets can be just as valuable as less important designated assets. The issue of judging importance cannot be approached based simply on the level of current designation of a heritage asset.

52. PPS 5 Practice Guide explains that understanding the level of importance of a heritage asset provides the essential guide to how protective polices should be applied (page 20, para 57).
53. The NPPF (Annex 2 page 51) includes Conservation Areas as designated heritage assets. However, it does not list Conservation Areas in paragraph 132 of the NPPF as having a particular test applied to them where there is substantial harm. Nevertheless the English Heritage publication *Understanding Place: Conservation Area Designation, Appraisal and Management* states that *"Whilst the local authority is responsible for designation (using local and regional criteria rather than any national standard), historic areas are an important resource for all of us and future generations and many conservation areas have a national as well as a local interest. For this reason the protection offered through designation is set through legislation and national policy"* (para 1.2) [emphasis added]. It should not therefore be assumed that conservation areas are only ever of regional importance or moderate sensitivity. I shall return to this in paragraphs 79 and 80 below.

Setting of Heritage Assets

54. This section of my proof of evidence sets out a number of considerations when determining the effects of a development on the setting of a heritage asset and on its significance which are particularly relevant in this case. I believe these considerations have not been adequately taken into account in the ES or FEI.
55. The contribution landscape setting makes to the significance of a heritage asset is not diminished as a result of the heritage asset having limited above ground visibility such as earthworks or battlefields. In these instances the setting of the asset can be all the more important in providing a narrative for the site and in reinforcing significance and enhancing appreciation (EH *The Setting of Heritage Assets*, page 8 and *Wind Turbines in the Countryside SPG Dec 2010*, para 11.27 5th bullet).
56. Heritage assets that are in close proximity to but not visible from each other may have an historic or aesthetic connection that amplifies the experience of the significance of each. They would normally be considered to be within one another's setting (EH PPS5 Practice Guide page 34, para 114). This is true for

the collection of heritage assets found at Sulgrave (where the ringwork, church, listed buildings, registered park and garden and Conservation Area have overlapping settings), Greatworth (where the listed buildings and Conservation Area have shared settings) and Helmdon/Stuchbury (where the Helmdon Viaduct, Stuchbury Earthworks and listed buildings at Priory Farm have overlapping settings).

57. The NPPF states that significance of a heritage asset can be harmed through development within its setting (paras 129 and 132). This is reinforced by the recent 'Planning practice guidance for renewable and low carbon energy' (paras 15 and 34). It says "great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting" (para 27).
58. A development may be some distance from a heritage asset but, as a result of its scale and prominence (e.g. a tall building), may visually intrude upon the setting and consequently affect significance (Setting of Heritage Assets Page 4, section 2.2).
59. PPS 5 Practice Guide (page 34, para 117) and The Setting of Heritage Assets (page 8) confirm that the contribution setting makes to the significance of a heritage asset does not depend on public rights or ability to access the setting.

Substantial Harm

60. An important aspect of considering harm to heritage assets in terms of the NPPF is whether the harm is substantial or less than substantial. I have therefore discussed these terms below as they are not defined in the NPPF.
61. Harm is defined in Conservation Principles as "Change for the worse", here primarily referring to the effect of inappropriate interventions on the heritage values of a place (page 71).
62. The recent 'Planning practice guidance for renewable and low carbon energy' states in paragraph 34 that substantial harm may be caused by a proposed wind farm development in the setting of a heritage asset as a result of its scale, design and prominence. It is clear from this and the NPPF that substantial

harm can arise from effects on the perception or enjoyment of a heritage asset, without the need for something akin to or approaching physical damage to the asset.

63. The NPPF states that the significance of a heritage asset can be harmed through development within its setting. It defines the setting of a heritage asset as the surroundings in which it [the asset] is experienced. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral (NPPF annex 2 page 56). Therefore, when assessing harm to the significance of a heritage asset, consideration should be given to change for the worse which affects significance either directly or through the way in which the asset is experienced. The test is not whether the proposed development 'prevents' understanding of the heritage asset. That is far too high a threshold. Nor is the test simply whether the development 'visually competes' with a heritage asset or whether it 'sufficiently contrasts' with the heritage asset - this does not explain fully the way in which significance may be affected. Similarly a development does not need to 'surround' a heritage asset physically to result in substantial harm to its significance.
64. The word "substantial" is an ordinary English word and, absent of any technical definition in the NPPF, should be given its ordinary meaning. The Shorter OED defines "substantial" as including the words: of considerable amount or fairly large. One practical way of considering whether harm is substantial or not is to take into account how the impact on a heritage asset is characterised in EIA terms. It could be said that a minor or moderate impact is less than substantial but that a major or severe impact is substantial. I do not think that this approach can be applied directly, in place of the ordinary meaning of the words, but it can be a helpful and objective indicator of the scale of adverse impact on a heritage asset. Substantial impacts are likely to be those where significance is eroded to a clearly discernible extent as a result of intrusive development or the addition of negative elements such that integrity is compromised and/or appreciation/understanding is diminished.
65. Paragraph 132 of the NPPF states that great weight should be given to an asset's conservation and that the more important the asset the greater the weight should be. In addition that harm should require clear and reasoned

justification and that less than substantial harm should be weighed against the public benefits of the scheme. Significant harm to important heritage assets should therefore carry weight in the balancing exercise. I return to this in paragraph 147 below.

66. Whilst it is acknowledged that NPPF paragraph 132 states that substantial harm should be exceptional or very exceptional in relation to specific designated heritage assets, the concept of substantial harm must also mean something in relation to designated heritage assets which are not listed in paragraph 132, namely, conservation areas. By definition conservation areas are broader than individual heritage assets and often contain a number of assets of the highest importance. In my view this is more likely to be an oversight than a conscious decision by DCLG that substantial harm to a conservation area can be permitted without any test from paragraph 132 of the NPPF applying to it.

Assessment of Effects on Cultural Heritage

67. This section of my proof addresses the indirect effects of the proposed development on heritage assets. It utilises the FEI viewpoint wireframes and photomontages as well as the HSGWAG photomontages (see Appendix A) to assist in the evaluation of the magnitude of change likely to occur at different locations and across different landscapes.
68. I have made reference to the factors which should be borne in mind when assessing the acceptability of developments within the setting of historic sites as set out in *Wind Energy and the Historic Environment* namely visual dominance, scale, intervisibility, vistas and sight-lines, movement, sound and light effects and unaltered settings (page 8). I have also made reference to the check-list of potential attributes of a development affecting setting that may help to elucidate its implications for the significance of a heritage asset as set out in *The Setting of Heritage Assets* (page 21).
69. Having reviewed the ES and FEI, and having had regard to the evidence from the first inquiry, I am of the view that in many cases the significance of heritage assets has not been fully understood and impacts have been under-estimated.

70. The ES and FEI conclude that there would be moderate impacts on eight designated heritage assets resulting in an effect that is moderate and significant overall, and that for other assets the effects would be less. However the analysis predates the five step approach set out in English Heritage guidance on The Setting of Heritage Assets, and is minimal (section 8.6.3.4, pages 150-152).
71. The heritage assets where I believe there is a difference of professional opinion are:
- Sulgrave Conservation Area
 - Railway Viaduct Helmdon
 - Stuchbury Earthworks
 - Church of St Peter Greatworth
72. These are discussed in the text below and for completeness I have also included a description of impacts on Priory Farm and barn listed buildings (Helmdon), Greatworth Hall, Greatworth Conservation Area and Astwell Castle.
73. I conclude that the adverse effects of the proposed development on the heritage assets noted above (with the exception of Greatworth Conservation Area) is significant and unacceptable, and collectively should carry great weight.
74. I also conclude that the effects on Sulgrave Conservation Area and Stuchbury Earthworks would result in substantial harm and be unacceptable.

Sulgrave Heritage Assets

75. The Sulgrave designated heritage assets as a group include Castle Hill Ringwork scheduled monument, Sulgrave Church (Grade II* listed), Sulgrave Manor (Grade I listed and Grade II Park and Garden), numerous listed buildings within the village and Sulgrave Conservation Area.
76. I agree with the ES that the impacts on Castle Hill Ringwork and Sulgrave Church would be moderate adverse (page 151) and impacts on Sulgrave Manor would be sufficiently small to be negligible (page 152). In each case the harm would not be substantial. These conclusions were also reached by the Inspector at the last inquiry (paras 40-43). I have therefore not considered the

impacts on the Ringwork or Church in any further detail in this proof as my conclusions are common ground with the appellant (although my analysis varies).

77. However, I disagree with the assessment of impacts on Sulgrave Conservation Area for the reasons set out below.

Sulgrave Conservation Area

78. I agree with the ES that Sulgrave Conservation Area is a designated heritage asset (ES section 8.5.4, page 146), however I do not agree that it is of medium sensitivity (ES section 8.6.1 page 147). Indeed the ES contradicts this classification in its conclusions on page 55. The last paragraph states that Sulgrave Conservation Area is one of the eight highly sensitive heritage assets affected by the proposed development. This anomaly was not clarified in the FEI.
79. There are 96 villages within South Northamptonshire of which 51 have historic areas designated as conservation areas⁵. The first conservation areas were designated in the District in October 1968 (Aynho and Evenley) and then two further villages were designated in October 1969 (Middleton Cheney and Sulgrave). Sulgrave Conservation Area was therefore one of the first to be designated. It contains an exceptional collection of heritage assets which contribute to its significance and character. Almost the whole of the village is contained within the Conservation Area boundary, indicating its intact historic character. Where there is modern infill it has a limited influence on the character of the Conservation Area as a whole (Conservation Area Appraisal section 6.5).
80. It is recognised that the criteria used to identify and define Conservation Areas are set by local authorities, however, in my view it is not reasonable to assume that all Conservation Areas are therefore only of regional or lesser value to the nation, or indeed only medium sensitivity. PPS5 Practice Guide paragraph 86 highlights this fact, stating *"Not all designated assets are of equal significance or sensitivity to change. Some Grade II listed buildings and conservation areas will be particularly important or sensitive to change"* (page 28). It is not unusual

⁵ See Appendix D of this proof - Preserving what is Special' The Conservation Strategy for South Northamptonshire 2011-2015. Adopted September 2011, pages 5-7).

for established methods and approaches to assessing impacts of development on cultural heritage, to identify in particular those conservation areas which are outstanding as a result of the collection of assets they contain and their special character and to regard them as having greater sensitivity. I consider the Sulgrave Conservation Area to have a high sensitivity for similar reasons. Not all conservation areas should be considered to be of the same importance or sensitivity. Regard must be had to their particular attributes and characteristics.

81. A Conservation Area Appraisal has been prepared for Sulgrave and recently updated and adopted in June 2013. The PPS 5 Practice Guide regards Conservation Area Appraisals as assessments of significance (page 8, para 18). The appraisal for Sulgrave states that:

"The settlement lies north of the headwaters of the River Tove on a sloping ridge with land falling away on either side." (summary)

"Views within the conservation area are an interesting mix of wide sweeping views of the countryside, with the contrasting focused views found along the main roads." (summary)

"Sulgrave is...in undulating sparsely populated countryside." (section 2.1, 1st para)

"The streams have eroded broad, gentle, convex slopes resulting in the area's distinctive undulating landform." (section 2.2, 3rd para)

"The area around Sulgrave comprises fieldscapes which are predominately of fragmented parliamentary enclosure origin." (section 2.2, 4th para)

"The area in which Sulgrave falls is especially noted for the presence of a number of castles and mottes which survive....Their frequency may be connected with the fact that many of the areas are located on dominant defensive positions." (section 2.2, 5th para)

"land cover...is typically a combination of arable and pasture farming. The land is characterised by soft undulating hills, with fields defined by hedgerows and trees, ... well preserved ridge and furrow patterns ... network of country lanes." (section 2.2, 6th para)

"Sulgrave is a compact and attractive village in the form of a loose figure of eight." (Section 3.1, 1st para)

"Overall the village has not changed substantially from this date [1843-1893]." (section 3.6)

"Views of the countryside from within the conservation area are key to understanding the development of Sulgrave and maintain the rural links which are the foundations of the village." (section 4.6, 4th para)

"Views of the conservation area from outside the village are also important in understanding the context and development of Sulgrave. The surrounding landscape provides an important rural setting and makes a contribution to the special character of the area." (section 4.6, 6th para)

82. The key views which contribute to the Conservation Area's special character are illustrated in figures 40 and 41. Of the views identified as important, four would be affected by the proposed wind farm development (see photomontages View 1 and View 2 - Appendix A, Packs A and B, which are from similar locations to two of the noted viewpoints).
83. The ES describes the setting of the Conservation Area as comprising *"surrounding buildings, fields, trees and hedgerows"* and concedes that there would be views of the turbines from within the Conservation Area to the south east (ES table 8.2, page 151). The ES acknowledges that the Sulgrave Conservation Area is of high sensitivity (page 155) and that the magnitude of effect on views from the southern edge would be moderate.
84. The importance of the rural setting to the Conservation Area in contributing to the historical significance of the village and its origins as well as the designation's special character is highlighted in the Conservation Area Appraisal. The setting makes a positive contribution to the significance of the Conservation Area in that it:
- complements the siting and appearance of the village
 - enables it to be appreciated in a rural landscape containing little or no urban or industrial development
 - enables the church to be the local landmark, contributing to sense of place and reinforcing its historic value
 - enables an understanding of the evolution and compact layout of the settlement.
85. Views of the development from within the conservation area would affect opportunities to appreciate the wider rural landscape context of the settlement as set out in the Conservation Area Appraisal. These views are afforded from publically accessible land (such as the Castle Hill Ringwork and Castle Green) as well as from the main street within the village (see HSGWAG photomontages View 3 and Supplementary View1, Appendix A). The impact of the turbines in these views would:

- undermine the significance of the ringwork - the turbines would appear prominently on the horizon, would diminish perceptions of the ringwork's historic function as a defence structure with commanding views and affect its wider rural setting.
- affect the rural context of the village as perceived from the valued open space of castle green - as a registered village green within the Conservation Area this land is valued for its views to the wider rural landscape. The turbines would alter perceptions of the rural context of the village and would appear large in relation to humble dwellings along Park Lane/Church Street.
- affect the domestic character and visual unity of the Conservation Area along the Helmdon Road. As above the visible turbine would appear large in scale compared to other buildings within the Conservation Area. It would introduce a new characterising element and would compromise the integrity of the village. The southern fringes of the Conservation Area would also be similarly affected.

86. In terms of effects on setting, the proposed development would affect the setting of the Conservation Area when viewed from the rising land to the north. In these views, from footpath AY2 and bridleway AY1, the proposed development would be seen directly behind the village and the church on the skyline and would be particularly noticeable.

87. I have explained in paragraph 39 of this proof that I consider the characterising effects of the proposed wind farm development to extend into the Sulgrave valley landscape and to extend north of the village onto south facing slopes which are of a higher elevation than the intervening ridge between the village and the proposed development. As such I consider this valley landscape and the land north of the Conservation Area, which affords views of the Conservation Area within its rural landscape setting, to become a local landscape with wind farm sub-type.

88. All five turbines would appear prominently on the skyline towards the broadest extent of the wind farm thereby affecting a greater proportion of the skyline than, say, from Astwell Castle to the east where views of the wind farm are more 'end on' and from a slightly lower elevation (see paragraphs 128 to 132 below and

HSGWAG View1 and View 2, Appendix A). From north of Sulgrave views of the turbines would often be backlit which would increase their visual prominence.

89. This is confirmed by the comments made by Inspector Fieldhouse when she stated in relation to views of the turbines from this landscape as: *"dominating the skyline"...."a key feature at odds with the scale of the settlement and the prominence of the church tower"* (para 27). Clearly the physical separation between the settlement and the development site does not prevent the wind turbines from visually intruding into the setting of the Conservation Area or indeed Sulgrave Church.
90. Inspector Fieldhouse went on to state that *"from other parts of the PRow, the juxtaposition of the turbines and the church tower would change and although striking elements on the skyline, the proposal would be sufficiently divorced from the settlement as not to conflict with the 'beacon' of the church tower."* I respectfully disagree. This ignores the important factors such as historical and artistic value attaching to the view. Where seen in the context of the church the turbines would act as a significant distraction, such that they would supplant the church tower as the new dominant landmarks of the area. Where seen in the context of the settlement the turbines would undermine the rural setting of the village.
91. The characterising effect of the proposed turbines would not enhance the special character of the setting of the Conservation Area but would in my view undermine it and thereby diminish significance. The development would discernibly change the surroundings of the village such that its baseline setting would be altered. Moreover the proposed development would visually intrude into the heart of the Conservation Area and would be intermittently visible from some of the key heritage assets, open spaces and main routes considered to create and positively reinforce character in the village. This in my view undermines the intact character and rural context of the settlement. Such an effect on this sensitive designated heritage asset would, in my view, be considerable and unacceptable. Although finely balanced I consider the harm would be substantial.
92. I appreciate that to a lay person the conclusion I reach in relation to substantial harm on the Conservation Area may appear inconsistent with the conclusion

that, the individual assets that make up the Conservation Area, experience less than substantial harm. In each instance the significance of each heritage asset is different and the contribution setting makes to significance also varies. The Sulgrave Conservation Area is of greater physical extent and the contribution setting makes to its significance is clearly articulated in the Conservation Area Appraisal. In addition the nature of the effects vary between assets as a result of their position in relation to the development, outlook, focus, and so on, and in the case of the Conservation Area the development would affect a range of views valued for a variety of reasons.

Collective Harm to Sulgrave Assets

93. When taken collectively, the adverse effects on the conservation area, scheduled monument, listed church, and registered park and garden (all of which have overlapping settings), the effects of the proposed development would, in my view, result in considerable and unacceptable harm which should count very heavily against the scheme (NPPF para 134).
94. The proposed development would be contrary to the NPPF in that the conflict between the proposed development and conservation of heritage assets would not be minimised (para 129) and because of the substantial harm to Sulgrave Conservation Area, which should be exceptional (para 132). Moreover the development would be contrary to Local Plan Policy EV11 because it would have an adverse effect on the setting of the Conservation Area and on views out of the area (CD 1.1, pages 33 and 34). It would also be contrary to Policy EV12 because it would not preserve or enhance the setting of listed buildings and also be inconsistent with the statutory duty in s66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. For the same reasons it would fail the test in Policy BN5 in the draft Joint Core Strategy of conserving and enhancing the setting of heritage assets. Moreover it would fail the test in Policy S11 where applications for renewable energy development must have no significant adverse impact on the historic and natural landscape, landscape character, townscape or nature conservation interests.

Helmdon Heritage Assets

Helmdon Viaduct

95. Helmdon Viaduct is on the London Extension of the Great Central Main Line which was opened for coal traffic in 1898 and for passenger travel in 1899. It

was in continual use until 1966 when the Great Central Railway was the first mainline to be closed as part of the modernisation scheme implemented by Beeching.

96. The significance of Helmdon Viaduct is in its architectural and historic interest. It is approximately 30.5m high above the valley floor and approximately 122m long. It comprises nine arches each with a span of 10.5 metres. It is a well preserved example of a multi-arched viaduct constructed of brick for which the Great Central Railway was famous. The bricks were made at a large plant sited close to Great Covert Wood, Sulgrave. Also associated with the viaduct is the line of the railway itself (reflected in the landscape by cuttings and embankments but also a line of vegetation) and the P-way hut just north of the viaduct, built for local track workers and for storing equipment. Helmdon Viaduct is the only remaining viaduct in the locality and is a well-known local feature. It is of value in terms of local identity and sense of place (it is for example used as the logo for Helmdon school) and as such is considered to be of communal value as described in Conservation Principles pages 31 and 32. The setting of the viaduct makes a notable contribution to the significance of the heritage asset. The key characteristics of the setting of the viaduct are:
- its predominately rural context which emphasises the form and character of the viaduct, enabling it to act as a local landmark despite the fact that it does not rise out of the valley
 - location in the lowest part of the valley, connecting the valley sides which emphasises the function of the viaduct
 - the valley topography emphasises the scale of the arches
97. The ES and FEI make no reference to the impacts on the Helmdon Viaduct (as an undesignated heritage asset) which is located approximately 860m from Turbine 5. The ES 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 which is visible from many locations within the valley to the west. The ES assesses the impacts on the disused railway line as a whole as negligible and not significant. It goes on to say that *“the setting of the 25 undesignated 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”*.

I do not agree. The proposed development would in my opinion have an adverse effect on the setting and importantly the appreciation and understanding of the Viaduct at Helmdon, not least because of the scale and proximity of the proposed turbines. The turbines will affect all three key aspects of the setting noted above. The turbines will:

- diminish the sense of an unspoilt rural context
- alter perceptions of scale both in terms of the viaduct as an architectural structure but also local topographic context
- supplant the viaduct as the local landmark to which Helmdon is associated.

98. This is supported by Inspector Fieldhouse who stated (para 25):
"The proposed turbines, some 1300m and 1350m away, would be conspicuously out of scale with the intimate river valley landscape and become dominant features with adverse impacts on the perceived small scale landscape. They would contrast harmfully with the viaduct over which they would visually dominate and tower."
99. I consider the effects of the proposed development on the setting of the Helmdon Viaduct to be major adverse and that they would diminish the significance of the asset and its appreciation. In view of its undesignated status and regional importance⁶ I consider these effects should weigh against the wind farm proposal.

Listed Buildings in Helmdon

100. There are a number of listed buildings within the village of Helmdon. Although the settings of these listed buildings are unlikely to be affected by the proposed development due to orientation and screening this is not the case for Priory Farmhouse and its associated barn (just 20m to the west) on Station Road which are set slightly apart from the village. Both are Grade II listed and neither were assessed in the ES or FEI. They form a group of heritage assets with strong agricultural associations. The farmhouse dates to the early 17th century with 19th century alterations while the barn is 18th century. They are positioned on the northern valley side with views in a south and southwesterly direction towards the Helmdon Viaduct. The significance of these heritage asset is primarily architectural but also historical (see Appendix E for listing which notes

⁶ Helmdon Viaduct was considered for listing in 2011 but not listed.

that the principal front of the farmhouse faces south onto the garden). The key characteristics of the setting of these heritage assets includes:

- their rural context apart from the village which emphasises the scale, form and layout of the buildings
- predominately rural, relatively static and tranquil landscape context which reinforces the function of the buildings as part of a wider agricultural landholding
- association with significant areas of intact ridge and furrow and enclosure patterns dating to earlier rural landscape activity

101. HSGWAG photomontage View 7 (Appendix A) illustrates the listed farmhouse in its setting with the proposed wind farm development. The development would impose on these buildings and would be visible within the immediate farmyard curtilage but also from the wider landscape and Station Road. In this context the scale of the buildings would be diminished; the turbines would be seen in the same view and context of the listed buildings and on occasion towering above them. The turbines would alter the rural character of the area and therefore the landholding context with which the buildings are associated. The comments made by Inspector Fieldhouse in relation to Helmdon Viaduct also apply to these listed structures. The ES concludes that the movement of the rotor blades would *"contrast with the relatively static agricultural landscape"* (page 9). The setting of these two listed buildings would be greatly affected by the proposed development. As a result of the contribution setting makes to the significance of the asset, I consider this change to have a discernible adverse effect on their historical significance but that their architectural interest would be less affected. I have therefore concluded that the effects would not constitute substantial harm. Nevertheless I regard these impacts to be unacceptable in NPPF terms (para 98).

Stuchbury Earthworks

102. The archaeological assessment undertaken in August 2010 to support the ES makes only passing reference to the Stuchbury archaeological site, while the ES does not consider the significance of the Stuchbury Earthworks in any detail, nor did it define its setting and the contribution this makes to significance.
103. Archaeological investigation was carried out at the development site area by Northamptonshire Archaeology in March 2011 but this focused on direct

impacts on archaeology and did not consider the significance of the Stuchbury Earthworks or impacts on setting. It therefore appears that the significance of the site and impacts of the proposed development were not assessed in the ES or FEI⁷.

104. I have undertaken my own review of evidence and information available on the Stuchbury site. The site comprises the buried and earthwork remains of a medieval village including house platforms, main street (now a hollow-way), fish ponds and possible location of a church. It lies on the northern slopes of the Helmdon Valley where the underlying geology of upper lias clay, with limestone overlaid with clay on the higher slopes, has resulted in many springs and marshy ground. These springs are likely to have influenced the siting of the settlement and associated fish farming, and are still apparent today. The HER includes the site as SMR5 and describes it as "*Anglo-Saxon and medieval finds, hollow-way, ditches, enclosures, fish ponds*". Stuchbury Hall Farm is known to incorporate carved stone in its construction (thought to have come from the former church) and the land surrounding the hall has in the past revealed further carved artefacts. The collection of earthworks sit within a wider agricultural landscape. The pattern of enclosure within the wider valley reflects a fossilised open field system contemporary with the settlement (PJO Archaeology desk top assessment, page 14, para 5.20 and page 15, para 5.25). This enclosure pattern is thought to date back to the late or early-post medieval period when enclosure took place and has changed little since its creation with only limited hedgerow removal or field subdivision.
105. The earthworks at Stuchbury have been surveyed in the past. The site was recorded in 1977/8 by the Royal Commission of the Historic Monuments of England (RCHME) and was assessed again in 1982 and the results of that recorded in *An Inventory of the Historical Monuments in the County of Northamptonshire, Volume 4: archaeological sites in South-West Northamptonshire*. The report states in relation to settlements that:
"Thirty-one deserted hamlets and villages are recorded in the Inventory....most have been damaged or altered by later activity".
"Stuchbury and Tafford have been partly damaged by other modern agricultural activities".

⁷ It is noted however that a more detailed examination of the setting and significance of Stuchbury was set out at the previous inquiry in Mr Brown's evidence (pages 28-29)

"Most villages, at least in their final stages, lay either along single streets or around more complicated street systems, all later reduced to hollow-ways. Impressive hollow-ways still remain at Appletree, Astwick, Stuchbury".
"Well preserved house sites survive at Astwick, Stuchbury and Kirby".

106. In relation to fishponds the report noted that those at Stuchbury relate to a type constructed on relatively flat ground surrounded by banks made of spoil from the interior or from side leats. However it is also likely, considering the location of the site on numerous spring lines, that the fishponds also occur on the valley sides with dams along the sides of ponds. The report notes the inexplicable 'island' of an unusual shape in the fishponds at Stuchbury which lay below the water-level of the original ponds.
107. A plan showing the layout and extent of the earthworks surveyed at Stuchbury is held by Northamptonshire County Council and a further more detailed plan showing the earthworks⁸ has been included in Appendix F to this proof.
108. In light of the above I consider that the significance of the Stuchbury site lies in its historic and archaeological value.
109. Designation of sites as scheduled monuments is discretionary which means that a site may not be scheduled and yet it may be of national importance.
110. The land on which the earthworks are located is currently in Countryside Stewardship. The stewardship agreement between Defra and the landowners states the following objectives in relation to history/archaeology, *"Protect and maintain any historically important features within the agreement area. In particular ...a) any surviving earthwork features associated with the deserted medieval village of Stuchbury, including the earthwork remains of ancient fishponds, dams, ditches, settlements, and the sunken hollow-way Saxon lane - formerly the main street of the village, b) all ridge and furrow remains....c) the early enclosure field system (field boundaries and hedgerows) around Stuchbury Hall Farm."* This indicates the value Defra place on the archaeological site and associated historic features/patterns in the landscape. It

⁸ The detailed plan of the earthworks appears to have originated from the RCHME survey (1982). The associated labels were added later and are one interpretation of the earthworks. This interpretation is likely to be reviewed and refined during the forthcoming EH survey - see paragraph 112 of this proof

also notes under 'access', *"allow the public to enjoy landscape views across the agreement area and observe the landscape and wildlife improvements being made to the holding through Countryside Stewardship"* (see Appendix G for extract).

111. Perhaps more significantly, the earthworks at Stuchbury have been highlighted as having the potential to be of national importance. This was stressed by English Heritage in their letter to South Northamptonshire Council dated 14 January 2011 (see Appendix H). In this letter EH state that, *"In addition attention is drawn to the potentially major impact that the development could have on the deserted medieval village at Stuchbury, as a non designated heritage asset that is potentially of national significance"* and that *"A group of extensive earthworks of the deserted medieval village of Stuchbury are located on land adjoining the northern boundary of the wind farm site. These earthworks are of regional significance and their extent and degree of survival suggests that they have the potential to be of national significance. We would advise that the impact of the proposal on the significance of these earthworks is fully considered..."*
112. Following consultation with English Heritage⁹ I understand that English Heritage intend to undertake a survey of Medieval Settlements in Northamptonshire with a view to assessing sites for statutory designation (i.e. scheduling). The list of sites for inclusion is a shortlist of those most likely to have potential for scheduling. I understand that the site at Stuchbury is on the list to be considered in the first phase of the project which is due to start in the autumn this year (2013). Whilst it is not possible to predict the outcome of this survey with certainty it nonetheless provides further support for the potential of the Stuchbury site to be of national importance. It also means that designation as a scheduled monument is a real possibility in the foreseeable future.
113. The rural landscape setting of the site comprises the valley landscape in which the turbines would be located. The small scale enclosure patterns and historic routes, along with the valley topography and hydrology, provides a narrative which explains the origins and development of the site and contributes greatly to its historic significance. In addition the current rural and tranquil character of the

⁹ Pers Comm Dr Dale Dishon (Principle Inspector Northamptonshire) and Katy Mack (Designations Team, Cambridge)

valley reinforces the 'deserted' status of the settlement and amplifies the site's significance. The setting of the site extends across the valley as far north as the Helmdon Road and as far south as the B4525. The orientation of the site on south facing slopes means that the majority of views from the site focus southwards. It is possible to quickly perceive and understand its component earthworks, their relationship to each other and their relationship to the wider landscape. The role of setting in the significance of this site is therefore high, not least because of the inherently subtle nature of the earthworks.

114. The nearest turbine would be approximately 500m away from the southern edge of the known extent of earthworks (T5). The whole of the earthworks site would lie within the wind farm landscape where the turbines would have a major characterising effect and would be visually dominant in views. While it could be argued that the landscape could still be perceived between the turbines, in reality one would focus on the turbines due to their scale and visual dominance. This would diminish the ability to appreciate the subtle nature of the earthworks and their relationship to one another and the wider valley. The turbines would be substantially larger in scale than all other components of the view such as hedges, trees, field pattern (see HSGWAG Photomontage Supplementary View 3 and 3A). In addition to the physical presence of the turbines, the access track would also be clearly visible extending from the B4525. This track does not follow any existing landscape feature and cuts across an open field, disrupting historic landscape patterns.
115. The effect of the close presence of the turbines in the setting would be to diminish the rural context of the site which contributes to historic significance. The turbines would be dominant due to their scale, extent in southerly views, but also because they are moving. Added to this there would be noise impacts and the potential for moving shadows all of which would detract from the tranquillity of the site. Overall I consider the magnitude of change to the setting to be major and the effect on the significance of this heritage asset to be very great. In light of the potential for this site to be of national importance, and its inherent characteristics, I consider the effects to constitute a negative intrusion where the integrity of the setting would be compromised and appreciation and understanding substantially diminished. The effects, in my view, would be very great indeed and would equate to substantial harm and would be unacceptable in terms of the NPPF para 98.

116. NPPF paragraph 139 states non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets. This would mean that the part of paragraph 132 of the NPPF relating to scheduled monuments (that substantial harm should be wholly exceptional) would apply here. In my professional opinion the Stuchbury Earthworks are demonstrably of equivalent significance to scheduled monuments, based on the evidence I have noted above, even if the site's actual scheduling as a result of the EH survey later this year cannot be predicted with certainty.
117. Even if this site was judged not to be demonstrably of equivalent significance to scheduled monuments, NPPF paragraph 135 states that for non-designated heritage assets there should be a balanced judgement taking into account the scale of harm, which in this case is substantial and should weigh very heavily against the scheme, and also the significance of the heritage asset, which is also very considerable in this case. Paragraph 83 of PPS5 Practice Guide also states that in relation to non-designated assets the 'desirability of conserving them and the contribution their setting may make to their significance is a material consideration'. The harm to the significance of the Stuchbury Earthworks would remain very great and unacceptable even if it was not treated as being of equivalent significance to a scheduled monument.

Collective Harm to Helmdon Assets

118. When taken collectively, the effects of the proposed development on Helmdon Viaduct, listed buildings and Stuchbury Earthworks would result in considerable and unacceptable harm which should count heavily against the scheme.
119. The proposed development would be contrary to the NPPF in that the conflict between the proposed development and heritage assets would not be minimised (para 129) and because the substantial harm to Stuchbury Earthworks should be wholly exceptional as applied through para 139 (para 132). The proposed development would be contrary to Local Plan Policy EV12 which seeks to preserve and enhance the setting of listed buildings and also be inconsistent with the statutory duty in s66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. For the same reasons it would be contrary to Policy BN5 in the emerging Joint Core Strategy which states that designated

and non-designated heritage assets and their settings will be conserved and enhanced in recognition of their contribution to sense of place. Moreover it would fail the test in Policy S11 where applications for renewable energy development must have no significant adverse impact on the historic and natural landscape, landscape character, townscape or nature conservation interests.

Greatworth Heritage Assets

120. The Greatworth designated heritage assets as a group include Greatworth Hall, Greatworth Church and Greatworth Conservation Area.

121. I agree with the ES that the impacts on Greatworth Hall would be moderate adverse (page 151) and impacts on Greatworth Conservation Area would be sufficiently small to be negligible. In each case the harm would not be substantial. These conclusions were also reached by the Inspector at the last inquiry (paras 47 and 48). However I disagree with the ES assessment of impacts on Greatworth Church (ES page 152), which concluded minor impact, for the reasons I set out below.

Greatworth Church

122. Greatworth Church is a Grade II* listed building located approximately 1.2km to the southwest of the proposed development, with 21 Grade II headstones within its churchyard. Its significance lies in its architectural value but also its historic value, the latter being reflected in the association of the Church with the headstones and churchyard which symbolise wider faith and cultural identity values. Views from the churchyard out to the wider landscape are noted in the Conservation Area Appraisal as one of the few locations where the visual connection between the village/church and its rural setting can be appreciated (CD 10.8, page 13). The unspoilt rural and tranquil setting of the Church and churchyard reinforces the historic significance of the assets. On the north-eastern side of the village the character of the rural setting of the village would be changed as a result of the proposed development. The turbines would be at odds with the rural, tranquil and unspoilt character of the church setting (see HSGWAG View 11, Appendix A). Not all the turbines would be visible due to existing vegetation cover, but their moving presence would affect the area's tranquillity. Overall the turbines would appear distracting and the impacts on the setting of the listed building and tombstones would be intrusive and would

compromise the integrity of the space and its historic significance. The impacts would not in my view be minor as concluded in the ES (page 152) but would be sufficiently great to erode the historic significance of these assets to a discernible extent. Nevertheless, I do not consider the impacts to constitute substantial harm overall.

Greatworth Conservation Area

123. Greatworth Conservation Area is, at its closest, approximately 1170m from the nearest turbine (T1). The conservation area comprises a large number of listed buildings and its significance is linked to its historic, architectural and archaeological interest. The setting of the Conservation Area is formed by areas of more recent housing development to the north and west and the wider rural landscape to the east and south (where there are longer distance views looking southwards). The village sits on the upper slopes of the valley which drops to the south away from the development site.
124. The Conservation Area Appraisal for Greatworth published in June 2012 states that *"the glimpsed views of the open countryside from within the conservation area contribute to the character of the village and stand as strong reminders of the setting and rural heritage of Greatworth"* (CD 10.8, Summary). It also notes that the hillside location of the settlement affords views to the south (CD 10.8, Summary).
125. Views of the turbines would affect the setting of the village, particularly the north-eastern edge of Greatworth Church and graveyard as noted above. Because the landform surrounding the village is sloping away to the south west there are limited views of the settlement within its wider landscape setting except from relatively close proximity. The proposed development would not be seen in views behind the village and would not intrude into the Conservation Area except on its eastern edges.
126. Overall the extent of impacts on the setting of the Conservation Area would be limited; effects on significance would therefore be slight and would not constitute substantial harm.

Greatworth Hall

127. Greatworth Hall is a Grade II listed building located approximately 500m from the nearest turbine (T1). The significance of this heritage asset includes

architectural and historic interest. Its setting is defined by the adjacent buildings (business units and accommodation), parkland (to the south) and surrounding fields, all of which contribute to the significance of this heritage asset. The principal views from the Hall are to the south and east, away from the proposed wind farm development and would be unaffected. From the west and south there are views of the Hall with the turbines in the same context and views from the approach to and from the house. The turbines would be visually dominant as seen in HSGWAG photomontage View 10 and FEI photomontage 2b (Volume 2) and the Hall and its setting would form part of the wind farm landscape. The movement of the turbines and noise would also impact on the setting and significance of this asset diminishing its wider rural context. As the turbines are located on the other side of the ridge, the base of the towers would fall below the skyline reducing their vertical scale to some degree. However, when viewing from the south towards the main elevation of the Hall, the turbines would be seen behind it as contrasting and dominant elements. For these reasons I consider that the development would impose on the setting of this heritage asset and diminish its historic significance. However its architectural significance would be less affected and overall the effects of the development would not constitute substantial harm.

Astwell Castle

128. Astwell Castle is a Grade II* listed building and scheduled monument located approximately 3.5km from the nearest turbine to the east. It consists of a fortified manor house (now farmhouse) and includes a three storey gatehouse with battlemented parapet located at approximately 140m AOD. The main front of the Castle faces southeast across and towards more recent farm buildings. The scheduled area associated with the Castle lies immediately to the north. The significance of these assets lies in their architectural, archaeological and historic value.
129. The gatehouse reflects the former defence role of the building and its setting, on gently rising land with clear views to the surrounding landscape, reinforces this historic function.
130. Views of the proposed development would be possible from the Castle when looking southwest. From the wider landscape there would also be views of the

listed building from the east and from adjacent to the farm and footpath where the turbines would also be seen within the same view as the farmhouse (Cultural Heritage visualisation 2a was from this location and was submitted as evidence to the last inquiry). All the turbines would be visible closely clustered on the skyline reflecting the fact the development is seen 'end on'.

131. The views from the building focus mainly southeast and northwest. The turbines, although prominent, would fill a relatively narrow angle of view. Their moving presence would affect the area's tranquillity and sense of isolation of the Castle within the wider landscape and would compromise understanding and appreciation of the historic function of this building.
132. The turbines would appear distracting and the impacts on the setting of the listed building and scheduled monument would be clearly felt but overall the significance of the assets would not be greatly affected, and the development would not constitute substantial harm.

Mitigation

133. The PPS5 Practice Guide states that proposals for large-scale schemes, such as wind farms, that have a positive role to play in the mitigation of climate change and the delivery of energy security, but which may impact on the significance of a heritage asset, such as a historic landscape, should be carefully considered by the developer and planning authority with a view to minimising or eliminating the impact on the asset (page 11). Similarly the NPPF (para 129) emphasises the need to take account of the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. In this case I do not consider that the harm has been minimised, in part because of the number and scale of the turbines proposed for this constrained site. Even though the number of turbines has been reduced (original scheme was for 7 turbines) and the site layout amended during the course of the design iteration, the harm is still very great and not possible to minimise.
134. The ES sets out in a number of places the importance of the design iteration which has taken place. As a result of this process the layout of the scheme is said to form a “compact cluster arrangement” (page122) 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).

I disagree as explained in this proof of evidence.

135. Neither the ES or the FEI contain detailed analysis of the grain and scale of the receiving landscape although it is recognised that evidence on this was considered at the previous inquiry. In particular there is no reference to the vertical scale of the turbines and their proportion in relation to the topography of the receiving landscape.
136. In relation to cultural heritage, the ES states that the revised turbine layout and locations minimise the impacts on sensitive cultural heritage receptors (page 312) but goes on to state that there is *“no scope to introduce effective screening of views of the turbines from heritage assets”* (page 154). 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 of which cultural heritage is a part.
137. The design iteration of the development as detailed in the ES has done little to address the impacts on landscape or heritage assets. It is clear, in my view, that the impacts of this development in this location cannot be satisfactorily addressed or made acceptable.

Reversibility

138. I entirely accept that the planning permission sought in this case is for 25 years and that the scheme is capable of being reversed. I have assessed the impact of the scheme bearing this duration of impact in mind. It is a point which applies to all the impacts of the scheme described in my proof. It is as long as many modern buildings, which are regarded as permanent, can be expected to stand. It is a generation (the NPPF definition of significance highlights the importance of this generation as well as future generations) [emphasis added]. The development is not “transient” in the ordinary meaning of that word as being brief or momentary, even in the context of the historic environment.

139. The reversibility of a scheme is noted in PPS5 Practice Guide as preferable to permanent harm to a heritage asset (para 180) and the EH Guide on Wind Energy also highlights the consideration of the reversibility of a scheme in relation to planning authorities needing to make provision for the long term protection of the landscape by requiring legal agreements for remediation and restoration of wind farm sites and their infrastructure when they are decommissioned (page 9).
140. However, it is not possible to guarantee that the landscape will be returned to a pre-development state. If developed, the new wind farm landscape would become the landscape baseline for any future and possibly permanent development which might be proposed over the 25 year period. The very presence of the turbines, even for 25 years, would inevitably affect future decision-making in the area. Reversibility needs to be seen in the context of what it means or may mean in practice rather than as a theoretical concept.

Conclusions

141. My assessment of the heritage assets within 4km of the proposed development has concluded that for the following heritage assets the effects on their significance would be clearly discernible;
- Castle Hill Ringwork, Sulgrave;
 - Sulgrave Church;
 - Sulgrave Conservation Area;
 - Helmdon Viaduct;
 - Priory Farm and barn, Helmdon;
 - Stuchbury Earthworks;
 - Greatworth Hall ;
 - Church of St Peter, Greatworth and;
 - Astwell Castle.
142. For Sulgrave Conservation Area and Stuchbury Earthworks these effects on significance would be considerable and would constitute substantial harm.

143. When taken collectively, the adverse effects on all these heritage assets would, in my view, result in extensive and unacceptable harm which should count very heavily against the scheme (NPPF para 134).
144. The proposed development would be contrary to the NPPF in that the conflict between the proposed development and heritage assets would not be minimised (para 129) and because of the substantial harm to Sulgrave Conservation Area and Stuchbury Earthworks (as applied through para 139), which should be exceptional and wholly exceptional respectively (para 132).
145. The development would also be in conflict with the relevant policies in the Local Plan and draft Core Strategy and would not accord with the objective of the statutory duty in s66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
146. The considerable adverse effects on a large number of heritage assets of importance results in a collective adverse effect on the fabric of the local historic environment which should weigh very heavily against the scheme. In effect the local sense of place and character of the area, which is derived from the presence and contribution of heritage assets (as set out in the Northamptonshire Current Landscape Character Assessment) would be altered. Local distinctiveness would be diminished because the visual role of heritage assets in defining local character and the role of landscape setting in contributing to their significance would be harmed.
147. This collective or cumulative effect should be an important factor in the overall balancing exercise. I note that it was agreed in the Statement of Common Ground between the Appellant and the Local Planning Authority that one of the principal issues was whether the development would cause unacceptable harm to the significance of heritage assets individually or cumulatively (para 3.1). In my view the number of assets significantly affected should be considered as a cumulative impact against the scheme. It is not appropriate to look at each impact in isolation only. Consideration of cumulative effects was an approach advocated by English Heritage in their letter to South Northamptonshire Council (Conclusion - see Appendix H, page 22-23 of this proof).

Visual Effects and Amenity

Introduction

148. In this section of my proof I have made particular reference to the photomontages prepared by the appellant and those prepared by HSGWAG (see Appendix A) as well as considering matters in the field.

Visual Amenity of Local Homes

149. I have given consideration to the proximity and orientation of the dwelling in relation to the turbines, the size, number and spread of turbines in views and the effects of screening.

150. I have focused my attention on nearby residential properties/settlements which I consider are significantly affected by the proposed development¹⁰, namely:

- Stuchbury Hall Farm
- Grange Farm
- Astral Row/Helmdon Road, Greatworth
- Manor Barn, No 66 and Manor Farm, Church Street, Helmdon

151. Stuchbury Hall Farm would be the property most adversely affect by the proposed development in terms of its visual amenity. Here the effect of the development would be substantial and would, in my view, be unacceptable. In relation to Grange Farm, Astral Row and the cluster of dwellings off Station Road, Helmdon I consider the wind farm development to also affect the visual amenity of these properties but to have a lesser effect on the overall living conditions. Nonetheless the effect on the visual amenity at these homes would still be substantial and unacceptable.

152. **Stuchbury Hall Farm** is located approximately 780m from the nearest turbine (T5). The sensitivity of the residents at Stuchbury Hall Farm is high. The property consists of a farmhouse and associated barns, one of which has been proposed for conversion to a residential property. The farmhouse and

¹⁰ I have not considered properties within 2km of the proposed development which I understand are involved and in support of the proposed development and which nonetheless will be substantially affected. The Inspector will need to satisfy himself about the acceptability in planning terms of the impacts on these residences.

associated barns lie in close proximity to the proposed development, at a similar elevation to the base of the turbines and would be within the 'wind farm landscape'.

153. The main elevation of the farmhouse is orientated west and would not have a view of the wind farm development. Nevertheless one or more turbines would be visible from the driveway approaching the farmhouse, from the rear garden (see HSGWAG photomontage View 4, Appendix A), from south facing windows in the property (lounge and upstairs bedroom), and from the spaces between the farm barns and outbuildings, (see HSGWAG photomontage V5, Appendix A). Whilst the existing low farm buildings and mature trees would filter and screen views, the moving blades of the turbines would nonetheless intrude into the domesticity of this space, coming in and out of view depending on where you were standing. In addition to these visual impacts there would also be noise impacts particularly during periods of high wind, although evidence on this is given by Robert Davis.
154. Similarly the proposed barn conversion to the south of the farmhouse would be orientated southwards towards the development with views of the turbines from ground floor and upper story windows (see HSGWAG photomontage Supplementary View 2, Appendix A which gives an indication of the nature of the likely views from the proposed garden area associated with the conversion). The proximity and thus the physical scale and movement of the blades would be uncomfortable in the context of the private living space.
155. The amenity of Stuchbury Hall Farm also includes the wider farm holding which the family have farmed for generations. The holding is within 610m of all 5 turbines and at its closest approximately 220 from turbine 5. Throughout the holding the base of the turbines are at the same level as the viewer or higher and the full height of a 125m turbine would feel considerably large and dominant. The proximity of views and layout of turbines through the valley on the southern slopes means that in general no more than 4 turbines are seen in any one view. Nevertheless the extent of turbines in the valley would mean that it would be difficult to escape from their presence. In addition to the views there would be effects associated with noise and shadows. The scale of the turbines and movement would dominate and draw the eye and the visual amenity of the property and working life of the family would change radically. I agree with the

conclusions reached by Inspector Fieldhouse that the proposed development would be unpleasant and imposing in this context and that it would create an unavoidable and pervading presence at Stuchbury Hall Farm and holding. The visual amenity and living conditions at this property would, in my view, change profoundly resulting in unreasonable and unacceptable harm.

156. **Grange Farm** is located approximately 860m from the closest turbines - 4 and 5 and consists of four separate households (The Granary, the Old Farmhouse, Orchard End and Grange Barn). These dwellings are arranged around a courtyard and sit on the southern slopes of the rural Helmdon Valley. As noted earlier in my proof I consider the wind farm landscape to extend further than 800m and it would include the homes here. The homes most affected by the proposed development are orientated east west and located at between 140 and 145m AOD.(Old Farmhouse and The Granary). FEI Viewpoint 1 indicates the nature of the views from these properties as does HSGWAG Supplementary View 4 (see Appendix A). From here the views will look directly west towards the proposed development and would see the wind farm 'end on', such that the turbines would appear to overlap and to be of different heights and scale. In relation to Old Farmhouse the development would intrude on the visual amenity from ground floor and first floor windows as well as from the rear garden an associated paddock. Although the extent of the view affected would be relatively limited, the turbines would be central in the principal view from the rear of the property and would be large enough to be clearly seen above intervening hedgerows and trees. From The Granary the impacts would be slightly less due to boundary vegetation but there would still be clear views from principle bedrooms to the rear of the property. The turbines would be visually distracting as a result of their movement, would also be audible, and would be visually imposing.

157. Orchard End is orientated such that no turbines would be seen from the principle rooms but there would be partial views of moving turbine blades from its extensive garden. Grange Barn would not be affected by the proposed development due to screening and other buildings.

158. I consider the impacts on visual amenity and living conditions of The Granary and Old Farmhouse, which draw heavily on the rural tranquil context of the Helmdon Valley would be substantially harmed and would be unacceptable.

159. **Helmdon Road, Greatworth.** Properties in this area on the edge of Greatworth include 1-12 Astral Row, Astral House and a number of detached and semi-detached houses which front onto Helmdon Road. These homes would be between approximately 800m and 1200m from the nearest turbine (T1). FEI Viewpoint 2 indicates the nature of the views from these homes. The orientation of the various properties and screening by vegetation influences the extent to which the visual amenity of the properties is affected by the proposed development.
160. The properties most greatly affected by the proposed development are 1-12 Astral Row. These properties are orientated in an easterly direction and the current outlook is rural across open arable fields. The skyline is formed by the vegetation along the B4525 which runs along the ridge. Varying proportions of all five turbines would be seen on the horizon in these views and would be differing heights due to their position on the valley sides and distance (see HSGWAG Photomontage View 9, Appendix A). The scale of the turbines would mean that they would be clearly visible above existing vegetation and their scale large in comparison to existing field trees in the foreground. The turbines would fill a significant proportion of the view and the views would be uninterrupted and continuous from gardens, ground floor windows and first floor windows due to limited planting and screening in the front gardens or hedgerow along Helmdon Road. Here there would be a considerable adverse effect on the visual amenity and living conditions of these properties.
161. Astral House, although slightly closer to the turbines is screened by existing vegetation such that the visual amenity would be little affected. Further south however the detached and semi-detached houses¹¹ have more open views across rural fields but this time are orientated in a more southerly direction away from the proposed development such that the turbines would appear more obliquely in main views. A further three properties off Church Lane¹² would also have views of the turbines albeit from a greater distance. The visual amenity of all these properties would again be affected by the turbines but less so than for Astral Row.

¹¹ Odds On, The Gables, Midway, Somerfields, Doralea, Witsend, Watendlath, Mountside, Four Winds, Hareth, Almond House and 1-8 Derling Cottages)

¹² Whitman's Farm, Mavis Bank and Bontiki

162. **Manor Barn, No 66 and Manor Farm, Church Street, Helmdon** - These homes are located approximately 1.5km from the proposed development. Manor Barn and No 66 have recently been converted to residential use. These properties are orientated westwards and would have clear views to the proposed wind farm development, (HSGWAG Viewpoints Supplementary Views 5 and 6 illustrate the nature of views - see Appendix A). Due to the orientation of the properties and elevation at between 145m-150m AOD the turbines would be clearly visible above existing hedgerows and trees with mature trees screening views only occasionally. The wind farm would be seen 'end on' such that turbines 1-4 would appear to overlap and to be of different heights/scale while turbine 5 would appear to be separate and divorced from the main group. Although the extent of the view affected would be relatively limited the turbines would be central in the principal views from the rear of these properties. Similar views would be gained from Manor Farm which is at a slightly higher elevation to the converted barns. Again there would be an adverse effect on the visual amenity of these properties, albeit less than for Grange Farm. However the presence of the turbines in the principle views from these properties would feel intrusive and distracting.

Amenity of the Locality and Local Countryside

163. The character of the landscape in which the wind farm is proposed is described earlier in my proof. Aspects of this landscape which are valued and are particularly sensitive to wind farm development of the scale proposed include its tranquillity and cultural heritage. This is a pleasant, unspoilt, rural countryside which has retained a strong sense of time depth. As a result this landscape can offer quiet solitude and refreshment and a sense of slow change and continuity, where the wealth of subtle landscape and heritage features tell a story which can be readily perceived and understood if the observer cares to look.

164. There are a number of public rights of way and bridleways (AN7, AN8, AN9], AN10, AN13, AN14, AN15, AN16, and AN32) and a byway¹³ (AN36) which cross the valley in which the turbines would be located and which also extend further afield and connect to the surrounding villages of Sulgrave, Helmdon and Greatworth. From my site visits these routes appear well used and in some cases are publicised with walks, some of which are led by a trained volunteers

¹³ This is the 'hollow-way' which formed the main street to Stuchbury Medieval village

while bridleway AN15/AN32 and AN36 are popular with horse riders from Grange Farm.

165. The Guidance on Landscape and Visual Impact Assessment makes it clear that visual receptors most susceptible to change are people engaged in outdoor recreation (page 113, para 6.33). Because horse riding and walking are relatively slow activities, they enable aspects of the landscape and in particular tranquillity and subtle historic features to be perceived and enjoyed. On walks through the area it is possible to get a real sense of time depth from historic hedgerows, ancient routes, significant areas of ridge and furrow, earthworks associated with deserted medieval villages and manorial sites and views to landmarks such as the churches of Sulgrave, Helmdon and Helmdon Viaduct. The tranquillity of the landscape is readily appreciated away from the B4525.
166. Within the wind farm landscape (i.e. within the valley to the west of Helmdon) the turbines would be located in close proximity to a number of the footpaths. Turbine 3 would be just 60m from the footpath and turbines 2 and 4 within 100m from the nearest right of way. From the above mentioned footpaths there would be enduring views of the turbines. The effects of the proposed development on footpaths and bridleways in the valley would include:
- noise
 - overbearing scale
 - movement
 - shadows on the ground.
167. As a result I consider that the proposed development would have a very great adverse impact upon the enjoyment of these routes for walkers and riders. Walking in the valley west of Helmdon would feel uncomfortable and the pleasantness of the area would be substantially lost. Whilst a number of the historic features would still be possible to identify, their context would have changed and their visual presence in the landscape diminished by the dominance of the turbines. It is my view that the proposed turbines would dissuade people from coming into this section of the Helmdon valley and would dissuade people from visiting and appreciating the cultural heritage features it contains, not to mention the natural heritage of the area.

168. Beyond the Helmdon valley there are footpaths and bridleways which connect to the surrounding villages of Helmdon, Sulgrave and Greatworth and which would also be affected by the proposed development. When walking in the direction of the development the turbines would in many places appear as prominent elements in views and detract from the enjoyment of the countryside in general. The duration of views towards the turbines is greatest when approaching from Manor Farm in the east along AP16 and AP10, from footpaths immediately to the south of the B4525, and from AY2 north of Sulgrave and AN6/AY6 on the ridge north of the development and Manor Farm. Elsewhere views along footpaths and bridleways would be more intermittent but even where this is the case the turbines would reappear in views from time to time, and due to relative proximity, would continue to alter perceptions of rural tranquillity.
169. Overall the proposed development may affect a small part of England but it is a very pleasant part of England with high amenity value and the proposed development if permitted would mean that the qualities which knit this countryside together and which are enjoyed and appreciated in terms of local amenity, would be seriously undermined. These impacts would be unsatisfactory in my view and unacceptable and would apply particularly to both the valley and interfluvial landscape types within the Helmdon Valley which in lay person terms are perceived together. This is a relevant factor to take into account and all the more so since the recent 'Planning practice guidance for renewable and low carbon energy' pointed out that "*protecting local amenity is an important consideration which should be given proper weight in planning decisions*" (para 15).

Conclusions

170. The proposed development would, in my view, have a substantial adverse effect on the visual amenity and living conditions of Stuchbury Hall Farm and holding, as a result of the scale and proximity of the turbines, such that they would appear pervasive and dominating. Notable adverse effects on visual amenity and living conditions of Grange Farm, Astral Row and Church Street, Helmdon would also be felt. The development would bring unacceptable harm to the occupiers of these properties also.

171. In terms of the historic and natural landscape the enjoyment of the area by people engaged in outdoor recreation would be substantially diminished especially within the Helmdon Valley where the development is proposed and where people currently walk and ride.
172. The development would be contrary to Policy G3 of the Local Plan, Policy S11 of the emerging Core Strategy, the Framework and the SPD on wind turbines.
173. In addition it would be contrary to Paragraph 17 of the NPPF which highlights the conservation and enhancement of the natural environment, and conservation of heritage assets in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations. The proposed development would also not comply with paragraph 123 of the NPPF because the tranquillity of the Helmdon valley would be substantially lost.

Conclusions

1. ***Consideration of the proposed development in relation to landscape character demonstrates in my view that the character and qualities of the application site and its surroundings make it highly sensitive to wind energy development of the scale proposed. The size of the five turbines at 125 metres high, sited effectively within a small scale valley landscape, would be out of scale and would dominate and undermine the subtle characteristics of the receiving landscape. More widely the landscape context of minor valleys and ridges exacerbates the impact of the turbines particularly to the north where the turbines would appear as prominent elements on the skyline.***

2. ***In addition the development would have considerable impacts on visual amenity and living conditions of local residents and in particular on Stuchbury Hall Farm and holding where the turbines would be pervasive and dominating. It would also seriously impact on the amenity of the local countryside in the valley west of Helmdon, making it a less attractive place to walk and ride.***

3. ***Moreover, the proposed wind farm development is located in a landscape which has a notable collection of sensitive heritage assets. The landscape settings make an important contribution to the significance of these assets and more widely to landscape character and sense of place. The development would result in substantial harm to the Sulgrave Conservation Area and Stuchbury Earthworks - a significant heritage asset despite its current lack of designation. In addition the proposed development would have less than substantial, but still significant, effects on a large number of important heritage assets namely Castle Hill, Sulgrave, Sulgrave Church, Prior Farm and Barn, Greatworth Hall, Greatworth Church and Astwell Castle. Each significant but less than substantial effect on each heritage asset counts as weight against the scheme. The collective weight against the scheme which arises when all significant impacts are considered together should not be underestimated or dismissed.***

4. ***Wind energy projects can satisfactorily co-exist with the natural and heritage environment but this is dependent on appropriate siting and on adverse effects being adequately addressed.***

5. ***The above lead me to conclude that the application has substantial negative impact on landscape character, cultural heritage and amenity of the locality. The substantial harm to Sulgrave Conservation Area, Stuchbury Earthworks and to the visual amenity and living conditions at Stuchbury Hall Farm and holding are enough in themselves to render the scheme unacceptable. Added to this is the collective harm caused to many other heritage assets within 4km of the development. Subject to any assessment of the advantages of the scheme, I consider the net impacts to be unsatisfactory and unacceptable overall.***