

**PROPOSED WINDFARM AT SPRING FARM RIDGE, HELMDON/GREATWORTH,
NORTHAMPTONSHIRE (SOUTH NORTHANTS COUNCIL PLANNING
APPLICATION S/2010/1437/MAF)
PUBLIC INQUIRY INTO APPEAL AGAINST REFUSAL OF PLANNING
PERMISSION**

APP/Z2830/A/11/2165035/NWF

STATEMENT BY COLIN WOOTTON

ON BEHALF OF

SULGRAVE PARISH COUNCIL

At its meeting on 9th May 2013, Sulgrave Parish Council formally resolved to ask me to appear at this inquiry on its behalf.

I am a retired Chartered Town Planner and Chartered Surveyor. At the time of my retirement from full time employment sixteen years ago I was Head of Planning Policy at Daventry District Council. In over twenty years with the Council I was responsible for preparing local plans and policies within the framework of national planning policies and advising the relevant committees on the implications of a whole range of development proposals. I represented the council at numerous appeal inquiries and examinations in public of the then relevant county structure plans.

I have always lived in the village of Sulgrave and for many years I was a member of the Parish Council. I am currently chairman of the Sulgrave Castle Archaeological Group, dedicated to bringing to public attention the research which has been undertaken into the important scheduled ancient monument known as the Sulgrave Ringwork. I am also a member of the committee which has been responsible for the recently completed improvements to the setting of the ringwork, a public open space known as Castle Green.

From time to time I am asked to advise the Parish Council on planning matters. I was particularly asked to help the council to understand the weighty and complex documents comprising the Environmental Statement which accompanied the planning application and to assess the probable implications for the village.

In considering the pre-application publicity material produced by Broadview, especially the photo montages, it seemed to the Parish Council that the visual impact upon Sulgrave, its conservation area and heritage assets had been greatly underestimated. The Council particularly asked the appellant that further montages should be produced indicating the impact as seen from roads, bridleways and footpaths to the north of the village from which the setting of the village in the landscape is best appreciated. To the Council's disappointment, no such visualisations were included in the Environmental Statement accompanying the planning application.

The Council's view on this matter was shared by English Heritage, whose response to the consultation on the planning application included the comment that:

Another consideration is the dominance of the Church's tower in medium to long distance views of the village and the potential for the turbines to appear in such views when approaching from the north and north west. It is advised that this wider impact is assessed more fully.

You will appreciate that the resources of the Parish Council were not such as to allow the commissioning of professionally prepared photo montages.

I was therefore asked to prepare photo montages from photographs taken at a number of public viewpoints in and around the parish to allow the Council to make a more informed decision on the visual impact that the proposed turbines would have upon the village. I did this to the best of my ability and produced for the Council a topic study entitled "An assessment of the implications for heritage assets at Sulgrave". This is attached as Appendix 1, amended to take account of the latest government planning policy guidance.

Having carefully considered this document the Council resolved to object to the planning application on the grounds of the unacceptable visual impact the turbines would have upon the settings of the Sulgrave Conservation Area, the Sulgrave Castle Scheduled Ancient Monument, the Grade 1 listed building, Sulgrave Manor and the Grade II* listed building, the Church of St James the Less.

The Council also resolved to object to the planning application because of the likely impact upon the unspoilt local landscape, the potential general loss of visual amenity by parishioners and a particular loss by a number of residents whose properties face in a southerly direction.

Additionally, the Council objected to the potential impact upon the network of byways, bridleways and footpaths linking the village with Helmdon, Stuchbury and Greatworth and the additional dangers to residents using the already dangerous B4525 road.

Further topic studies setting out the reasons for these objections are attached as Appendix 2 (Sulgrave Rights of Way), Appendix 3 (Loss of Visual Amenity), Appendix 4 (Traffic Implications).

In preparation for the previous inquiry, the Helmdon Stuchbury and Greatworth Windfarm Action Group (HSGWAG) commissioned the preparation of photo montages by Tomo Graphics Ltd. Some of these were from viewpoints at or near those chosen to illustrate the topic studies and clearly indicate that the latter were fair representations of how the turbines would appear in the landscape. These can be seen in HSGWAG Photomontage Pack A (75 degree angle of view) and Photomontage Pack B (40 degree angle of view), Views 1, 2 and 3.

The Parish Council notes that the appellant recognises that Sulgrave Conservation Area comprises a heritage asset of the highest level of sensitivity. However, the Council considers that the failure by Broadview properly to analyse the visual impact

on the setting of Sulgrave heritage assets as viewed from north of the village led to the mistaken conclusion that the impact of the proposal upon it was merely “Moderate Adverse”

The Environmental Statement accompanying the planning application states that: *“With respect to potential impacts upon the setting of heritage assets, if the development is considered to be within that setting and is assessed as being intrusive, it has been classified as being major adverse.”* With the benefit of the photo montages in HSGWAG Photomontage Packs A and B, the Parish Council considers that the proposed turbines must be considered to be within the setting of the heritage assets and can demonstrably be seen to be intrusive and therefore the potential impact should be classified as “Major Adverse”.

At this point I note that, after failing to respond to repeated requests for the preparation of photo montages illustrating the visual impact of the proposal as seen from viewpoints to the north of the village, just before the previous public inquiry the appellant produced such a montage from the Sulgrave Old Windmill viewpoint. As with all of the appellant’s photo montages, this is at the unnecessarily wide angle of ninety degrees, a point with which I deal in more detail at appendix 1a.

This latest photo montage from this viewpoint simply verifies the accuracy of that commissioned by HSGWAG . It confirms that all five turbines would be seen on the horizon to the south of the village, with the full circle of the rotating blades visible, completely dominating the setting of the conservation area and replacing the ancient church as the most significant feature in the landscape. Taken at such a wide angle and in such dull light, what it does not do is give a true impression of the magnitude of the impact as shown in professional single frame montage prepared for HSGWAG. This is at an angle of view which would have been a mandatory requirement under the accepted guidance from the Highland Council.

This is important because the latest government planning policy guidance in the National Planning Policy Framework states that the significance of a heritage asset can be harmed through development within its setting. The NPPF further states that: *“Substantial harm to heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”*

The Parish Council considers that the harm to the setting of heritage assets at Sulgrave, comprising a scheduled ancient monument, grade I and II* listed buildings and a registered park and garden, would be substantial and the wider environmental benefits of the proposal would not be such as to justify this as being an exceptional case where the harm should be permitted.

Sulgrave is an attractive Northamptonshire village, almost all of which is within a designated conservation area, centred on the internationally important Manor, the Church and the ancient Castle site. Its character is much appreciated both by the inhabitants and the many visitors. That it is truly valued by the people who live in the village can be seen in the results of tireless work by volunteers in improving and maintaining public open spaces such as Castle Green and the Pocket Park, creating

and manning the community shop in its listed building and looking after the network of bridleways and footpaths. Inevitably, many people work in distant places but it is far from being a soulless dormitory settlement inhabited by people with little interest in their surroundings. Local people, young and old, use the surrounding countryside for regular recreation on foot, horseback or bicycle.

On their doorsteps they have a traditional heart of England enclosure landscape of small fields, with their hedgerows still mainly intact, of copses, of ancient barns, of byways, green lanes and minor roads winding unobtrusively through the countryside. Far from any main roads, walks and rides here can be enjoyed in a silence which is sometimes almost profound with views uncluttered by modern intrusions.

I note from the government's latest National Planning Policy Framework that *"planning decisions should aim to identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason"*. Anyone walking the local footpaths will be able to agree with me and the many walkers, cyclists and horse riders who cross the site of the proposed turbines that this is just such an area of tranquillity.

The Parish Council views with great concern the proposal to insert into this small scale, unspoilt landscape five alien structures completely out of proportion to any other features, thus enormously devaluing the enjoyment and appreciation of the countryside by parishioners and visitors alike.

From its perspective to the north of the proposed windfarm site, the Parish Council is at a loss to understand the appellant's assertion that the proposal will *"form a compact, balanced group of turbines which relates well to the grain and scale of the surrounding landscape"* and *"relates well to local landscape character and respects the scale and composition of the landscape"*.

The Environmental Statement contains no analysis or description of *the grain and scale of the surrounding landscape* to which the turbines are said to relate so well. In particular there is no reference to the vertical scale of the turbines and their proportion in relation to the vertical scale of the receiving landscape. It is therefore not clear how the judgement that the scheme relates well to the local landscape character, is reached.

The Council's view is that far from *"respecting the scale and composition of the landscape"*, the turbines would be a totally out-of-scale element in a small scale landscape and would be completely at odds with its present composition, especially the almost total absence of large man made features.

This is clearly important in that the recent National Planning Policy Framework requires planning decisions to take account of the different roles and character of different areas and in doing so to recognise the intrinsic character and beauty of the countryside.

Government policy is that when local planning authorities are considering renewable energy applications they should attach significant weight to the wider environmental benefits of the proposal in reducing CO2 emissions.

Whilst local planning authorities are advised not to refuse planning applications for renewable energy projects simply because they are small, in concluding whether the weight to be attached to the wider environmental benefits is so significant as to outweigh the sum total of the identified disbenefits, it must be reasonable to have regard to the actual contributions that the project will make to the reduction of CO2 emissions.

The applicant estimates that the Spring Farm scheme would save between 11,276 and 14,215 tonnes of carbon dioxide annually and claims that this would be a “significant contribution” towards reducing the 540 million tonnes of carbon dioxide emitted annually in the UK.

The applicant does not explain why this small contribution is considered to be “significant”. On the contrary, it is submitted that the negligible contribution set out above can only be described as insignificant and cannot be judged to constitute a wider environmental benefit sufficient to outweigh the disadvantages of the proposal outlined in this statement and other evidence to this inquiry.

I therefore respectfully request that this appeal is dismissed.

Colin S. Wootton MRICS MRTPI (Rtd)

09.05.2013