

**TOWN AND COUNTRY PLANNING  
(INQUIRIES PROCEDURE)(ENGLAND)  
RULES 200**

Appeal by Broadview Energy Limited In respect of the refusal of planning permission for: Wind Farm comprising the erection of five wind turbines plus underground cabling, meteorological mast, access tracks, control building, temporary site compound and ancillary development (Includes Environmental Statement)at Spring Farm Ridge, land north of Welsh Lane between Greatworth and Helmdon

**Planning Inspectorate Ref:** APP/Z2830/A/11/2165035

**Local Authority Ref:** S/2010/1437/MAF

## **Cultural Heritage Proof of Evidence: Annex 2**

### **Consultation Response from English Heritage**

## Consultation response from English Heritage

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Mr Christopher Johnston  
South Northamptonshire District Council  
Springfields  
Towcester  
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NN12 6AE  
Our ref: P00094899  
14 January 2011

Dear Mr Johnston

### **Notifications under Circular 01/2001 & GDPO 1995 SPRING FARM RIDGE WIND FARM, GREATWORTH, SOUTH NORTHAMPTONSHIRE, NORTHAMPTONSHIRE Application No S/2010/1437/MAF**

Thank you for your letter of 18 November 2010 notifying English Heritage of the above application. Please excuse the delay in responding which was due to the severe weather affecting site visits planned for last month. Having considered the submitted information we can offer the following comments.

#### **Summary**

The proposed wind farm at Spring Farm Ridge has the potential to impact upon the setting and significance of a large number of designated and non-designated heritage assets. Consequently it is felt that the development's affect on the historic environment is a key consideration when determining this application.

The submitted information presents a good starting point from which to understand the impact of the proposal on the historic environment though is not felt to be exhaustive and some further analysis is felt to be necessary and in some cases desirable. Also it is noted that there exists a close relationship between heritage assets and their landscape setting and that this predominately rural character can, in some cases, emphasise the impact the turbines on the setting and consequently, the significance of heritage assets.

Seven instances are cited where it is felt that the impact of the wind farm development will result in a moderately harmful effect on the significance of high grade designated heritage assets or group of assets. These are:

Sulgrave: Castle Hill Ringwork - Scheduled Ancient Monument: SAM), St James Church (grade II\* listed building), Sulgrave Manor (grade I). The latter is felt to have the potential for moderate harm and requires further analysis.

Helmdon: The Church of St Mary Magdalene (grade II\*), Astwell Castle (SAM and grade II\* listed building)

Canons Ashby Estate (Collection of SAM, grade II\* Registered Park and Garden, Grade I, II\* and II listed buildings)

The Stowe Estate (Grade I Registered Park and Garden, grade I and II listed buildings)

Consideration should also be given to the way in which these assets contribute to the significance of other designated and non-designated heritage assets, such as conservation areas, grade II listed buildings and registered parks and gardens. In addition attention is drawn to the potentially major impact that the development could have on the deserted medieval village at Stuchbury, a non designated heritage asset that is potentially of national significance. It is requested that the potential impact is explored further, with reference to your archaeological advisors.

In determining this application it felt important to consider, in line with policy HE1.2 of PPS5, the potential to deliver similar measures to mitigate climate change in a manner that is less damaging to the historic environment. Potentially this could be achieved through adapting the current proposal. However, If this is felt to be neither feasible or desirable, policies HE1.3, HE9.4 and 10.1 of PPS5 should be considered once the overall degree of harm to heritage assets has been satisfactorily demonstrated. To summarise, these policies request that where harm to the significance of a heritage asset or assets is caused by a proposal than the wider public benefits of that proposal should be weighed against the harm caused. The greater the harm the greater the public benefit required by way of justification.

### **English Heritage Advice**

The proposal is for five wind turbines on land at Spring Ridge Farm in the parish of Greatworth. The height of each turbine is around 125 metres to blade tip with a hub height of around 80 metres. The height of the turbines combined with their elevated siting within a broad undulating landscape produces wide ranging visual impacts over an area that contains a significant number of designated and non designated heritage assets. The applicant's summary of historic environment shows that within a 5km radius of the site there are 8 scheduled ancient monuments, 319 listed buildings (of which eight are listed grade I and 13, grade II\*) and one registered park and garden, Sulgrave Manor. Beyond this radius the submitted 'zone of the theoretical visibility' maps show the potential for varying degrees of visible impact up to 20km and it is conceivable that heritage assets of a significant scale, area or position could be affected, for example Canons Ashby House or the grade I registered park and garden at Stowe. In addition consideration should be

given, in line with policy HE8.1 of PPS5, to the effect on un-designated heritage assets. Consequently the proposal's impact in relation to the historic environment should be considered thoroughly and in reference to national and local policy advice not only in relation to environmental impact assessments but also the historic environment, especially PPS5: Planning for the Historic Environment.

The applicant's assessment of the impact the proposal may have on the historic environment is explored within chapter 8 of the submitted environmental impact assessment, appendix 4 of that report and several wire-frame viewpoints. Considering the wide area of potential impact and the number of heritage assets that could be affected the applicant's assessment is robust. In particular we welcome the consideration of relevant policy and guidance, the highlighting of several instances where the impact is felt to be moderate and significant, and the analysis through written description and viewpoints in relation to Canons Ashby and the parkland of Stowe. Whilst we would disagree with some aspects of the analysis and see the need for further analysis on their part, the consideration of the historic environment presents a sound starting point from which to discuss and explore the issues involved.

The principle concern of English Heritage is the effect the application may have on highly graded heritage assets; scheduled ancient monuments and listed buildings and registered parks and gardens graded I or II\*. In addition the effect on conservation areas and other designated heritage assets is considered especially when they have an association with highly graded designated assets, for example the grade I Sulgrave Manor and its grade II registered park and garden and place with the Sulgrave Conservation Area.

### **General Comments**

Our comments are chiefly made in relation to specific assets and are given below. However, there are a number of general themes and observations we wish to highlight. We would agree with the applicant that no registered heritage assets would be directly affected by the instillation of the wind farm and that consequently it is the consideration of indirect effects that is pertinent. Put another way the application involves the consideration of the effect on the setting of a heritage asset and the contribution that setting makes to the significance of that heritage asset. Setting is defined within paragraph 113 of the Historic Environment Planning Practice Guide that accompanies PPS5 as 'the surroundings in which an asset is experienced'. The setting of a heritage asset is particular to each asset and results from a number of factors, not always just visibility. Through extensive site visits it became clear that the setting of many if not all heritage assets considered had a close relationship to the wider landscape in which they were placed. The overwhelming rural nature of the surrounding landscape is undoubtedly partly the result of modern agricultural practices but is relatively free from modern large-scale interventions such as infrastructure (pylons, major roads ect.) or views of large conurbations. This reinforces the rural nature of many heritage assets and noticeably adds to the aesthetic and historic values of their significance. The view expressed by the applicants that the turbines would be

seen as another feature in the landscape does not take into account their large scale industrial character in an environment largely devoid of such features. It follows that their impact will be the greater due to their 'alien' nature and that even at distances beyond 5km they can appear as an untypical and sometimes discordant feature that intrudes on the setting of a heritage asset and its rural context.

Another consideration is the applicant's assertion that screening reduces the impact of the development for the majority of heritage assets. Considering the nature of the landscape this is undoubtedly a strong factor in determining indirect affects. However, in some instances, outlined below, we feel that screening has been over relied upon. More generally we would draw your attention to paragraph 25 within 'The Setting of Heritage Assets: EH guidance (Consultation Draft)' 2010 which states that screening may change over time and that the potential removal of screening should be considered when defining setting. This is particularly the case for modern tree plantations, trees not covered by formal protection or the potential of woodland management to result in the thinning of tree cover.

### **Specific comments**

#### **Castle Hill Ringwork (Scheduled Ancient Monument) and St James Church (gradell\* listed building)**

The Castle Hill Ringwork and St James Church are the two oldest designated heritage assets within the village of Sulgrave. Their close proximity represents the historically typical arrangement of manorial centre combined with a place of worship and it is reasonable to assume that the early village developed around this grouping. Excavation within the ringwork uncovered evidence for construction dating to the late 10<sup>th</sup> century Anglo Saxon period, whilst a re-sited triangular headed doorway in the tower of St James also indicates significant Anglo-Saxon settlement within the present village. The ringwork appears to have remained in occupation until the late 12<sup>th</sup> century when presumably the manor moved to the present site of Sulgrave Manor, helping to create the distinctive figure of eight pattern layout of the village that dominates to this day.

The significance of the ringwork and church is expressed in a number of ways. Their historical and evidential value both as individual monuments and when together is considerable and well-documented. Their enduring presence within the village will have considerable communal value in the way they define a sense of place for past and present generations, whilst there is considerable aesthetic value through the artistic expression of the Church, its church yard and the green open space of the ringwork. Their contribution to village character is also their contribution to the character of the Sulgrave Conservation Area. The setting of both is intimately linked with each other and the south-west edge of village and the immediate fields that adjoin it.

The turbines will be visible from shaft height upwards from the mound of the ringwork and from the remnant of its bailey to the south west. Views from the

church yard seem to be screened by the houses opposite, though glimpses through gaps in the building line and blade tips appearing above houses are a possibility. It is felt that where visible the turbines will intrude onto the intimate connections between Church, ringwork and village and so detract from the setting of each and compromising the aesthetic value of this relationship. The screening afforded by houses and topography reduces the impact but it is felt that a degree of moderate harm to the significance of these assets still results. 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.

**Sulgrave Manor** (Grade I listed) and attendant registered park and garden (grade II)

The present Sulgrave Manor is in part the remains of the manor house built around 1540 - 60 by Lawrence Washington and a 1920s restoration in the Elizabethan manorial style by Sir Reginald Blomfield, who also designed the gardens. Lawrence Washington's building is a good example of a 16<sup>th</sup> century manor house whilst Blomfield's restoration, addition and garden harmoniously add to and emphasise the original building's solid traditional character. The grade I listed status of the house is in part due to the connection through ancestry, with George Washington, the first President of the United States. Whilst this gives the building and its grounds considerable historic value in itself the securing of the property and its restoration as a memorial to Washington in the early part of the 20<sup>th</sup> century is highly significant for our understanding of the Anglo-American Peace Movement and Anglo-American relations in general. Held in trust for the peoples of the United States and the United Kingdom the property has a high commemorative and associative value that gives the property and its grounds an international significance.

The manor is situated at the south-eastern edge of Sulgrave and though slightly detached from the main body of the village it is clearly still part of it. This relationship is reflected in the boundary of the conservation area. The garden forms the immediate setting to the manor house and has an intimate inward-looking relationship with the house as befits its status. Beyond the garden the Manor forms associative and aesthetic relationships with the houses to the north and south and the landscape beyond.

The house faces the direction of the wind farm site though is placed in a slightly sunken position allowing it to be screened at lower level by houses to the south and the landscape beyond. This is clearly shown in the viewpoint taken from the formal garden at the front of the house. However, considering the proximity of the proposed wind farm and the high national and international significance of the Manor it is necessary to explore inter-visibility further. What is not clear is the potential for the turbines to be seen from the upper levels of the house and the raised south-western section of garden. Additionally views from the gated road to Weston, the north-eastern footpath that runs out from the Manor and the raised area of open ground to the west of the garden should be analysed to understand the wider context. Without

such analysis there is a danger that substantial or moderate harm to the setting and significance of Sulgrave Manor could occur and not be identified prior to determination.

### **Church of St Mary Magdalene, Helmdon (Grade II\* listed)**

St Mary Magdalene is a 14<sup>th</sup> century church with considerable 19<sup>th</sup> century restoration work. It is situated at the southern boundary of Helmdon where the land rises up out of the village and the built form gives way to open countryside. The elevated position of the church emphasises its presence within the landscape and this part of the village. West of the church are the remains of a medieval manorial site and beyond a section of the Great Central Railway line and beyond both is the proposed wind farm development. Though an undesignated heritage asset the manorial remains have significance in understanding the development of Helmdon and manorial sites in general. Similar to Sulgrave, the close connection between church and manor is a deeply historical survival that would have helped shape and form the village. The line of the Great Central railway is not overly obvious save for its remaining viaduct, which itself should be seen as un-registered historic asset.

Views from the western edge of the Church of St Mary Magdalene will clearly show the wind farm and the combination of both will be seen in various ways. The church yard often limits and contains views though there is a notable view from the southern section of the church yard where the turbines will intrude onto the close view of the Church itself. This juxtaposition is then seen again on the footpath that runs south east from the village. Another important consideration is the view coming out from the village where presently the Church dominates. This dominance will be greatly challenged by the extensive view of the wind farm to the west. It is felt that such impacts will cause a negative impact on the aesthetic values of the Church and its setting as defined by the manorial remains and location at the edge of the village. Considering the degree of screening around the Church the impact on the building's significance is felt to be moderately severe and should be considered along side not only other impacts on the historic environment but the impact on Helmdon as a whole. Further viewpoint analysis would help to explore this issue.

### **Astwell Castle (Scheduled Ancient Monument and Grade II\* listed building)**

Astwell Castle comprises the extant and buried remains of a fortified manor house dating from the 15<sup>th</sup> and early 17<sup>th</sup> century. The disappearance of its attendant settlement has left the property isolated and remote in the landscape. The combination of gate-house tower and main house with a wide panoramic view of the countryside beyond gives the property considerable aesthetic value which combine with its historic and evidential values in forming its national significance.

This impression is best viewed looking west from the road that runs past the property and the foot paths that lead off from it. It is highly probable that the

gatehouse tower is positioned so to take in this view. As the wind farm will be clearly seen from these aspects it can be said to intrude onto the relationship between heritage asset and its landscape by introducing an alien feature that will draw attention. Considering the distance between the Castle and the width of view it is felt that the harm caused to the significance of the registered heritage assets will be of a moderate scale.

**Canons Ashby** (Scheduled Ancient Monument, Series of grade I, II\* and II listed buildings and grade II\* Registered Park and Garden)

The Canons Ashby estate is a compact collection of mostly high grade heritage assets that represent the transition from Augustinian Priory to Country House estate. The degree of survival and the quality of the assets themselves form a whole that is of exceptional national significance.

The estate is located on the brow of a broad hill that allows a degree of inter-visibility with the wind farm site, even though it is 7km distant. The latter phases of development are represented by Canons Ashby House (grade I listed) and its grade II\* registered park and garden. The elevation of the house with the closest visual connection to the wind farm site faces south-west whilst the wind farm is located due south. This limits direct visual connections from inside the house and the main designed landscape features that connect with this aspect. The wind farm will be visible from the roof of the tower of the main house and it is probable that this once acted as an historic viewing platform. It is possible the oblique views from the upper stories of the tower shall include some of the turbines. Within the grounds it is probable that the turbines will be visible from the parkland to the south-west and west of the house where screening is less prevalent or the ground is elevated. The present view is largely uninterrupted by large scale modern features and consequently the introduction of turbines will be noticeable and intrusive. Considering the distance between application site and estate combined with the varying degrees of intervisibility it is felt that the proposal will have a moderately negative impact on the significance of heritage assets within the estate, in particular the main house and its registered park and garden.

**The wider Stowe Estate** (Grade I registered Park and Garden, grade I and II listed buildings)

The proposed wind farm will have some inter-visibility with the northern parkland at Stowe. This is an informally landscaped deer park set amid rolling hills and contains two important garden structures, the Gothic Umbrello (grade II listed) and Wolfe's Obelisk (grade I listed). This part of the landscape does not remain in its pristine 18<sup>th</sup> century form. Much of the parkland has been given over to farming and subdivided by hedges, though recent work by the National Trust has sought to restore it and a large number of new trees have been planted. The vista between the Temple of Concord and Wolfe's Obelisk has been obscured by later tree planting, but it is conceivable that this could be restored in the future. Also a number of houses and farm buildings have been built within the visual envelope of the parkland since the 18<sup>th</sup> century. Despite this the essential character of the parkland remains intact as does the

wider setting of the park and the house itself, which remains overwhelmingly rural and this is both of historic and aesthetic value.

Photomontages supplied by the applicant for the proposed wind farm (photomontage 18b) indicate that the wing tips of all five turbines will be visible from the park land. Granted, they do not interfere with a planned vista and as the turbines are over 10km away they are relatively small. However, as they will be moving they will draw they eye and will doubtless be more visible in the landscape than any photograph can suggest.

The impact of the turbines on the landscape is assessed on pages 22-23 of AppendixB to the Environmental Statement, Landscape and Visual, that accompanies the application. This concludes that in terms of landscape character and visual amenity the level of change is considered slight and the effect of change is considered moderate and that this would does not represent a significant impact on the Park.

Our view is the development would harm the significance of the Park. This harm would be less than substantial, as a major vista is not affected, but the development would be an alien intrusion into the otherwise overwhelmingly rural setting and the dominance of Stowe over the entire landscape would be challenged and diminished. This would be noticed by all who visited the park and detract from the experience of all those visiting and is therefore not insignificant. This harm to significance needs to be taken cumulatively with the harm to the setting of other heritage assets and weighed against other public benefits.

**Stuchbury** (un-designated heritage asset)

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 suggest 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, in line with Policy HE8.1 of PPS5, and in reference to your archaeological advisor.

**Conclusion**

English Heritage considers that the Spring Farm Ridge wind farm application will cause a moderate degree of harm to the setting and significance of six highly designated heritage assets or groups of assets. Furthermore there is the potential for a significant degree of harm to be caused to the significance of Sulgrave Manor and this requires further analysis. The cumulative affect of these impacts are considerable in themselves but need to be considered alongside the total impact on all designated and un-designated heritage assets.

In considering the overall impact it is important to consider, in line with policy HE1.2 of PPS5, the potential to deliver similar measures to mitigate climate change in a manner that is less damaging to the historic environment.

Potentially this could be achieved through adapting the current proposal. However, if this is felt to be neither feasible or desirable, policies HE1.3, HE9.4 and 10.1 of PPS5 should be considered once the overall degree of harm to heritage assets has been satisfactorily demonstrated. To summarise, these policies request that where harm to the significance of a heritage asset or assets is caused by a proposal than the wider public benefits of that proposal should be weighed against the harm caused. The greater the harm the greater the public benefit required by way of justification.

### **Recommendation**

We would recommend that in determining this application, sufficient information is gained from the applicant to fully assess the impact of the proposal on the historic environment, in line with policy HE6.1 of PPS5. We particularly request further analysis on the impact on Sulgrave Manor. This should take the form of wire-frame viewpoints from the upper section of the house and the higher south western section of the garden. Further view point analysis of the impact on the Church of St Mary Magdalene, Helmdon, Astwell Castle and long to medium views of Sulgrave village from the north west would also be beneficial.

We would also request that the instances of moderate harm to the setting and significance of the six highly graded heritage assets or groups of assets listed above is given full consideration in the overall analysis of impact. In doing so we would request that the potential to mitigate that harm is explored and that where harm is felt to be unavoidable that the public benefits of the proposal are seen to outweigh the harm caused to the significance of the historic environment. In this regard we draw your attention to policies HE1.3, policies HE9.4 and HE10.1 of PPS5, all of which consider the way in which harm and public benefit should be weighed up in determination.

We would welcome the opportunity of advising further. Please consult us again if any additional information or amendments are submitted. If, notwithstanding our advice, you propose to approve the scheme in its present form, please advise us of the date of the committee and send us a copy of your report at the earliest opportunity.

Yours sincerely

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