

September 2013

Town and Country Planning Act 1990, Section 78

Town and Country Planning (Inquiry Procedure) (England) Rules 2000

Proposed Wind Farm at Spring Farm Ridge, land to the north of Welsh Lane between Greatworth and Helmdon, Northamptonshire

PINS Ref: APP/Z2830/A/11/2165035

LPA Ref: S/2010/147/MAF

Appeal by Broadview Energy Developments Limited against refusal of planning application by South Northamptonshire District Council ("the Council") for the installation of five wind turbines, plus associated infrastructure at Spring Farm Ridge, land to the north of Welsh Lane between Greatworth and Helmdon.

Proof of Evidence in respect of landscape and visual effects

2.1: Proof of Evidence

Prepared by

KATE AHERN, BSC, MSC, MLI
PRINCIPAL OF LAND USE CONSULTANTS

On behalf of

South Northamptonshire District Council

1. INTRODUCTION

The Witness and Scope of Evidence

- 1.1. I am Kate Ahern. I am a Chartered Member of the Landscape Institute (Management) MLI and a Principal of Land Use Consultants (LUC). I have 25 years of experience in professional practice as a landscape planner. A summary of my relevant experience with particular reference to wind turbine developments is provided at **Appendix 2.3**.
- 1.2. My evidence considers the landscape and visual effects arising from the proposed wind turbine development at Spring Farm Ridge. The landscape policy context is covered by the Council's planning witness.
- 1.3. I recognise that all commercial wind turbine schemes will have effects on the landscape character and visual amenity in the immediate vicinity of the development site due to the size and scale of structures introduced. However, my evidence focusses on showing how the landscape of this part of rural South Northamptonshire, notably the tranquil valley at Stuchbury, and the way that it is experienced, means that it does not have the capacity to accommodate change of the scale proposed. This is an area with a subtle rural character - great care needs to be given to large scale infrastructure to ensure that it is located appropriately within such a landscape. The need to be sensitive to site and local landscape context is emphasised throughout recent government guidance.
- 1.4. The guidance from DECC/DCLG¹ on Renewable and Low-carbon Energy Capacity Methodology has been implemented at the regional level for the East Midlands². The results for Northamptonshire identify South Northamptonshire, Daventry, East Northamptonshire and Kettering as having the greatest potential for wind energy (Map 4.13). The report states that this represents the 'technical potential' and does not cover the 'deployable potential' i.e. what could be practically achieved within the local authority area. It notes that this would require further assumptions and scenario testing, specifically including landscape constraints. Landscape sensitivity is a key factor that should be considered when assessing deployable potential for wind energy and is a critical

¹ DECC/DCLG (2010) Renewable and low carbon energy capacity methodology for the English Regions

² Low carbon energy opportunities and heat mapping for local planning authorities across the East Midlands, LUC/Centre for Sustainable Energy/SQW, 2011

requirement for sites which may theoretically have technical potential for wind energy development. The East Midlands report goes on to note (Chapter 6) that landscape sensitivity assessment is one tool that can be used to guide the location of large and medium-scale wind energy development. *“As landscape impacts are one of the key constraining factors for wind energy developments, a landscape sensitivity assessment can help identify those areas where landscapes are more or less sensitive to wind energy development”* (para. 6.37). Furthermore, the East Midlands report specifically notes (under Project Scope) that it does not provide guidance on specific sites. *“Further site based studies and assessments would be required to assess the suitability or otherwise of specific sites.”* For these reasons, I consider that it would be wrong to place any significant weight on this document in considering the planning merits of the proposed scheme.

- 1.5. The importance of the local context was further reinforced by Eric Pickles in his Written Ministerial Statement on local planning and onshore wind given to Parliament on 6th June 2013. This noted that current planning decisions on onshore wind are not always reflecting a locally-led planning system. It followed a wide range of representations as part of DECC’s call for evidence which indicated that action is needed to deliver the balance expected by the National Planning Policy. The statement identifies a *“need to ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment”*. It states that that *“meeting our energy goals should not be used to justify the wrong development in the wrong location”*
- 1.6. The new Planning Policy Guidance³ foreshadowed by the Ministerial Statement and published in July 2013 states that while all communities have a responsibility to help increase the use and supply of green energy -*“this does not mean that the need for renewable energy automatically overrides environmental protections and the planning concerns of local communities”*. It also highlights the role of landscape character assessment as a tool to help assess likely landscape and visual impacts.
- 1.7. In my evidence I show how the area around Spring Farm Ridge and the Helmdon valley is a cherished and sensitive, tranquil rural landscape in the context of South Northamptonshire. It is highly valued locally and provides an important local amenity and

³Planning practice guidance for renewable and low carbon energy, DCLG, July 2013

is not appropriate for the location of the proposed development. While being in favour of renewable energy, I believe that this is an example of the wrong development in the wrong location.

Background and Brief

- 1.8. LUC was commissioned by South Northamptonshire District Council in spring 2011 to undertake a review of the Landscape and Visual Assessment (LVIA) chapter of the Environmental Statement of the Spring Farm Ridge Wind Farm. I undertook a review following IEEMA guidance⁴ and visited the site and key viewpoints. In February 2012 an updated LVIA (Chapter 7) was submitted as part of the *Further Environmental Information (FEI)*. My review of the LVIA and the FEI update is provided as **Appendix 2.4**.
- 1.9. Following the refusal of planning permission in July 2011 and the subsequent appeal, LUC was engaged to provide the evidence in relation to landscape and visual impacts. I undertook an independent appraisal of local landscape character and sensitivity, involving a further visit to the site and surroundings. This is provided as **Appendix 2.5**.
- 1.10. At the inquiry in May 2012, I appeared as a witness for the Council and gave evidence (APP/Z2830/A/11/2165035/NWF). The appeal was allowed. That Inspector's decision was challenged in the High Court by the Council and the decision was quashed leading to this inquiry. The challenge related to policy matters and it is my understanding from the minutes of the pre-Inquiry meeting, August 2nd 2013, that the previous Inspector's judgement on factual matters are material considerations for this inquiry. I agree with the judgement on landscape and visual impacts of the Inspector set out in the conclusions section of the decision letter (para.88):

"In this particular case, the proposal would bring about a significant change to the landscape and from some viewpoints the proposed wind farm would become a key feature at odds with the scale of the landscape with a subsequent adverse impact."
- 1.11. I was engaged by the Council as an expert witness to provide the landscape and evidence for this appeal. As part of this work I undertook a further site visit (July, 2013). I also reviewed the original reports prepared for SNC as part of the ES review (**Appendix 2.4**)

and my own landscape sensitivity study (**Appendix 2.5**) to ensure that they are relevant and up to date. The original appendices are included and are unaltered, with the addition of a further supporting map in **Appendix 2.5**. I have not changed my opinion since the first appeal. In this proof of evidence, I bring forward more of the information included in the Appendices to strengthen understanding of the local landscape impacts and provide further emphasis where I consider that the Inspector may find it helpful in reaching a decision. My evidence specifically draws attention to the relevant points in the previous Inspector's decision which I believe remain as material considerations for this inquiry. Where I dispute judgements in the previous Inspector's decision I set out the reasons why and provide additional information. My evidence is focused on the original reasons (2 and 5) for refusal of the planning application (in summary):

- that the development by virtue of its scale and siting would appear prominent and incongruous in its rural setting and would have an adverse impact on the highly valued character and appearance of the countryside in what is a gently, rolling, tranquil and agricultural landscape (Reason 2)
- that there would be significant adverse and detrimental visual effects on the residential occupiers in the settlements of Greatworth, Helmdon, Sulgrave and Stuchbury. (Reason 2)
- that there would be an adverse effect on the amenity of walkers, cyclists, horses and riders on a well-used and valued public rights of way network(Reason 5).

1.12. I confirm that this evidence is true and has been prepared and is given in accordance with the guidance of the Landscape Institute. I confirm that the opinions expressed are my true and professional opinions.

1.13. My evidence (2.1) is structured as follows:

Section 2: Approach and methodology

Section 3: Effects on landscape

Section 4: Effects on visual amenity

⁴IEMA (2011a) EIA Quality Mark ES Review Criteria, Lincoln: Institute of Environmental Management &

1.14. My evidence is supported by the following Appendices:

Appendix 2.2: Summary

Appendix 2.3: Relevant experience

Appendix 2.4: LVIA and FEI review

Appendix 2.5: Landscape sensitivity study

Appendix 2.6: LVIA approach and methodology

Assessment

2. APPROACH AND METHODOLOGY

2.1. My review of the LVIA chapter of the ES considered that generally an appropriate approach had been adopted following the Guidelines for Landscape and Visual Impact Assessment (GLVIA)⁵. There were some omissions in information, lack of transparency in methodology, underestimates of impacts and areas of clarification needed, some of which are now included in the FEI. My comments on the approach and method followed by the LVIA are set out in **Appendices 2.4 and 2.6**. I do not intend to use my evidence to unpick the LVIA in detail, but highlight the following main points regarding the methodology.

Assessing sensitivity

2.2. My principal concern is that the ES does not address the particular character, qualities and sensitivities of the local landscape. The ES relies too heavily on generic county-scale landscape information and fails to recognise the specific sensitivities of this part of the Tove Catchment. This is considered in the following section of my evidence. As part of this I have undertaken site work and prepared a detailed local landscape character assessment for the area (presented in **Appendix 2.5**).

Determining significance

2.3. An understanding of the method used by the appellant requires cross referencing between the original ES LVIA chapter 7, the LVIA Appendix, FEI Appendix B method statement and their application in both documents. It is a confusing a process.

2.4. I agree with the FEI Appendix B which states (pg 59) "*... significance... is not absolute and can only be defined in relation to each development and its location. It is for each assessment to determine the assessment criteria and the significance thresholds using informed and well reasoned judgement...*". In practice, the application of these criteria and judgements is not always transparent in the LVIA itself.

2.5. In my assessment of impacts on landscape, I use the approach set out in the Table 7.3 (pg. 69) of the original LVIA which cross references sensitivity and magnitude of change.

⁵ Guidelines for Landscape and Visual Impact Assessment, 2nd Edition Landscape Institute and Institute of Environmental Management and Assessment, 2002 (this document now revised, the LVIA was prepared under the 2002 guidance)

Valency

- 2.6. I recognise that judging the nature of change of wind turbine development, especially effects on visual amenity, is a complex matter. Different people have different responses to seeing wind farms and associated changes in the landscape, depending to some extent on their predisposition towards landscape change in general, to seeing wind farms in the landscape, and attitudes to renewable energy.
- 2.7. The FEI method statement states (Appendix B, pg. 65) with regard to valency that "*... it is expected that in order to secure full compliance with the (EIA) regulations, the assessor should establish her/his opinion as to the 'valency' of the schemes effects*". This means whether the assessor considers the effects are positive (beneficial) or negative (adverse). In the LVIA the assessor has not followed this method statement through and made a judgement as to whether the effects are considered to be positive or negative, beneficial or adverse.
- 2.8. In my opinion, given the sensitivity of the landscape and visual receptors at this site, I consider that the significant impacts identified are always negative and adverse.

Photomontages

- 2.9. Photomontages can only be a guide to how turbines will appear in the landscape, not least because in reality the turbine blades are moving elements and will draw the eye. Photomontages will inevitably underestimate impacts.
- 2.10. The photomontages submitted in the FEI are acceptable, complying with current guidance and I refer to these where necessary. In my review of the LVIA I also noted the need for supplementary photomontages to illustrate impacts, which have not been provided by the appellant. In my evidence, I also refer to the photomontages prepared by the Action Group (Helmdon, Stuchbury and Greatworth Windfarm Action Group (HSGWAG)). I confirm that these photomontages comply with current industry guidance and good practice.
- 2.11. **In summary**, the method presented for the LVIA in Appendix B of the FEI appears appropriate. My concern is about how this method is followed through in practice to make judgements on the significance of impacts. This is demonstrated in the following parts of

my evidence which show how the high sensitivity of the local landscape combined with the great change induced by a wind turbine development of this scale will have a very significant impact on this part of South Northamptonshire. I believe that this is more than the generic impacts of large scale infrastructure in a rural environment. I dispute the notion that they are 'additive' and therefore remove little physically from the landscape. Landscape is more than just what you can see, and in my opinion the proposed development would change our understanding and appreciation of the particular sense of place of this valley.

3. IMPACTS ON LANDSCAPE

- 3.1. Here, I review the findings of the LVIA (and FEI). I concentrate on the main landscape effects related to the operational stage of the wind farm, with reference to the second reason for refusal that the development by virtue of its scale and siting would appear prominent and incongruous in its rural setting and would have an adverse impact on the highly valued character and appearance of the countryside in what is a gently, rolling, tranquil, agricultural landscape.
- 3.2. My evidence follows the definition in the European Landscape Convention (ELC)⁶, signed by the UK Government in February 2006, and binding from March 2007. The ELC states that *"landscape means an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors"*. I am not only concerned with whether you can see wind turbines or not in any particular view but focus on how this affects the experience of this landscape as perceived by people. All wind farms are massive structures and highly visible in any local landscape. However, not all local landscapes will necessarily be adversely affected by wind turbines to the same degree. My evidence shows that by virtue of the scale, tranquillity and particular characteristics of this local landscape that the effects are harmful and destroy the particular character of this valley.
- 3.3. In this section, I challenge the Appellant's evidence (referred to in the previous Inspector's decision para. 23 and 33) relating to a theoretical wind farm landscape within 800m of the turbines, a probably theoretical local landscape with wind farm sub-type up to 1.5 km and a possible theoretical local landscape with wind farm sub-type up to 2.5 km. I consider that the use of these terms is confusing. The terms do not adequately convey the actual impacts of the scheme on the experience of this particular landscape. Moreover, I consider that the hills and valley configuration (**Appendix 2.5**, Figure 1.2) of this landscape means that significant adverse landscape impacts occur at a greater distance than 2.5km. Not least, because of the role that the valley crests and ridges play in forming skylines. My reasoning is set out in my detailed analysis of landscape sensitivity in **Appendix 2.5** and summarised below.

3.4. I consider the national and regional landscape context, focussing down to the county landscape context and concluding with the context and character of the site itself. The evidence is supported by my assessment of landscape sensitivity set out in **Appendix 2.5**.

NATIONAL AND REGIONAL LANDSCAPE CHARACTER CONTEXT

3.5. The national landscape character context is set out in Character Area 95: Northamptonshire Uplands⁷. The site is on the south eastern boundary of this area, transitional with three Character Areas. This edge location makes assessment of sensitivity difficult and means that the next regional tier in the landscape character hierarchy is important. The regional landscape information is omitted in the LVIA.

3.6. The regional landscape context is set out in the East Midlands Regional Landscape Character Assessment⁸. The proposed site lies within **5C: Undulating Mixed Farmlands**. The description for landscape indicates specific attributes that highlight its sensitivity to wind turbine development, notably:

- Remote, rural and tranquil character
- Intimate and enclosed landscape associated with valleys
- Undulating landform
- Strong historic character – tangible evidence of the medieval period

3.7. These sensitivities are also recognised in the section covering landscape change and management for this landscape type which suggests: *'The aim should be to protect the character of the landscape by appropriately siting and designing new wind farm installations, and also considering any potential cumulative effects.'* (pg. 172)

3.8. In my opinion, sensitivity is medium-high and magnitude of change is major (to a radius of up to 3-4km from the site). I would therefore consider there to be a **Major significant effect (adverse)** up to 3-4 km from the site. The LVIA for the Spring Farm Ridge site does not refer to the regional landscape character context and does not demonstrate how the siting and design of this wind farm protects the character of this landscape type.

⁶ The Council of Europe, European Landscape Convention, CETS No.:176, Florence, 20.X.2000

COUNTY AND DISTRICT LANDSCAPE CHARACTER

3.9. A landscape character assessment (LCA) of Northamptonshire has been prepared⁹ as part of a published suite of information on the environment of the county. The assessment provides a detailed review of Northamptonshire's current landscape. It was undertaken in accordance with the most recent LCA methodology. Here, I use this baseline evidence to highlight the sensitivities of the two character areas in closest proximity to the appeal site. I make a judgement on the magnitude of change and significance of impacts.

Undulating Claylands - 6a Tove Catchment

3.10. The Spring Farm Ridge site is located within this area. In my opinion the factors that **elevate sensitivity** for the Tove Catchment according to the characteristics identified in the LCA are:

- *Relative scale* - A more intimate and intricate scale associated with the topography of the stream valley and associated the pastoral land cover;
- *Perceptual/ Experiential aspects* - rural villages and areas of countryside evocative of the medieval period, villages bordered by Manor Farm and moated site (note this is exemplified at Stuchbury adjacent to the site).

3.11. While the county character area/type as a whole has a medium-high sensitivity, I consider that this site is located in an area with attributes identified as being of high sensitivity. The magnitude of change would vary according to the distance from the site and it would be major up to about 3-4 km from the site, as far as the next ridge and encompassing land within the intervening valleys includes the villages of Sulgrave, Helmdon and Greatworth. The high sensitivity and major magnitude of change means that there would be a **Major significant effect (adverse)** on the landscape character of 6a: Tove Catchment up to 3-4 km radius from the site.

3.12. Table 1 of the FEI Appendix A, sets out the sensitivity for the wider Northamptonshire landscape type, not the Tove Catchment local character area. My assessment indicates

⁷ Countryside Character, Volume 4: East Midlands, The Countryside Agency, 1999

⁸ East Midlands Regional Landscape Character Assessment. EM Regional Landscape Partnership (2010)

⁹ Current Landscape Character Assessment, Northamptonshire (web based information)

that this particular part of the landscape type has a higher sensitivity than the 'medium' identified for the type as a whole. The LVIA (para. 7.7.6.3) concludes that sensitivity is medium, magnitude of change up to 4 km radius Major to Moderate, resulting in a Major/Moderate effect, significant from some areas. The ES therefore recognises this as a significant adverse effect.

Undulating Hills and Valleys - 13a Middleton Cheney and Woodford Halse

3.13. This character area is located, at its closest point, 1.6 km to the west of the site. In my opinion sensitivity is Medium, as a result of the following:

- *Relative scale* – intimate, human scale;
- *Perceptual/ Experiential aspects* - deeply rural qualities – outside urban areas, strong historic character.

3.14. I agree with the FEI assessment that the magnitude of change would vary according to the distance from the site and range from major to moderate for the area within 2.5km of the site and including the area around Greatworth. The effect would therefore be **Major to Major/Moderate** and is considered to be a significant adverse effect.

LOCAL LANDSCAPE CHARACTER

3.15. This valley is a special place. While it lacks any national or local designations it is highly valued. Taking a walk into the valley heading north following the byway (BOAT) from the B4525 one very quickly enters a quiet rural landscape, largely uninterrupted by modern development, with strong historic and natural qualities. It is a tranquil place to be.

3.16. The LVIA baseline does not describe the different aspects of the landscape of the site (elements, characteristics, character) as recommended by GLVIA para. 2.16. The baseline description places an emphasis on 'negative' characteristics such as the disused railway line, use for tank driving and the wider (off site) context such as Greatworth Park business space, which is not relevant. I recognise that since the last appeal the tank driving enterprise on a small part of the south east of the site has been granted planning permission (S/2010/1117/MAF). I consider that this use of the site does not have an

impact on the overall tranquillity of the wider valley. Landscape conditions included as part of the planning permission seek to enhance local visual amenity by strengthening and replanting boundaries. I consider that the valued character of the local landscape is underplayed in the ES. The failure to fully articulate the character of the local landscape is an omission which I address here.

3.17. My landscape character assessment (**Appendix 2.5**) reveals that the site falls into two distinct local character areas. An enclosed valley and the interfluves forming the valley crest. I note that these are two interlinked areas that together form the valley unit. The boundaries of the character area are not hard and fast lines that separate it into two isolated areas. Boundaries are zones of transition; whatever happens in one area will influence the other both visually and in terms of its character – and how the landscape is perceived and experienced. Depending on the characteristics of the particular landscape in question (including elevation, topography, perceptual experience etc.), a development of wind turbines in one area can have direct and significant effects on both the area in which they are located and in adjacent areas. The Landscape Character Assessment Guidance¹⁰ notes in relation to boundaries that “*landscape is a continuum and character does not, in general change abruptly*”.

3.18. The previous Inspector’s decision (paras. 19. and 20) comments on the local landscape assessment. The Inspector notes that the Appellant does not dispute this local landscape and visual assessment but did not agree with the boundaries. I challenge the implications of the Inspector’s findings (para. 20) which states that “*from my site visit, having regard to the springs noted on the base map, the gradient and characteristics of the landscape, and the tranquillity of the area, I found that proposed turbines T3 and T4, shown to be on the border between the two area would be in the interfluves like turbines T1 and T2*”. I consider that, whether they are or are not within the interfluves is not the material point here. The fact is that the ridge and valley together form a distinctive landscape unit as shown in **Appendix 2.5**. Within this Appendix, Figure 1.2 highlights the topography and shows the quick transition between the ridges and valley. Any change in one area will quite clearly affect the adjacent area. On the understanding that boundaries are zones of

¹⁰Landscape Character Assessment Guidance for England and Scotland (2002), Swanwick, C. and Land Use Consultants.

transition my local landscape character assessment (**Appendix 2.5, 1.1**), now consistently follows a contour line on both sides of the valley, with extensions to take in springs. My conclusions remain the same – that the turbines do not relate to the local landscape and topography and are of a massive scale within this modestly scaled subtle valley.

- 3.19. Here, I describe the impact on the two local landscape character areas covering the site. To the north the site forms part of a distinct enclosed valley. This quick transition in character is especially apparent when moving into the site from the B4525 along the byway. The Helmdon Valley is characterised by the presence of springs, the minor watercourse running east west towards Helmdon, grazed pasture within the valley and evocative medieval landscape of Stuchbury with its sunken lane, earthworks, moated site. The enclosure and complex, intimate landscape pattern, gently undulating valley landform, associated high levels of tranquillity and strong undisturbed rural character combine to give it a high sensitivity. The proposed development would introduce new tall structures which at 125 m height are completely out of scale with and three times greater than the subtle valley which only has a 40m difference in contours from valley floor to valley crest. They will also introduce moving structures into a peaceful, tranquil enclosed valley setting within this part of South Northamptonshire. The magnitude of change will be major across the landscape unit. There will therefore be a **Major significant effect (adverse)**.
- 3.20. To the south, bordering the B4525, the appeal site forms part of a narrow ridge or interfluvium between the valleys. The ridge itself is a more open, arable landscape, although contained by medium sized fields and blocks of woodland. The ridges form a strong skyline and setting for the settlements in the intervening valleys, in this case Sulgrave, Greatworth and Helmdon. I judge the sensitivity to be medium-high, by virtue of the fact that these are narrow ridges with a close relationship to the intervening valleys and their role as a setting to the villages. The magnitude of change will be major. This is due to the scale of the tall moving structures in this subtle valley landscape and their influence over a wide area forming the backdrop to neighbouring villages. There will therefore be a **Major/Moderate significant effect (adverse)**.
- 3.21. The nature of the local landscape comprising a series of subtle skyline ridges and intervening valleys means that the influence of the turbines on this upper valley side is far reaching. In this case, for example extending across the intervening ridges and valleys

and forming skyline features from beyond, forming a backdrop to settlements such as at Sulgrave and Helmdon and conflicting with existing landmarks and features.

- 3.22. In considering these local landscape impacts, the Inspector found that reference to some viewpoints aids the assessment. For the valley in which the appeal site is located, it is pertinent to note the Inspector's comments in relation to Viewpoint 3 looking south west from Helmdon (Para 25) "*the proposed turbines some 1300m to 1350m away, would be conspicuously out of scale with the intimate river valley landscape and become a dominant feature with adverse impacts on the perceived small scale landscape. They would contrast harmfully with the viaduct over which they would visually dominate and tower*". Likewise, for the valley in (Para 31) the Inspector describes how "*the peaceful tranquillity of the area would be changed by the rotating blades that would contrast harmfully with the modest scale of parts of the landscape, its patterns, undulations and textures. Overall the turbines would be a palpable feature of the landscape...*". For the interfluves the Inspector refers to HSGWAG view 2, and agrees (para. 27) that the five turbines would "*dominate the skyline and the proposed turbines would become a key feature at odds with the scale of the settlement (Sulgrave) and the prominence of the church tower*"
- 3.23. My analysis of how the Inspector has calibrated judgement with reference to viewpoints is set out in the following section (4) of my proof of evidence.
- 3.24. In conclusion, my criticism of the LVIA is that it does not assess the particular character of the site itself, but instead jumps to the much wider character context represented by the county-wide landscape type (Undulating Claylands) – which is at a very different scale. I consider that the LVIA should have clearly articulated the particular grain and scale of the local landscape within which the site lies rather than relying on a much broader generic county scale study.
- 3.25. **Landscape fabric:** I agree with the conclusions of the LVIA that there would be a long term, reversible effect on the landscape fabric of the site during the operational life of the development as a result of loss of ground vegetation. I note that there will also be losses of lengths of hedgerow and tree cover and that no mitigation to renew or replace hedgerows or trees is proposed as part of the LVIA. The assessment does not follow the process set out in the method statement by assigning sensitivity and magnitude of change

to determine the significance of effects on landscape fabric. This is an omission in the LVIA and will need to be covered by planning conditions.

CONCLUSION ON LANDSCAPE IMPACTS

3.26. I conclude that the landscape does not have capacity to accept such a change without a fundamentally adverse (harmful) effect on character. I do not agree with the conclusion of the LVIA (*para. 7.1.6*) that the *"proposal will relate well to local landscape character and respect the scale and composition of the landscape"*. Five structures of 125m height, with moving blades are not simply additive; they remove an understanding and experience of the sense of place. They do not relate to the grain and scale of this modestly scaled valley landscape for the following reasons:

- It is part of an enclosed, intimate valley unit with undulating valley sides – it is not a large scale or vast landscape;
- The turbines are located on the upper slopes and crest of a minor valley such that they will appear out of scale and overbearing in this subtle valley landscape - it is not an exposed open plateau as suggested by the LVIA. The interfluves form a very narrow ridge between valleys and as such are a prominent skyline over the local area;
- This is an intricate, complex landscape, with hedgerows crossing the undulating valley site enclosing medium sized irregular fields. The minor water course, areas of pasture, sunken lane and medieval earthworks adjacent to the site all add to the interest and complexity of this landscape. It is by no means a regular, simple or linear landscape.
- The landscape has a very strong time depth and resonant historic character – the strong historic and cultural associations are visible in the form of earthworks representing a deserted medieval village on the valley side and a chain of fishponds on the valley floor. These are linked by a distinctive sunken lane descending from Stuchbury. The whole of this local landscape is highly evocative of the medieval;
- The area retains a rural, tranquil quality, with a strong historic resonance. It is largely undisturbed by visual or audible intrusions, with an absence of modern development. The scheme would introduce large scale built vertical moving structures into this subtle quiet, peaceful and locally valued landscape.

3.27. The valley crests and slopes and floor together combine to make up one landscape unit. Any change in one area will affect the other. The fact that the majority of turbines are located on the upper valley sides only serves further to exaggerate their effect on the valley landscape. They will be experienced across the local area and form the skyline backdrop to the small villages. The particular nature of the local topography comprising a series of narrow elevated ridges and small valleys means that the turbines will frequently come in and out of view when travelling through this area and will be a dominant presence for parts of the landscape between 3 – 4km radius, particularly to the north of the site towards Sulgave and within the Helmdon valley. I therefore challenge the notion that a wind farm landscape would only extend to 800m. In experiencing this landscape we could not differentiate a theoretical wind farm landscape within 800m of the turbines, a probably theoretical local landscape with wind farm sub-type up to 1.5 km and a possible theoretical local landscape with wind farm sub-type up to 2.5 km. We would experience the landscape as whole with the turbines dominating the valley and forming prominent skyline elements coming in and out of view from different elevations in this undulating landscape. Whether we could see them or not, we would know that they are there.

4. IMPACTS ON VISUAL AMENITY

- 4.1. This section of my evidence reviews the findings of the LVIA with regard to effects on visual amenity. It relates to the second reason for refusal that there would be significant adverse and detrimental visual effects on the residential occupiers in the settlements of Greatworth, Helmdon, Sulgrave and Stuchbury. It also supports the fifth reason for refusal that there would be an adverse effect on the amenity of walkers, cyclists, horses and riders on a well-used and valued public rights of way network.

Choice of viewpoints

- 4.2. The FEI contains an updated viewpoint analysis to determine the significance of the changes from a selection of viewpoints that represent the main landscape and visual receptors. My review of the LVIA considered that the representative viewpoints should have been listed, described and justified as part of the visual baseline. The FEI does not provide any further information on the rationale for the choice of the 19 viewpoints (listed in Table 7.4 of the FEI). However, the viewpoints represent a reasonable choice of mid and long range views and receptors although, importantly, they omit some short range of local views. I consider that the omission of views from the area on and to the north of the site means that the significant landscape and visual impacts relating to the turbine location on this valley side are underestimated. I, therefore, refer to additional photomontages views prepared by the Action Group.

Visual impacts

- 4.3. The FEI clearly demonstrates the significant (adverse) visual effects of the scheme. It indicates and shows on the associated photomontages that there will be **significant effects** at all eight of the viewpoints up to 4 km from the site (see Table 7.5 in the FEI). There will be significant effects on the visual amenity of a large number of residents and recreational users.
- 4.4. The LVIA identifies significant adverse effects on visual amenity at the following viewpoints:
- 1: View West of Grange Farm (842m) – Major
 - 2: View north east from Helmdon Road, Greatworth (953m) – Major

- 3: View south west from Helmdon Village Green (1.35m) – Major
- 4: View south east from Castle Green at Sulgrave (2.12km) - Major to Major/Moderate
- 5: View south from bridleway near Sulgrave Manor (2.41km) - Major to Major/Moderate
- 6: View north west from minor road within Radstone (2.85km) - Major to Major/Moderate
- 7: View north east from Thenford Road at Marston St. Lawrence (3.2km) – Major/Moderate to Moderate
- 8: View south west from a minor road at Weston (3.7km) - Major to Major/Moderate
- 9: View from south west of Milthorpe (3.9km) - Major/Moderate

4.5. The Appellant clearly recognises the significant visual impacts of the scheme on walkers, residents plus other users, and has undertaken a professional analysis involving detailed fieldwork observations and preparation of visualisations following good practice guidelines. This detailed assessment is presented in Appendix B of the LVIA (2010) and Appendix A of the FEI (2011). Here, I challenge the findings of the previous Inspector’s decision (paras. 24. – 29) where she has made judgements which are contrary to those of the Appellant. I refer to the findings in the original LVIA (2010), Appendix B and the FEI (2012), Appendix A.

4.6. **Previous Inspector’s decision, Para. 24 - View 2.** The Inspector records that “*the turbines would be dominant and clearly visible but, in view of the width of view, large skies and sizeable fields, the proposal would not be overbearing*”. In considering effects on visual amenity I would note that there is no higher threshold of ‘overbearing’ that needs to be breached. In contrast, the Appellant’s LVIA states that the turbines would constitute a Major new element and that there would be a significant effect on the landscape character and visual amenity of residents of Greatworth and walkers using the public right of way. This is confirmed in the FEI.

4.7. **Previous Inspector’s decision, Para. 25 - View 3.** The Inspector records that “*the proposed turbines some 1300m to 1350m away, would be conspicuously out of scale with the intimate river valley landscape and become a dominant feature with adverse impacts on the perceived small scale landscape. They would contrast harmfully with the viaduct*

over which they would visually dominate and tower". I agree with the Inspector's judgement here and it is in accordance with the LVIA. The LVIA notes that from this location the turbines would be prominent vertical elements on the local skyline and attention would be drawn to them as a result of their position, size and blade movement. Significant effects are recorded on visual amenity and landscape. This is confirmed in the FEI.

- 4.8. **Previous Inspector's decision, Para. 28 - Views 8 and 9.** The Inspector records that these viewpoints to the north "*offer wide expansive views over mainly fairly small scale pastureland. Although the proposed turbines would be clearly visible and striking elements on the skyline, they would be sufficiently divorced from the settlements of Weston and Milthorpe so as not to be a conflict with, or dominate the landscape.*" Again, this judgement is markedly different from that of the Appellant who states in the LVIA that from view 8 the turbines would constitute new moving elements on the skyline, with a reasonably balanced composition. From view 9 the turbines would be visible on the sky in a cohesive group with full towers and moving rotors visible. They would be visible on the horizon in the context of open undulating farmland. The level of effect is considered to be significant for both landscape character and visual amenity. This is confirmed in the FEI.
- 4.9. **Previous Inspector's decision, Para. 29 – View 6.** The Inspector records that that from this viewpoint "*the wide sweep of the arable fields, the hedges with hedgerow trees and larger woodland copses would break up/filer views of some of the turbines which in any event would not appear at odds with the overall width of view and expansive skies.*" This judgement again conflicts with that of the Appellant who records significant impacts on landscape character and visual amenity.
- 4.10. In summary, I believe that the Inspector has not always calibrated the impacts correctly and has underestimated the significant effects on visual amenity as recorded by the Appellant.

Additional views (north of the site)

- 4.11. My review of the LVIA notes the lack of close range views notably to the north of the site showing the turbines in the context of their valley setting. These were not provided as part of the FEI. Here, I refer to views provided by the Action Group.

Stuchbury Hall Farm

HSGWAG View 5: This photomontage, equivalent to a view from the byway, shows the view across the valley and the turbines within this quintessential rural landscape. They form dominant structures completely out of scale with the grain of this small scale valley landscape. The turbines would introduce new vertical structures which at 125 m height and three times greater than the subtle valley which only has a 40m difference in contours from valley floor to valley crest. They will also introduce moving structures in to what is a peaceful, highly tranquil enclosed valley setting.

North of Sulgrave

HSGWAG Views 1 and 2: These photomontages, from rights of way, clearly show the turbines as viewed across the intervening valley and their prominence on the skyline and the setting of the village of Sulgrave and in some locations conflicting with the church tower. They would clearly change the perception of this area as a quiet rural landscape. The Inspector concluded (para. 27) for View 2 that in these views north of Sulgrave the turbines would appear as "*dominating the skyline*" and "*striking elements of the skyline*". From viewpoint 2 they would "*form part a key feature at odds with the scale of the settlement and prominence of the church tower*".

- 4.12. In my opinion these views helpfully illustrate the local landscape context of minor valleys and ridges; a context which exacerbates the impact of the turbines.

Impacts on residential amenity

- 4.13. The LVIA (Appendix B) indicates that there will be significant effects on residential amenity for a large number of properties. There are 6 properties or groups of properties within 2km which would experience significant adverse effects, 10 of which are within 1km of the turbines. I agree with this assessment and these significant adverse effects will need to be considered as part of the overall planning balance. They relate to the following properties:

Grange Farm (817m) – Major

Spring Farm (506m) – Major

Gwebi/Ashvale (692m) – Major/Moderate

Bungalow Farm (666m) – Major

Bungalow Farm (666m) – Major

Greatworth Hall (472m) Major

4.14. The LVIA (Appendix B) also records significant adverse effects for properties within parts of the all the settlements of Helmdon, Greatworth, Sulgrave, Weston, Milthorpe and Weedon Lois, Marston St Lawrence, Halse, Radstone, Thorpe Mandeville and Culworth. These are all intact rural Northamptonshire villages with a strong historic character.

4.15. Given the size and scale of wind turbine developments, significant adverse effects on visual receptors, including residential locations, will often occur. For this reason, a further higher threshold relating to residential amenity has been applied by applicants, local authorities and planning inspectors in considering the acceptability of a proposal on residential visual amenity. There needs to be a degree of harm over and above a significant adverse effect and whether these significant impacts are unacceptable, will rest on whether they are considered to reach the threshold which has been described variously as 'overwhelming', 'overbearing', 'oppressive' or dominating by Inspectors. I am aware from recent wind farm appeal decisions that the factors to be considered include proximity, lack of screening, orientation and spread of turbines in the view. However, there are no straightforward rules that can be applied. Each case must always be considered on its own merits and the particular circumstances that apply to the property, not least its landscape context. In my opinion the degree of harm over and above a significant adverse effect is not a single threshold but involves a gradation of categories. It is perhaps also more helpful to seek to express the degree of harm over and above significant adverse effects for the assistance of the inquiry. Here I set out my findings for the properties that I consider to be most affected in terms of visual amenity.

4.16. Firstly, considering Stuchbury Hall Farm, in my opinion a range of factors which elevate the degree of harm all come into play for the property at Stuchbury Hall Farm. I refer to viewpoints 4 and 5, prepared by the Action Group. The particular issues at this property are:

- Proximity at c.800m to the nearest turbine (T5), although noting that the landholding is much closer (c. 200m) and that the boundary of the land holding is closer (c600m) to all 5 turbines;
- Residents are not confined to the dwelling but manage a small livestock farm with direct views across their holding to the turbines. The limited screening only relates to the immediate curtilage of the dwelling. There would be no escaping from the presence of the turbines within the landholding ;
- The turbines would be located on the opposite side of this small, quiet, undisturbed valley side and rise up in views forming an overwhelming and overbearing presence. The base of the turbines is at the same level or higher than the viewer. Their vertical prominence is exaggerated so that they dominate the view and appear overpowering and 'out of scale'. ;
- The orientation of the house on the valley side means that main views from the house (south facing windows from the lounge and upstairs bedroom) and the garden are across the valley terminated by the ridge which forms the skyline in views. While there is some screening from existing farm buildings and trees the turbines (T1 – T4) would be dominant on this ridge with different combinations coming in and out of views from the property and garden. Furthermore the movement of the blades will draw the eye so that they become a constant uncomfortable and distracting presence;
- The turbines would be a prominent feature in the view on the approach to the house along the drive from Helmdon/Sulgrave Road.

4.17. I agree with the conclusion reached by the Inspector (para. 62) that "*The proposed development would be unpleasantly imposing and pervasive*". I consider that Stuchbury Hall Farm would be an unpleasant and significantly less attractive place to live. The turbines would be a constant and pervading presence from the house, approaches and landholding and the degree of harm would be greater than a significant adverse impact.

4.18. Following my further site visit (July 2013) I also consider that Grange Farm (2 properties orientated east – west) falls into a higher category of harm than significant adverse. I am therefore including new information in this proof of evidence as a further example of a

property that moves up the scale and becomes a significantly less attractive place to live.

For the properties at Grange Farm the following factors come into play:

- Proximity at 860m from the closest turbines, with direct views to the turbines channelled along and through the tranquil and rural Helmdon Valley;
- Channelled 'end on' views such that turbines T1- T4 would fall in line 'stacked' with moving blades overlapping and the structures appearing to be of different heights. This is acknowledged as an uncomfortable viewing experience;
- Direct views from both within the properties and gardens so that the turbines have a pervasive presence

4.19. I agree with the Inspector (para. 63) that "*there would be visual harm from rotating blades that overlap that would be unlikely to rotate at exactly the same rate*". I consider that it would be an unpleasant and significantly less attractive place to live and that the degree of harm would be greater than a significant adverse impact.

Impacts on the amenity of walkers, cyclists, horses and riders

4.20. I am aware and have familiarised myself with the Council's evidence of Richard Hall on Public Rights of Way matters. I note that the site is crossed by a network of rights of way. A byway open to all traffic (BOAT) runs north-south between the B4525 and links to the sunken lane at Stuchbury Hall Farm, a public footpath runs east-west across the site and further footpaths cross the north and western parts of the site. These form part of a network of rights of way and link to the villages of Helmdon, Sulgrave and Greatworth. My site visits confirmed that they appear to be well used by walkers and horse riders, receptors acknowledged as being of the highest sensitivity.

4.21. There are no visualisations from the rights of way that cross the site and I consider that this is an omission. The turbines will be in very close proximity; Turbine 3 is just 41m from the nearest right of way. Turbines, 1, 2 and 4 are all well within 100m of the nearest right of way from parts of the rights of way they will be very dominant. I consider that there will be **Major significant adverse** effect on the visual amenity of users of the rights of way. The LVIA does not highlight the very close proximity of the turbines to the rights of way network, although recognises that the effect will be significant. In addition to the

effect on the visual amenity of users of the rights of way, enjoyment of recreational amenity will be affected by noise and movement of the rotating blades. The turbines will be a distracting and pervasive presence to the detriment of the enjoyment of the special qualities of the valley, notably its tranquillity

- 4.22. In my opinion, this is a valued network of rights of way that connects and links the local villages. The rights of way provide local access to a quiet area of countryside across, into and through a secluded valley landscape offering a range of experiences with strong sense of time depth and naturalness. I note the findings of the previous Inspector's decision (para. 31) in relation to the network of PROWs "*the peaceful tranquillity of the area would be changed by the rotating blades that would contrast harmfully with the modest scale of parts of the landscape, its patterns, undulations and textures*". Similarly, (para. 32) "*From some viewpoints particularly along parts of the PROWs and BOAT, the proposed turbines would become a key feature at odds with the scale of the landscape on which the proposal would have an adverse impact.*" This is clearly the case. However I challenge the judgement that "*Though the scale of the proposal would be dominating, it would not necessarily be overpowering.*" and that the "*continuous presence of the turbines in the landscape would be unlikely to be unnerving unless the blades over-sail the footpath*". I do not consider that there are thresholds of 'overpowering' or 'unnerving' that need to be breached for an impact on visual and recreational amenity to be unacceptable. In my opinion, the development is harmful and will destroy the experience and appreciation of this tranquil rural landscape for user of the rights of way within, across and along the Helmdon Valley.

CONCLUSION ON IMPACTS ON VISUAL AMENITY

- 4.23. In summary, I do not agree with the LVIA conclusion (para. 7.1.6) that significant landscape and visual effects will be localised as a result of local topography and the level of tree cover and the scale of the proposed development. In my view, the local topography forming a valley side, serves to exaggerate the scale of the development in views, and the turbines clearly rise above the tree cover forming prominent vertical elements in undisturbed rural views and have an adverse impact on the visual amenity of receptors from a large number of residential properties, historic villages, and destroy the experience of this landscape for users of the network of rights of way.