

Sexton Paul

From: Newell Corrie
Sent: 08 September 2013 21:05
To: Sexton Paul
Subject: Highfields Wind Farm, Litlington S/0439/12/FL

Dear Paul,

Thank you for the additional information & report from Oxford Archaeological Associates Ltd dated July 2013.

As requested, the report corrects the list of relevant policies and acknowledges English Heritage guidance.

Specific points to address additional information supplied on concerns raised, are as follows:

I accept that the policy basis is now addressed in principle, although I do not agree with the detail of the case put forward. In particular:

- I do not agree that the English Heritage guidance referred to is at odds with the policies & advice cited (para 2.3.14).
- I do not agree that setting should be referred to as 'direct' or 'indirect'. Instead I agree with the EH case for objection. (para 2.3.20).
- I do not agree that the use of the DCLG criteria of effect should be used confusingly & interchangeably when referring both to the extent the wind farm would be perceived (the basis of the DCLG criteria) and also to the extent of the overall impact on the significance / sensitivity of the heritage asset (para 2.3.34). As described in my previous response, the use of the term 'impact' is more appropriate for the latter.

My concerns regarding the lack of consistent & transparent basis of analysis of individual heritage assets are not overcome, as the previous review remains the basis for the conclusion in Section 3. Again the criteria within the main table in Section 3 confuses 'effect' with 'impact'.

The report is an improvement in that it includes descriptions of each Conservation Area that demonstrate that the specific views have been assessed, although I do not agree with the generalisations and conclusions given, and strongly disagree with the section (Module B) for Litlington. My basic analysis & conclusions remain those within my previous response, for the reasons stated there.

Within the Litlington report, paragraphs B18, 19 & 23 are relevant to an area I called South Green. This is because it was the southernmost area of green I saw within the current village during my visual assessment. Whilst the report contests this on the basis of historic maps which show a green further north, neither of the historic maps provided annotates any area as South Green. I am happy to discuss further (preferably with some local input) the local name for this area, but in the meantime confirm my name for the area was based on the geographical basis of what now exists.

At our meeting to discuss the basis in principle of the additional information to be produced, I understood that numerous wireframe visuals would be produced, to cover the areas identified. However there are only two produced in total under the section on Conservation Areas, and of these, none are provided for Litlington, the Conservation Area I identified as most affected by the proposed development. I do not find the mathematical description of visuals given in the text sufficiently clear to assess the areas identified most of concern, and this therefore does not overcome the need for the visuals requested. I am also disappointed to find that there are no winter visuals in the report for the areas identified as having a significant difference between summer & winter, yet there is a winter visual for Wimpole South Avenue, an area also only considered after our previous response. Likewise I am disappointed that one of these positions identified as a primary area of impact during winter for the Conservation Area (at the Village entrance sign approaching Litlington Church) was presented as an addendum (at a time when there were no leaves) as a summer view (in full leaf) using a photograph clearly taken some months earlier. This gave the unfortunate impression that there are numerous known positions of primary views that had been assessed before the submission but are being withheld from decision makers.

I acknowledge the explanation for the apparent discrepancy of levels in the Wimpole South Avenue view (footer 1). If this is the case, I note then the turbines would be more visible than those in the visual, when standing each side of the view provided, when they are less obscured by trees. Because of the topography and significance of the raised plateau, the surrounding views and countryside are a significant part of the context to the avenue, and therefore there would be a significant impact in this view, albeit I agree the impact would not be as great as

if the view were directly on axis. I think my previous response dealt sufficiently with this point, but please contact me if you require more detail.

In conclusion, I maintain my objection to the proposals on the same grounds as in my previous response.

Regards,

Corrie

Sexton Paul

From: Newell Corrie
Sent: 04 April 2013 18:23
To: Sexton Paul
Subject: FW: S/0439/12/FL Highfield Wind Farm

Dear Paul,

The site for the proposed wind farm is significant being part of a highly visible ridge running east west above a chalkland valley which contains numerous historic villages (most of which are Conservation Areas), Listed Buildings and Archaeological sites. The ridge itself is significant as the route of Icknield Way cum Ashwell Street, and locally it connects Litlington with Royston.

The site is also a significant undesignated archaeological site as can be seen from aerial photographs including fig 3.3. of the submitted documentation. As well as containing a horseshoe-shaped feature and known ditch, it also contains a section of Avenell Way which crosses north of the site with Icknield Way, and north and south to other sites of significance, within a landscape significant for its wealth of historic and archaeological features as described as being particularly significant to the character of the area within Design Guide Chapter 3 (and specifically para 3.15).

My previous concerns regarding the Environmental Statement, the methodology & references used have largely not been addressed. The additional addendums recently provided do not address those concerns specifically related to cultural heritage and my updates on this are:

1. The additional policy base update to the NPPF does not include those policy statements related to the historic environment (mainly from paragraphs 126 onwards); nor does it consider the need to contribute to the existing environment & to support the existing community in order to be sustainable development (under paragraph 7). Also, other than a mention that it still exists, there is no consideration of the relevant retained Practice Guide to PPS5 (heritage) and is therefore not proportionate to that given for PPS22 (renewable energy).
2. The methodology of the assessments and main sections on cultural heritage in Volume 2 (Chapter 10) and Appendix 11 are still flawed in that they are not revised to include significance, sensitivity, effect and impact in accordance with 2011 English Heritage Guidance on Setting. Instead they are stated to be based on a Highways Manual for roads & bridges, neither of which developments are relevant to the type of proposal in this case and which when referred to does not appear to mention heritage. The issues I previously identified regarding lack of transparency, errors in positioning of assets and inconsistencies in the individual assessments of assets remain. This includes the over-reliance on matrices rather than the assessment of characteristics of individual assets, and also results in a considerable lack of proportionality in dealing with Grade II Listed buildings and Conservation Areas.
3. Subject to these concerns, and given that there is a conclusion of harm to the significance of 11 assets, there is no investigation of less harmful alternatives. Para 10.92 of the ES says there is inherent mitigation in the location & design, but this is not transparent - there is no evidence of any alternatives explored, nor of the consideration of basic tweaked positions, such as to relocate further from visual prominence along roads & tracks. Again the minimising of harm is a basic step in the process expected within the EH Guidance on Setting.

Within South Cambridgeshire, the proposal would affect the settings of the nearest Conservation Areas comprising the villages within the valley between the two east-west chalk ridges. The views across the valley are predominately tranquil unspoilt and rural in character, and from north and south all the 5 closest church spires and villages within these Conservation Areas are visible on a clear day, linking the highly designated Listed churches to the Conservation Areas they predominate, and demonstrating the visual, historic and communal links between these historic settlements. Likewise, from the north, the villages are seen within a backdrop of the southern ridge and edge of Hertfordshire District, to which they were also

linked, e.g. by ancient trackways, roads between nearest Roman Towns, and combined ecclesiastical parishes.

Being the tallest structures within the settlements, the churches and their intervisibility is important, and they and the villages they serve would be dominated by the height of the proposed turbines, especially in views from the northern & southern ridges.

Within the Conservation Areas, the visual, historic, communal and functional links between the villages and surroundings are also significant. As rural villages located away from main roads and following medieval & pre-medieval road layouts, they have a predominately small scale, quiet, green & tranquil character and also contain farm groups, open fields, frequent village greens, lanes & tracks and long back gardens, linking the character and function of the village with the agricultural character and landscape beyond. Some, like Litlington, also contain moated sites, specifically designed with their landscape qualities in mind.

Litlington is a small village and Conservation Area built around a Parish Church, 2 village Greens and 3 Manors. The Conservation Area, which was designated on 12th July 1974, covers the heart of the old settlement together with the important open spaces and open frontages to the west, which form part of the setting of the village. It contains 1 Grade II* and 36 Grade II listed buildings. The proposed wind farm would be visible in long views towards the village, within closer views on the Northern approach to the village and near the village sign, and from within the village core.

The Northern part of the village & Conservation Area is on higher ground around St Catherine's Church (listed Grade II* and 1.6 km away from the nearest turbine). The Church is located between two early Manors to which it was closely historically related, at Bury Farm (formerly Dovetales Manor, then Litlington Manor) and Manor Farm (Huntingfields Manor); both of which are moated sites with Grade II listed farmhouses. These have a strong historic and functional relationship with their surroundings. On the Northern approach to the village, the Church & Bury Farm would be seen against a backdrop and skyline of wind turbines, with the turbines seen above the trees on the skyline and as taller structures than both of the buildings. The latest submitted predicted viewpoint D shows this approach, but during mid-summer. Now and during winter, the tree cover is substantially less including the trees around the Church and Bury Farm. The full height of the Church & its tower, the whole eastern front of Bury Farmhouse, intervening village buildings and farmland beyond are all currently visible in this approach to the village, in a series of positions, and therefore the historic and functional character of these would be notably and detrimentally affected by the conflicting modern character, movement and height of the proposed turbines. The tower of St Catherine's Church would no longer be the main focal landmark because the turbines would tower above it on the horizon when viewed towards the north and during winter towards the south west, above the village and Conservation Area.

The historic Southern part of the village & Conservation Area is located around the southern green, the site of the former village fair. It is surrounded by a number of historic grade II Listed buildings. These include College Farm and Hill Farm, which would have a functional as well as historic and visual relationship with the surrounding countryside and rural backdrop. The nearest wind turbine is 1.3 km away. Although no predicted view has been received for this, and the predicted Viewpoint 3 (fig 9.6.3) shows that the nacelles at least would be visible above rooftops in this part of the village and therefore from the Green, the wind turbines would project above and along the roof of Rose Cottage and above and between the other roofs. The orientation of the road to Royston is towards WT5 along part of its length here, making it likely that this turbine would be visible in views of this group and to and from these buildings for much of its height. The intimate, historic character of this group would again be notably and detrimentally affected by the proposed turbines.

The Southern boundary of the Conservation Area continues eastwards in the form of a designated Important Countryside Frontage within the 2009 Local Plan. The turbines would be visible almost in their entirety over and beyond the houses along Royston Road. This interruption to these designated countryside views would be detrimental to their character.

The Western part of the village & Conservation Area comprises Manor Farm and its farmland, and later development between this and the Southern Green. Much of this farmland is behind a historic wall fronting

the street, and is designated an Important Countryside Frontage within the 2009 Local Plan. The farmland is visible beyond the wall at entrances, from the higher part of the street, Manor Farm and its approach within the Conservation Area. An predicted view is shown as Viewpoint 3 (fig 9.6.3) although the nearest turbines appear to be located behind a tree. The whole group would therefore be faced by the listed Manor farmhouse, across its farmland. The unspoilt rural character, outlook and setting of manor farm, this part of the village and the designated countryside frontage would also be notably and detrimentally affected by the proposed turbines.

The grade II barn at Highfield farm is the closest listed building to the turbines at 520 metres and is outside the Conservation Area. It is within a farm group and has a functional as well as historic relationship to its surroundings. The turbines would be visible for much of their height above and around the listed building in both long and closer views and in the skyline above the trees from the site itself, and this is confirmed by the predicted viewpoints from Therfield Heath and the entrance to Highfields. Again recent photographs show the tree screening in those views is now significantly less than it was in mid-summer. The unspoilt rural character, outlook and functional setting of the listed barn would be notably and detrimentally affected by the proposed turbines.

Steeple Morden is a small historic village and Conservation Area with a main village street and a roughly rectangular grid of smaller lanes to its east. The main street runs parallel to Cheyney Water and the early settlements near the stream are identified by farms. It contains 1 Grade II* and 37 Grade II listed buildings. Odsey and Morden Green are very small separate hamlets where there is a strong rural character and Morden Green is contained within the Conservation Area. The proposed wind farm is 2.3km from Morden Green and 3 km from the Church, and would be visible in long views towards the village, from Morden Green, and from within the village core.

Within the village, views would be as a backdrop and skyline to the buildings on the eastern side of the Main Street. From the Churchyard, these views would be more extensive due to the greater distance of view. It is likely that the reason for the discrepancy in assessment of the Church I previously noted is because the turbines were incorrectly plotted, as the photograph showing the direction of view on page 265 is incorrect.

The predicted viewpoint 5 shows that the entire wind farm would be visible on the hillside above the Listed buildings and Conservation Area at Morden Green. In particular, they would form a backdrop to the view ahead when following the road near 24 Litlington Road, a grade II listed building backing onto the fields.

To the south of the village, all the turbines would be visible from Station Road and above Gatley Farmhouse, a grade II listed farmhouse (1.9 km from the nearest) and with a close functional as well as historic relationship with the countryside.

I am unable to assess the impact on Bassingbourn from any viewpoints provided. There would be views in conjunction with Listed Buildings & the Conservation Area at South End (2.9 km) and probably also from South End Recreation field (3.3 km).

The indicative view of Wimpole Hall South Avenue does not appear to accord with the topography of the ridge on which the turbines sit. This view at the point at which it intersects with the road is significant as the main access point to the southern part of the Avenue. According to my calculations, the turbines would be on the higher ridge and therefore well above the treeline. I would ask for this to be clarified. Wimpole Hall is particularly sensitive and highly important group (Grade I listed with its Grade I designated Registered Park & Garden) and the changes to its primary views by the proposed wind farm would have a notable and detrimental impact.

Regards,

Corrie

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Sexton Paul

From: Newell Corrie
Sent: 17 July 2012 14:37
To: Sexton Paul
Cc: Hamilton David
Subject: S/0439/12/FL Highfield Wind Farm

Dear Paul,

We discussed some time ago that we were going to meet to have a closer look at the site itself & Morden Grange. In case this is not possible before I go on leave in 2 weeks' time, I thought it may help you to have my initial comments as follows:

The site is significant being highly visible open countryside on a ridge running east west above a chalkland valley which contains numerous historic villages (most of which are Conservation Areas), Listed Buildings and Archaeological sites. It is also a significant undesignated archaeological site as can be seen from aerial photographs including fig 3.3. of the submitted documentation, which links it north and south to other sites of significance, within a landscape significant for its wealth of historic and archaeological features (See Design Guide Chapter 3 including para 3.15).

Having reviewed the Appellants' Environmental Statement it is my opinion that it does not contain sufficient accuracy, analysis and evaluation of the existing cultural heritage and the potential effects of the proposed wind farm upon it, in order for an application to be determined (other than a refusal) on the basis of the information supplied.

Its policy base needs to be updated from the PPS to NPPF and also to take into account the 2011 EH Guidance on Setting. The assessments of setting in para 10.45 and in detailed sections such as Appendix 11 therefore need to be revised.

There are concerns in principle about the main sections on cultural heritage in Volume 2 (Chapter 10) and Appendix 11:

1. The terms and process of assessment used. The relevant policies refer to the significance of a heritage asset. However the assessment is based on 'site importance' instead and this importance appears to be a desk based exercise based on the level of designation of a heritage asset. It therefore does not take into account the relationship of the asset to the site. The word 'significance' is then applied to the 'effect significance' rather than the significance of the heritage asset. This leads to confusion when the detailed assessments are made because then the relationship of a heritage asset with its surroundings is not assessed as part of its importance, significance or sensitivity.

Instead, I would expect the normal process for assessing impact is as follows:

1. Assessing sensitivity, based on significance, designation, importance, landmark qualities & physical & functional relationship to setting etc., then
2. Assessing effect, based on proximity, visibility, effects on views & vistas, proximity etc., and then
3. multiplying sensitivity by effect to get impact.

If the applicant has specific reasoning for deviating from the norm, could this please be explained.

2. The criteria appears to change. For instance, the methodology for 'importance' in paras 10.35 onwards does not directly correspond with the assessments themselves - Table 10.1 bases importance on levels of designation and giving Grade II listed buildings and Conservation Areas only a Medium importance, whereas the detailed assessments in Appendix 11 then assesses all of them as High. In principle, if something is statutorily designated for its historic or architectural interest, then the importance would normally be High. Also, because no magnitude of effect is assessed as greater than Moderate, and no conclusion of Moderate or lower is considered significant, the effect of Table 10.1 is to make it impossible to conclude a significant impact on any Grade II Listed Building or Conservation Area. The resulting omission of the majority of the designated buildings & areas does not appear to accord with good practice and the conclusion in

para 10.95 that there is a significant impact on Litlington Conservation Area and Steeple Morden Church comes as a surprise.

3. Other categories for assessments do not appear to be taken forward with transparency to the conclusions of those assessments. For instance, the study of individual assets in Appendix 11 has a number of categories e.g. for amenity value that are not mentioned again when the impacts on individual assets are given. All assessments of assets within Appendix 11 need to be updated to accord with the EH guidance.
4. The assessment in Appendix 11 of specific views and effects appears very limited and only taken from the asset or very close to. This misses the middle distance views and those on the approach to settlements or assets, such as of Litlington & its Church. An assessment of relevant views needs to take into account views from heritage asset to the wind farm, from the wind farm to the heritage assets, and any side views. The individual assessments also need to be updated to accord with the EH guidance.
5. It only assesses visual impact (pg 261 para 10.45), but needs to acknowledge that there may be other impacts on heritage assets such as noise or loss of telecommunications resulting in potential changes to settings of buildings and areas that may result in the lessening of viability or in the demand for installations such as satellite dishes to overcome problems.
6. Given that there is a conclusion of harm to the significance of 11 assets, there is no investigation of less harmful alternatives. Para 10.92 says there is inherent mitigation in the location & design, but there is no evidence of any mitigation as this is the only scheme presented and there is no investigation of other alternatives explored.
7. Some significant inaccuracies are:
 1. Para 10.44 there are no known cultural heritage assets within the permanent land-take, but figure 3.3 from the 2008 satellite image clearly shows aerial archaeological features within the site (confirmed by our aerial photos including a horseshoe shaped feature within the western part of the site in addition to those on fig 3.3) and paras 14.124 and 14.125 describe a known feature ditch below Turbine 4 and other previously unrecorded features that would be directly impacted. I am advised that the north-south line through the site is Avenell Way and whilst it was not plotted on the County Council site until now, I think it could have been reasonably interpreted from the information available to each side of it read together with the comments and description of the pathway in the above paragraphs.
 2. The remains of Litlington Villa are reported to have been destroyed. This is based on an outdated study, overturned by the Time Team Series 17 investigation of 2010 which showed that the previous investigation was done in the wrong place. Our Design Guide para 2.11 describes this villa as a particularly large & magnificent example.
 3. There are errors in plotting heritage assets, such as St Catherine's Church (GII*) and Manor Farmhouse (GdII), Litlington which are plotted further from the windfarm than they really are.

Initial assessment of assets:

Whilst I did not have access to the site itself, from the quarry ridge immediately north, the tranquil unspoilt rural character of the valley predominated and within that landscape all 5 closest church spires and villages within the valley were visible. On a clear day those within the northern part of the valley such as Croydon would also be seen. These villages are historically important and all 5 closest are also Conservation Areas. Their churches are important as a group of highly graded listed buildings and indicators of their community character, history & functions, and are currently the tallest solid structures within the valley. The proposed windfarm with 100M high turbines would weaken that relationship and the turbine heights would dominate.

Key views on the approaches to villages would also be detrimentally affected including:

1. Northern approach to Litlington (1.7 km) as a backdrop behind and above St Catherine's Church (GII*) and Bury Farm (GdII), both of which have a functional relationship with the surrounding countryside.
2. South End Bassingbourn when leaving the village southwards (2.9 km)
3. Steeple Morden – eastern and northern approaches and when leaving the village, Morden Green (2.2 km) & Gatley End (1.9 km)
4. Abington Piggots – eastern & western approaches (3.1 km) and when viewed from north of village (4.4 km)

Key views to and from listed buildings and spaces within CAs in villages would be detrimentally affected, especially:

1. Litlington
 - Northern part of the village on higher ground around St Catherine's Church (GII*) (1.6 km)
 - Western part of the village (1.5 km) including Manor Farm (GdII)
 - Southern part of the village including the group of listed buildings at South Green (1.3 km) including College Farm (GdII).

All these areas include listed buildings with a functional relationship with the countryside.

2. Steeple Morden
 - Eastern part of village including Morden Green (2.2 km) and listed buildings with a functional relationship with the countryside.
3. Bassingbourn
 - South End (2.9 km)
 - Group around South End Recreation field potentially (3.3 km)
4. Croydon
 - Although much further from the wind farm site at 8-9km, the village is located on the southern slopes of the next chalk ridge, and because of the substantial land slopes, far reaching views across the valley are a notable characteristic of the village and from above the Church (GdII*). Whilst there would be some impact on Croydon, the views are also significant being across the 5 nearer villages at middle distance with the turbines located above them.

More information is required including:

Reasoning for assessments:

- 1. Considerable differences in assessment of impact between Steeple Morden Church and the other 4 Churches in the nearest group.
- 2. Litlington Church & northern approach to Litlington once positions of buildings are corrected.
- 3. Barn at Highfields Farm
- 4. The other key views above

Assessment & photomontage showing the northern approach to Litlington (1.6 km).

Assessment of Odsey Grange (GdII*), an early racing Stables from the Dukes of Devonshire, built to take advantage of the land along the 2 chalk ridges on the northern edge of Royston, together with a photomontage from the eastern front of Odsey Grange (3.3 km).

Assessment & 2 photomontages from Wimpole Hall (GdI with GdI Registered Park & Garden), specifically from the South Avenue (e.g. at 8.3 km) and from the Ruin looking over the main house & avenue (11 km).

Assessment & photomontage from the eastern side of the Barn at Highfields Farm (GdII and at 520 metres is the closest Listed Building to the wind farm)

Assessment & photomontage from north east side of South End Recreation field, Bassingbourn (3.3 km).

Assessment and photomontage from Croydon above Church at junction of road and footpath (9 km).

Please contact me if you have any queries.

Regards,

Corrie

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