

Mr Kevin Cartwright,
South Kesteven District Council,
Council Offices,
St Peters Hill,
Grantham
NG21 6PZ

Date: 6 March 2008

Dear Mr Cartwright,

Subject: Thackson Well Wind Farm ref: S07/1661/01

Thank you for your letter of 29 January 2008 in which you have provided further information – report entitled *Supplementary Assessment of Effects on the Settings of Cultural Heritage Resources*, dated January 2008 and prepared by RPS - enabling us to assess the impact of the proposals for the above site. We are now able to offer the following supplementary advice.

Summary

English Heritage provided advice that South Kesteven District Council should refuse planning consent for a wind farm of ten turbines at Thacksons Well Farm, Long Bennington, because of the unacceptable affect that the proposed development would have on the immediate setting of a scheduled ancient monument, Bennington Grange Moated Site, and on other key receptors listed in our originals scoping advice, most notably Belvoir Castle and its registered park-land.

RPS, acting for Infinergy Ltd., have submitted a report that questions whether English Heritage's advice is sustainable because 'it appears not to be fully consistent with either the physical situation of historical/archaeological remains likely to be affected, the existing ES assessment, or with existing guidance'. English Heritage has reviewed its advice following further extensive site inspections and in our consideration of heritage assets and their setting we remain robust in the view that the original ES is flawed. On the basis of Government planning policy guidance in PPG15 (Planning and the Historic Environment) and PPG16 (Planning and Archaeology) we consider that the proposed wind farm will have an adverse impact on the setting of important heritage assets or historic places. We consider that the setting of important listed buildings and monuments will not be preserved and therefore object to the proposed development.

English Heritage advice

A) Archaeology and scheduled ancient monuments

In terms of the impact on the setting and context of archaeological sites we understand that your authority has not sought any specialist advice. If this is the case we consider it premature to determine this application until you have actively sought and given full consideration to the views of English Heritage and the archaeological planning advisory services from the three affected counties.

In response to the further information provided by RPS on behalf of Infinergy Ltd, English Heritage offers further advice on the impact on the archaeological interest of the area.

i) In addition to the identified Savigny Abbey cell and grange at Long Bennington (see below), there is also the unscheduled but still nationally significant Premonstratensian abbey of Neubo at Sedgebrook, and Belvoir Priory, a Benedictine house (a cell of St Albans) that was mausoleum to the Manners family prior to their removal to Bottesford Church by Thomas Manners, first Earl of Rutland, at the suppression. Even for Lincolnshire this is a significant grouping of monastic houses. Site inspection indicates that, based on the location of the present anemometer the landscape settings of a significant number of ancient monuments, lying in three counties and three separate planning authorities, will be either damaged or compromised by the construction of ten wind turbines and that these assets

ii) Bennington Grange Moated Site, Long Bennington, Lincolnshire (National Monument 31622)

This site, with well-preserved earthworks, was revised on the schedule of Ancient Monuments in February 1999 after review by the Monuments Protection Programme of English Heritage. By definition a scheduled ancient monument is of national importance.

Bennington Grange is of greater than national importance because of what it represents, a Cistercian monastic farm attached to Long Bennington Priory which itself was a cell of the abbey of Savigny which joined the Cistercian order in 1147 and became head of one of the six Cistercian families (the others being Cîteaux itself, La Ferté, Clairvaux, Pontigny, and Morimond). A cell was essentially a wholly-owned subsidiary under the management of the founding monastery, in this case Savigny. Bennington Priory was suppressed in 1414 as an 'alien' possession during the

Hundred Years War with France and in 1421 granted to Mount Grace Priory, one of only nine Carthusian monasteries in England, after being held by St Anne's charterhouse in Coventry for a short period. Its later significance as a Carthusian estate centre is, if anything, of even more significance than its original association. Because it was originally a Cistercian grange it was not subject to tithes (the whole order was exempt) and lay outside the parish system. Being extra-parochial its land-holding can still be identified because exemption from tithes continued beyond the

printing of the first edition of the Ordnance Survey. It is very rare to be able to establish the land holding of any monastic farm, and Bennington Grange is exceptional on a national scale. This increases the national and international significance of the scheduled monument. It is not relevant that the land has continued to be cultivated, that it has lost most (not all) of its evidence for medieval cultivation or that the field pattern is post-enclosure. What is relevant is that its extent is recorded in the land and that its association with the structural remains of the grange (itself obviously modified from its medieval form by ruination, stone robbing, and natural decay to become a high-quality archaeological site) survives. That is, the scheduled monument does retain its historic setting. In this respect English Heritage does not claim that the construction of a wind farm would damage historic landscape, but considers that the identification of the grange holding increases the importance of the scheduled monument itself.

This point was made clear to Tom Lane, Principal Archaeologist of APS, who provided the archaeological elements of the Environmental Statement. Mr Lane consulted Glyn Coppack on 4 January 2008 *after* he had investigated the use of a mechanical excavator in the immediate vicinity of the scheduled monument. English Heritage was not consulted in the course of the production of the desk-based assessment or subsequent evaluation of the turbine sites, though early consultation was advised by your authority's planning archaeologist.

PPG16 (Archaeology and Planning), paragraph 18 advises that 'the desirability of preserving an ancient monument *and its setting* is a material consideration whether that monument is scheduled or not'. Setting means the relationship of the ancient monument to its surroundings (see below for definition of 'setting' and 'context'), not just its 'historic' setting. PPG 16 does not require public access to a monument for it to have setting. English Heritage contends that to place one turbine within 200m and one just over 200m from the southern boundary of the scheduled monument disregards and damages the setting of an internationally important monument. Our published advice, *Wind Energy and the Historic Environment*, while being generally supportive of renewable energy, advises 'a pro-active and strategic approach to the land-use planning system [which] will maximise the benefits of renewable energy projects, while minimising their adverse effects on the historic environment'. No

attempt whatsoever has been made to minimize the effect of the development on Bennington Grange.

iii) Easthorpe Medieval Settlement, Bottesford, Leicestershire (National Monument 17043)

On rising ground south of the River Devon, the proposed turbines will be visible across this site from the public highway and from the monument itself. As said above, there is no requirement in government planning policy guidance for public access to a monument for its setting to be affected by development. In this case, we accept that the effect will be moderately adverse.

iv) Muston Moated Grange, Bottesford, Leicestershire (National Monument 17041)

On rising ground the proposed turbines will be visible across this site from the public highway and from the monument itself. In this case, we accept that the effect will be moderately adverse.

v) Allington Village Cross, Allington, Lincs (National Monument 22658)

English Heritage accepts that the effect on this scheduled monument is unlikely be noticeable within the village setting, though the effect of the proposed development on the conservation area at Allington still needs to be considered.

vi) Kilvington Medieval Settlement, Kilvington, Nottinghamshire (National Monument 29997)

Though 3.4km to the north west of the proposed wind turbines, there is clear intervisibility between the development site and this monument. Even in poor weather the anemometer was clearly visible and development would have an adverse effect on the setting of a particularly well-defined medieval settlement site.

Summary

In terms of the scheduled ancient monuments, your authority has yet to consider properly the direct effect on Bennington Grange, and the cumulative effects on all the other sites which are less directly but still adversely affected. The scheduled ancient monuments should be seen as part of the wider historic environment in an area which is still poorly understood and not simply as individual entries on then national schedule of ancient monuments.

B) Listed buildings, registered parks and gardens and conservation areas.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires authorities considering applications for planning permission for works which affect a listed building to have **special regard** to the desirability of preserving the setting of the building. As a statutory duty this is a prime consideration for the decision maker. We understand, however, that your authority has not sought any specialist advice and that all of the places to be affected, and their settings, have not been subject to site assessment. If this is the case we consider it premature to determine this application until you have actively sought specialist advice and given full consideration to the views of English Heritage and the conservation advisory services from the affected counties and districts. Indeed, without specialist advice it is not clear how the statutory duty to have special regard to the desirability of preserving the setting has been discharged.

‘Setting’ and ‘context’

Government policy guidance does not define ‘setting’ but states that *.....the setting of a building may be limited to obviously ancillary land, but may often include land some distance from it... .. A proposed high or bulky building might also affect the setting of a listed building some distance away, or alter views of a historic skyline. In some cases, setting can only be defined by a historical assessment of a building’s surroundings.*

English Heritage has defined ‘setting’ as *an established concept that relates primarily to the surroundings in which a place is experienced, while embracing an understanding of perceptible evidence of the past in the present landscape. Definition of the setting of a significant place will normally be guided by the extent to which material change within it could affect (enhance or diminish) the place’s significance.* We have also offered guidance on the related idea of ‘context’: *it embraces any relationship between a place and other places. It can be, for example, temporal, functional, intellectual or political, as well as visual, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity or group.* (EH Conservation Principles, Policies and Guidance, *y and Practice*, second stage consultation, 2007)

The original Environmental Statement fails to understand the historic landscape setting and context of the historic places that will be affected by the proposed wind farm. The Vale of Belvoir (the name ‘Belvoir’ is nearly 900 years old) is only moderately

researched in terms of its historic environment. Site inspection indicates a substantially intact post-enclosure landscape populated with significant heritage assets. Basic historical research indicates that this is a landscape of progression from domination by monastic and aristocratic land-holdings prior to 1538 to the full development of one of the most important ducal estates in the early post-medieval period. This pattern of land-holding survived as a large entity until the 1920s.

The whole historic landscape, comprised of the land and villages of an historic estate, is dominated and characterised by two ‘monuments’ that are of outstanding interest and international significance. Belvoir Castle is one of the great British castles/country houses and estates, and the church of St Mary, Bottesford is one of England’s most important parish churches – *Its glory is the spire* (Buildings of England, second edition, 1984). Since the Conquest there has been a demonstrable and indivisible historic relationship between the two buildings and for almost 600 years (since *circa* 1420) the eponymous Vale has been characterised by the visible relationship between the two.

The surroundings in which the two dominant historic places – Belvoir Castle LBS 189989 and its park and the Church of St Mary LBS 190042 – are jointly experienced (their setting) constitutes the whole of this part of the Vale extending over a

considerable distance in all directions. One interesting example is the land just to the north of Bottesford. Beacon Hill, a prominent landmark with a network of public rights of way, is a critical part of the surroundings in which the historic places are experienced. We firmly believe that change of the scale proposed will diminish the experience and therefore significance of the historic places as the turbines, albeit will be intrusive and even dominate by being extremely tall, high in number, extensive in scale, moving and, possibly, causing noise.

The assessment of significance has not embraced the concepts set out above, specifically it is lacking in its understanding of the perceptible evidence of the past and all relationships between the historic places, including the temporal, functional, intellectual or political, as well as visual relationships. It employs a narrow approach relying on limited views and ‘obstructions’ within them. It ignores the many important views from all around, and from some distance, which presently have only the Castle and St Mary’s ‘in the picture’, but which if the development were approved, in the future would also contain the inappropriate and incongruous addition of ten turbines. Moreover, the report pays scant attention to the important wider historic landscape and the surroundings in which the historic assets are experienced. Any new features in this context would have a significant adverse impact on these most important historic buildings.

There are also a number of assertions that are questionable. For example, on-site inspection reveals that the Castle is not a 'relatively minor feature on the horizon' from beyond the turbine site and there is no single 'key' view of the Castle.

We have inspected the proposed development site from many listed buildings, conservation areas and registered parks across the counties of Lincolnshire, Leicestershire and Nottinghamshire but are not able to provide detailed assessments on each site within the short consultation period. One selected example will suffice to underline the general point about adverse impact. In the north west, the views from the church at Flawborough, the historic settlement at Kilvington and Staunton Hall and park - part of an *exquisite group* (Buildings of England) of historic assets - have not been fully assessed and are likely to be adversely affected. Staunton has important historical connections with Belvoir and is of interest for its mention in Sir Walter Scott's works. It may be that the adverse impact on each individual heritage asset in these settlements would be only moderate or minor but the cumulative adverse impact will be significant.

Returning to the setting of the outstanding historic buildings, this includes views from the villages to the northwest and west but also from many of the historic villages that straddle the Leicestershire/Nottinghamshire border to the south west. From these the setting of Castle and Church will be interrupted and adversely affected. Likewise, from the east (Barrowby) and south east (Wolsthorpe) the panoramic views of the Vale with the dominant monuments will be adversely affected by the introduction of ten turbines. Finally, from Belvoir Park with views to Newark and Lincoln cathedral, the dominance of the spire of St Mary, Bottesford, would be challenged. Once again the cumulative impact will result in a significant adverse

impact on the setting of historic sites and will compromise the visual amenity of the wider landscape, detracting from its historic character and sense of place.

Recommendation

English Heritage recommends that your authority should refuse this application because of both the significant direct and cumulative adverse effects on the setting and visual amenity of a number of heritage assets and on the whole historic landscape of the Vale of Belvoir which contains historic buildings and monuments of outstanding and international significance.

Please send us a copy of the decision notice in due course. This will help us monitor actions related to changes to historic places.

Yours sincerely

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