



3 The Objections

Sections 3.1 to 3.7

**STOP WOODLANE WIND FARM ACTION GROUP
OBJECTION DOCUMENT**

**SECTION 3
THE OBJECTIONS**

See the full objection document for other sections. This is an extract only.

		Page
3.1	Objection – The site is not suitable for a wind farm	27
3.2	Objection - Landscape and Visual Impact	34
3.3	Objection - Impact on Cultural Heritage	44
3.4	Objection – Noise	54
3.5	Objection - Health risks	64
3.6	Objection - Green Belt Impact	68
3.7	Objection - Loss of Residential Amenity	71
3.8	Objection - Loss of Rural Recreational Amenity	76
3.9	Objection - Damage to Sensitive Rural Ecology	80
3.10	Objection - Increased Flood Risk and Hydrology	85
3.11	Objection - Shadow Flicker and Shade Caused by Rotor Blades	88
3.12	Objection- Safety – Risk to the Public	90
3.13	Objection - Traffic Disruption and Construction Issues	94
3.14	Objection - Omission of Information by the Applicant	96

STOP WOODLANE WIND FARM ACTION GROUP OBJECTION DOCUMENT

3.3 OBJECTION - IMPACT ON CULTURAL HERITAGE

- ? PPG15 says that Grades 1 and 11* listed buildings are “*of particularly great importance to the nation’s built heritage: their significance will generally be beyond dispute*”
- ? We believe the Applicant has not considered some important historic sites and has misinterpreted the assessment standards for those which have been considered; this has had the effect of skewing the results
- ? The Applicant does not appear to have considered the SINCs
- ? Comparison with a recently refused application elsewhere shows that the application should be rejected

Note this Objection should be read with reference to photographs and sketches in Appendix 3.3

Introduction

Description of the Site

- 3.3.1 The proposal is for 14 no. 125 m high wind turbines sited in an area approximately 3 km x 1 km. The application site lies in a flat open area of agricultural land. It abuts Green Belt on its southern boundary and on its northern boundary it abuts the historic Gateforth Hall Estate, the setting of a Grade 11* listed building. The site is crossed by 6 footpaths recorded on the Ordnance Survey and these are shown in Appendix 3.3, Sketch 3.3 SK1 “Rights of Way”.
- 3.3.2 Within 5 km of the site there are:
- ? 21 listings of grade 11 or above, three of which are Grade 1 or 11*
 - ? Two scheduled monuments
 - ? Two areas of locally important landscaped areas
 - ? One historic park or garden
 - ? Five sites of importance for nature conservation
 - ? Two conservation areas
- Most of the above lie within 2 km of the site
- 3.3.3 We will set out here our objection to the proposed development because of its enormous impact on sensitive areas of the district’s Cultural Heritage. The areas of concern we will discuss are Listed Buildings, Conservation Areas, Sites of Importance for Nature Conservation, Historic Parks and Gardens, Locally Important Landscaped Areas, Scheduled Monuments and Green Belt. See Appendix 3.3 - 3.3 SK2 “Wider Site Context”.
- 3.3.4 We will use as reference the following Planning Guidelines:
- ? Planning Policy Guideline 15 (PPG15) “Planning and the Historic Environment”
 - ? Planning Policy Statement 22 (PPS22) “Renewable Energy” and its companion guide
 - ? Scottish Planning Advice Note 45 (PAN45)
 - ? Selby Local Plan

STOP WOODLANE WIND FARM ACTION GROUP OBJECTION DOCUMENT

PAN45

- 3.3.5 PAN45 sets out the varying perception of a wind farm based on the subject distance from the wind farm in open landscape:
- ? Up to 2 kms - Likely to be a prominent feature
 - ? Up to 5 kms - Relatively prominent
 - ? Up to 15 kms - Prominent in clear visibility
- seen as part of the wider landscape
 - ? Up to 30 kms - Seen in very clear visibility
- a minor element in the landscape
- 3.3.6 See Appendix 3.3 Sketch SK3 which graphically shows the limited consideration the Applicant has given this important advice.
- 3.3.7 At 10.4 of the Applicant's Environmental Statement they have produced a table (Figure 10.3) which purports to combine the severity and the significance of the effect on settings. **We believe the Applicant has misinterpreted the standards, which has the effect of skewing the results in Fig 10.3.** We have proposed an alternative interpretation with what we consider to be a more balanced viewpoint. See Appendix 3.3 - Table 3.3 SK4.

Listed Buildings

- 3.3.8 We schedule below details of 21 listed buildings of Grade 11 standard and above and show the significant impact the application will have on each.
- 3.3.9 Plan Reference A 22 Main Road, Hambleton.**
Within 2 km of nearest wind turbine
Grade 11
- | | | |
|---------------------|------------------------|----------------|
| Significance impact | Applicant's assessment | Not considered |
| | SWL assessment | Moderate |
- 3.3.10 Plan Reference B Church of St Mary, Birkin**
Within 2 km of nearest wind turbine
Grade 1
- | | | |
|--------------------|------------------------|-------|
| Significant impact | Applicant's assessment | Major |
| | SWL assessment | Major |
- 3.3.11 Plan Reference C Birkin Grange, Birkin**
Within 2 km of nearest wind turbine
Grade 11
- | | | |
|--------------------|------------------------|----------|
| Significant impact | Applicant's assessment | Minor |
| | SWL assessment | Moderate |
- 3.3.12 Plan Reference D Birkin House**
Within 2 km of nearest wind turbine
Grade 11
- | | | |
|--------------------|------------------------|----------|
| Significant impact | Applicant's assessment | Minor |
| | SWL assessment | Moderate |

STOP WOODLANE WIND FARM ACTION GROUP

OBJECTION DOCUMENT

importance to the nation's built heritage: their significance will generally be beyond dispute"...

3.3.31 The Study Area definition at 10.6 of the Applicant's Environmental Statement seems to acknowledge our values but figure 10.2 adopts different criteria. The application will have visual dominance over all these 21 listings. The vertical scale of wind turbines 125 m high in a flat rural landscape will make them the most visually dominant feature.

3.3.32 We provide below studies for two particular cases of higher value listings.

Gateforth Hall (Grade 11*)

3.3.33 Gateforth Hall (Grade 11*) is currently the most prominent local feature. It is constructed on raised ground and it is approximately 35 m AOD to the roof and it is 1.7 km from the nearest wind turbine. The Hall is seen from many distant viewpoints throughout the village of Gateforth and beyond and can be seen from ground level on the application site (see Appendix 3.3 - Photographs 3.3.1 to 3.3.6). From these viewpoints of Gateforth Hall the 14 no. turbines will be dominant. From Gateforth Hall the minimum that will be visible at all times will be the generator housing and the top half of the arc of the blades in all 14 cases. In winter when the trees are bare most of the towers will also be visible. This does not meet the intervisibility requirements of PPG15 para 2.17 "*A proposed high or bulky building might also affect the setting of a listed building some distance away*" (see Appendix 3.3 - Photographs 3.3.7 to 3.3.9).

3.3.34 The Applicant states at 10.11.4 that the main aspect of the house is towards the southwest. It is a matter of fact that because of its elevated setting Gateforth Hall enjoys a wide panorama of historic rural landscape. The Applicant makes reference to the Hall "*looking directly towards Drax Power Station*"; they fail to note that it is 12.5 km from Gateforth Hall.

3.3.35 The setting of Gateforth Hall is the original Estate shown on the plan attached to the 1896 sale particulars (see Appendix 3.3 - Drawing 3.3 SK5). The land encompassed in the 2086 acre estate is still intact and is still used as agricultural land. Gateforth Wood to the south is part of the historic setting and the south side abuts the application site. The Applicant's statement "*Gateforth Hall is not situated within a designed landscape; its setting is provided by its immediate grounds*" is factually inaccurate as the Hall and Hambleton Hough lie within an area designated as a Locally Important Landscaped Area.

3.3.36 Further, PPG15 at para 2.13 states "*the setting of a building may often include land some distance from it*" and this is confirmed in detail in ENV 22 of the Selby Local Plan. The Applicant's efforts to limit the setting of Gateforth Hall to the current ownership boundary are not credible in this context. PPG15 para 3.34 deals with changes of ownership and states that such changes do not affect the listing.

3.3.37 The setting of Gateforth Hall has always been its agricultural land and this setting is wholly intact. Given its status set out in PG15 para 3.6 "***great importance to the nation's built heritage: their significance will***

STOP WOODLANE WIND FARM ACTION GROUP OBJECTION DOCUMENT

generally be beyond dispute". We do not consider that the Applicant has shown adequate recognition of this fact.

St Mary's Church, Birkin (Grade 1)

- 3.3.38 The Applicant's Environmental Statement at chapter 10 para 11.3 acknowledges that the Church is considered to be "*one of the most impressive Norman Churches in Yorkshire*". It is sited at the southern end of the village and will be 1.2 km from the nearest wind turbine. The Applicant also acknowledges that the Church "*can be seen from some distance across the flat countryside – for example it is visible from the churchyard at St Edmund's Church near Kellington, about 2.5 km away*".
- 3.3.39 There are two other listed buildings, Birkin House and Birkin Grange; both are Grade 11 listed and are closer to the wind turbines than the Church.
- 3.3.40 The Environmental Statement attempts to limit the impact of the development by stating that the turbines will be visible only across a 70° area of view. They also state that the Church building will retain visual dominance. We find that an unrealistic statement given the difference in height of the Church tower and the wind turbine.
- 3.3.41 The Applicant does not adequately consider a viewpoint from south of the Church, say from the banks of the Old Eye or Intake Lane. The turbines will be three times higher than the Church tower and will dominate these aspects.
- 3.3.42 Similar to our comments above regarding Gateforth Hall, the impact on St Mary's Church will not meet the requirements of PPG15 and PPS22.
- 3.3.43 ENV22 of the Selby Local Plan provides the legal framework for the "Protection of Listed Buildings" which states "*Development will not be permitted where it would have a detrimental effect on the character, fabric or setting of a listed building*". We feel this gives the officers of Selby Planning Section and the members of the Planning Committee grounds for refusal.
- 3.3.44 This view is supported by the recent planning officers' recommendation for refusal of the application to erect 2 no. 125 m high wind turbines at Chelker Reservoir, Addingham, Ilkley. The reason for recommendation for refusal stated at paragraph 10 of the officers' report is "*The siting and development of the proposed replacement turbines with a maximum height to the blade tip of 125 m would be seen from a number of historic locations and this would have a significant impact on the historic landscape in the locality and (in) particular that of the priory at Bolton Abbey and Fairfield Hall, both of which are Grade 1 listed*".

STOP WOODLANE WIND FARM ACTION GROUP OBJECTION DOCUMENT

3.3.45 The officers of Selby District Council should consider the comparison with the Woodlane application:

	Addingham	Selby
Current use	- Wind farm 4 x 41.5m	- Agriculture
Number proposed	- 2	- 14
Distance to listed buildings	- Bolton Abbey - 2.6km - Fairfield Hall - 1.6km	- Gateforth Hall - 1.7km - St Mary's Church - 1.4km

Table 3.3.1

By any reasonable assessment the Woodlane wind farm will have a much greater impact than the Addingham wind farm which was refused.

Conclusion

3.3.46 We recommend the refusal of the application on the grounds that in relation to the listed buildings within the area of significant impact the requirements of PPG15, PPS22 and PAN45 have not been duly considered.

Conservation Areas

3.3.47 There are two Conservation Areas, Monk Fryston 2½ km from the nearest wind turbine and Hillam 2 km from the nearest wind turbine.

3.3.48 The Companion Guide to PPS22 para 3.34 advises: *“One of the judgements to be made in planning for renewable energy is to determine the sensitivity of the landscape. Sensitivity relates to the character of a landscape and how vulnerable this is to change. It is assessed by considering the physical and perceptual characteristics of a given landscape character type/area in relation to particular forms of development.”*

3.3.49 Monk Fryston Conservation Area has three listed buildings and these we have assessed in section 3 of this report (Plan ref N, P and R). See Appendix 3.3 - Drawing 3.3SK2.

3.3.50 The Applicant starts his assessment by stating that: *“The village of Monk Fryston is about 3 km northwest of the proposed site”*. We calculate that the nearest wind turbine to the edge of the Conservation Area is less than 2½ km, a further example of the Applicant's misinterpretation which serves to minimise the impact.

3.3.51 The Applicant assesses the impact on the Conservation Area to be moderate and the Grade 11 listed buildings as minor. We assess the Conservation Area to be major and the Grade 11 buildings to be moderate.

3.3.52 The village consists of a range of properties, mostly cottage style with some agricultural building converted to residences. The scale and massing of the

STOP WOODLANE WIND FARM ACTION GROUP OBJECTION DOCUMENT

wind farm will have a dominant visual effect from the properties on the boundary of the Conservation Area.

- 3.3.53 Hillam Conservation Area has seven listed buildings and these are assessed in section 3 of this report (Plan references S, T, U, V, W, X and Y). See Appendix 3.3 - Drawing 3.3SK2.
- 3.3.54 The applicant has assessed the impact on the Conservation Area to be moderate and on the listed buildings as minor. Our assessment on the buildings was moderate. This however is based on the 5 km magnitude range. In fact these buildings and the Conservation Area are only 2.1 km from the nearest wind turbine. If we used the 2 km bank of magnitude the assessment would rise to major for the conservation area and the upper border of moderate for the listed buildings.
- 3.3.55 The village consists of a range of properties, mostly cottage style with some agricultural building converted to residences. The scale and massing of the wind farm will have a dominant visual effect from the properties on the boundary of the Conservation Area.
- 3.3.56 We consider that the Applicant has minimised the impact on the Conservation Areas due to the skewing effect of their Fig 10.3.

Conclusion

- 3.3.57 We recommend the refusal of the application on the grounds that, in relation to the two Conservation Areas within the area of significant impact, the requirement of PPG15 PPS22 and PAN45 have not been duly considered.

Sites of Importance for Nature Conservation

- 3.3.58 There are three SINCs within the study area:
- ? Staker Wood which is 500 m from the nearest wind turbine
 - ? Birkin Holme which is 800 m from the nearest wind turbine
 - ? Bywater Wood which is 2.5 km from the nearest wind turbine
- 3.3.59 We assess the significant impact on these areas as major. **The Applicant does not appear to have considered these areas.**

Conclusion

- 3.3.60 We recommend refusal of the application on the grounds that these sensitive areas in close proximity to the development have not been given due consideration.

Historic Parks and Gardens

- 3.3.61 The Applicant considers Monk Fryston Hall and Byram Hall and Park; both are assessed as of minor impact. Using our criteria we consider the impact to be moderate.

STOP WOODLANE WIND FARM ACTION GROUP OBJECTION DOCUMENT

Locally Important Landscaped Areas

- 3.3.62 There are two LILAs within the study area, Hambleton Hough which is 2 km from the nearest wind turbine, and Brayton Barff which is 3½ km from the nearest wind turbine.
- 3.3.63 Both these areas provide an amenity for walking and horse riding. They are elevated areas and are the highest point of land at approximately 50 m AOD in the district.
- 3.3.64 The long-distance views from these public areas will have a severe impact from the windfarm when looking southwest.
- 3.3.65 We assess the impact to be moderate. The Applicant does not appear to have given them consideration.

Conclusion

- 3.3.66 We recommend refusal of the application on the grounds that in relation to the two Locally Important Landscaped Areas within the area of significant impact the requirements of PPG15, PPS22 and PAN45 have not been duly considered.

Scheduled Monuments

- 3.3.67 There are two scheduled monuments within the study area.
? Monument 91995 site of a Roman auxiliary fort
? Monument 56177 a double moated enclosure and central platform
- 3.3.68 The Applicant considers the impact to be moderate in relation to the fort site and the enclosure site as moderate. We assess the impact to be major for the fort site and the enclosure site to be major.

Green Belt

- 3.3.69 The impact on the Green Belt to the south and west of the application site has been dealt with in detail elsewhere.
- 3.3.70 The Applicant does not meet with the requirements of PPG2 paragraph 3.15 and Selby Local Plan SG1 and GB4 and should be refused.

Summary

- 3.3.71 The Applicant has failed to meet the requirements of PPG15, PPS22 and PAN45 in relation to the protection of listed buildings and their settings within the study area.
- 3.3.72 The Applicant has failed to meet the requirements of PPG15, PPS22 and PAN45 in relation to the Conservation Areas within the study area.
- 3.3.73 The Applicant has failed to meet the requirements of PPG15, PPS22 and PAN45 in relation to the Sites of Importance for Nature Conservation within the study area.

STOP WOODLANE WIND FARM ACTION GROUP OBJECTION DOCUMENT

- 3.3.74 The Applicant has failed to meet the requirements of PPG15, PPS22 and PAN45 in relation to the Locally Important Landscaped Areas within the study area.
- 3.3.75 The Applicant has failed to meet the requirements of PPG2 and Selby Local Plan SG1 and GB4 in relation to the areas of Green Belt within the study area.

Recommendation

- 3.3.76 We request that the officers and the committee members of Selby Planning Section find the above compelling facts satisfactory to refuse planning permission on the grounds that the application is contrary to the requirements of PPG15, PPS22, PAN45, PPG2 and the Selby Local Plan SG1 and GB4.