

**Bullington Cross proposed wind farm
Review of Environmental Statement,
Landscape and Cultural Heritage
Chapters**

for

Keep Hampshire Green

June 2013

Quality control

Bullington Cross proposed wind farm
Review of Landscape and Cultural Heritage chapters

for

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1 Introduction

1.1 Background to the Project

- 1.1.1 EDF Energy Renewables has applied to Winchester City Council, Basingstoke and Deane Borough Council, and Test Valley Borough Council for planning permission to construct and operate for 25 years a wind farm comprising 14 wind turbine generators (WTG's), each nominally rated at 2 MW. The proposed wind farm development is known as Bullington Cross Wind Farm. It is located at a site known as Upper Norton Farm located west of Basingstoke and to the north east of the junction between the A34 and the A303, Hampshire. Seven of the turbines would be located within the planning authority of Winchester City Council, four would be in Basingstoke and Deane and three in the Test Valley.
- 1.1.2 EDF Energy Renewables have stated that the wind farm would have a capacity of around 28MW which would be capable of providing enough electricity to meet the average annual consumption of over 13,000 households. The wind farm would contribute towards reduced UK emissions targets by offsetting the annual release of 26,000 tonnes of carbon dioxide.
- 1.1.3 The project would comprise the following:-
- 14 wind turbines with a maximum height to blade tip of 126.25m;
 - 14 external transformers;
 - Crane pads and laydown areas;
 - New and upgraded on site access tracks;
 - Buried interconnecting electrical cables;
 - Control building;
 - Anemometry mast with a maximum height of 70m; and
 - Temporary construction compound.
- 1.1.4 The detail of the model of wind turbines to be constructed has not yet been decided by the applicant.
- 1.1.5 The control room building is to be of single story construction, approximately 12m by 12m in plan and 3m in height to eaves, with a pitched roof with total height to apex of 4.5 metres. Alternatively the control room may have a flat roof.
- 1.1.6 The total wind farm project footprint would occupy approximately 10.42 ha situated within a site that covers approximately 442 ha. The planning application boundary which allows for micro-siting covers 57.92 ha.

1.2 Environmental Statement and extent of review

- 1.2.1 Detailed Planning applications for the development were made in April and May 2013 to Winchester City Council (planning application ref 13/00800/FUL), Test Valley Borough Council (planning application ref 13/00753/FULLN), and to Basingstoke and Deane Borough Council (planning application ref 13/00046/FUL). One combined Environmental Statement, forming part of an Environmental Impact Assessment for the whole development, was submitted to each Local Planning Authority with the respective planning application.
- 1.2.2 The Environmental Statement documents used to inform this review and referred to in this report are the following:-
- Bullington Cross Wind Farm Environmental Statement, Volume 1: Non Technical Summary, prepared by PMSS for EDF Energy Renewables
 - Bullington Cross Wind Farm Environmental Statement, Volume 2: Main Report. April 2013, prepared by PMSS for EDF Energy Renewables – and in particular:

- Chapter 6 Landscape Resource and Visual Amenity
 - Chapter 11 Archaeology and Cultural Heritage
 - Bullington Cross Wind Farm Environmental statement, Volume 3a: Figures. In particular, Figures 6.1 – 6.25 (Landscape) and Figures 11.1 – 11.2(Cultural Heritage).
 - Bullington Cross Wind Farm Environmental statement, Volume 3b: Appendices. In particular, Appendices 6 (Landscape) and 11(Cultural Heritage).
 - Statement of Residential Amenity.
- 1.2.3 Additional documents and sources of information used to inform this review and referred to in this report are the following:-
- Planning Application form submitted with the application.
 - Bullington Cross Wind Farm Design and Access Statement – April 2013, prepared by PMSS for EDF Energy Renewables.
 - A web site provided by EDF Energy Renewables, which is available at <http://www.bullingtoncrosswindfarm.co.uk> (accessed 26 May 2013).
- 1.2.4 Jonathan Billingsley, a Director of The Landscape Partnership has carried out the review of the two chapters of the Environmental Statement referred to above. He viewed the application site and wider area on 9th and 29th May 2013 from adjacent land, local rights of way, public locations and some private locations with the agreement of the landowners. Jonathan Billingsley is a Chartered Landscape Architect with over 30 years experience. He has provided specialist landscape, visual and heritage advice in regard to renewable energy projects including a number of wind farms.

1.3 Objectives of this report

- 1.3.1 The Landscape Partnership has been asked by the environmental action group Keep Hampshire Green to advise on the acceptability of the development relating to the topics of ecology, landscape and cultural heritage. This review will be made available to all three Local Planning Authorities considering the proposed wind farm, and to statutory and other consultees, to inform their understanding and/or decision-making for the proposal. This review is for the landscape and cultural heritage topics only, with a separate report advising on ecology.
- 1.3.2 The objectives of this report are to:-
- Review the methodology used in the Environmental Statement.
 - Assess whether the Environmental Statement contains the full baseline information.
 - Review the judgements made about the effects on landscape, visual and cultural heritage aspects.
 - Identify further work that should be undertaken by the applicant.

2 Review of Methodology

2.1 Landscape Resource and Visual Amenity

- 2.1.1 The methodology is set out in outline in Chapter 6.44 – 6.58 and in more detail at Appendix 6.1.
- 2.1.2 The methodology used follows current guidance and good practice. It is clearly set out in both the main text and Appendix 6.1. However, we have a few observations as detailed below.
- 2.1.3 It is noted that the method follows the GLVIA Second Edition (para 6.45). This is now superseded by Edition 3 (April 2013). However, as the ES was initiated before Volume 3 was issued it is accepted practice to continue with the approach in Edition 2. This should not affect the findings of the ES.
- 2.1.4 The production of Photomontages has been carried out against the SNH Guidelines of 2006, which is also currently under review. However, until the consultation responses have been gathered the 2006 guidance is to follow the 2006 version.
- 2.1.5 Para 6.55 identifies that in the majority of cases the introduction of wind farms will not be seen as positive addition. The ES therefore adopts the 'precautionary principle' that the nature of the effects will be 'adverse'. We would agree with this approach.
- 2.1.6 Para 6.58 refers to the fact that introducing turbines to a 'much modified' landscape will be less harmful than in a more natural one. This will however depend on the type of modification. The majority of lowland Britain is a 'much modified' landscape despite the fact that most of current agricultural landscapes still retain the appearance of a 'natural' or undeveloped character, particularly where there is an absence of detracting elements.
- 2.1.7 The Use of Wireframes (Appendix 6.1 para 3.11 – 3.12) has a number of limitations in some of the views. This is particularly the case where there is no overlay of the wireframe on the photograph and it is not possible to see how much of the turbines would be seen. **In a number of locations additional Photomontages are required as set out further below to rectify this lack of clarity. This also applies to the use of wireframes for the Residential Amenity Study.**
- 2.1.8 The sensitivity of views from roads is indicated in the Table at Para 3.16 (App 6.1) as 'Low to Moderate' for 'minor rural roads'. However, it is considered that for some minor lanes and particularly routes which have strong associations with the landscape and/or where the pace of travel is slower or are used by non motorised recreational users, the sensitivity of the receptor should increase to at least moderate or even higher. We have allowed for this below in the assessment of sensitivity of specific views (Table 3).
- 2.1.9 Paras 3.19 (App 6.1) does not include for the effect of 'stacking' or 'blade clash'. **These effects should be noted as factors that can considerably 'increase the apparent magnitude of change'.** We have allowed for this below in the assessment of magnitude of change on views (Table 3) and under comments on Mitigation in Section 4.
- 2.1.10 Table 3 (App 6.1) after para 3.19 provides a helpful calibration of the magnitude of visual effects and definition to guide the assessor. However, there is no indication at what distance these categories may typically apply. We have used the 'verbal' distance categories set out below and applied the likely range of effect in term of km from the turbines (see Table 1 below). These are taken from a study by Ove Arup – Placing Renewables in the East of England. Whilst not rigid to all situations (due to the presence of e.g. intervening screening by landform or vegetation) they are helpful in the calibration of magnitude. We have also used these to inform the professional judgement of the significance of visual effects at the various viewpoints.

Table 1 – Categories of Magnitude and distance

Magnitude	Size Class descriptor	Distance Range
Very Large	Dominant	Up to 2km
Large	Prominent	2-5km
Medium	Conspicuous	4-10km
Small	Apparent	9-16
Very Small	Inconspicuous	15-20
Negligible	Faint	15-30

- 2.1.11 Para 4.3 of Appendix 6.1 and the Table following sets out where effects are considered 'significant' in EIA terms through the use of a matrix. We would agree with this approach and the categories included as giving rise to significant effects in the Table – i.e. Moderate to Major, Major or Substantial. However, an aggregation of moderate adverse effects should also form part of decision making judgements.
- 2.1.12 The definitions set out in the methodology for categories of magnitude and sensitivity for both landscape and visual factors are generally considered to be acceptable. To aid comparability in this review we have adopted the definitions in Appendix 6.1 of the ES for the application of judgements (unless stated otherwise) in the sections on effects on landscape and visual amenity.
- 2.1.13 The photomontages produced in the ES are based on the use of a 50mm equivalent lens. This follows standard practice as set out by Scottish Natural Heritage (SNH) in Visual Representation of Wind Farms – Good Practice Guidance, (2006) and The Landscape Institute in their Advice Note 01/11. However, there is an ongoing debate about whether a 50mm based image represents what the human eye sees or whether it underplays the scale of the existing landscape and any proposed features within it. An email dated 1/12/11 from SNH sent following a workshop held on 7/11/12 states that: 'Our initial conclusion is that the Good Practice Guide needs considerable revision.' SNH have recently gone out for consultation into changes on their guidance with a reply date of July 2013.
- 2.1.14 **Our view having viewed a number of comparable focal length images in the field, is that an image based on a 50mm lens under represents the scale of wind turbines. However, images based on a 70-75mm (SLR equivalent) single frame image is more representative of what the human eye sees.** This is the approach advocated in the Highland Council's Visualisation Standards for Wind Energy Developments (January 2010). **We consider that the images in the ES therefore do not show the perceived scale of the development. Photomontages based on a 70-75mm lens and produced as single frame images at 200mm height minimum should be requested from the applicant for a number of key locations including those where there are acknowledged significant impacts.**
- 2.1.15 The application includes a separate Statement of Residential Amenity that includes nine residential locations closest to the proposed turbines. This includes coverage of shadow flicker, noise and visual effects. This report also reviews the visual effects recorded. Each location includes wireframes of the proposed turbines from a viewpoint at the properties. However, they only include the landform and turbines. The wireframes are therefore of very limited benefit in assessing the visual effects where there are any intervening built or natural features

in addition to landform. **It is recommended that a photomontage is produced (or at least a superimposed wireframe) over a baseline photograph from selected residential locations where there is likely to be a significant visual impact to assess if there will be any greater impacts that would result in an unpleasantly overwhelming and unavoidable presence on the residence.**

2.2 Cultural Heritage

- 2.2.1 This review does not cover the approach to Archaeology in the ES but is focused on comments on the visible presence of cultural heritage features and in particular the effect on Listed Buildings, Conservation Areas and Registered Parks and Gardens.
- 2.2.2 Chapter 11 sets out the methodology used in the ES at Paras 11.21 – 46 and more fully in Appendix 11.2. The heritage assets were assessed principally within a 5km radius of the turbines. Beacon Hill at 12km was later added to the assessment at the request of Hampshire CC (ES Viewpoint 16).
- 2.2.3 It is noted that the assets in the wider range did not include Winchester Cathedral. **It is recommended that a heritage assessment is made for the Cathedral, particularly in terms of the view from St Catherine's Hill (ES Viewpoint 31).** This should include the effects on the criteria as set out in the English Heritage Document Wind Energy and the Historic Environment.
- 2.2.4 It is noted at Para 11.38 (and App 11.2 at para 2.21) that all visits to heritage assets were undertaken from publically accessible locations. For some locations this would not provide sufficient information on the ground e.g. Laverstoke House and Registered Park and Garden. **This approach is considered a significant flaw in the assessment for those assets where there is no public access and yet where the ES records there are likely to be 'moderate – minor' impacts or above. In particular where this reference is to 'key views' from a listed building or from within parks and gardens. This omission should be rectified before the applications are determined. Photomontages or at least wireframe/photograph overlays should be produced where any 'key views' may be affected to understand the magnitude significance and nature of the affect.**
- 2.2.5 The approach to the assessment of sensitivity of heritage assets is set out in Table 11.1. The range of relative sensitivity is provided for each class of asset. However, the approach to classify the locally listed undesignated assets as low sensitivity e.g. the hunting lodge near T13 and Tufton Warren Farm attributes them a very modest value.
- 2.2.6 The approach in the ES does not state which effects are 'significant' in EIA terms in contrast to the Landscape and Visual chapter. Rather it makes a distinction between those effects that are 'Major' (and adverse) and would require 'substantial public benefit' from the proposal to justify the effects. Where effects are classed as 'Moderate' or less, any harm should then be 'weighed against' the public benefit. This approach seems to reflect the NPPF at paras 133 and 134 and is reasonably helpful in determining the relative weight and acceptability of any effects.

3 Review of Policy Context and Baseline

3.1 Secretary of State's Letter 6th June 2013

- 3.1.1 Subsequent to the preparation of the ES the Secretary of State issued a letter on 6th June 2013 indicating a rebalancing of the decision process for onshore wind turbine proposals to reflect the voice and concerns of local communities particularly where there is an effect on the local environment. The statement specifically refers to impacts on the landscape, local amenity, local topography and views to heritage assets. All these factors are fully engaged in this application. This statement indicates a rebalancing of the benefits –v- harm debate which will no doubt be made clearer in the guidance Mr Pickles has indicated will be made available soon. The guidance is likely to be read alongside other government guidance including NPPF, Companion Guide to PPS 22 and National Policy Statements EN1 and EN3.

3.2 Landscape Resource and Visual Amenity Policy

- 3.2.1 The ES provides a fair review at Paras 6.12 to 6.43 of the existing policy context at the time of the submission of the Planning Application.
- 3.2.2 However, it is noted that there is no analysis in Chapter 6 as to whether the proposed wind farm complies with the policies and in particular the various Local Planning Policies. In particular, this would apply to Basingstoke and Deane – Policies E6 and A6, Test Valley – Policies ESN32 and DES01 and Winchester – Policies DP4 (in particular the view from Catherine's Hill), CE5 and CP20. **It is recommended that an assessment against these policies should be made by each of the determining local authorities.**
- 3.2.3 It is likely that there will be breaches with most of these policies arising from the proposed scheme and that these impacts should be balanced against the benefits of the proposal by the decision makers.

3.3 Cultural Heritage Policy

- 3.3.1 The ES provides a fair review at Paras 11.4 – 11.20 of the existing policy context at the time of the submission of the Planning Application.

3.4 Landscape Resource and Visual Amenity Baseline

- 3.4.1 The ES at Paras 6.62 – 6.123 provides a review of the baseline. The description provides a reasonable overview of the main features but is limited in extent.
- 3.4.2 **The presence of the main A34 and A303 and main line railway are in our opinion perhaps over-emphasised compared to other aspects of the local character.** Furthermore the presence of the railway line in the landscape is well contained either by being in cutting for considerable lengths or by the presence of mature lines of vegetation providing enclosure.
- 3.4.3 **There is no mention of the network of minor lanes and roads that provide a connection for local communities through the landscape. These provide a much more intimate association with the landscape than the main roads and a different perspective of the landscape character and views e.g. Micheldever Road between Whitchurch and Micheldever Station.**
- 3.4.4 We would agree that along a number of the routes (ranging from trunk roads to minor roads) there are considerable lengths that are locally enclosed by vegetation from woodland and hedges. However, conversely there a number of locations where, when there are more open views over the surrounding landscape, that these become of greater importance in appreciating

the landscape character and this therefore raises their relative importance (e.g. TLP Viewpoints A, Q, M).

- 3.4.5 There is also no mention of the more isolated and individual properties in the landscape e.g. Tufton Warren Farm Roundwood Farm or New Barn Farm.
- 3.4.6 Para 6.73 –76 highlights the purpose of the South Downs National Park which is located some 9.8km to the south. The 'special quality' that is most likely to be affected by the proposed development is the 'diverse, inspirational and breathtaking views.' Three locations are included in the ES from the National Park at 8, 9 and 31.
- 3.4.7 The site is also located within 3.7km of the North Wessex Downs AONB which lies to the north. Para 6.78 identifies and Appendix 6.3 includes a list of the special qualities. There is no assessment in the ES as to which of these most readily apply to the site. However, it would seem that those likely to be engaged are in relation to: 'Development' – and namely 'The sense of remoteness and tranquillity' and that 'All landscapes are sensitive to change'.
- 3.4.8 The ES refers at paras 6.97 – 98 to the North Wessex Downs AONB study, 'Landscape Sensitivities and Constraints to Wind Turbine Development'. The focus of this study is on wind turbine development within the AONB and is based on a range of character types within the AONB. The text on 'connections with adjacent landscapes' appears to be largely concerned with other areas within the AONB. The largest Character type closest to the proposed development is 2: Downland with Woodland. The AONB study at page 51 notes that among the main valued views are 'extensive views to and from the scarp slopes of Watership Down and Beacon Hill (Area 2D). Both of these are included in the ES at Viewpoints 23 and 16 respectively. A key visual sensitivity is recorded at Page 55 as 'the perception of a rural 'undeveloped' landscape with long distance views to and from the open summits'. The sensitivity of this aspect is noted as being 'High'. This description fits with the view from Beacon Hill. The closest Character Type to the site is 7: River Valleys and in particular Area 7C: Bourne Valley which extends along the Bourne to Hurstbourne Priors.
- 3.4.9 The coverage of Viewpoints is included at Paras 6.109 – 116. Para 6.111 states how the selected viewpoints were derived. **However, the criteria seem to omit an important category of local routes in the areas where people would see the proposals from rights of way and local roads. There is a relative shortage of views in the ES from within 2.5km with only two to the north from local rights of way and none along the route that passes through the south of the site.** These are likely to be significantly affected. We have included a number of these in our additional Viewpoints A-Z as discussed in detail below.
- 3.4.10 With regard to the selected viewpoints, it was noted that there was a dialogue with the Local Authorities and Statutory Consultees as to the locations. Our general observations on the viewpoints are that whilst a number of the locations provide good logical viewpoints, there are a number where there is no view of the proposal e.g. 4, 21 and 32. In addition there are some locations where open views exist in close proximity e.g. TLP views R and Q to the south and N, O and P along the right of way within the site. **It is also unhelpful and disappointing that the majority of the photographs were taken in the summer at the time of maximum screening by deciduous vegetation. The additional transparency in the winter months is not therefore adequately demonstrated.** This would be most notable where the screening is provided by a relatively narrow belt of trees e.g. Viewpoints 10, 17 and 18.
- 3.4.11 The use of wireframes alone in a number of locations does not assist in the appreciation of the effects due to the partial screening of vegetation.

3.5 Cultural Heritage Baseline

- 3.5.1 The ES at Appendix 11.2 provides the detailed Heritage Settings Assessment. This combines the baseline information with the assessment on the settings. The main findings of 11.72 are carried forward to Paras 11.72 – 78 and the Table following.

- 3.5.2** The effect on the locally listed Tufton Warren Farm which is within 1km of the site does not seem to have been included in the assessment. **This should be rectified in respect of the effect on the setting of the asset.**

4 Review of Effects

4.1 Landscape Resource

- 4.1.1 The direct effects on the **Landscape Fabric** are set out in Paras 6.124 – 133. It is accepted that the direct effects on the landscape fabric itself within the site are likely to be limited, mainly affecting the locations in arable fields where the turbines are located. **There is no mention in Chapter 6 of the effect of locating the substantial lengths of access track to construct and maintain the turbines. This will affect c. 7km of route and be a notable new addition in the landscape.**
- 4.1.2 There is a description at Chapter 12 and on Drawings 12.1 – 12.4 that vegetation clearance will be required along the access routes to achieve a width of 6m and height of 5 metres and that trees and hedges would need to be trimmed to achieve this. **However, the extent of the likely effect along the route on the vegetation is not detailed. This information should be provided prior to determination of the applications.**
- 4.1.3 Paras 6.134 – 137 summarise the effects on **Landscape Character**. A detailed assessment is provided at Appendix 6.7 for each of the District Scale Landscape Character Areas (LCAs) in each of the three authorities. It is agreed that this is the best scale to review the effects. The ES identifies a significant effect on five character areas: 12 Test and Bourne Valley, 13 South Test Down, 10E Drayton Chalk Downland, 5 Dever Valley and 6 North Dever Downs.
- 4.1.4 It also states in the ES that there are no significant effects over any entire LCA. However, this is not unusual given the scale of some LCA's and should not be considered to be a determining factor in assessing the application. However, the effect on LCA 13 South Test Down is noted to cover the 'majority' of the area. The effect on each LCA and also the combined effect on all areas as a whole should be assessed.
- 4.1.5 The ES summarises that in these five LCAs the turbines would be 'a recognisable component of landscape character'. However, in our opinion the turbines would not only be 'recognisable' but clearly new alien features causing a dominant effect on large parts of the LCAs and the locality. The ES states at para 6.137 that the extent of effects is determined by their visual prominence in a setting where the presence of 'such tall engineering structures are almost absent.' This is a misleading statement as there are clearly no other existing structures of a similar scale (even pylons). Rather it is the lack of detracting features in the landscape that is one of the defining characteristics of the local area. The main transport routes of the A34 and A303 and associated traffic are the main built engineering features in the area. However, these routes are only variably visible due to the undulating landform, local presence of cutting and woodland cover. The moving traffic on the route would also typically be under 2m and at a maximum of 5m for HGVs. The turbines would introduce a completely new scale and type of feature into the landscape.
- 4.1.6 The extent of significant effect is recorded as extending to 3-4km to the north west and south and 2.5km to the south.** We have carried out a review of the ES findings as summarised in Table 2 below and broadly agree with the extent and nature of effects on landscape character. It should be noted that the effects on landscape character do not always extend to the same distance as visual effects. **It should be underlined that this is a significant effect for an area of c. 10km from north to south and 8.5km from east to west. This is a very notable effect on the local landscape character that has no other similar types or scale of impact and that in the main is a landscape with few detracting features. This would equate to significant harm to landscape character.**
- 4.1.7 **Areas where TLP consider the landscape effects to be greater than recorded in the ES are at LCA: 12 Test and Bourne Valley. Here there would locally be a high magnitude impact on the character of the valley around Whitchurch and in particular from cross valley views e.g. ES Views 14, 18 and TLP Views I and S where**

the turbines would adversely affect the peaceful valley setting and views to the south.

Table 2 – Summary of Effects on Landscape Character

Viewpoint Ref ES	Description	Comments on impact in ES (shaded boxes = significant impacts for the operation period)	Comments
Basingstoke and Dean			
8	Great Litchfield Down and Willesley Warren	ES assessment Sensitivity = Moderate – High Magnitude = Very Small Significance = Minor – Moderate TLP agree with ES	Two key characteristics are: <ul style="list-style-type: none"> • The sense of elevation and open views • Open and expose character and high intervisibility within and outside the area However this is less apparent to the south closer to the site although there are some locations where views are present and hence these are relatively more important
9	Ashmansworth and Binley Down	ES assessment Sensitivity = High Magnitude = Very Small Significance = Moderate TLP agree with ES	
10	Litchfield Down	ES assessment Sensitivity = High Magnitude = Very Small Significance = Moderate TLP agree with ES	Key characteristics include: <ul style="list-style-type: none"> • Extensive views within the more open south-west section ES view 15 is in this LCA
11	Wyke Down	ES assessment Sensitivity = Moderate – High Magnitude = Very Small Significance = Minor – Moderate TLP agree with ES	The key Characteristics do not include views out of the landscape. ES view 24 is in this LCA. This will have an effect visually on the LCA and AONB.
12	Test and Bourne Valley	ES assessment Sensitivity = High Magnitude = Negligible (Bourne Valley and Test valley from Laverstoke eastwards) Small (Test Valley around Whitchurch) Significance = Negligible (Bourne Valley and Test valley from Laverstoke eastwards) Moderate – major (Test Valley around Whitchurch)	Relevant key characteristics include: <ul style="list-style-type: none"> • Area west of Whitchurch within AONB generally possessing an unspoilt, intimate character with limited intrusion. ES views 14, 18 and TLP View I are within this LCA. At these locations there would be a notable impact on the landscape character. This would raise the magnitude of change to moderate in these local areas and the significance to Major.

Viewpoint Ref ES	Description	Comments on impact in ES (shaded boxes = significant impacts for the operation period)	Comments
		TLP consider magnitude locally moderate and significance = Major	
13	South Test Down	ES assessment Sensitivity = Moderate Magnitude = Large (majority of character area small (south of Overton) Significance = Moderate – Major (majority of character area) Minor – Moderate (south of Overton) TLP agree with ES	Significant impact over the majority of this area with the turbines the defining feature.
14	Oakley – Steventon Down	ES assessment Sensitivity = High Magnitude = Very Small Significance = Moderate TLP agree with ES	
15	Hannington Down	ES assessment Sensitivity = Moderate – High Magnitude = Very Small Significance = Minor – Moderate TLP agree with ES	
17	Dummer and Popham Down	ES assessment Sensitivity = Moderate Magnitude = Negligible Significance = Negligible TLP agree with ES	
20	Candover Valley	ES assessment Sensitivity = High Magnitude = Very Small Significance = Moderate TLP agree with ES	
Test Valley			
5C	Upper Test Valley Floor	ES assessment Sensitivity = High Magnitude = Very Small Significance = Moderate TLP agree with ES	
5G	River Dever Valley Floor	ES assessment Sensitivity = High Magnitude = Negligible Significance = Negligible TLP agree with ES	
6C	Little Somborne Wooded Downs	ES assessment Sensitivity = Low – Moderate Magnitude = Negligible	

Viewpoint Ref ES	Description	Comments on impact in ES (shaded boxes = significant impacts for the operation period)	Comments
		Significance = Negligible TLP agree with ES	
6D	Harewood Forest Wooded Downs	ES assessment Sensitivity = Moderate Magnitude = Very Small (eastern part of character area) No Change (western part of character area) Significance = Minor (eastern part of character area) No Effect (western part of character area) TLP agree with ES	
10D	Leckford and Chilbolton Downs	ES assessment Sensitivity = Low – Moderate Magnitude = Medium (between Barton Stacey and Sutton Scotney) Very Small (rest of character area) Significance = Minor – Moderate (between Barton Stacey and Sutton Scotney) Slight – Minor (rest of character area) TLP consider sensitivity should be moderate and significance increases to Moderate	ES views 13 and 20 TLP View A are within this LCA
10E	Drayton Chalk Downland	ES assessment Sensitivity = Moderate Magnitude = Large (east of A34) Medium (rest of character area) Significance = Moderate – Major (eastern/north-eastern part of character area) Moderate (rest of character area) TLP agree with ES	ES views 25 and 26 are within this LCA
10F	Andover Chalk Downland	ES assessment Sensitivity = Low Magnitude = Negligible Significance = Negligible TLP agree with ES	

Viewpoint Ref ES	Description	Comments on impact in ES (shaded boxes = significant impacts for the operation period)	Comments
Winchester			
3	Crawley Downs	ES assessment Sensitivity = Moderate – High Magnitude = Negligible Significance = Negligible TLP agree with ES	
4	Wonston Downs	ES assessment Sensitivity = Moderate Magnitude = Medium (northern edge of character area Small (rest of character area) Significance = Moderate (northern edge of character area) Minor – Moderate (rest of character area) TLP agree with ES	ES view 11 and TLP Views B,C, D and E are within this LCA
5	Dever Valley	ES assessment Sensitivity = High Magnitude = Medium (localised) Very Small (character area as a whole) Significance = Major (localised) Moderate (character area as a whole) TLP agree with ES	ES views 10 and 12 and TLP Views F and G are within this LCA
6	North Dever Downs	ES assessment Sensitivity = Moderate Magnitude = Large (majority of character area) Small (eastern part of character area) Significance = Moderate – Major (majority of character area) Minor – Moderate (eastern part of character area) TLP agree with ES	ES views 5 and TLP Views Q and R are within this LCA
7	Stratton Woodlands	ES assessment Sensitivity = Low – Moderate Magnitude = Very Small Significance = Slight – Minor TLP agree with ES	
8	North Itchen Downs	ES assessment Sensitivity = Moderate – High Magnitude = Negligible Significance = Negligible TLP agree with ES	

Viewpoint Ref ES	Description	Comments on impact in ES (shaded boxes = significant impacts for the operation period)	Comments
9	Upper Itchen Valley	ES assessment Sensitivity = High Magnitude = Negligible Significance = Negligible TLP agree with ES	

4.2 Review of effects on Visual Amenity

- 4.2.1 An assessment has been carried out of the 32 representative views included in the ES and detailed at paras 6.138 – 6.173 and in tabulated form at Appendix 6.8.
- 4.2.2 As part of our site review we have also identified a number of additional locations A-Z as shown on Figures 01 and 02 and illustrated by the Photographs A-Z in the separate A3 Volume of Appendices to this review. The photographs have been taken with a digital using a fixed lens equivalent to 50mm focal length on a manual SLR camera. The 50mm lens is used to show the landscape context. The additional locations have been selected where it is considered that the ES does not provide an adequate representative view study or where further locations were considered important to illustrate the visual effects. Photographs A- T illustrate locations where there is an effect on public views. Photographs U-Z illustrates a number of views from some of the residential properties most significantly affected.
- 4.2.3 The table below summarises the findings of the ES from the viewpoints and states if we agree with the findings. Where boxes are shaded we consider there would be a 'significant' effect on the views involved. Conclusions are drawn at the end to the table.

Table 3 Assessment of Visual effects from Viewpoints

Viewpoint Ref ES	Description	Comments on impact in ES (shaded boxes = significant impacts for operation period)	Comments on Viewpoints and Photomontage(NB: General comments on montages in text)
1	Wayfarer's Walk, Stubbington Down (11.61km)	ES assessment Sensitivity = High Magnitude = Very Small Significance = Moderate TLP consider magnitude would be 'small' in clear weather conditions and not 'very small' which would be a Moderate to Major Impact	The viewpoint selected has a pylon directly in front of the view. There are likely to be other locations where this will not be so dominating in the foreground.
2	B3051, Harroway (7km)	ES assessment Sensitivity = Low – Moderate Magnitude = Small Significance = Minor TLP consider magnitude would be 'medium' at this distance in clear weather conditions and not 'small'	The view is at a short gap in the tall hedges. There are unlikely to be other open views in the vicinity of this approach to Overton and from the AONB.

Viewpoint Ref ES	Description	Comments on impact in ES (shaded boxes = significant impacts for operation period)	Comments on Viewpoints and Photomontage (NB: General comments on montages in text)
		which would be a Minor to Moderate Impact	
3	Sapley Lane Playing Field, Overton (4.5km)	ES assessment Sensitivity = Moderate Magnitude = Small Significance = Minor – Moderate TLP consider magnitude would be 'medium' at this distance in clear weather conditions and not 'small' which would be a Moderate Impact	View from playing fields and agree with ES that attention not focused on the view. Recent planting to the south on the skyline will also provide further screening.
4	Minor Road near Bull Bushes Copse (8.7km)	ES assessment Sensitivity = Low – Moderate Magnitude = No Change Significance = No Effect TLP agree with ES	Question the use of this viewpoint as no change.
5	Public footpath, Micheldever Station (2.5km)	ES assessment Sensitivity = Moderate – High Magnitude = No Change (summer) Negligible (winter) Significance = No Effect (summer) Negligible (winter) TLP agree with ES	
6	Wayfarer's Walk / Three Castles Way (10.7km)	ES assessment Sensitivity = High Magnitude = Very Small Significance = Moderate TLP consider magnitude would be 'small' in clear weather conditions and not 'very small' which would be a Moderate to Major Impact	
7	Micheldever (4.7km)	ES assessment Sensitivity = High Magnitude = Negligible Significance = Negligible TLP agree with ES	TLP Viewpoint G would be a more open aspect – see below.
8	South Downs Way, near Cheesefoot	ES assessment Sensitivity = High Magnitude = Very Small Significance = Moderate	Turbines likely to be visible from AONB and in the distant prospect to Beacon Hill which is itself visible at

Viewpoint Ref ES	Description	Comments on impact in ES (shaded boxes = significant impacts for operation period)	Comments on Viewpoints and Photomontage (NB: General comments on montages in text)
	Head (15.3km)	TLP consider magnitude would be 'small' in clear weather conditions and not 'very small' which would be a Moderate to Major Impact	a further 12km (total of 27km).
9	Magdalen Hill Down (14km)	ES assessment Sensitivity = Moderate – High Magnitude = Very Small Significance = Minor – Moderate TLP consider magnitude would be 'small' in clear weather conditions and not 'very small' which would be a Moderate Impact	
10	Church of St Michael, Stoke Charity (3.9km)	ES assessment Sensitivity = Moderate Magnitude = No Change (summer) Negligible (winter) Significance = No Effect (summer) Negligible (winter) TLP consider the sensitivity moderate to high and magnitude could be 'medium' in winter and small in summer 'small' which would be a 'Moderate to major' and significant impact in winter.	The trees on the horizon are poplars which would be much more open in the winter months. There are other viewpoints – TLP View F where the telegraph pole is less prominent and the context for the approach to the church more of a feature. See below.
11	South Wonston (6.9km)	ES assessment Sensitivity = Low – Moderate Magnitude = No Change (summer) Negligible (winter) Significance = No Change (summer) Negligible (winter) TLP agree with ES – but see note opposite	The selected view is not representative of the numerous elevated views from South Wonston from properties on Stavedown Road and Wrights Close, all of which face north to the turbines. These would be high sensitivity and likely to incur a significant adverse effect. In addition there are more sensitive public views than ES 11 – see Viewpoints C, D and E below from rights of way with open views.
12	Sutton Scotney (3.9km)	ES assessment Sensitivity = High Magnitude = Very Small	

Viewpoint Ref ES	Description	Comments on impact in ES (shaded boxes = significant impacts for operation period)	Comments on Viewpoints and Photomontage (NB: General comments on montages in text)
		Significance = Moderate TLP consider magnitude would be 'medium' at this distance and particularly in winter and not 'very small' which would result in a Moderate to major and significant Impact particularly in winter from this location	
13	A30 near Chilbolton Down (6.7km)	ES assessment Sensitivity = Low Magnitude = Small Significance = Slight to Minor TLP consider magnitude would be 'medium' at this distance and not 'small' which would result in a Minor significant Impact from this location. TLP do not accept that the sensitivity of the user of the A30 is low.	View a gap in hedge and not representative of wider views – See TLP A below.
14	Drury Lane, Hurstbourne Priors (4.2km)	ES assessment Sensitivity = High Magnitude = Medium Significance = Major TLP consider magnitude would be 'large' at this distance and not 'medium' which would result in a Major to Substantial and significant Impact from this location.	The view is also from the edge of Hurstbourne Priors Conservation Area which includes the meadows east of Longparish Road. There are other similar views from properties along Longparish Road across the meadows and Conservation Area. All 14 turbines would be seen wholly or in part on the skyline. This will include some stacking of 5, 9 and 10.
15	Newbarn Down (6.5km)	ES assessment Sensitivity = Low – Moderate Magnitude = Very Small Significance = Slight to Minor TLP agree with ES	There are other closer views within the AONB with more open aspects from rights of way – See TLP View S.
16	Beacon Hill (12.6km)	ES assessment Sensitivity = High Magnitude = Small Significance = Moderate – Major TLP agree with ES	While only occupying a small part of the view the turbines would become the single most obvious feature (due to the scale, form and movement) in the view in clear conditions towards the South Downs National Park.
17	Micheldever Road, Whitchurch	ES assessment Sensitivity = High Magnitude = Small Significance = Moderate –	The majority of the houses are not oriented directly towards the turbines. However, there would be clear views to them in part from

Viewpoint Ref ES	Description	Comments on impact in ES (shaded boxes = significant impacts for operation period)	Comments on Viewpoints and Photomontage (NB: General comments on montages in text)
	(2.67km)	Major TLP consider magnitude would be 'large' at this distance and not 'Small' which would result in a Major to Substantial and significant Impact from this location	gardens and obliquely from the houses. The turbines will be very much more evident in winter with less vegetation in gardens and intervening hedges.
18	Footpath, edge of Whitchurch (3.5km)	ES assessment Sensitivity = Moderate – High Magnitude = Small Significance = Moderate TLP consider the sensitivity to be high on account of this also being a view from the Laverstoke Conservation Area. TLP consider magnitude would be 'Large' at this distance and not 'Small' which would result in a Major to Substantial and significant Impact from this location.	The turbines are framed by the vegetation to both sides in summer and would also likely to be visible through the bare trees in winter.
19	Minor road near Ridgeway Farm (8.36km)	ES assessment Sensitivity = Low – Moderate Magnitude = Small Significance = Minor TLP agree with ES	This is a very short gap in a tall section of hedgerow which encloses most other views along the road.
20	Barton Drove (4.2km)	ES assessment Sensitivity = High Magnitude = Medium Significance = Major TLP consider magnitude would be 'large' at this distance and not 'Medium' which would result in a Major to Substantial and significant Impact from this location	All 14 turbines would be seen wholly or in part on the skyline. This will include some stacking of 2, 4 and 7 and 1,3 , 8 and 9.
21	Lower Bullington (3km)	ES assessment Sensitivity = Moderate Magnitude = No Change Significance = No Effect TLP agree with ES	
22	Byway north-west of Longparish (4.9km)	ES assessment Sensitivity = High Magnitude = Very Small Significance = Moderate	

Viewpoint Ref ES	Description	Comments on impact in ES (shaded boxes = significant impacts for operation period)	Comments on Viewpoints and Photomontage(NB: General comments on montages in text)
		TLP agree with ES	
23	Watership Down (11.8km)	ES assessment Sensitivity = High Magnitude = Small Significance = Moderate – Major TLP agree with ES	The photograph has mist in the distant vale which makes the far horizon more difficult to read.
24	Footpath near Upper Wyke Farm (9.2km)	ES assessment Sensitivity = Moderate – High Magnitude = Small Significance = Moderate TLP consider sensitivity is high as it is located in the AONB and connects with other local and waymarked routes. The magnitude would be 'Medium' at this distance and based on the focus of the receptor on the route and not 'Small' which would result in a Major to Substantial and significant Impact from this location.	
25	Footpath near Tidbury Ring (2.5km)	ES assessment Sensitivity = High Magnitude = Very Small Significance = Moderate The magnitude would be 'Large' at this distance. While sweeping over woodland the blades would be unmistakable. This would result in a Major to Substantial and significant Impact from this location.	The view to the Scheduled Monument within the Wood is currently unencumbered by any features. The A34 is hidden and in cutting at this point. The effect would be greatest in the winter months.
26	Byway near Larkwhistle Farm (2.7km)	ES assessment Sensitivity = High Magnitude = Medium Significance = Major The magnitude would be 'Large' at this distance as all 14 turbines would be visible on the horizon at this range. This would result in a Major to Substantial and significant Impact from this location.	
27	Footpath near Brickkiln Wood	ES assessment Sensitivity = High	The effects from this direction on high ground would be similar and in

Viewpoint Ref ES	Description	Comments on impact in ES (shaded boxes = significant impacts for operation period)	Comments on Viewpoints and Photomontage (NB: General comments on montages in text)
	(674m)	Magnitude = Large Significance = Major – Substantial The magnitude would be 'Very Large' at this distance with 10 of the turbines visible at close proximity. This would result in a Substantial and significant Impact from this location.	some cases worse e.g. from right of way to west where all 14 turbines would be visible.
28	Footpath north of site (285m)	ES assessment Sensitivity = High Magnitude = Very Large Significance = Substantial TLP agree with ES.	
29	Footpath, Abra Barrow (2.8km)	ES assessment Sensitivity = High Magnitude = Medium Significance = Major The magnitude would be 'Large' at this distance as all 14 turbines would be visible on the horizon at this range. This would result in a Major to Substantial and significant Impact from this location.	All 14 turbines would be seen wholly or in part on the skyline. This will include some stacking of 13 and 14 and 2 and 6.
30	Beacons Farm, nr Micheldever Station (3.5km)	ES assessment Sensitivity = Low – Moderate Magnitude = Small Significance = Minor The magnitude would be 'Medium' at this distance. This would result in a Minor to Moderate Impact from this location.	The view is not seen this open for the motorist.
31	St Catherine's Hill (15.3km)	ES assessment Sensitivity = Very High Magnitude = Small Significance = Moderate – Major TLP agree with ES	This is a particularly sensitive view. The position of the turbines in the same direction and located above the cathedral on the skyline is of particular concern in its affects on the views from South Downs National Park and the impact on the setting of the Grade 1 listed cathedral. The movement of the blade in clear weather would be very evident and cause harm in heritage and visual terms.

Viewpoint Ref ES	Description	Comments on impact in ES (shaded boxes = significant impacts for operation period)	Comments on Viewpoints and Photomontage (NB: General comments on montages in text)
			A photomontage should be produced from this location to establish how much of the turbines are seen.
32	Riverside footpath, Whitchurch (3.5km)	ES assessment Sensitivity = High Magnitude = No Change Significance = No Effect TLP agree with ES	
Additional Viewpoints – see TLP Figure 1 and Photographs A- Z			
A	A30/Martins Lane Chilbolton Down (8.5km)	TLP assessment Sensitivity = Moderate Magnitude = Medium Significance = Moderate	Originally proposed by applicant (App 6.6 – Table 2 View E). Not clear why replaced with ES 13 as visibility in landscape far less and more low lying. The sensitivity travelling along the old Roman Road is considered higher due the fine views from this location for the motorist.
B	Footpath east of A272 (7.6km)	TLP assessment Sensitivity = Moderate – high Magnitude = Medium Significance = Moderate – Major	The view from the road is screened by mature shelter belt. Views from footpaths are more open.
C	Footpath south of South Wonston (7.4km)	TLP assessment Sensitivity = High Magnitude = Medium Significance = Moderate – Major	View similar to a number of residential locations that face north on Wrights Close and Stavedown Road.
D	Footpath south of South Wonston (6.8km)	TLP assessment Sensitivity = High Magnitude = Medium Significance = Moderate – Major	Similar location to ES View 11 but from more sensitive receptor on right of way where circular routes.
E	Right of Way east of Wallers Ash close to railway (6.7km)	TLP assessment Sensitivity = Moderate to High Magnitude = Medium Significance = Moderate – Major	Open sections and aspects along route.
F	Stoke Charity Church (4km)	TLP assessment Sensitivity = High Magnitude = Medium Significance = Moderate – Major Effect and visibility should be verified by winter Photomontage	A more representative view including the church and approach along the footpath than ES 10.
G	From Minor Road above Weston Colley west of Railway	TLP assessment Sensitivity = Moderate Magnitude = Medium Significance = Moderate	Minor Road more sensitive receptor.

Viewpoint Ref ES	Description	Comments on impact in ES (shaded boxes = significant impacts for operation period)	Comments on Viewpoints and Photomontage (NB: General comments on montages in text)
	line (6.7km)		
H	Lynch Hill Park (3.7km)	TLP assessment Sensitivity = High Magnitude = Large Significance = Major	Location representative of residential properties on Lynch Hill Road facing south and upper storeys of properties on the B3400. Impact would be similar to ES Viewpoint 18. Sensitivity of receptors are high for residential locations.
I	Hurstbourne Priors Cricket Ground (4.6km)	TLP assessment Sensitivity = High Magnitude = Medium Significance = Moderate – Major	The location is in the centre of the Conservation area and looking towards Bee House. It is likely that a number of the turbines would be seen in this direction as shown on Photograph I. A photomontage should be produced from this location.
J	Private access Road to Tufton Warren Farm and Clock Barn Wedding Venue (1.5km)	TLP assessment Sensitivity = High Magnitude = Very Large Significance = Substantial	An elevated and open access route to the Farm, properties and Clock House wedding venue with panoramic views over the site. The turbines would have a dominant impact on this route.
K	Micheldever Road near Southfield Farm (2.3km)	TLP assessment Sensitivity = Moderate Magnitude = Large Significance = Moderate – Major	Minor Road considered to be moderate sensitivity (at least).
L	Micheldever Road towards Brickkiln Wood (1.7km)	TLP assessment Sensitivity = Moderate Magnitude = Very Large Significance = Major	Minor Road considered to be moderate sensitivity (at least). Attractive panoramic views over rolling wooded Downland with no present detractors.
M	Micheldever Road adjacent to Brickkiln Wood (1km)	TLP assessment Sensitivity = Moderate Magnitude = Very Large Significance = Major	Minor Road considered to be moderate sensitivity (at least). Attractive panoramic views over rolling wooded Downland with no present detectors.
N	Right of Way through site (400m)	TLP assessment Sensitivity = High Magnitude = Very Large Significance = Substantial	The right of way would be dominated by the proposed turbines and the experience of this quiet enclosed valley landscape.
O	Right of Way through site (300m)	TLP assessment Sensitivity = High Magnitude = Very Large Significance = Substantial	The right of way at this point would be surrounded by the proposed turbines and would dominate the experience of this quiet enclosed valley landscape.
P	Right of Way through site	TLP assessment Sensitivity = High Magnitude = Very Large	The right of way would be dominated by the proposed turbines and the experience of this quiet

Viewpoint Ref ES	Description	Comments on impact in ES (shaded boxes = significant impacts for operation period)	Comments on Viewpoints and Photomontage(NB: General comments on montages in text)
	(700m)	Significance =Substantial	enclosed valley landscape.
Q	Right of Way at Tumuli east of North (3.2km)	TLP assessment Sensitivity = High Magnitude = Medium Significance =Moderate – Major	Fine panoramic view towards Freefolk Wood.
R	From minor Road on elevated stretch east of Norton (2.5km)	TLP assessment Sensitivity = Low- medium Magnitude = Medium Significance =Minor to Moderate	Originally proposed location by Axis and Basingstoke on this route (App 6.6 – Table 2 View L). Not included as no suitable location found. However View R was taken in lay-by. View Q also provides an elevated view to south from a right of way with clear views.
S	From Right of way west of Whitchurch from AONB (4.6km)	TLP assessment Sensitivity = High Magnitude = Medium Significance =Moderate – Minor	Fine prospect over Whitchurch towards Freefolk Wood.
T	Framed view along Twinley Lane AONB (5.6km)	TLP assessment Sensitivity = Moderate Magnitude = Medium Significance =Moderate	Originally proposed similar location by applicant (App 6.6 – Table 2 View G). Deleted due to tree screening views to north. However location in AONB framed view to turbines from minor lane.
U- 1,2, & 3	Tufton Warren Farm (869m)	TLP assessment Sensitivity = High Magnitude = Very Large Significance =Substantial	The Residential Amenity Study provides wireframes. However these are of little value unless related to the existing context including and built features and vegetation to assess the actual effects on residential amenity. Photomontages should be produced from the actual properties.
V	Tufton Warren Cottages (855m)	TLP assessment Sensitivity = High Magnitude = Large Significance =Major – Substantial	The Residential Amenity Study provides wireframes. However these are of little value unless related to the existing context including and built features and vegetation to assess the actual effects on residential amenity. Photomontages should be produced from the actual properties.
W	Not used		
X	Poachers Lodge (1km)	TLP assessment Sensitivity = High Magnitude = Very Large Significance =Substantial	T6 and 7 would be dominant from the side/rear aspect to the west. The Residential Amenity Study provides wireframes. However these are of little value unless related to the existing context including and built features and

Viewpoint Ref ES	Description	Comments on impact in ES (shaded boxes = significant impacts for operation period)	Comments on Viewpoints and Photomontage (NB: General comments on montages in text)
			vegetation to assess the actual effects on residential amenity. Photomontages should be produced from the actual properties.
Y	Rear of properties at Norton (2.4km)	TLP assessment Sensitivity = High Magnitude = Moderate Significance = Major to Substantial	Views from rear of properties framed by woodland and vegetation to turbines on higher ground.
Z	Grovehill House (2.9km)	TLP assessment Sensitivity = High Magnitude = Large Significance = Major to Substantial	An elevated property with its main orientation facing directly towards the turbines. The elevated and framed location raises the magnitude.

4.2.4 The ES at para 6.139 indicates that of the 32 viewpoints ten would experience significant effects. However of these at least three have no view to the turbines due to localised screening.

4.2.5 The table above identified that **TLP consider there would be significant effects on 18 of the 32 viewpoints locations some 8 more than in the ES. The locations where these additional significant effects would occur as assessed by TLP compared the ES at Viewpoints are 1, 6, 8, 10, 12, 18, 24, and 25.** The reasoning for this variation in the level of effect is based on the different applications of professional judgement by TLP compared with the assessor in the ES. TLP have used the criteria and definitions in the ES to inform their judgements.

4.2.6 In addition, of the 20 viewpoints A-T included in the TLP review some 16 are considered to experience significant effects. A higher proportion (than in the ES) of these views are at a closer distance to the proposed turbines e.g. Micheldever Road (K, L and M) and the right of way through the south of the site (N, O, P) where there would be Major or Substantial effects. Locations where further significant effects are identified at greater distance include around South Wonston at c.6-7km (C, D and E), Whitchurch and Hurstbourne Priors at 3.5-4.5km (H, I and S) and east of Norton at 3.2km (Q). This assessment illustrates that there are further locations at closer vantage points where there would be substantial effects.

4.2.7 The ES provides a summary of the visual effects from Paras 6.145 to 6.173.

Shorter Range Views

4.2.8 **The assessment of shorter range views (up to 5km) records there would be notable effects to the more elevated sections of Whitchurch as illustrated by ES 18, TLP Viewpoint S (also in the AONB) and at TLP viewpoint H on Lynch Hill Road where the turbines will breach the skyline looking south.** The effect on views east of Whitchurch is likely to be more contained by the valley and dense vegetation. However, from Laverstoke House it is surmised as there is no public access (see also comments on cultural heritage below). **There would be harmful effects on the views from rights of way around Abra Barrow (ES Viewpoint 29) where there are attractive uninterrupted views towards the site.**

- 4.2.9 To the south east the views along the Dever Valley are noted as illustrated by TLP View G near Weston Colley.
- 4.2.10 **It is noted that there is no description in the ES of the views from the rights of way that runs through the southern part of the site from Upper Norton Farm north east (TLP Views N, O and P). This is a significant omission in the ES. There would be a substantial effect on this route which would become completely dominated by the turbines.**
- 4.2.11 Likewise there is no assessment of the visual effect on the access tracks within the landscape which would be most evident from the closets rights of way.
- 4.2.12 **The effect on views from the ridge north of the Dever valley e.g. east of Norton close to the tumuli (TLP view Q) would be locally significant and the turbines would dominate the ridge occupied by Freefolk Wood.**
- 4.2.13 **To the west there would be notable effects from parts of Hurstbourne Priors (ES Viewpoint 14) and also the edge of Barton Stacey (ES Viewpoint 20).**

Middle Range Views

- 4.2.14 In respect of middle distant views (5-c.12km) the adverse effects are less widespread. **However, TLP identify there would be a significant effect on the sensitive view from Beacon Hill in the AONB at c. 12km. Despite the distance involved the proposals would become the focal feature of the view (due its movement) in the Downland looking towards the National Park.**
- 4.2.15 **The effect on views to the south at South Wonston and local rights of way to the north of the village (TLP views C, D and E) would be locally significant and the turbines would also dominate the ridge occupied by Freefolk Wood.**

Longer Views

- 4.2.16 The longer views from the south include those from the South Downs National Park. Although these are some distance it is considered that in clear weather the turbines would be readily identifiable and **there would be a significant effect on two locations at ES Viewpoint 8 on the South Downs Way, near Cheesefoot Head looking towards Beacon Hill and also from ES Viewpoint 31 from St Catherine's Hill over looking Winchester Cathedral. In both locations the turbines would be in the direct line of sight. Both of these views are considered by TLP to be of high sensitivity and fit with the description of a 'breathtaking view' as set out by the South Down National Park.** It is noted that the South Downs National Park Director of Planning's report for the application of 13th June 2013 objects to the proposed wind farm application based on the effect on key views including those listed above. This opinion is supported by a more detailed consideration from the National Park's Landscape Architect. It should be noted that there is also an objection to the use of a 50mm lens to produce wireframes/photomontages from these viewpoints which underlines our own concerns outlined above. In our opinion a 75-80mm lens would be more applicable at the distances involved to the National Park.

Views from A34 and A303

- 4.2.17 There would be significant effects from sections of these two main road corridors. The level of significance is not recorded in the ES. The most notable effect would be travelling west on the A303 and also travelling south on the A34 both south and also north of Whitchurch. Whilst it is noted that the photomontages are not produced due to safety reasons, it would be helpful to appreciate the scale of impact if agreement could be reached to take photographs at a safe distance from the carriageway.

Mitigation

- 4.2.18 The Design Evolution process as set out at paras 5.13 – 19 of the Design and Access Statement indicates how the proposal involved a reduction from 17 to 14 turbines by the applicant following consultation and based on various landscape, visual, ecological, archaeological and other practical constraints. It is noted at para 6.190 that the design of the layout included consideration to reduce the effect of stacking – i.e. the visual overlap of blades. **However, the effectiveness of the approach is questioned and stacking is still a notable problem in a number of the viewpoints, including ES Views 14, 17, 20 and 30. This is a consequence of the layout of turbines involving an extended mass of turbines composed of a number of informal groups or irregular rows extending both north south and east west. The arrangement seems to be as much an approach of maximising the number of turbines in the available areas rather than of producing a well considered visual grouping in the landscape.**

Residential Amenity

- 4.2.19 The review of the Residential Amenity study has identified the following points. For each location the applicant concludes that the wind farm development is 'unlikely' to produce an unpleasantly overwhelming and unavoidable presence on the residence. Such an effect would be at the level identified by Inspector Lavender as a threshold that should not be crossed. However, the use of the word 'unlikely' does not convey surety and needs to be verified with further information, particularly in respect of visual material for some properties. This would require access to the properties and the agreement of the owners. It is appreciated that this may not be the standard practice of some developers. However, it is considered the best way to verify the nature of the effects involved.

Tufton Warren Farm

- 4.2.20 The property was viewed from a public right of way running south of the site. However, from this location it is difficult to fully understand the character of the more elevated views from the house at ground level, first and second floor and also the garden areas. These are illustrated by TLP views U1, U2 and U3. U2 clearly shows there would be views over the outbuildings to the existing landform and full extent of the turbines. The study indicates there would be a measure of screening by the intervening Barns and vegetation. Whilst this is the case in part from ground level, the extent of this screening is not identified. This is an important factor that should be more fully tested due to the close proximity and outlook from the main house to the south and east towards the full range of turbines. The effect is further amplified by the fact the turbines are located on land that is up to 25m higher than the house. **It is likely that the effect from T1 and 3 will also be significant on the property in combination with T6, 7 and 8.**
- 4.2.21 The text states that the access is from the A34. Whilst there is an access from this direction, this is not a very safe exit point and the main access is actually via a private road approach from the north at Whitchurch. This approach currently enjoys panoramic views to the south that will be significantly affected by the proposed development and all the turbines (see TLP View J). This route is also used for the guests to the Clock Barn wedding venue located at the adjacent Clock Barn facility. The view from the car park to Clock Barn is also illustrated by TLP View V.
- 4.2.22 It is recommended that photomontages are produced by the applicant from Viewpoints U1, 2 and 3 to assess the effect on the property before the application is determined.**

Tufton Warren Cottages

- 4.2.23 These properties were viewed by the assessor from the right of way to the north which would not afford the character of the view from cottages 1-3 that face north and south. View V is taken from the car park directly south of the cottages. Whilst there is a measure of screening from woodland to the south, there is a view from the rear of the properties and private gardens between and under the trees to the south east. It is anticipated that there will be a view of T1-4 as well as T5 from the rear aspect of these cottages.
- 4.2.24 **It is recommended that a photomontage is produced by the applicant from the rear of Cottages 1-3 to assess the effect on the property before the application is determined.**

New Barn House

- 4.2.25 This property is located 936m from the closest turbines. The property is relatively well enclosed by summer vegetation. However, the effectiveness of screening in the winter has not been assessed. There are likely to be views in the winter months to the south that would include a number of the turbines from the south facing views as illustrated by the wireframe. We do not agree with the assessor that says the magnitude of change would be very small in respect of likely winter effects for the property.
- 4.2.26 **It is recommended that a photomontage is produced by the applicant from the south elevation of New Barn House to assess the effect on the property before the application is determined.**

Poachers Lodge

- 4.2.27 The view from this property would largely be to T6 and 7. We would agree that both of these turbines would be clearly seen on the skyline to the west. In addition there would be a stacking of the blades as T6 sits behind T7 which would aggravate the visual effect on the amenity. However, the wireframe does not help to clarify the scale of the effect of whether additional turbines may be partially seen above Freefolk Wood. It is noted that the assessor records the change in the view as of medium magnitude. However, we would consider the effect (based on the definitions at Table 3 of Appendix 6.1) to be at least Large magnitude, if not Very Large, at just 1km from the house, see TLP Photographs X1 and X2.
- 4.2.28 **It is recommended that a photomontage is produced by the applicant from the side of Poachers Lodge (TLP view X1) to assess the effect on the property before the application is determined.**

Upper Norton Farmhouse

- 4.2.29 This property is some 647m distance from the closest turbine and 647m from the closest turbine. T1-6 are likely to be all visible with little or no intervening screening. It is noted that there is a landowner interest in the application at the property. However, the correct approach to residential amenity in our view is to be consistent in treating all properties the same and not apply different rules for different landowner interests. The approach should be to assess whether the effect on the property would be overwhelming and unavoidable. It is noted that there are also open views to the south and west that are not affected by turbines. Yet the approach to the property and views from the gardens and windows facing north would be dominated by the turbines at this distance.

4.2.30 It is recommended that a photomontage is produced by the applicant from the property to assess the effect on the property before the application is determined.

4.3 Review of effects on Cultural Heritage

4.3.1 The effects on cultural heritage features from this proposal relate to the effects on the settings of the assets. The full assessment is provided in Appendix 11.2 and summarised in Paras 11.72 onwards and Table 11.6. All the effects are considered to be less than Major in that they would not result in 'substantial harm' in NPPF terms. However a number of effects have been identified as of Moderate or Moderate – Minor effect which needs to be balanced against the public benefit of the proposal.

Laverstoke House and Registered Park and Garden

4.3.2 Appendix 11.2 cites at para 4.16 that the view to the south to the elevated wooded downland comprises the principal views from the house (Grade II*). The comparison is made with viewpoint 18 which we have identified as significantly harmful in visual terms (see Table 3 above). It is understood that access has not been gained to the property to assess the impact or produce a wire frame overlay. The listed house is a high sensitivity asset. It is quite possible that the proposal could result in more than moderate magnitude effect on the House and Park and a Major effect occur. **The lack of assessment in the field on this aspect is complacent and should be rectified by an assessment in the field before any decision is made on the application.**

Hurstbourne Priors Park and Bee House

4.3.3 The views from the Grade II listed house towards the proposed turbines to the south east are more likely to be screened by woodland. However, this is not verified by any evidence on the ground. The House has an open aspect for c.3-400m to the south east and it is possible that there may be views of the turbines.

4.3.4 Bee House (Grade II*) is located to the south east edge of the park and is likely to have an aspect to the south east including a view to the turbines. Access to the property is required to verify this potential and the consequential significance on the asset.

4.3.5 There are also likely to be views from the southern section of the wooded park (Grade II). The extent of views in the ES is supposition (as accepted at App 11.2 para 4.13) and not based on a site visit. **The lack of assessment in the field on this aspect should be rectified before any decision is made on the application.**

Hurstbourne Priors Conservation Area

4.3.6 The ES considers that the views to the south east (App 11.2 – Para 4.53) 'make a small contribution to the significance of the Conservation Area. They refer to the ES Viewpoint 14 where we have noted a significant impact on the receptors. This would also apply to the views from properties looking across the meadows which fall within the Conservation Area. In addition we have included at TLP Viewpoint I a view from the core of the Conservation Area. This includes the parish church, cricket ground and the view to Bee House (Grade II*). There are likely to be views to the turbines towards the south east in the context of Bee House. If visible this would be likely to be a moderate magnitude and moderate adverse significance in contrast to the minor effect recorded in the ES. **A photomontage or wireframe/ photograph overlay should be produced by the applicant before the application is determined to assess the effect from this central location in the Conservation Area.**

Laverstoke Conservation Area

4.3.7 The ES view 18 indicates the turbines would, be prominent from the western section of the Conservation Area. This equates to a level of harm that may be moderate in some parts of the Conservation Area and as such should be included in the planning balance.

Stoke Charity Conservation Area and Parish Church

- 4.3.8** ES view 10 includes a view from within the Conservation Area that indicates the turbines would be largely screened. However, the impact in the winter from this view is likely to be more significant as the poplar trees providing the screening will have a fine tracery of branches. The small Conservation Area is centred around the Grade I listed church which is set in a pastoral location surrounded by meadows. TLP View F shows this character and the important view to the church. **A further winter photomontage or wireframe/photograph overlay from Viewpoint F should be produced to verify the effect on the Conservation Area.**

Bullington House

- 4.3.9** Bullington House is a Grade II listed house some 1.3km from the closest turbine. App 11.3 para 4.138 states that 'views to the north east across the associated garden may comprise a key view from this dwelling' and furthermore that 'views to the turbines in the middle distance in a key view from the house would potentially result in a medium magnitude of effect'. Again, this analysis is based on supposition. This is surprising as it is the closest listed building that is most affected to the site. It would appear from aerial photos that the main views from the house are to the south and that the views to the north east are more contained by mature trees. **However, the effect should be verified by a site visit prior to determining the application.**

Tidbury Hillfort

- 4.3.10** The ES records a moderate adverse effect on this Scheduled Monument which is located within 800m west of the site. The setting of the hillfort has been modified by the woodland cover on the earthworks and the close proximity of the A34 in deep cutting. It is considered that the moderate adverse effect is an appropriate assessment of the harm.

Winchester Cathedral

- 4.3.11** ES Viewpoint 31 shows that the proposed turbines would be visually located on the skyline above and to the right of the cathedral from this recognised vantage point of the cathedral. **It is considered that a heritage assessment of the effect on Winchester Cathedral and its setting as seen from St Catherine's Hill should be made prior to the application being determined. This should include a full photomontage and not just a wire-frame.**

5 Conclusions

5.1 Landscape Resource and Visual Amenity

- 5.1.1 The LVIA in the ES has broadly been carried out in accordance with best practice.
- 5.1.2 The photomontages follow the current SNH guidance for use of 50mm lens. However, this will underestimate the scale of the proposed turbines. There is a relative shortage of viewpoints from within 2.5km where the effects will be greatest. Photomontages are produced with summer vegetation and do not illustrate the more transparent and worst case winter conditions.
- 5.1.3 The provision of wireframes for views, particularly from residential properties, but also from the A34 and A303, does not enable an adequate appreciation of the visual likely effects on the properties. Photomontages should be produced for the five properties specifically identified in this report to assess if the impacts would make the properties an 'unattractive place to live'.
- 5.1.4 There is a limited assessment from some aspects and parts of the study area, most notably minor roads e.g. Micheldever Road and the local network of rights of way to the south of the site and further afield but within a significant effect range.
- 5.1.5 The effects on the landscape fabric are relatively restricted as the turbines are proposed to be located in arable fields. However, there will be additional impacts from the construction of access tracks. In addition, the effect on trees and hedges along the access route still needs to be determined to ensure that any losses are acceptable.
- 5.1.6 The effects on landscape character would result in significant effect extending to 3-4km to the north west and south and 2.5km to the south. This spreads across five landscape character areas affecting one of them for the majority of the area. This is a major significant effect for an area of landscape extending in total c. 10km from north to south and 8.5km from east to west. This effect on the local landscape character is particularly noteworthy as there are no other similar types or scale of impact and would be located in a landscape with few detracting features. This would equate to significant harm to landscape character.
- 5.1.7 The effects on visual amenity would give rise to significant and extensive adverse effects. These would largely be within 7-8km of the site but locally extend c. 12-15km from a few high sensitivity locations at Beacon Hill, South Downs Way and St Catherine's Hill. TLP consider there would be significant effects on 18 of the 32 viewpoints locations, some 8 more than identified in the ES.
- 5.1.8 The reasoning for the variation in the level of effect between TLP and the ES is based on the different professional judgements. However, TLP have used the same criteria and definitions in the ES to inform their judgements.
- 5.1.9 In addition 20 viewpoints have been identified by TLP of which some 16 are considered to experience significant effects. These include additional Major and Substantial effects from Micheldever Road and the right of way through the south of the site. Locations where further significant effects are identified at greater distance include around South Wonston at c.6-7km, Whitchurch at 4.5km and Hurstbourne Priors at 3.5-4.5km (both including locations within the AONB) and east of Norton at 3.2km.
- 5.1.10 The effect on 5 residential locations should be more fully explored by the use of photomontages taken from the actual properties. The assessor should visit the locations and assess the outlook from the house and garden areas. This should include Tufton Warren Farm Tufton Warren Cottages (1-3), New Barn House, Poachers Lodge and Upper Norton Farm.

5.2 Cultural Heritage

- 5.2.1 The assessment of heritage assets has been carried out from publically assessable locations. Whilst this may be satisfactory for some locations, it means there is a lack of 'ground truthing' evidence for a number of important assets where the ES itself identified there may be an effect on a key view. This includes Laverstoke House and Bullington House. These locations should

- be visited and the impacts assessed and photomontages taken to illustrate any important views towards the site.
- 5.2.2 The effect on the locally listed Tufton Warren Farm should be assessed in heritage terms due to its close proximity to the site.
- 5.2.3 The effect on the view from St Catherine's Hill on Winchester Cathedral should be assessed in heritage terms.
- 5.2.4 The effect on heritage assets at Hurstbourne Priors, including the Conservation Area, Hurstbourne Park and Bee House and also at Stoke Charity, including the Grade 1 church and Conservation Area should be more fully assessed, including in the winter context where views of the development would be more visible.
- 5.2.5 It is considered that there are a number of assets as listed above where the effect would result in harm to their significance and that this harm should be balanced against the public benefits of the scheme.