

# Whose Job is it anyway?

A consideration of the professional skills required to assess the impact of wind turbine development on heritage assets.

Michelle Bolger

From a presentation at the conference on **Wind Turbines and the Historic Environment**

Organised by the Landscape Design Trust

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## **The Professionals**

Currently there are a range of professionals involved in the assessment of the impact of wind turbine development on the setting of heritage assets. They include, in alphabetical order, Archaeologists, Conservation Architects, Conservation Officers, Historians, Landscape Architects and Landscape Historians. Who is best equipped to reach the right conclusion?

The various professionals are represented by a number of professional bodies, including the Landscape Institute, the Institute for Archaeologists, the Royal Institute of British Architects and the Institute of Historic Building Conservation (IHBC). It is interesting to note that although still called the Institute of Historic Building Conservation the IHBC describes itself as the UK's professional body for historic environment conservation. Membership of the IHBC is not restricted to a single profession and the IHBC website states that: *Membership of the Institute is drawn from many disciplines and may include architects, town planners, building surveyors, estate managers, structural engineers, landscape architects, architectural historians, local authority conservation officers, officers from national conservation organisations, academics or private practitioners.* This statement is encouraging because it indicates that the wide range of professionals involved in the assessment of the impact of wind turbine development is representative of the range of professionals rightly considered to have a role to play in the conservation of the historic environment.

## **The Landscape Architect's Approach**

As a landscape architect undertaking landscape and visual impact assessments I have always considered the impact on the historic environment to be part of a landscape and visual impact assessment. Historical and cultural associations, registered parks and gardens, battlefields and the setting of listed buildings and ancient monuments are described as Special interests in the Guidelines for Landscape and Visual Impact Assessment (the Guidelines) Landscape Institute/Institute of Environmental Management and Assessment Second Edition 2002<sup>1</sup>. The Guidelines stress that it is important for a landscape assessment to recognise the contributions that these special interests make to the character and importance of a landscape:.

*Landscapes are considerably more than just the visual perception of a combination of landform, vegetation over and buildings – they embody the history, land use, human culture, wildlife and seasonal changes of an area<sup>2</sup>.*

<sup>1</sup> Landscape Institute/Institute of Environmental Management and Assessment Guidelines for Landscape and Visual Impact Assessment, Second Edition 2002 Page 28 Paras 3.26-3.27

<sup>2</sup> Ibid Para 2.3

The premise that the contribution a heritage asset makes to the landscape / townscape is an important consideration is set out in the opening paragraph of PPG15 *Planning and the Historic Environment*<sup>3</sup>:

*It is fundamental to the Government's policies for environmental stewardship that there should be effective protection for all aspects of the historic environment. The physical survivals of our past are to be valued and protected for their own sake, as a central part of our cultural heritage and our sense of national identity.*

.....

*Their presence adds to the quality of our lives, by enhancing the familiar and cherished local scene and sustaining the sense of local distinctiveness which is so important an aspect of the character and appearance of our towns, villages and countryside*<sup>4</sup>.

I suggest that this implies that in determining the significance of a heritage asset it is important to make an assessment of the contribution that the asset makes to the current landscape/townscape. Having made this baseline assessment one aspect of the impact assessment will be to determine whether a proposed development would change the value of that contribution. In a simple example a new building might obscure views towards a heritage asset that previously contributed to the townscape/ landscape whilst in another example the removal of a building might enable a heritage asset to contribute where previously it did not. I would consider both these examples could constitute impacts on setting. In the latter example, where a view was revealed, this could constitute an enhancement to the setting if the revealed views had an historic, architectural or aesthetic function.

### **The Guestwick Experience**

Landscape and visual impact assessments that I have undertaken to date have always included an assessment of impacts on the historic environment. However it is only more recently that this has been directly addressed at the statutory duty to have special regard to preserving the setting of a listed building. I first became closely involved with this aspect of impact assessment during the first Guestwick Inquiry. At this inquiry I was giving evidence on behalf of Broadland District Council in support of their refusal to grant planning permission for a wind turbine development. Although the Environmental Statement included an Archaeology Chapter there was no separate Cultural Heritage Chapter and the Council's conservation officer had not been asked to comment on the application. The Inspector, David Lavender, asked for an assessment of the impact of the proposals on listed buildings in the vicinity and this was undertaken by the appellant's landscape architect during an adjournment.

The Inspector's decision was to dismiss the appeal with one of the reasons cited being the impact on the listed buildings in the vicinity. The decision letter included the following statement:

*Whilst the landscape around Guestwick is neither statutorily designated nor of such scenic beauty that it is of national importance in itself, it does provide the tablecloth on which a number of Listed Buildings stand, and it is the protection of the setting of these that is a matter of national importance. To that extent I regard landscape and setting as indistinguishable from each other*<sup>5</sup>.

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<sup>3</sup> The draft PPS 15 does not include a statement to this effect although a similar sentiment is expressed at the beginning of the consultation document: The historic environment is central to our cultural heritage. It contributes to our sense of national, local and community identity, through the memories of events and phases in our history that it holds. It has aesthetic value and provides local distinctiveness that is so important to a sense of place. (Consultation Introduction 1.1) Currently this introduction is not intended to form part of the new PPS 15 but at the English Heritage consultation day in London 11/09/09 it was suggested that in the absence of the Government's Vision Statement on the Historic Environment it should be included.

<sup>4</sup> PPG15 Planning and the Historic Environment: Para 1.1

<sup>5</sup> Guestwick App\_K2610\_A\_05\_1180685 First Decision David Lavender Para 16

The decision was subsequently challenged and withdrawn by the Planning Inspectorate without going to the High Court and there was therefore no judgement on whether the Inspector had drawn the definition of setting too widely. Although there has been some criticism of this statement I consider that it represented recognition by the Inspector that assessing the impact of wind turbine development on rural listed buildings was going to require some new thinking. It was an attempt to make a general statement about the setting of listed buildings that have a key relationship to their surrounding countryside, rather than listed buildings that relate principally to a street scene – whether it be village, town or city.

The inquiry at Guestwick was re-determined; the second inspector also dismissed the appeal and also cited the impact on listed buildings as one of the reasons. He summarised his conclusions as follows: *The proposal would adversely affect the harmonious relationship between the buildings and the landscape that has evolved over many decades*<sup>6</sup>.

This decision was also challenged and this time went to the High Court where Frances Patterson QC sitting as a Deputy High Court Judge came to the following conclusion:

*In my judgement it is abundantly clear .. that the Inspector was fully conscious of the broader landscape impact and recognised the overlap between that and the setting of the listed buildings. He then considered the individual viewpoints recognising where he had to the distinction between the wider landscape impact and setting*<sup>7</sup>.

This judgement confirms that there is an overlap between landscape impact and the setting of listed buildings. The judgement also confirmed that it was sufficient for the inspector to consider only visual impacts on setting and that it was not necessary for him to *determine what the setting was in relation to each listed building and record what that was in the decision letter*.<sup>8</sup>

### **The Visual Dimension**

At both the second Guestwick Inquiry and a subsequent inquiry at Ellands Farm, June 2007 (APP/G2815/A/06/2019989) in which I was involved, the assessment of the impact on heritage assets was undertaken on both sides by a landscape architect. At both inquiries the impact on heritage assets was a key issue and subsequently one of the reasons for dismissing the appeal. At neither inquiry was an issue raised concerning whether the landscape architects were suitably qualified to make the assessment. Since that date however most of the Environmental Statements relating to wind turbine development that I have read, contain a separate Cultural Heritage Chapter undertaken by the range of professionals I have listed above. Since that date it has also been challenged at Inquiry that as a landscape architect I have no relevant qualifications for assessing the impact of wind turbines on heritage assets.

Rather than bowing out gracefully and accepting the position that landscape architects are not qualified to assess the impact of development on heritage assets, I believe that when the impacts of the proposed development are primarily visual – as they are in the case of wind turbine development - landscape architects are probably the best placed professionals to assess impact if that assessment is to be undertaken by a single professional.

I have explained above why I consider that any assessment of changes to the setting of a rural heritage asset must take account of the role that the heritage asset plays in the landscape, the contribution it makes to *‘enhancing the familiar and cherished local scene and sustaining the sense of local distinctiveness which is so important an aspect of the character and appearance of our towns, villages and countryside.’* It is this assessment that landscape architects are best placed to make. Without having established this baseline the assessment of impact can be incomplete.

<sup>6</sup> Guestwick App\_K2610\_A\_05\_1180685 Second Decision Geoff Salter Para 29

<sup>7</sup> Enertrag (UK) Limited v the Secretary of State for Communities and Local Government Para 25

<sup>8</sup> Ibid Para 17

## Assessments of Significance

In my experience heritage professionals usually start with the asset itself and begin by establishing the significance of the asset. This is admirable, in accordance the English Heritage's *Conservation Principles, Policy and Guidance* and in line with draft PPS 15 which states that heritage assets are 'Those parts of the historic environment that have significance because of their historic, archaeological, architectural or artistic interest.' However, when assessing the impact of proposals on the setting of a heritage asset it is not sufficient just to understand the historic significance of an asset. This of itself will not result in an understanding of the current relationship between the asset and the landscape and may not inform the decision makers on the impact of the proposals on the setting of a heritage asset.

*Within Conservation Principles, Policy and Guidance* setting is described as follows:

*Setting is an established concept that **relates to the surroundings in which a place is experienced**, its local context, **embracing present and past relationships to the adjacent landscape**. Definition of the setting of a significant place will normally be guided by the extent to which material change within it could affect (enhance or diminish) the place's significance. [My emphasis].<sup>9</sup>*

Heritage professionals have spent many years developing their understanding of the historical significance of heritage assets and agreeing guidelines by which the significance of heritage assets can be judged. Meanwhile landscape architects have spent many years developing their understanding of how the various elements within a landscape combine to create the patterns and textures in the landscape that make one place different from another and create a sense of local distinctiveness. They have also over the last twenty years developed an established methodology and a range of techniques for assessing the significance of changes to the landscape and to the visual environment.

I consider that when it comes to assessing the impact of wind turbine development on the setting of a heritage asset the impacts will in almost all cases be as a consequence of changes to visual components of the setting of the heritage asset and landscape architects are best placed to make that assessment.

I think it is significant that cultural heritage assessments have adopted the term 'indirect' impacts to describe impacts on setting.. I believe this is derived from the English Heritage guidance *Wind Energy and the Historic Environment* where impacts on the fabric of heritage assets are described as direct impacts whilst impacts on setting are described as indirect impacts. I consider this term to be misleading. The introduction of the EIA regulations prompted landscape architects to distinguish between impacts on landscape and visual impacts but both have always been described as direct impacts. Indirect impacts are defined (in PPG 15 and in the Guidelines) as impacts that are the result of a complex pathway. For example a new development may change circulation patterns and result in increased road traffic. This could have an impact on the setting of a heritage asset and would be an indirect impact. Visual impacts that are the result of the development itself are always direct impacts.

## Seeing the obvious

I would not consider the use of the term indirect as significant except that I think it reveals a lack of understanding of the present relationship between a historic asset and the adjacent landscape. I have encountered a number of examples of this in Cultural Heritage assessments of wind turbine development and I give below two extreme examples with regard to the disassociation of a heritage asset from its adjacent landscape.

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<sup>9</sup> English Heritage's Conservation Principles, Policy and Guidance Para 76

The first regards impact of Wind Turbine development on a Grade 1 listed Manor House on the Isle of Wight. The Manor House sits on agricultural land at the foot of the Downs, part of the Isle of Wight AONB. The cultivated agricultural land gives way rapidly to the uncultivated slopes of the Downs which form a backdrop in views of the front elevation of the Manor House. The turbines were proposed on land behind the Manor House at about 2km distant, such that in views of the front elevation the turbines would have been seen immediately above the Manor House and would have appeared to be of a similar height. The assessment however concluded that the setting did not extend to the Downs and therefore the impact was assessed as *no impact to low impact*.

The second example is an approach to the assessment of setting that believes that the extent of the setting of a heritage asset can be drawn as a line on a plan. Having drawn the line an argument is put forward that development on one side of the line would have an impact on the setting of the heritage asset whilst development on the other side of the line would not. This approach takes as its starting point a definition of the functional historical relationship between the heritage asset and its surroundings and is often unrelated to any physical features in the landscape – i.e. it is not relying on screening vegetation. This approach appears to consider the present relationship with the adjacent landscape, a large element of which must be a visual relationship, as insignificant. I do not think it possible that development (in this case wind turbines) could have an impact when placed on one side of an imaginary line and no impact when placed on the other side, although equally visible.

It is in circumstances like these that I believe the landscape architect's approach – which acknowledges what is in front of your eyes - is required.

The English Heritage's *PPS Planning for the Historic Environment: Historic Environment Planning Practice Guide Living Guide* refers to a number of visual assessment tools that might be of assistance in assessing effects on setting and ensuring transparent and consistent decision-making. They include *'Placecheck, Visual Impact Assessment, Accurate Visual Representation, Seeing the History in the View and other 'visioning' techniques, including those promoted by the Landscape Institute..*<sup>10</sup> However I think it is important to recognise that the use of 'visioning techniques' is not simply a question of having the correct computer programme, any such technique need to be applied by an experienced professional. To consider otherwise would be the equivalent of suggesting that identifying historical significance is merely a question of having access to 'research techniques'.

It is clear that impact on setting begins with visual impact although it does not always end there. With reference to wind turbine development it almost always consists entirely of visual impact. Noise impacts are limited to a few proposals where the turbines are very close, including examples where the heritage asset is located within the proposed wind turbine site.

### **Whose Job is it anyway?**

In order to decide whether a heritage asset will be affected by proposed development two primary questions must be answered:

- What is the impact?
- What is the significance of the heritage asset?

To reach a conclusion I consider that assessing the visual impact of wind turbine development on the heritage asset is of equal importance to identifying the significance of the asset. With only one of the questions answered it is not possible to come to an accurate assessment of the impact. Whilst heritage professionals may be best placed to answer the second of these questions landscape architects are without doubt best placed to answer the first.

So what are the advantages and disadvantages of particular professionals undertaking an assessment of the impact of wind turbine development on heritage assets?

Landscape architects are experienced in using visual assessment techniques to assess visual impact and are probably the best placed professionals to assess impact. However they do not always have the skills and experience when it comes to historical research and they may miss subtle historic functional relationships between a heritage asset and its setting. Landscape architects may not be able to accurately judge the weight to put on different kinds of primary or secondary evidence. In the last resort they may have to rely on others (such as the listing information) for an assessment of significance.

Heritage professions are experienced in assessing the historical significance of heritage assets and knowledgeable about the relationship between a heritage assets and its historic setting. However they may be less skilled in understanding the present relationship between a heritage asset and the adjacent landscape, and they may be inexperienced in the use of visual assessment techniques. Rather than missing the subtle relationships between a heritage asset and its historic setting they can miss the obvious visual relationships between a heritage asset and its adjacent landscape, as well as the more subtle issue of the contribution that the heritage asset makes to the landscape. The distinctions that are drawn can be academic and historical rather than visual.

A complete understanding of setting must include both the historic and the visual and I consider this is the approach that is set out in *Conservation Principles, Policy and Guidance* and the emerging guidance on PPS 15.

The best of all possible worlds will be one where either a landscape architect has been supported in the historic research by a heritage professional or a heritage professional has been supported by the visual impact assessment undertaken by a landscape architect. The answer has to be that we must work together.

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