



Historic England

Mr David Love  
Northumberland County Council  
County Hall  
Morpeth  
NE61 2EF

Our ref: PL00793051  
Your ref: 23/01779/SCOPE

Telephone: 07557 834 316

12 June 2023

Dear Mr Love,

**Scoping Opinion for a single wind turbine, Land South Of Norham Village And North Of Newbiggin Dean, Norham Northumberland.**

Thank you for your letter of 15<sup>th</sup> May 2023 informing us of the above EIA Scoping Request.

While Historic England broadly welcomes measures to mitigate and adapt to the effects of climate change, we are aware that such developments have the potential to harm the significance of heritage assets and their settings. With this in mind Historic England has drawn up guidance for planners and developers on climate change and renewable energy technologies [https://historicengland.org.uk/whats\\_new/features/climate-change/](https://historicengland.org.uk/whats_new/features/climate-change/).

To assist in the implementation of national planning policy Historic England has produced guidance on managing change within the settings of heritage assets. The guidance offers a framework for the consideration of setting, applicable to designated and non-designated heritage assets, and for assessing the implications of development affecting the setting of a heritage asset. It provides the principal Historic England advice on the issue of setting and should be used in conjunction with other relevant guidance. The Setting of Heritage Assets is available at <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>.

This development could, potentially, have an impact upon a number of designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

The location of the proposed wind turbine means there is the potential for the structure to have an impact on the setting of heritage assets in neighbouring local



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authority areas, including the Scottish Borders.

The Scoping Report submitted by Green Cat Renewables indicates that a study area of 10km will be used. For the height of the proposed turbine in terms of our interest in the historic environment we consider this to be generally appropriate.

However, we would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed. Furthermore, any buffer should not be arbitrary.

We also have concerns that paragraph 6.3.2 states that Grade II\* listed buildings and conservation areas are of regional significance, whilst Grade II listed buildings are of local significance. Such a geographic distinction between designated heritage assets is incorrect, all designated heritage assets are of national significance regardless of their grade. It would be more appropriate in determining a buffer for different types of asset to reflect paragraph 200(b) of the NPPF on the basis of highest significance for Grade I and II\* listed buildings, Grade I and II\* registered parks and gardens, registered battlefields, protected wreck sites and world heritage sites, by applying a 10km buffer in that instance, with a reduced buffer for conservation areas and Grade II listed buildings, and non-designated heritage assets such as locally listed buildings.

Not far beyond the 10km buffer lies the Registered Battlefield of Halidon Hill 1333. Paragraph 200(b) of the National Planning Policy Framework identifies registered battlefields as being of the highest significance as heritage assets. The ZTV 40m to hub height identifies that the turbine will potentially be visible from the registered battlefield. The Combined Wind and Solar ZTV document submitted by the applicant, also identifies an important view LV07 very close to the battlefield site. We therefore recommend in this instance that the Registered Battlefield of Halidon Hill 1333 is scoped in within the EIA.

Consideration should be given to undertaking a practical exercise with either a crane or balloons erected at the height of the proposed turbine so that all parties are better able to understand the landscape impact of the proposals. We have been engaged in other major developments where this technique has been used and it greatly assisted the identification of the key issues and impacts from which the resulting EIA was able to focus its assessment.

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area.

Paragraph 6.34 refers to historic maps and aerial photography. Historic England also has its own database of historic aerial photography known as Aerial Photo Explorer which may be found at <https://historicengland.org.uk/images-books/archive/collections/aerial-photos/>.



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Given the number of designated heritage assets within the area, we would welcome early discussions with the applicants in order to agree the key sites and setting issues which will need to be addressed within the EIA, particularly in relation to visualisations.

If you have any queries or would like to discuss anything further, please do not hesitate to contact me.

Yours faithfully

Henry Cumbers

**Henry Cumbers**

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