

Gen Duffy

From: Planning
Subject: FW: Consultation Request - WP/20/00692/DCC - Portland Port, Castletown, Portland

From: Richard I Brown <R.I.Brown@dorsetcc.gov.uk>
Sent: 30 October 2020 08:56
To: Planning <planning@dorsetcc.gov.uk>
Subject: RE: Consultation Request - WP/20/00692/DCC - Portland Port, Castletown, Portland

Dear Sir or Madam,

Thank you for consulting the AONB Team. Overall, I am concerned that the presence of the proposed development within the setting of the AONB has the potential to erode the landscape and scenic qualities of the designated area. Whilst it is not considered that the proposed buildings would result in significant effects on the AONB, I am concerned that visible emissions would lead to a notable industrial element being added to the AONB's setting, in prominent position.

The Countryside and Rights of Way Act 2000 places a statutory duty on all local authorities to have regard to the statutory purpose of conserving and enhancing natural beauty when discharging any function affecting land in AONBs. Furthermore, National Planning Policy Framework (NPPF) makes the following reference to AONBs in paragraph 172: "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated."

It is acknowledged that, as this development is located outside of Dorset AONB, the aspects of NPPF 172 that refer to development 'within' the AONB do not apply, including the potential requirement for a major development test. Nonetheless, great weight should be attributed to conserving the landscape and scenic qualities of the designated area.

In order to evaluate the effects of the development on Dorset AONB, attention should be paid to the Special Qualities (SQs) that make it a unique and outstanding place, underpinning its designation as a nationally important landscape. These are the features that we need to conserve and enhance for the future and they should be considered in decisions affecting the AONB.

The AONB Management Plan identifies these Special Qualities as:

Special Quality	Comprising
Contrast and diversity – a microcosm of England's finest landscapes	<ul style="list-style-type: none">• A collection of fine landscapes• Striking sequences of beautiful countryside that are unique in Britain

	<ul style="list-style-type: none"> • Uninterrupted panoramic views to appreciate the complex pattern and textures of the surrounding landscapes • Numerous individual landmarks • Tranquillity and remoteness • Dark night skies • Undeveloped rural character
Wildlife of national and international significance	
A living textbook and historical record of rural England	<ul style="list-style-type: none"> • An exceptional undeveloped coastline • A rich historic and built heritage
A rich legacy of cultural associations	

I consider that the following SQs to be particularly susceptible to harm from the proposed development:

- Uninterrupted panoramic views to appreciate the complex pattern and textures of the surrounding landscapes
- An exceptional undeveloped coastline

The development site is located within the setting of the Dorset AONB, which is referred to within the AONB's Management Plan. Objective C1 of the Plan is that: "The AONB and its setting is conserved and enhanced by good planning and development". To support this objective, policy C1h states that: "The landward and seaward setting of the AONB will be planned and managed in a manner that conserves and enhances the character and appearance of the AONB. Views into and out of the AONB and nonvisual effects, such as noise and wider environmental impacts, will be appropriately assessed."

The development site is, at closest, within ~7.5km of the AONB boundary. Publicly available views of the proposed development within the AONB would therefore generally affect receptors from long distances, particularly panoramic sea views from the coastal margin and elevated inland hills, such as the South Dorset Ridgeway. It should be noted that a development does not need to be within the AONB to have a 'direct' effect upon the designated area (E.g. visibility of a development is regarded as a direct effect in terms of the EIA Regulations). When considering effects on landscape character, these may include locations that are not publicly accessible.

The location of the proposed development is within the eastern portion of Portland Port, at the foot of the steep cliffs that form the northern face of the Isle of Portland. The immediate context of the site encompasses a harbour area, active coastal waters, large-scale quasi-industrial buildings and other built development such housing. From within the AONB, the distance from which existing built development is seen means that it is common for only larger developments to be perceptible. For example, the large-scale buildings within the harbour area and the overall mass of housing that is grouped together across the sloping landform of Fortuneswell are clearly discernible. Visibility of built development in the area varies greatly dependent upon atmospheric and lighting conditions. Clear visibility and 'highlight' conditions (when the sun is relatively low in the sky), tends to result in built development being much more perceptible. Similarly, reflective finishes, such as those found in the roofs of some of the large buildings, can notably increase visual effects under certain conditions.

The AONB's landscape and seascape character assessments make numerous references to views that include the Isle of Portland. Sweeping panoramas along the AONB's coastline, particularly from elevated locations, draw the eye toward the landmass of Portland, making this an instantly recognisable focal point. The introduction of the proposed power plant would add a new large-scale feature within the port area. Due to the scale of the building it is likely that this would often be a discernible feature within sensitive views out from the AONB. However, considering the distances involved, it is not considered that the addition of the power plant buildings alone would adversely affect the outlook from the AONB to the degree that would justify its refusal.

The Guidelines for Landscape and Visual Impact Assessment (GLVIA, third edition) recommend that EIA assessment should include a reasonable scenario of maximum effects, commonly known as the 'worst case scenario'. I am concerned about the effect of visible emissions on views out from the AONB and perceptions of the area's

exceptional undeveloped coastline. In my opinion the presence of visible emissions, even if these are not consistently present, has the potential to notably increase the effect of the development on the designated area. The LVIA refers to potential plume visibility by reference to technical appendix J, part 4. The LVIA consistently states that the technical report supports a conclusion that the plume would: “likely to only produce a very minor alteration to the view for a very limited number of hours”. In my opinion, the conclusions of the LVIA are questionable. Clearly the technical appendix indicates that there will be visible emissions on some occasions and that this plume may be substantial, at times with a length greater than 200m. Putting aside the technical aspects of the modelling, which I am not qualified to comment upon, it appears that the worst case scenario for the effects of the development include a significant plume that has the potential to substantially increase the landscape and visual effects of the development. Unfortunately, the LVIA’s visualisations exclude this feature and therefore appear to underrepresent the maximum effects of the development. Furthermore, the LVIA does not appear to fully acknowledge the maximum level of effect that would occur when the plume is visible.

I hope that these comments are helpful in informing your review of the application. I would be happy to discuss the impact of the development on the AONB in further detail, if this would be beneficial.

Kind regards

Richard

Richard Brown CMLI

Dorset AONB Landscape Planning Officer

Dorset AONB Partnership, hosted by Dorset Council, County Hall, Dorchester DT1 1XJ

r.i.brown@dorsetcc.gov.uk

Web: www.dorsetaonb.org.uk **Twitter:** [@DorsetAONB](https://twitter.com/DorsetAONB)

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The Dorset AONB covers over 40% of the county, from Lyme Regis to Poole Harbour and from Blandford to Chesil Beach, and is the 5th largest of the 46 AONBs in the UK.

The Dorset AONB Partnership brings together 20 organisations to care for the area and to keep this nationally important landscape in good shape for future generations to enjoy.