



Dorchester Civic Society

An Independent Voice

Registered Charity No. 268636

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Proposed Slyers Lane Wind Farm

Application Number WD/D/14/002611

Position Statement

Approved at the meeting of the Society's Full Committee on 6th January 2015

Dorchester Civic Society considers this application should be refused as the public benefit from the proposal is outweighed by the significant harm that would be caused to the setting of Dorchester and especially to the character and appearance of the Dorchester Conservation Area and other heritage assets.

1. Introduction

Founded in 1974, Dorchester Civic Society exists to, among other things, ... *secure the preservation, protection, development and improvement of features of historic, natural or public interest* ... in Dorchester and its setting.

The Society acknowledges and supports the case for sustainable development and renewable energy generation (including wind power) and, as such, it has sought to assess this application with an open mind but having regard to the Society's well-established role, objectives and priorities. So, for example, a wind farm development in the environs of the town, like the one proposed, (1) must be so located, and the number and size of turbines should be such that the visual, historic, cultural and landscape setting of the town and its heritage assets are not adversely affected; and (2) should not prejudice future changes and improvements to the town and its setting and, ideally, would actively promote such enhancement possibilities.

The Society is not equipped to comment on arguments about the targets for clean energy generation in Dorset; the extent to which such targets may be, or have already been, met; and specifically the contribution on-shore wind farms can or should make. However, the Society is concerned about the potential cumulative impact of wind farm developments on the County's landscape: in particular in the eastern localities of West Dorset in the relatively small part of the District Council's area not within designated protected areas such as the AONB (covering over 70% of the District).

2. Planning policy framework

Section 12 of the National Planning Policy Framework, 2012, *Conserving and enhancing the historic environment*, provides support for the Society's concerns and stance on this development proposal.

At the local level, key policy references are contained in Chapter 2, *Environment and Climate Change*, of the draft West Dorset and Weymouth & Portland Local Plan - the subject of an independent public examination in November/December 2014.

Policy ENV 4 (ii)

In considering the impact of a proposed development on the significance of a heritage asset a judgment will be made, taking into account the scale of any harm, potential public benefit and the nature, significance and level of importance of the asset; and

Policy ENV 4 (iv)

Proposals for development within a Conservation Area, or outside but which would affect its setting or the views into or out of the area, should not be permitted unless they preserve or enhance the character or appearance of the Conservation Area.

The supporting justification for these policies states that:

Section 2.1 Strategic approach

High priority will be given to protecting and enhancing the area's heritage assets – including its Listed Buildings and Conservation Areas, and other features with local or cultural associations, particularly where it contributes to the area's local distinctiveness;

Paragraph 2.2.3

Effects of development outside, but affecting the AONB (within its 'setting') will ... need to be carefully considered;

Paragraph 2.2.5

Areas that lie outside these national designations are not significantly less outstanding, and are worthy of conservation and enhancement; and

Paragraph 2.3.1

Much of the area retains strong links with its past heritage, providing a sense of continuity, local identity and pride.

The supporting justification also highlights the importance of cultural associations with writers including Thomas Hardy (Paragraph 2.3.1) and acknowledges that heritage assets ... *provide wide social, cultural, environmental and economic benefits* (Paragraph. 2.3.2).

3. The character of Dorchester and its setting

In Dorchester we are blessed in our surroundings. Within the town itself we benefit, for example, from some fine historic streets and spaces; a wealth of historic buildings including some striking landmarks such as St Peter's and St George's churches, All Saint's spire and the Corn Exchange clock tower; and the Town Walks and Borough Gardens. The town's historic core, contained within the Dorchester Conservation Area, is situated on a spur of high ground overlooking the Frome with a steep escarpment down to the river. As a result we have immediate access to, and enjoy splendid views of, the countryside north of the town: residents, visitors and others can access this rural hinterland by walking direct from the town centre northward; all other directions lead across large residential areas and major highways. Outside the town's historic core there are several scheduled monuments, including Maiden Castle and Poundbury Camp prominent in Dorchester's landscape setting and overlooking the application site.

To the north and east of Dorchester, the Frome river valley dominates the landscape with the meandering course of the river and an intricate system of drainage channels through flood

meadows. Beyond this flood plain an upland chalk landscape creates an attractive backdrop to the town. Even close to Dorchester the area is peaceful, rural and tranquil in character and is enjoyed by residents, visitors and others. The landscape visible today was modified in the 18th and 19th centuries by the addition of parkland trees and coverts for sporting and aesthetic reasons but despite farming practices changing through the centuries the overall landscape character remains unaltered since far earlier.

This intimate relationship between town and country is not simply a memorable visual one; it is an historic and timeless relationship notwithstanding changes, for example, in field and planting patterns, in flood management practices and, of course, the overall shape and size of Dorchester itself to the east, south and, most dramatically, to the west with development of Poundbury. In contrast to elsewhere, the changes to the north of the town have been gradual, incremental, subtle, and rural in nature and scale.

This landscape setting to Dorchester has significant cultural, historic, literary resonance: it is an essential part of the town's identity and people's sense of place. Thomas Hardy's description in the Mayor of Casterbridge of Dorchester's character, form and situation still rings true in respect of this part of the town:

The borough of Casterbridge ... was as compact as a box of dominoes ... country and town met in a mathematical line.

The historic core of Dorchester is designated a Conservation Area and the Conservation Area Appraisal (2003) highlights the essential contribution of this setting to the special character of the town including specific references to several views north, towards the application site; the Frome water meadows are designated Land of Local Landscape Importance (LLLI); and the chalk uplands are within the Dorset Area of Outstanding Natural Beauty (AONB). These three designated 'protected' areas contribute to each other and the 'unprotected' land between is an essential element of the 'setting' of the 'protected' areas: when assessing the landscape and visual impact of the proposed wind farm the landscape must be seen as one indivisible entity.

The West Dorset Landscape Character Assessment (WDDC, 2009) highlights specific 'detrimental features' in each of the report's 35 'landscape character areas' that collectively cover the entire District. Such detrimental features include: ... pylons and masts ... visually prominent ... detracting from the characteristic open views (Area 28, Dorchester Downs, and Area 32, Cerne and Piddle Valleys and Chalk Downland); and ... electricity pylons crossing the Frome Valley ... are conspicuous in this flat open landscape (Area 29, Frome and Piddle Valley Pasture). In October 2014 Natural England and the Department for Environment, Food and Rural Affairs issued revised guidance replacing a 2002 guidance note on how such landscape character assessments should be undertaken. This revised guidance stresses the need to capture cultural associations, history and memories and to demonstrate how landscapes are perceived, experienced and valued by people: WDDC's 2009 assessment did not address these important matters.

4. The visualisations submitted with the application

The Society acknowledges the dangers and limitation of visualisations (photomontages, wireframes etc) but it questions the perceptual realism of the montages submitted with the planning application: these are designed to support the applicant's assessments of the landscape, visual and heritage impacts of the proposal and to inform and persuade decision-makers and consultees that a scheme should be approved.

Updated guidance issued by Scottish Natural Heritage (SNH) - *Visual Representation of Wind Farms, Version 2, July 2014* - details a revised methodology for the production of visualisations: one that it is argued is easier for both the public and decision makers to use and will represent proposed wind farm developments in a more realistic way. After January 2015, in Scotland all new visualisations will be expected to accord with the new guidance and it seems likely that changes will follow to accepted best practice in England.

The Society is concerned that Broadview's visualisations, although prepared in accordance with accepted best practice prior to SNH's revised guidance, are likely to have understated the perceived visual impact of the six turbines in the landscape. The photomontage below shows the view north from Glyde Path Road, within the Dorchester Conservation Area, over the Frome valley and water meadows: it is included as an aid to visualising the impact of the turbines not as a fully accurate representation. Similar views will be experienced along the Mill Stream and, for example, from parts of the site of Dorchester Prison close to North Square - the Ministry of Justice announced the purchaser of this important and prominent site in December 2014.



5. Dorchester Civic Society's stance on development north of Dorchester

Dorchester Civic Society has consistently opposed significant development north of the town. For example, having lobbied in the 1970s for a by-pass to be built the Society gave evidence to the public inquiry in the 1980s strongly supporting a road south of the town as opposed to a northern route. In 1981 a consortium of developers and landowners launched the 'Coker's Frome Scheme' that, on completion, would have resulted in a satellite community north of the Frome water meadows extending from Stinsford to Charminster: the Society opposed this scheme and instead advocated development at Poundbury.

Apart from this wind farm application, the threat of further major development north of Dorchester remains with the North Dorchester Consortium actively seeking to undermine the 'soundness' of the WD and W&P Local Plan and to secure approval for a satellite development, initially for 1500 homes, in this open countryside to meet 'housing needs' pre and post completion of Poundbury.

6. The Society's assessment of the Slyers Lane wind farm proposal

The Society objects to Broadview's application (WD/D/14/002611) on the grounds of:

- Visual and landscape impact;
- Impact on Dorchester Conservation Area and heritage assets in the town; and
- Socio-economic and tourism impact.

Landscape and visual impact

The Society considers that the siting, size and number of turbines proposed will adversely affect the visual, historic, cultural and landscape setting of the town. The wind farm development would create a new landscape character area – one where the six wind turbines, prominent by reason of their number and height, will be the dominant landscape feature: this will significantly damage the character and quality of the ‘protected’ areas, their wider settings and the important inter-relationships between the AONB, the LLLI and Dorchester Conservation Area.

The Society does not accept that decommissioning the wind farm in 25 years can justify acceptance of significant adverse visual and other impacts now and for the next two and a half decades. Although now withdrawn, the advice given in Circular 11/95, *Use of Conditions in Planning Permission*, is particularly relevant in respect of whether development detrimental to the amenities of an area can be made acceptable by means of a temporary consent. Paragraph 109 of that Circular stated:

Thus, the reason for granting a temporary permission can never be that a time-limit is necessary because of the effect of the development on the amenities of the area. Where such objections to a development arise they should, if necessary, be met instead by conditions whose requirements will safeguard the amenities. If it is not possible to devise such conditions, and if the damage to amenity cannot be accepted, then the only course open is to refuse permission. These considerations will mean that a temporary permission will normally only be appropriate either where the applicant proposes temporary development, or when a trial run is needed in order to assess the effect of the development on the area.

Impact on Dorchester Conservation Area and other heritage assets

The Society considers that the siting, size and number of turbines proposed will adversely affect Dorchester’s heritage assets including several important views from the Dorchester Conservation Area, Maiden Castle and Poundbury Camp, Salisbury Fields and Greys Bridge.

Socio-economic and tourism impact

The Society considers that the wind farm would adversely affect tourism to Dorchester. Tourism is a key element of the local economy. The visitors that Dorchester attracts year-long, come for the beauty of the countryside, its fine buildings and its literary associations - Thomas Hardy being foremost among them. Many tourists enjoy the walks around Dorchester and out across the water meadows to the north abutting the town. Ratty’s Walk and the Riverside Walk focus on the defining views along the braids of the River Frome, and across the panes of the meadows and the slopes northward. In *The Mayor of Casterbridge*, Thomas Hardy aptly wrote:

Casterbridge was the complement of the rural life around; not its urban opposite.

Dorchester Civic Society considers this application should be refused as the public benefit from the proposal is outweighed by the significant harm that would be caused to the setting of Dorchester and especially to the character and appearance of the Dorchester Conservation Area and other heritage assets.

Alan Rowley (Chairman)
9 January 2015