## TOWN AND COUNTRY PLANNING ACT 1990

## **PROOF OF EVIDENCE**

of Colm O'Kelly BSc (hons), MPhil, CMLI, MBA, PGDip Senior Landscape Architect, Dorset Council

## **Section 78 Appeal**

Appeal By: Dudsbury Homes (Southern) Ltd

SITE ADDRESS: Land to the South of Ringwood Road, Alderholt, Dorset, SP6 3DF

# AGAINST THE REFUSAL OF THE PLANNING APPLICATON BY DORSET COUNCIL FOR:

Mixed use development of up to 1,700 dwellings including affordable housing and care provision; 10,000 sqm of employment space in the form of a business park; village centre with associated retail, commercial, community and health facilities; open space including the provision of suitable alternative natural green space (SANG); biodiversity enhancements; solar array, and new roads, access arrangements and associated infrastructure (Outline Application with all matters reserved apart from access off Hillbury Road).

- **PINS REF:** APP/D1265/W/23/3336518
- LPA REF: P/OUT/2023/01166
- **DATE:** 28 May 2024

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## Glossary

ALC	Appellant's Landscape Consultant.
CD	Core document.
CPRE	The Campaign to Protect Rural England The Countryside Charity.
DTGN 05/23	Draft Technical Guidance Note 05/23 Notes and Clarifications on aspects of Third Edition Guidelines on Landscape and Visual Impact Assessment (GLVIA3) published by the Landscape Institute July 2023 (CDF.10).
GLVIA3	Guidelines for Landscape and Visual Impact Assessment. Third Edition, published by Routledge in collaboration with the Landscape Institute and Institute of Environmental Management and Assessment April 2013 (CDF.7).
Landscape Character	A distinct, recognisable, and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse ( <b>CDF.7</b> p.157).
Landscape Character Areas	These are single unique areas which are the discrete geographical areas of a particular landscape type. Each will have its own individual character and identity, even though it shares the same generic characteristics with other areas of the same type (CDF.11 p.54).
Landscape Character Types	These are distinct types of landscape that are relatively homogenous in character. They are generic in nature in that they may occur in different areas in different parts of the country, but wherever they occur they share broadly similar combinations of geology, topography, drainage patterns, vegetation, historical land use, and settlement pattern and perceptual and aesthetic attributes ( <b>CDF.7</b> p. 157).
Landscape effects	Effects on the landscape as a resource in its own right (CDF.7 p.157).
Landscape Quality (condition)	A measure of the physical state of the landscape. It may include the extent to which typical character is represented in individual areas, the intactness of the landscape and the condition of individual elements ( <b>CDF.7</b> p.157).
Landscape value	The relative value or importance attached to a landscape (often as a basis for designation or recognition), which expresses national or local consensus, because of its quality, special qualities including perceptual aspects such as scenic beauty, tranquillity or wildness, cultural associations or other conservation issues ( <b>CDF.11</b> p.55).
LI TGN 1/20	Landscape Technical Guidance Note 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs) 10 January 2020 (CDF.9).
LI TIN 01/17	Landscape Institute Technical Information Note 01/17 (revised) March 2017 – Tranquillity an Overview (CDF.8).

Magnitude (of effect)	A term that combines judgements about the size and scale of the effect, the extent of the area over which it occurs, whether it is reversible or irreversible and whether it is short or long term in duration (CDF.7 p.158).
NL/AONB	The Cranborne Chase and West Wiltshire Downs National Landscape/Area of Outstanding Natural Beauty. Following a recommendation in the Glover Landscapes Review in
	2019 that AONBs should be rebranded as National Landscapes to strengthen them with new 'purposes, powers and resources' the Government agreed that the national significance of AONBs should be 'reflected in their name'.
	AONBs are now known as 'National Landscapes'. The rebranding was launched on the 22 November 2023.
	Area of Outstanding Natural Beauty remains the Legal Designation.
NPPF	National Planning Policy Framework issued by the Department for Levelling Up, Housing and Communities in December 2023.
Participatory	Participatory Appraisal is a method of understanding people's
Appraisal (PA)	values and beliefs. It enables them to discuss what is important to them in their own words ( <b>CDF.36</b> p.5).
	It involves consulting stakeholder groups and creating a cycle of collecting information, reflection, and learning using suitable methods to facilitate the analysis of issues and perceptions.
PRoW	Public Rights of Way.
Representative	Location within a selected Tranquillity Receptor area, where a
Views (RV)	photograph is taken, and then annotated to highlight factors which positively and negatively affect relative tranquillity in that location as perceived by the ALC.
SANG	Suitable Alternative Natural Greenspace. Defined in the glossary of the Adopted Core Strategy as meaning: substantial areas of open space in the vicinity of major residential development to act as sites to attract users who would otherwise recreate on nearby
	internationally designated heathlands, to mitigate the harm caused by human occupation within 5km of internationally protected heathland (CDD.1 7.260 p.256).
SCLM	Statement of Case in relation to AONB Tranquillity in the Appellant's Pre-Inquiry Statement of Case Reason for Refusal 8 - AONB Tranqillity dated November 2023 (CDC.3 2.33 to 2.35 pp. 13 and 14).

Sensitivity	A term applied to specific receptors, combining judgements of the
Sensitivity	
	susceptibility of the receptor to the specific type of change or
	development proposed and the value related to that receptor
	( <b>CDF.7</b> p.158).
Significance	A measure of the importance or gravity of the environmental effect,
	defined by significance criteria specific to the environmental topic
	( <b>CDF.7</b> p.158).
Susceptibility	The ability of a defined landscape or visual receptor to
	accommodate the specific proposed development without undue
	negative consequences (CDF.7 p.158).
The Adopted	Christchurch and East Dorset Local Plan Part 1 - Core Strategy
Core Strategy	April 2014 forming part of the development plan for the area
	(CDD.1).
The	The area of land shown edged in red on Scott Worsfold Associates
Application	Plan Number 22-1126 LP.01 Revision C dated 14.06.2023
Site	(CDA.3).
Tranquillity	A state of calm and quietude associated with peace, considered to
Tanquinty	be a significant aspect of landscape ( <b>CDF.7</b> p.158).
Tranquillity	People experiencing the factors or indicators of tranquillity
Receptor (TR)	(CDA.83 8.489 p.87).
Visual amenity	The overall pleasantness of the views people enjoy of their
(Visual value)	surroundings, which provides an attractive visual setting or
	backdrop for the enjoyment of activities of the people living,
	working, recreating, visiting or travelling through an area
	(CDF.7 p.158).
Visual effects	Effects on specific views and on the general visual amenity
	experienced by people (CDF.7 p.158).
VP	View Point - a location from which a view is experienced or a
	representative photograph of that view is taken.
Visual	Individuals and/or defined groups of people who have the potential
receptors	to be affected by a proposal (CDF.7 p.158).
ZTV	Zone of Theoretical Visibility - a map usually digitally produced,
	showing areas of land within which a development is theoretically
	visible (CDF.7 p.159).

## 1. INTRODUCTION

#### Witness qualifications and experience

- 1.1 My name is Colm O'Kelly. I am a Landscape Architect and Chartered Member of the Landscape Institute (CMLI). I am employed by Dorset Council as a Senior Landscape Architect. My primary role is to provide specialist landscape advice on planning policy and development management applications.
- 1.2 I have worked for Dorset Council for three and a half years and prior to this for Bath and Northeast Somerset Council, as a Tree and Landscape Officer, for four and a half years. I have over thirty-three years of experience working as a Landscape Architect and Project Manager in the public, private, and charitable sectors.
- 1.3 I have a BSc (Hons) degree in Environmental Biology from Essex University, an MPhil in Landscape Design from The University of Newcastle Upon Tyne, an MBA from The University of the West of England, and a PG Dip in the Conservation of Historic Buildings from the University of Bath.

#### Statement of truth

The evidence which I have prepared and provide for this appeal reference APP/D1265/W/23/3336518 (in this proof of evidence) is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true professional opinions.

#### Background

1.4 I submitted my first comments on the Application (P/OUT/2023/01166) on the 27 April 2023 and subsequent comments on the 13 June 2023. I have visited the site and am familiar with its surroundings (CDB.17, CDB.26).

#### Scope of evidence

- 1.5 The scope of my evidence addresses concerns raised by the Cranborne Chase and West Wiltshire Downs National Landscape/Area of Outstanding Natural Beauty (NL/AONB) Principal Landscape and Planning Officer in his letter of the 26 April 2023, and reason 8 of the Planning Decision Notice for Outline Planning Application Number P/OUT/2023/01166, regarding the impact of the proposed development on the tranquillity of the AONB (CDB.4, CDA.76).
- 1.6 Reason 8 stated that "The proposal, by bringing additional traffic and recreational activity into the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty (AONB), would result in environmental impacts and a loss of tranquillity the extent of which has not been adequately identified and mitigated within the application contrary to Policy HE3 of the Christchurch and East Dorset

Local Plan: Part 1, 2014, and to paragraphs 174 and 176 of the NPPF." [paragraphs 180 and 182 in NPPF December 2023] [my emphasis in **bold**].

- 1.7 My intention is to provide the Inquiry with a proportionate and technically sound summary and to explain where there are differences between my judgement and that of the Appellant and the Appellants Landscape Consultant (ALC).
- 1.8 I have undertaken a review of the additional evidence presented regarding tranquillity in the Consolidated Environmental Statement (ES) main text and the additional appendices 8.7 and 8.8 and its addendum (CDA.83, CDA.84, CDA.85, CDA.135).
- 1.9 I have also reviewed the following documents and I refer to these documents where relevant:
  - Developing an Intrusion Map of England August 2007 LUC/CPRE (CDF.4)
  - Tranquillity Mapping: Developing a Robust Methodology for Planning Support Technical Report on Research in England, January 2008 (revised) Northumbria University/Newcastle University/bluespace environments/CPRE (CDF.5)
  - Cranborne Chase and West Wiltshire Downs AONB Tranquillity Mapping Ground Truthing Report and Methodology Version 2.6 December 2009 (CDF.2)
  - Cranborne Chase and West Wiltshire Downs AONB Tranquillity Mapping Ground Truthing Methodology and Interim Report Version 3.0 July 2010 (CDF.3)
  - Broadly engaging with tranquillity in protected landscapes: A matter of perspective identified in GIS – Landscape and Urban Planning 158 (2017) (CDF.6)
  - Cranborne Chase Partnership Plan 2019 2024 (CDD.5)
- 1.10 My evidence relates to Issue 2 highlighted in the Inspector's Case Management Conference Summary Note for the Meeting of the 2 May 2024 (CDC.6):
  - Issue 2. Whether the development would be appropriate in this location having regard to: its relationship to Alderholt and other settlements and their facilities; its connection to the highways network; its relationship to the AONB; the local plan spatial strategy; and the emerging Neighbourhood Plan [my emphasis in bold].

#### Approach and Methodology

- 1.11 My comments and judgements have been guided by:
  - the Third Edition Guidelines for Landscape and Visual Impact Assessment (GLVIA3) 2013 (CDF.7)
  - Landscape Institute Technical Information Note 01/17 (revised) March 2017 Tranquillity an Overview (CDF.8)
  - Landscape Technical Guidance Note 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs) 10 January 2020 (CDF.9)
  - Landscape Institute Draft Technical Guidance Note 05/23 notes and clarifications on aspects of the Third Edition Guidelines on Landscape and Visual Impact Assessment (GLVIA3) May 2023 (CDF.10)
  - Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic Movement Revision 7 July 2023 (CDF.38)

## 2. RELEVANT POLICY

#### Introduction

- 2.1 This section identifies the key policies that I consider are relevant to my evidence. Noting that the Inspector's preference was not to have lengthy policy summaries in evidence, in this section I refer only to those policies of direct relevance to the decision, which put my evaluation of the appeal scheme into its proper policy context.
- 2.2 Applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise.
- 2.3 The development plan includes:
  - the Christchurch and East Dorset Local Plan Part 1 Core Strategy adopted by East Dorset District Council in April 2014 (Adopted Core Strategy) which sets out a long-term spatial vision for the former local authority areas of Christchurch and East Dorset and the strategic policies and proposals to deliver that vision over the 15year period to 2028; and
  - the saved policies of the East Dorset Local Plan of January 2002.
- 2.4 Government planning policy, set out in the National Planning Policy Framework issued by the Department of Levelling Up, Housing and Communities in December 2023 ('the NPPF'), is material to planning decisions in England and can be accorded significant weight in decision making.

2.5 Paragraph 48 of the NPPF states that:

*"Local planning authorities may give weight to relevant policies in emerging plans according to:* 

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given);
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)."
- 2.6 The Dorset Council Local Plan Options Consultation took place between 15 January and 15 March 2021.

Christchurch and East Dorset Local Plan Part 1 – Core Strategy April 2014 (the Adopted Core Strategy)

- 2.7 **Policy HE3** of the Adopted Core Strategy is relevant to this evidence:
- 2.8 **Policy HE3** Landscape Quality states:

"Development will need to protect and seek to enhance the landscape character of the area.

# Proposals will need to demonstrate that the following factors have been taken into account:

- The character of settlements and their landscape settings.
- Natural features such as trees, hedgerows, woodland, field boundaries, water features and wildlife corridors.
- Features of cultural, historical and heritage value.
- Important views and visual amenity
- Tranquillity and the need to protect against intrusion from light pollution, noise and motion.

#### Development proposals within and/or affecting the setting of the Area of Outstanding Natural Beauty will need to demonstrate that account has been taken of the relevant Management Plan.

Within the Areas of Great Landscape Value development will be permitted where its siting, design, materials, scale and landscaping are sympathetic with the particular landscape quality and character of the Areas of Great Landscape Value. Planning Permission will be refused for major developments in these designated areas except in

exceptional circumstances and where they are in the public interest." [my emphasis in **bold**]

National Planning Policy Framework, December 2023 (NPPF)

- 2.9 NPPF Section 15 Conserving and enhancing the natural environment paragraphs 180, 182, and 191 (previously paragraphs 174, 176 and 185) are relevant to this evidence.
- 2.10 Paragraph 180 states that:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) **preventing new** and existing **development from contributing to**, being put at unacceptable risk from, or being adversely affected by, **unacceptable levels of** soil, air, water or **noise pollution** or land instability. Development should, where possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate." [my emphasis in **bold**]
- 2.11 Paragraph 182 states that:

"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 weight in National Parks and the Broads<sup>63</sup>. The scale and extent of development within these designated areas should be limited, while development within their settings should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas." [my emphasis in bold] 2.12 **Paragraph 191** states that:

"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life<sup>69</sup>;
- *b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational amenity value for this reason; and*
- c) limit the impact of light pollution from artificial light on local amenity intrinsically dark landscapes and nature conservation."

The Cranborne Chase Partnership Plan 2019 - 2024

- 2.13 The Cranborne Chase National Landscape/Area of Outstanding Natural Beauty (NL/AONB) forms part of the extensive belt of chalkland that stretches across southern and central England whose special qualities are a result of human interaction with the landscape over millennia. Designated in 1981 under the National Parks and Access to the Countryside Act 1949 and further protected under the Countryside and Rights of Way (CRoW) Act 2000 it is one of the nation's finest landscapes. It's primary purpose, conserving and enhancing the natural beauty of the area, has statutory protection. The purpose of this designation is to secure the permanent protection of the NL/AONB against change or development that would damage its special qualities (CDD.5 1.1, 1.2, 1.4 p.6, 2.1 p.8).
- 2.14 Natural beauty encompasses the visual appearance, flora, fauna, geological and physical features of the countryside, its cultural and historic associations, and our sensory perceptions of them. The combination of these factors gives each locality its own sense of place (CDD.5 2.1 p.8).
- 2.15 The special qualities of the Cranborne Chase NL/AONB are set out in the statement of significance at the beginning of the plan. The NL/AONB covers an area of 983km<sup>2</sup> and contains over 550 Scheduled Ancient Monuments, 2000 Listed Buildings and 17 Registered Parks and Gardens. It has 5 internationally and 60 locally protected sites of ecological importance including ancient woodland, chalk rivers and wildflower meadows. There are also 520 sites of local importance for wildlife. The NL/AONB has an extensive network of Public Rights of Way with a combined length of over 1,500km (CDD.5 2.6 and 2.7 p.9).
- 2.16 At the outset the plan makes clear that the high levels of tranquillity within the NL/AONB are an important element of the natural beauty of the NL/AONB and a significant part of

what makes the area special. Many local people and visitors value the special qualities of the area which include its tranquillity. While the plan acknowledges that access is important to a thriving economy, it notes that it can have serious consequences and significant impacts on tranquillity. Conserving and enhancing tranquillity and reducing the effects of transport on tranquillity therefore form part of the Partnerships ambitions (**CDD.5** 1.8 p.7, 2.1 p.8, A p.12, C, D p.13, 8.1 p.41, 8.2 p.42, 8.4 and 8.7 p.44, 13.3 p.90, 15.1 p.115, 16.1 p.123, p.259).

- 2.17 The Martin Whitsbury Downland Hills landscape character area lies immediately to the north of Alderholt on the southeastern edge of the NL/AONB and the absence of major roads within the character area is noted as contributing to its feeling of remoteness and tranquillity. Within other NL/AONB landscape character areas, and especially the Open Chalk Downland and Chalk River Valleys along the southern edge of the NL/AONB, traffic volumes are noted as leading to a loss of tranquillity and this is seen as an issue and a challenge especially on the minor road network that has few realignments or improvements and reflects the deeply rural, tranquil character of an area composed of landscapes that are sensitive to change (CDD.5 pp.31, 33, 34, 35, 36, 13.1 p.89).
- 2.18 Within the plan objective LAN B asserts that the tranquillity of the AONB should be conserved and enhanced. Policy LAN4 aims to ensure that this is achieved, and Policy LAN6 aims to "determine the factors that contribute to, or detract from, tranquillity to ensure that policies will more effectively conserve and enhance levels of tranquillity" (CDD.5 p.45).
- 2.19 The protection of tranquillity from the pressures related to farm diversification and freight transport are addressed by **Policy PT18** and **PT29** respectively (**CDD.5** pp.99, 101).
- 2.20 When judging the merits of applications, it should be borne in mind that the NL/AONB has the highest status of protection in relation to landscape and scenic beauty and Policy **PT14** makes clear that development proposals in the setting of the NL/AONB should demonstrate how account has been taken of the NL/AONB management plan and its policies (CDD.5 13.8 p.94).

Dorset Council Local Plan - Consultation January 2021 (DCLPC)

- 2.21 Paragraph 3.5.9 in the preamble to Draft Policy ENV4, paragraph 3.12.11 in the preamble to Draft Policy ENV11, and paragraph 5.38 in the preamble to Draft Policy ECON6 of the DCLPC are relevant to this evidence (CDD.16).
- 2.22 Paragraph 3.5.9 in the preamble to Draft Policy ENV4. Landscape states:

"In considering how proposals may affect the landscape and scenic beauty of AONBs, consideration will be given to impacts on: the distinctive character of the landscapes; local landscape features, and special qualities such as tranquillity and remoteness." [my emphasis in bold]

2.23 Paragraph 3.12.11 in the preamble to Draft Policy ENV11. Amenity states:

"The countryside areas are particularly valued for their tranquillity, particularly in the AONBs. This means that even small increases in noise levels can give rise to significant adverse effects. Noise connected with new development can affect the character of these areas. For this reason, particularly within the two AONBs, the level of noise production above the current level will be given consideration through planning decisions." [my emphasis in bold]

2.24 Paragraph 5.8.3 in the preamble to Draft Policy ECON6. Supporting vibrant and attractive tourism states:

"The area's designated landscapes, important natural features and historic settlements are particularly valuable in attracting visitors, but also bring visitor pressures which need to be managed. **High numbers of visitors can put pressure on some locations in terms of their tranquillity, appearance, and physical erosion**. It is important that tourist related development takes place in a sustainable manner so as to ensure positive benefits whilst avoiding adverse impacts on the local environment or existing infrastructure." [my emphasis in **bold**]

## 3. THE PROPOSED DEVELOPMENT AND ITS CONTEXT

- 3.1 The proposed development site lies to the south of Alderholt approximately 2km from the southern boundary of the NL/AONB. The B3078 runs along the northern boundary of the settlement and forms the major vehicular route to the NL/AONB from the settlement and the proposed development.
- 3.2 There is an extensive footpath network which links Alderholt to the NL/AONB but the most direct footpath route is approximately 2.5km in length and runs from the western side of the site boundary to Lower Daggons along the bridleway E34/10 and then footpaths E34/11, E34/25, and bridleway E34/26.
- 3.3 Within the NL/AONB boundary there are a number of recreational trails and tourist attractions of which the Jubilee Trail, Chettle House, Badbury Rings, Breamore House and Museum, Knowlton Church and Earthworks, and Kingston Lacy House are closest to Alderholt.



Figure 1: Site in context with the NL/AONB



Figure 2: PRoW network between site and NL/AONB



Figure 3: National trails and tourist attractions within the NL/AONB (CDD.15 p.56)

## 4. TRANQUILLITY AN OVERVIEW OF GUIDANCE AND ASSESSMENT

#### Introduction

- 4.1 The third edition of the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) defines tranquillity as "a state of calm and quietude associated with peace, considered to be a significant asset of landscape". References to tranquillity as an important and valued aesthetic and perceptual aspect of landscape character and the consideration of vehicular noise and movement upon it are included in the text (CDF.7 4.18. p.56, 5.4 p.74, Box 5.1 p.84, 5.29 p.85, 7.25 p.126, p.158).
- 4.2 Landscape Institute Technical Guidance Note 01/2017 Tranquillity An Overview makes clear that, while public understanding of the concept of tranquillity is already well established, "*there is no objective guidance on the subject or a consistent application of approach*" to its assessment. However, there are clear links between environmental factors within the landscape and the perception of tranquillity and therefore its assessment is within the scope of the landscape profession (**CDF.8** 1.1 to 1.4 p.2).
- 4.3 Because tranquillity is a state of mind, related in part to the effect a set of environmental characteristics have on our senses, human perception as well as factual evidence should be considered in any assessment of tranquillity (CDF.8 2.10 p.3).
- 4.4 It is also important to make a distinction between absolute and relative tranquillity. The visual or audible evidence of human influence is nearly always present within the English landscape and therefore absolute tranquillity, its total absence, is rarely if ever obtainable. Assessment should therefore be focused on relative tranquillity and the assessment of the presence and degree of environmental factors which make a location more or less likely to induce a sense of tranquillity (CDF.8 2.11 p.3).
- 4.5 The IEMA Environmental Assessment of Traffic and Movement Rev 7 (2023) states that "Changes to the type or volume of traffic may give rise to effects on views and/or landscape character (particularly where there is an increase in larger vehicles). The perception of tranquillity, which is characteristic of some landscapes, may be affected by increased vehicle numbers, movement and noise, and the increased presence of lights at night may affect characteristically dark landscapes. These are less likely to give rise to significant effects than physical; changes to the road network, but may require assessment, such as in areas close to nationally designated landscapes. In order to undertake an assessment, the competent landscape expert will not need detailed traffic data, but will require a clear description, readily understood by the non-expert reader, of what changes to the traffic would include (for example type of vehicles, frequency, duration, traffic volume)" (CDF.38 4.38) [my emphasis in bold].
- 4.6 The additional evidence presented by the applicant with regard to tranquillity in the Consolidated Environmental Statement (ES) references the Campaign to Protect Rural England (CPRE) Tranquillity and Intrusion Maps and the Cranborne Chase and West

Wiltshire Downs AONB Tranquillity Mapping – Ground Truthing reports. I consider that an understanding of the methodologies which underpin these maps and reports is pertinent to an assessment of the additional evidence presented by the applicant and my evidence in regard to it (CDA.83, CDA.84, CDA.85, CDF.4, CDF.5, CDF.2, CDF.3).

#### The Campaign to Protect Rural England (CPRE) Intrusion Map

- 4.7 In 1991, Simon Rendel of ASH Consulting developed a methodology and produced a tranquil areas map. The map showed the visual and audible impact on the countryside of features such as roads, railways, and urban areas by establishing distance thresholds for the extent of the intrusion of these features.
- 4.8 The original methodology was further developed by ASH Consulting and was used to create comparator tranquil areas maps for the early 1960's and 1990's that were published by CPRE and the Countryside Agency in 1995.
- 4.9 While these maps played a role in raising awareness of the subject, the methodology relied on expert judgement rather than the general public's view of what constitutes tranquillity, focused on factors that detracted from tranquillity, and excluded factors which contribute to tranquillity, and this was subject to criticism.
- 4.10 Following the publication of the New Tranquillity Map of England in 2006 (revised 2007) the early 1960's and 1990's comparative maps were renamed Intrusion Maps to reflect the fact that they map distances from various visual and audible intrusions in the landscape rather than the perception of the effects of that intrusion.
- 4.11 Land Use Consultants were commissioned by CPRE to prepare national Intrusion Maps and this resulted in the production of revised Intrusion Maps for the early 1960s and 1990s and the production of a new national Intrusion Map for 2007. In doing so LUC developed and published a comprehensive methodology detailing the thresholds, data sets and processes used which would allow this methodology to be replicated (CDF.4).

#### The Campaign to Protect Rural England (CPRE) Tranquillity Map

- 4.12 In 2006 the CPRE commissioned a project to map tranquillity on a national scale. The approach adopted combined three key streams of data collection and integration (CDF.5).
  - **Public consultation** on 44No. 'hearing' and 'seeing' option choices that either enhance or detract from tranquillity to establish the public perception of their relative importance and allow their weighting within the GIS Model.
  - **Threshold analysis** to ascertain whether public perception in relation to distance, spatial thresholds, and perceived naturalness could be established and used instead of expert opinion.
  - **The GIS model** the use of GIS data to provide a spatial footprint of the weighted 44No. option choices disaggregated into visual and auditory factors.

- 4.13 The CPRE Tranquillity map is a product of this research and brings together surveys of the human experience of tranquillity derived through Participatory Appraisal (PA), and the factors which add to or detract from it, with desk-based analysis of national Geographical Information System data (GIS) on the presence of such factors in the landscape. The measurements were applied to a 500 x 500m grid covering the land mass of England and were based upon 'seeing' and 'hearing' factors, derived from the PA process, which are considered to contribute to or detract from overall tranquillity.
- 4.14 The tranquillity data was broken down into 'what you can see' and 'what you can hear'. Researchers asked people what they thought tranquillity was, what enhances it and what detracts from it and how important those factors are to them. The 44No. factors which emerged from this exercise were used to collate data on the characteristics of each locality – such as its closeness to roads and buildings, how noisy and crowded it is, how near to water and whether it offers views of open countryside etc.
- 4.15 The overall tranquillity scores resulting from the weighted model data were plotted on an Ordnance Survey grid by using the 1km grid and dividing each square into 500 x 500m squares. Each 500 x 500m square of England was given a tranquillity score, by subtracting the total score for negative factors from the total score for positive factors. These scores were then colour coded to produce the tranquillity map – darkest green for those places with the highest tranquillity score where people would be most likely to experience feelings of tranquillity, and brightest red for those places with the lowest tranquillity score where people would be least likely to experience feelings of tranquillity.
- 4.16 However, it is important to recognise that the map is a snapshot of a time in 2006, that the map shows relative rather than absolute tranquillity, and that squares that are the same colour and have the same score may differ markedly in the different components of tranquillity both positive and negative from which that score has been derived.
- 4.17 While the data sets for individual 500m x 500m grid squares have not been published the detailed methodology set out in the technical report would appear to allow its replication (CDF.5).

Cranborne Chase and West Wiltshire Downs AONB Ground Truthing Study

- 4.18 The Cranborne Chase and West Wiltshire Downs NL/AONB carried out a ground truthing exercise which sought to establish how the GIS datasets used in the production of the CPRE Tranquillity map compared with survey data gathered by AONB Staff and surveyors for selected 500 x 500m grid squares within the NL/AONB.
- 4.19 The ground truthing survey investigated a set of 31No. factors rather than the 44No. factors identified in the National Tranquillity Model; it used a simple tripartite scoring system of minimum, medium, and strong for each factor but with a different multiplier for positive factors and negative factors; and it used the same weighting factors used for the national model.

4.20 Once again, the methodology set out in the interim report would appear to allow replication (CDF.3).

#### Broadly Engaging with Tranquillity in Protected Landscapes (BET)

- 4.21 The University of Winchester, in collaboration with the Dorset NL/AONB, carried out research through consultations with institutions and residents and surveys of householders and visitors into the factors which contribute to or detract from tranquillity as perceived by organisations, local residents, and visitors. These factors were related to GIS data to produce maps of relative tranquillity for these groups of the Purbeck Peninsula within the Dorset NL/AONB from Wareham and its immediate setting in the northeast, along the southern edge of Poole Harbour and around the coast from Swanage to Lulworth Cove (CDF.6).
- 4.22 The research showed that tranquility has a meaning that varies at both group and individual level and that it relates to both objective physical characteristics and subjective aesthetic values (CDF.6 p.197).
- 4.23 Data from the consultations and surveys suggest that the presence or absence of people and positive and negative visual and audible factors were key to the perception of tranquillity, but that policy focuses on negative aspects of audibility with regard to tranquillity namely noise because this can be easily measured (**CDF.6** pp. 185, 197).
- 4.24 While the process provides a useful inclusionary framework for capturing and mapping different stakeholder views on tranquillity that can be used in other locations, it notes that policy makers and planners should only consider tranquillity and noise models as general guides because they are only as good as the data on which they are based and, in the study, the poorest data set related to the most important factor related to non-tranquillity namely traffic noise (**CDF.6** p.197).

#### Other assessments and research

- 4.25 Landscape Institute Technical Information Note TIN 01/17 contains a comprehensive review of research on the subject of tranquillity up to March 2017 in which the research outlined above is included. The overview covered many themes and had a wider scope than the brief review above, which is focused on the most high profile research to date by the CPRE and other studies which I consider to be relevant to this appeal (CDF.8 3.1 to 3.77 pp.5 to 17).
- 4.26 It is important to note that since March 2017 research into various aspects of tranquillity has continued. For instance, suitably experienced consultancies were invited to quote for undertaking further research to discover people's views on tranquillity by the CPRE and Natural England in December 2023 with a view to carrying out the research during January to May 2024. It is presumed that this research is ongoing.



Figure 4: Intrusion Map of England 2007 with NL/AONB overlay (CDF.3 p.52)

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## National map with 2001 regional boundaries



Figure 6: Campaign to Protect Rural England (CPRE) Tranquillity Map



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POSITIVE FACTORS	NEGATIVE FACTORS				
Seeing					
a Wild Landscape	Urban Development				
Remote Landscapes	Towns and Cities				
Wide Open Spaces	Villages and Scattered Houses				
a Natural Landscape	Roads				
Trees in the Landscape	Railways				
Deciduous Trees	Power Lines				
Natural Looking Woodland	Any Signs of Human Impact				
Water	Anyone at All				
the Stars at Night	Wind Turbines				
	Low Flying Aircraft				
	Overhead Pollution				
	Coniferous Trees				
Hearing					
Water	Occasional Noises from Cars and Lorries				
Low Noise Area	Constant Noise from Cars and Lorries				
	Railways and Trains				
	Low Flying Aircraft				
	Non-natural Sounds				
	Seeing and Hearing:				
	Lots of People				
	High Altitude Aircraft				

## Figure 8: NL/AONB factors investigated (CDF.3 p.17)

Positive Tranquillity:	Negative Tranquillity:
Min = Multiplied by 1.0	Min = Multiplied by 1.5
Med = Multiplied by 1.5	Med = Multiplied by 2.5
Strong = Multiplied by 2.0	Strong = Multiplied by 3.5

## Figure 9: NL/AONB tripartite scoring (CDF.3 p.19)

TRANQUILLITY SQUARE REF: 2078							
POSITIVE FACTORS				1		Admin Only	
	No	Min	Med	Strong	Score	Weight	Final
Seeing a Wild Landscape	1.				FALSE	2.12	0
Seeing Remote Landscapes		1			1	1.4	1.4
Seeing Wide Open Spaces			1		1.5	2.15	3.225
Seeing a Natural Landscape			1		1.5	6.59	9.885
Seeing Trees in the Landscape			1		1.5	1.81	2.715

Figure 10: NL/AONB example of weighted scoring (CDF.3 p.19)



**Figure 11:** BET tranquillity maps (clockwise from top left) for Residents, Institutions, Visitors, and Householders showing variance in perceptions of tranquillity (CDF.6)

## 5. CONSOLIDATED ES TRANQUILLITY ASSESSMENT – A CRITICAL REVIEW

5.1 Following the refusal of Outline Planning Application Number P/OUT/2023/01166, Allen Pyke Associates were appointed to undertake an assessment of the proposed development's impact upon tranquillity within the NL/AONB and the findings of this assessment were incorporated into the submitted Consolidated ES and additional appendices 8.7 and 8.8 and its addendum (CDA.83, CDA.84, CDA.85, CDA.135).

#### Issues with regard to background documents referenced

5.2 The Consolidated ES references CPRE's publication 'Mapping Tranquillity March 2005' which sets out the methodology for a pilot study in the Northumberland National Park and West Durham Coalfield that predates the national tranquillity mapping project. However, the Consolidated ES fails to reference CPRE's 'Tranquillity Mapping 2008' which sets out the refined methodology that underpins the mapping of tranquillity at a national scale and the 2007 Tranquillity Map (CDA.83 8.3 p.39, 8.39 p.43, 8.472 p.86, CDF.36, CDF.5).

- 5.3 The Consolidated ES references the positive and negative factors and their weighting on page 6 of CPRE's publication 'Mapping Tranquillity March 2005'. This is a list of 12 positive and negative factors from the pilot study and not the list of 44 positive and negative factors from the CPRE's 'Tranquillity Mapping 2008' (CDA.83 8.474 p.86, CDF.5 Table 28 p.63).
- 5.4 The Consolidated ES refers to the positive and negative factors listed in the NL/AONB's 'Tranquillity Mapping Ground Truthing Report Methodology' published in July 2010. This contains a significant number of errors with regard to the ID, questions, totals, and % weighting of the 44 positive and negative factors. Reference should instead be made to either the interim version of the report published in 2009 or CPRE's 'Tranquillity Mapping 2008' (CDA.83 8.477 p.86, CDF.3 Figure 2 p.7, CDF.2 Figure 2 p.7, CDF.5 Table 28 p.63).

The conflation of tranquillity with wildness and remoteness

- 5.5 While Landscape Institute Technical Guidance Note TGN02/21 includes tranquillity as one of the perceptual factors to be considered when assessing landscape value it is clear that tranquillity is distinct from wildness, remoteness, and dark night skies (CDA.83 8.484 p.87, CDF.37 Table 1 p.10).
- 5.6 Though wildness, remoteness, and dark night skies may add to a sense of tranquillity, Landscape Technical Information Note 01/2017 makes clear that their presence is not a prerequisite of tranquillity, nor would their absence preclude tranquillity (**CDF.8** 2.9 to 2.11 pp.3 and 4).

The structure of the tranquillity assessment contained within the Consolidated ES

- 5.7 Appendix 8.7 of the Consolidated ES includes the CPRE Intrusion and Tranquillity maps published in 2007 with the approximate location of the study area identified but fails to distinguish the important differences in the methodologies which have produced these maps as outlined in the previous section (CDA.84).
- 5.8 Appendix 8.7 also contains a 'Baseline Tranquillity Map'; this overlays a coloured 500m x 500m grid, representing a range of baseline tranquillity scores, on a 1:25,000 Ordinance Survey Map Base. The coloured 500m x 500m grid appears to have been transposed from an interim version of the NL/AONB Ground Truthing Report. The location of Tranquillity Receptors (TR) and annotated Representative Views (RV) included in the appendix are also identified on the Baseline Tranquillity Map (CDA.84, CDF.2 p.1).
- 5.9 The Consolidated ES states that the criteria considered for the selection of the 8No. Tranquillity Receptors (TR) and the 19No. Representative Views (RV), were as follows (CDA.83 8.488 p.87):
  - Those currently experiencing a higher tranquillity rating in accordance with the CPRE New Tranquillity Map and the NL/AONB Unit's Ground Truthing Exercise.

- Those currently experiencing key characteristics of the NL/AONB landscape which are associated with tranquillity.
- Those most likely to hear an increase in noise on local roads as a result of offsite traffic increases.
- Those most likely to see an increase in traffic on local roads.
- 5.10 The impact of additional recreational activity resulting from the proposed development on tranquillity does not form part of the assessment. The Consolidated ES asserts that "the proposed development will deliver extensive areas of open space and SANG which will mitigate both recreational pressures on the landscapes close to the Site, including Cranborne Common, and those further afield including the AONB" (CDA.83 Table 1.1 p. 7, 8.258 p.68).
- 5.11 It is also asserted that "the potential impacts of lighting are mitigated through the lighting strategy for the Site which includes the following measures to ensure that the Cranborne Chase and West Wiltshire AONB and International Dark Skies Reserve will not be impacted by the visual effects of lighting and the lighting technical effects (primarily sky glow) from the development" (CDA.83 8.259 p.68).
- 5.12 An extract from CPRE's 'England's Light Pollution and Dark Skies' online map is included in appendix 8.7 and it is asserted, by reference to this map, that light intrusion within the AONB is "*mostly associated with built up areas and not the roads which connect them*" (CDA.83 8.490 p.87).
- 5.13 The 8No. Tranquillity Receptors (TR) were characterised as:
  - TR1: Residents at, and visitors to, Cranborne Village (RVs -TR1a, b, c, d, e, f)
  - TR2: Walkers west of Cranborne Village (RV TR2)
  - TR3: Walkers east of Cranborne Village (RV TR3)
  - TR4: Walkers at Castle Hill Wood (RVs TR4a, b, c)
  - TR5: Visitors to the NL/AONB near Edmondsham (RV TR5)
  - TR6: Visitors to the NL/AONB Dorset Downs (RVs 6a, b, c, d)
  - TR7: Visitors to the NL/AONB near Damerham (RVs 7a, b)
  - TR8: Visitors to the NL/AONB near Lopshill (RV 8)
- 5.14 Within each of the 8No. selected Tranquillity Receptor (TR) areas, one or more Representative Viewpoint locations (RV) were identified, as listed above, and these were visited and assessed by a Chartered Landscape Professional who considered the Tranquillity Receptors as people experiencing the factors or indicators of tranquillity (CDA.83 8.489 p.87).

- 5.15 A brief written description of these assessments has been included in the main text of the Consolidated ES. Annotated photographs of the RVs listed are contained in Appendix 8.7. On these photographs, features which the ALC considers enhance relative tranquillity are annotated in black, and those which the ALC considers detract from relative tranquillity are annotated in red. The ALC acknowledges that whether certain features contribute positively or negatively to the experience of tranquillity is subjective and that their effect on tranquillity is likely to change temporally and seasonally. (CDA.83 8.493 to 8.523 pp.88 90, CDA.84, CDA.83 8.491 p.87).
- 5.16 The ALC's statement that "the annotated views are the assessor's comments and in no way seek to restrict, or define, what residents or visitors to the AONB value most in terms of their experience of tranquillity" seems contrary to the participatory appraisal and weighting of positive and negative factors adopted by other methodologies and, I consider, limits the validity and utility of the annotated views (CDA.83 8491 p.87, CDF.2, CDF.3, CDF.5, CDF.6).

The assessment methodology used in the Consolidated ES

5.17 The ALC appears to have adapted the methodology for assessing the significance of landscape and visual effects outlined in GLVIA3 to assess the significance of the effects on the identified Tranquillity Receptors of an increase in the audibility and visibility of local roads as a result of off-site traffic increases (CDF.7).





- 5.18 The methodology seeks to combine an assessment of the **susceptibility** of the receptor to the type of change arising from the specific proposal, that is its ability to accommodate the type of change without undue negative consequences, and the perceived **value** attached to the receptor to assess the **sensitivity** of the receptor to the type of change (**CDF.7** 3.26 p.38 and p.158).
- 5.19 The **sensitivity** of the receptor to the type of change arising from the specific proposal and the **magnitude** of the specific effect, that is its size/scale, duration, and reversibility, are then combined to come to a view on the **significance** of the specific effect on the receptor (**CDF.7** 3.26 p.38 and p.158).
- 5.20 Landscape Institute Draft Technical Guidance Note (DTGN) 05/23 makes clear that in assessing the **susceptibility** of a receptor to the type of change, care should be taken to avoid overlap and double counting between **susceptibility** and **magnitude** (CDF.10 5940 pp.11 and 12).
- 5.21 So, following the methodology, the ALC should be seeking to assess the **susceptibility** of the Tranquillity Receptor's perception of tranquillity to an increase in the audibility and visibility of local roads as a result of off-site traffic increases resulting from the proposed development, and the **value** of the Tranquillity Receptor, to come to a view on the **sensitivity** of the Tranquillity Receptor to an increase in the audibility and visibility of local roads as a result of off-site traffic increases resulting from the proposed development.
- 5.22 The ALC should then be assessing the size/scale, duration, and reversibility of the audibility and visibility of local roads as a result of off-site traffic increases resulting from the proposed development in relation to a Tranquillity Receptor to assess the **magnitude** of the effect of the increase in audibility and visibility of local roads as a result of off-site traffic increases resulting from the proposed development.
- 5.23 The ALC should then be combining the assessed **sensitivity** of the Tranquillity Receptor with the assessed **magnitude** of the effect to assess the **significance** of the effect.

#### The ALC's assessment of value, susceptibility and sensitivity - a critical review

- 5.24 The ALC states that "all tranquillity receptors are contained within the Area of Outstanding Natural Beauty where tranquillity is a valued characteristic. **The receptor values are all assessed as high**. Their susceptibility to a change in their baseline tranquillity associated with an increase in traffic on local roads is considered. These two criteria (as defined in **Appendix 8.1**) are weighed up to draw a conclusion on the sensitivity of each tranquillity receptor" (CDA.83 8.492 p.88).
- 5.25 I would agree that the location of Tranquillity Receptors within the NL/AONB, a valued and designated Landscape which has the highest status of protection, should confer a **high value** on their experience of tranquillity as a perceptual aspect that contributes to, and is an acknowledged part of, the landscape and scenic beauty of the NL/AONB

(CDF.7 5.19 p.80, Box5.1 p.84, CDA. 83 8.492 p.88, CDD.5 1.8 p.7, 2.1 p.8, 8.1 p.4, 8.4 p.44, 15.1 p.115, 16.1 p.123).

- 5.26 **Residents at, and visitors to, Cranborne Village (TR1 RVs TR1a, b, c, d, e, f) -**The ALC concludes that residents of, and visitors to, Cranborne village would have a **low susceptibility** to change because the surrounding built environment already reduces any sense of wildness or remoteness when considered in the context of the wider NL/AONB and that, (when combined with their **high value**), this would result in the Tranquillity Receptors having **medium tranquillity sensitivity (CDA.83** 8.493 to 8.500 p.88, **CDA.84** TR1a, b, c, d, e, f).
- 5.27 I would challenge the idea that "*wildness or remoteness*" are necessary components of tranquillity. The GLVIA3 definition does not include these factors and while Landscape Institute guidance on the subject notes that "*tranquillity is commonly associated with* '*wildness*' and '*remoteness*" is also notes that "*tri is widely recognised that none of these terms is synonymous*" and that "*the benefit to people of the relative tranquillity in an urban greenspace can be very high despite the intrusion from background traffic noise or the presence of many people*". In comparing the near absolute tranquillity of wild and remote locations with urban settings it notes that what they have in common is "*the achievable state of mind rather than the environmental setting*" (CDF.7 p.158, CDF.8 2.9 and 2.11 pp.3 and 4).
- 5.28 I would also challenge the statement that "*the intermittent, yet regular, noise of cars reduces any sense of peace and calm in the context of the wider AONB.*" I visited Cranborne on the 08 and 09 of May 2024 and spent several hours in the village and its surroundings visiting the Tranquillity Receptor sites and Representative Viewpoints illustrated in appendix 8.7 (CDA.84).
- 5.29 I would agree with the characterisation of traffic within and through the village as intermittent, but I observed it to be irregular rather than regular in nature.
- 5.30 While I would agree that publicly accessible heritage features and their settings within the village such as Cranborne Churchyard, the formal parkland landscape associated with Cranborne Manor, and to a lesser extent the memorial green offer areas of reflection in which a sense of tranquillity may be attained, I also considered that a state of calm and quietude could be attained in publicly accessible locations that were not heritage features such as Cranborne Manor Garden Centre, the Sheaf of Arrows Public House beer garden, the allotments, the playing field, and public rights of way to the west and east of the village.
- 5.31 I would therefore challenge the notion that "the built-up area detracts from any true sense of tranquility". My overall impression, though subjective and based on limited experience, is that the village, as a whole, was relatively tranquil in nature and relative tranquility rather that absolute or 'true' tranquility is what is at issue (CDF.83 8.499 p.88).

- 5.32 I would therefore disagree with the ALC's characterisation of residents at, and visitors to, Cranborne Village as having a low susceptibility to change and would instead suggest that Tranquillity Receptors in this location would have a **high susceptibility** to change and therefore, taking their **high value** into account, a **high sensitivity** to factors which would affect relative tranquillity.
- 5.33 Walkers west of Cranborne Village (TR2 RV TR2) the ALC asserts that from the Hardy Way there are limited visual or audible detractors and that consequently there is a sense of calm, peace and appreciation of natural features. The ALC also notes that the baseline tranquillity map shows that tranquillity increases away from the roads and their traffic. The ALC concludes that walkers west of Cranborne village would have a high susceptibility to change and that, (when combined with its high value), this would result in Tranquillity Receptors having a corresponding high tranquillity sensitivity (CDA.83 8.501 to 8.503 pp.88 and 89, CDA.84 TR2).
- 5.34 While I would agree that "the mature landscape which forms the village's western edge" is a positive feature, on the day of my site visit the newly planted avenue of what appear to be Silver Lime trees (Tillia tomentosa) in the middle ground on the western side of View TR2, and the sporadic occurrence of what appear to be Purple Beech trees (Fagus sylvatica 'Purpurea') within the tree belts suggested a designed rather than a "*naturalistic*" landscape. I also considered that the intensely farmed fields did not significantly detract from my sense of tranquillity in this location (CDA.83 8.501 pp.88, CDA.84 TR2).
- 5.35 However, I would agree with the assessment of Tranquillity Receptors in this location as having a **high susceptibility** to change, and, taking their **high value** into account, a **high sensitivity** to factors which would affect relative tranquillity.
- 5.36 Walkers east of Cranborne Village (TR3 RV TR3) the ALC asserts that from the public footpath that heads east from the village (PRoW E38/1) there are various detractors in the view and Tranquillity Receptors are much more aware of their proximity to the settlement. The ALC argues that the high level of pedestrian traffic on the footpath detracts from any sense of remoteness, wildness, calm or peace. The ALC also noted the audibility and occasional visibility of the B3078 beyond the roadside hedgerows. The ALC asserts that, in the context of the wider NL/AONB, Tranquillity Receptors in this location are assessed as having a low susceptibility to change and that, (when combined with their high value), this would result in walkers east of Cranborne village having a medium tranquillity sensitivity (CDA.83 8.504 and 8.505 p.89, CDA.84 TR3).
- 5.37 Unlike the ALC, on the day of my site visit, there was no pedestrian traffic on the public footpath (E38/1). I would also note that the view from the same location but facing west rather than east is of the village and is decidedly more picturesque. Again, I would note that wildness and remoteness are not prerequisites for tranquillity. I would describe the traffic on the B3078 as irregular and mostly screened from view and I did not find it overly intrusive.

- 5.38 I would therefore disagree with the ALC's characterisation of walkers east of Cranborne village as having a low susceptibility to change and would instead suggest that Tranquillity Receptors in this location would have a **high susceptibility** to change, and, taking their **high value** into account, a **high sensitivity** to factors which would affect relative tranquillity.
- 5.39 Walkers at Castle Hill Wood (TR4 RVs TR4a, b, c) the ALC asserts that walkers are mostly confined to the bridleway within the woodland edge, and that the intermittent yet regular audibility and visibility of car traffic on the B3078 detracts from tranquillity but this is less noticeable within the woodland meaning that receptors are likely to have a **medium to low susceptibility** to the proposed change and that, (when combined with their **high value**), this would result in walkers at Castle Hill Wood having a corresponding **medium to high tranquillity sensitivity** (CDA.83 8.506 to 8.510 p.89, CDA.84 TR4a, b, c).
- 5.40 Contrary to the ALC's assertion, walkers are not "*mostly confined to the bridleway within the woodland edge*" as there is a permissive path within the woodland that allows access between Castle Hill Lane and the public footpath within the eastern portion of the wood (E38/18) and to the site of Cranborne Motte and Bailey Castle.
- 5.41 I would again characterise traffic flows on the B3078 during my visit as irregular rather than regular.
- 5.42 While framed views to the B3078 are possible from the byway (E38/17) these were mostly filtered or screened by the vegetation along its northern edge on the day of my site visit, though this may vary seasonally. Framed views were also possible from the Motte of the Castle but again these may be subject to seasonal variability.
- 5.43 On my visit I found the intermittent air traffic noise and fly tipping along the byway to be more detrimental to my sense of tranquillity.
- 5.44 While a sense of remoteness and, to a certain extent wildness, is most readily experienced within the woodland, the reduction or absence of a sense of remoteness on the woodland edge and the Motte of Cranborne Castle did not reduce my sense of tranquillity in these locations.
- 5.45 However, I would challenge the assertion that walkers at Castle Hill Wood would have a medium to low susceptibility to the proposed change. Any increase in traffic flows that elevated the audibility of traffic may attract the attention of the viewer and thereby make it more visually intrusive.
- 5.46 I would therefore disagree with the ALC's characterisation of walkers at Castle Hill Wood as having a medium to low susceptibility to change and would instead suggest that Tranquillity Receptors in this location would have a **high susceptibility** to change, and, taking their **high value** into account, a **high sensitivity** to factors which would affect relative tranquillity.

- 5.47 Visitors to the AONB near Edmondsham (TR5 RV TR5) the ALC asserts that there is a reduced sense of remoteness in this part of the AONB due to the large-scale open landscape in which a number of detractors are present. Consequently, Tranquillity Receptors are assessed as having a low susceptibility to the proposed change and that, (when combined with their high value), this would result in Visitors to the AONB near Edmondsham having a corresponding medium tranquillity sensitivity (CDA.83 8.511 and 8.512 p.89, CDA.84 TR5).
- 5.48 The choice of location for Representative View TR5, on a bend in the hedge-bordered country lane to the southwest of the village, is somewhat eccentric. The view illustrated was only possible through a field gateway on the day of my visit, though Google Street View does suggest that winter views may be more open in nature.
- 5.49 The large open arable field illustrated is not typical of the small pastoral fields and well wooded higher ground that border the village to its north and south. I consider that a location within the village itself or on the Public Rights of Way to is south (E39/7, E39/8) or east (E39/1) may have been more representative and therefore appropriate.
- 5.50 In contrast to the ALC, I found the location of Edmonsham in a secluded shallow valley surrounded by predominantly small pastoral fields and well wooded low hills, and only accessible by minor infrequently trafficked country lanes, gave it a sense of remoteness typical of the southern edge of the NL/AONB.
- 5.51 I would therefore disagree with the ALC's characterisation of visitors to the AONB near Edmondsham as having a low susceptibility to change and would instead suggest that Tranquillity Receptors in this location would have a **high susceptibility** to change, and, taking their **high value** into account, a **high sensitivity** to factors which would affect relative tranquillity.
- 5.52 Visitors to the AONB Dorset Downs (TR6 RVs 6a, b, c, d) the ALC asserts that both deciduous and coniferous woodland invoke a sense of calm, peace and connection to nature and that natural sounds are present and there is a strong sense of place. Consequently, Tranquillity Receptors in this location are likely to have a high susceptibility to change and that, (when combined with their high value), this would result in Visitors to the AONB Dorset Downs having a corresponding high tranquillity sensitivity (CDA.83 8.513 to 8.517 p.89, CDA.84 6a, b, c, d).
- 5.53 On the day of my visit, traffic on the roads between Cranborne, Tidpit and Damerham was very infrequent, sounds of nature were very prominent, and the dominant detractor from the general peace and tranquillity was the low and high-altitude air traffic noise that, though irregular, was frequent in occurrence.
- 5.54 I would therefore agree with the ALC assessment that visitors to the AONB Dorset Downs would have a **high susceptibility** to change, and, taking their **high value** into account, a **high sensitivity** to factors which would affect relative tranquillity.
- 5.55 Visitors to the AONB near Damerham (TR7 RVs 7a, b) The representative views in appendix 8.7 identify detractors such as intensive grazing, overhead lines, consistent

traffic noise, and occasional light aircraft noise. While this is not brought out in the text the ALC asserts that receptors are likely to have a **low susceptibility** to the proposed change and that, (when combined with the **high value**), this would result in Visitors to the AONB near Damerham having a **medium tranquillity sensitivity** (**CDA.83** 8.518 to 8.520 p.90, **CDA.84** 7a, b).

- 5.56 The annotated photograph for Representative View 7a in appendix 8.7 of the Consolidated ES notes a *"(distant consistent hum of traffic near Fordingbridge)*" which was not evident to me on the day of my site visit (CDA.84 7a).
- 5.57 While there was occasional noise disturbance from light aircraft, this only emphasised the absence of car traffic noise and indeed I was only passed by one car in the ten minutes I stood at the roadside (CDA.84 7a).
- 5.58 I did not find the telegraph poles and overhead lines overly intrusive or significantly detrimental to my sense of tranquillity at Representative Viewpoint 7b and would note that the telegraph poles and overhead lines in Representative Viewpoint 7a have not been identified as a detrimental feature in the representative Viewpoint photograph (CDA.84 7b, 7a).
- 5.59 I found both locations to be tranquil and I would therefore disagree with the ALC's characterisation of visitors to the AONB near Damerham as having a low susceptibility to change and would instead suggest that Tranquillity Receptors in this location would have a **high susceptibility** to change and, taking their **high value** into account, a **high sensitivity** to factors which would affect relative tranquillity.
- 5.60 Visitors to the AONB near Lopshill (TR8 RV 8) The text references representative views TR8a and 8b. However, appendix 8.7 only contains one Representative View 8. This shows a landscape with four positive factors and no negative factors noted (CDA.83 8.521 p.90, CDA.84 8).
- 5.61 The similarity of the text between paragraphs 8.518 and 8.521, the error outlined above, and the lack of negative factors noted on Representative View 8 suggest that the ALC's assertion that receptors are likely to have a **low susceptibility** to change may be a cut and paste error (CDA.83 8.521 to 8.523 p.90, CDA.84 8).
- 5.62 However, the ALC asserts that receptors are likely to have a **low susceptibility** to the proposed change and that, (when combined with their **high value**), this would result in Visitors to the AONB near Lopshill having a **medium tranquillity sensitivity** (CDA.83 8.521 to 8.523 p.90, CDA.84 8).
- 5.63 On the day of my site visit, one car passed in the time I spent at the site of Representative View 8, and once again occasional noise disturbance from light aircraft only emphasised the absence of car traffic noise and the dominance of natural sounds related to the birds and farm animals in the surrounding landscape.
- 5.64 I would therefore disagree with the ALC's characterisation of visitors to the AONB near Lopshill as having a low susceptibility to change and would instead suggest that

Tranquillity Receptors in this location would have a **high susceptibility** to change and, taking their **high value** into account, a **high sensitivity** to factors which would affect relative tranquillity.

Differences between the ALC's and my assessment of susceptibility and sensitivity

5.65 The differences between the ALC's assessment of the susceptibility and sensitivity of the eight Tranquillity Receptors and my assessment of the susceptibility and sensitivity of the eight Tranquillity Receptors are set out in Table 1 below.

Receptor	ALC My		ALC/My	ALC	Му
	assessment	assessment	assessment	assessment	assessment
	of	of	of	of	of
	Susceptibility	Susceptibility	Value	Sensitivity	Sensitivity
TR1	Low	High	High	Medium	High
TR2	High	High	High	High	High
TR3	Low	High	High	Medium	High
TR4	Medium to Low	High	High	Medium to High	High
TR5	Low	High	High	Medium	High
TR6	High	High	High	High	High
TR7	Low	High	High	Medium	High
TR8	Low	High	High	Medium	High

KEY

ALC/My assessment the same
ALC/My assessment differ by up to one category
ALC/My assessment differ by one category
ALC/My assessment differ by up to two categories
ALC/MY assessment differ by two categories

Table 1: Comparison of ALC and my assessment of susceptibility, value, and sensitivity

5.66 While I would agree that the eight Tranquillity Receptors have a **high value**, and that walkers west of Cranborne village (TR2) and visitors to the AONB Dorset Downs (TR6) would have a **high susceptibility** and a **high sensitivity** to an increase in the audibility and visibility of local roads as a result of off-site traffic increases resulting from the proposed development, my views on the susceptibility and sensitivity of the other Tranquillity Receptors differ from those of the ALC.

Reasons for the differences between the ALC's and my assessment

5.67 This may, in part, be the result of a general undervaluing of the susceptibility of Tranquillity Receptors on the part of the ALC. I would suggest that Tranquillity Receptors are analogous to visual receptors and that, with reference to GLVIA3, the Tranquillity Receptors most susceptible to change are likely to include:

- residents at home;
- residents and visitors who are engaged in outdoor recreation including the use of public rights of way and whose attention and interest is likely to be focused on enjoyment of landscape and scenic beauty of which tranquillity forms a perceptual aspect;
- visitors to heritage assets or to other attractions where the perception of tranquility is an important part of the experience;
- and communities where the perception of tranquillity contributes to the landscape setting enjoyed by residents of the area (CDF.7 6.33 p.113).
- 5.68 I would suggest that the Tranquillity Receptors listed in 5.13 above fit one or more of the above descriptions and that they are therefore likely to have a higher susceptibility to an increase in the audibility and visibility of local roads as a result of off-site traffic increases resulting from the proposed development than the ALC has proposed.
- 5.69 I also consider that there are differences in our assessments of the susceptibility and sensitivity of residents of, and visitors to, Cranborne village (TR1), walkers east of Cranborne village (TR3), walkers at Castle Hill Wood (TR4), and visitors to the NL/AONB near Edmondsham (TR5) to an increase in the audibility and visibility of local roads as a result of off-site traffic increases resulting from the proposed development. These result in part, from the ALC implying that wildness and/or remoteness are essential to attaining a sense of tranquillity. The ALC also implies that environmental factors which reduce or negate a sense of wildness and/or remoteness necessarily reduce a sense of tranquillity and therefore the susceptibility and thereby the sensitivity of these Tranquillity Receptors (CDA.83 8.500 p.88, 8.504 8.509 8.512 p.89).
- 5.70 As previously noted in paragraphs 5.5 and 5.6 above, guidance suggests that tranquillity should not be conflated with wildness and remoteness and while a sense of wildness and/or remoteness may add to a sense of tranquillity, their presence is not a prerequisite for attaining a sense of tranquillity nor does their absence or reduction necessarily reduce or negate a sense of tranquillity as I have argued in paragraphs 5.27, 5.37, 5.44 and 5.50 above (CDF.37 Table 1 p.10, CDF.8 2.9 to 2.11 pp. 3 and 4).
- 5.71 With reference to the text within the Consolidated ES and the annotated representative photographs in Appendix 8.7 I am unclear as to why a low susceptibility and a medium tranquillity sensitivity have been attributed to visitors to the AONB near Damerham (TR7) and Lopshill (TR8) (CDA.83 8.520 8.523 p.90).
- 5.72 In these two locations there seems to be an overreliance on baseline tranquillity mapping data from other assessments and also some disparity between the ALC's onsite assessment as summarised in the text and as illustrated in the annotated photographs especially in the case of Visitors to the AONB near Lopshill (TR8) (CDA.83 8.519 to 8.522 p.90, CDA.84 7a 7b 8).
- 5.73 However, I have set out my reasoning for why I consider that visitors to the NL/AONB near Damerham (TR7) and Lopshill (TR8) would have a high susceptibility and a high sensitivity to an increase in the audibility and visibility of local roads as a result of off-site traffic increases resulting from the proposed development in paragraphs 5.56 to 5.59 and 5.61, 5.63 and 5.64 above.
- 5.74 The annotated representative view photographs in appendix 8.7 of the Consolidated ES reference positive and negative visual factors and negative audible factors. However, apart from Viewpoint TR1a ("*Churchyard as quiet reflective space*") they fail to reference positive audible factors that add to tranquillity such as birdsong, natural sounds, peace and quiet, the absence of human sounds, and running water the presence of some or all of which I noted at or close to the locations of the majority of the Representative Viewpoints (**CDA.84** TR1a, TR1e TR1f TR2 TR3 TR4a TR4b TR4c TR5 6a 6b 6c 6d 7a 7b 8).
- 5.75 In addition, some of the annotated representative view photographs in appendix 8.7 note the same factor more than once (e.g.TR1b "*Overhead cables and poles*", TR6c "*Electricity Pylon*") (CDA.84 TR1b TR6c).
- 5.76 As I noted in paragraph 5.16 above there is also no weighting of factors, so that those which are noted as being significantly more important and which are allocated a higher weighting in other tranquillity assessment methodologies appear to have the same importance and weight with regard to their impact on tranquillity within the ALC's assessment (e.g. TR1b "cars passing through village (associated noise)", "Pub beer garden timber fence") (CDF.3, CDF.5, CDF.6, CDA.84 TR1b).
- 5.77 As a consequence, the higher frequency of negative factors noted on Representative Viewpoints TR1b, TR1c, TR1d, Tr1f, TR3, TR4a, TR5, 6d, and 7a appear to bias factors which detract from tranquillity either through repetition or the omission of factors which add to tranquillity and this conveys an impression of a lower level of existing relative tranquillity in these locations than appears to be the case in reality (CDA.84 TR1b TR1c TR1d Tr1f TR3 TR4a TR5 6d 7a).
- 5.78 I also consider that within the text in the Consolidated ES and the annotations of the Representative Photographs in appendix 8.7 there is an exaggeration and/or overemphasis on the negative impact of the following factors on baseline tranquility:
  - The frequency, and/or audibility, and/or visibility of car traffic (CDA.83 8.497 8498 p.88, 8.504 8.508 p.89, CDA.84 TR1b TR1c TR1f TR3 TR4a TR4b 6d 7a)
  - The frequency, and/or visibility of pedestrians (CDA.83 8.497 8.498 p.88, 8.504 p.89)
  - The effect of buildings and streetscapes (CDA.83 8.487 8.499 8.500 p.88, CDA.84 TR1b TR1c)
  - Intensively farmed/grazed fields (CDA.83 8.498 p.88, 8.511 p.89 CDA.84 TR2 TR3 TR5 6d 7a)

- Large scale farm buildings (CDA.83 8.498 p.88 CDA.84 TR3)
- Street lighting, barriers, bollards, telegraph poles, pylons, and overhead cables, footpath surfacing, fencing (CDA 83 8.498 CDA.84 TR1b TR1c TR1d TR1f TR3 TR5 6c 6d 7b)

#### The ALC's Assessment of Magnitude and Significance – a critical review

- 5.79 The ALC states that the submitted transport assessment provides detail on the anticipated off-site traffic increases associated with the proposed development. Within the Consolidated ES It is stated that the Annual Average Daily Trips (AADT) on the route from Batterley Drove to Cranborne would increase by 700 trips to circa 3,400 and that this would represent an 8% increase traffic flows along the B3078 towards Cranborne and that additional traffic will pass through Cranborne village (CDA.83 8.265 p.69).
- 5.80 It is also estimated that 0.25% of the 8,372 trips generated by the proposed development would continue across Cranborne Chase towards Shaftesbury and Gillingham along the B3081 and that this would amount to a total of circa 21 trips through Cranborne Chase during a daily period (CDA.83 8.266 p.69).
- 5.81 Unlike the assessment of the landscape and visual effects of the proposed development, the assessment does not appear to make direct reference to the magnitude of the impact of the audibility or visibility of increased traffic noise for each of the Tranquillity Receptor locations or Representative Viewpoints but instead assumes a worst case scenario of the completed development with reference to the Assessment of Road Traffic Noise contained in appendix 8.8 of the Consolidated ES (CDA.83 8.254, 8.257, 8.261, 8.267 and Table 8.1 pp.68 to 70, 8.290, 8.300, 8.310, 8.323, 8.334, 8.348, 8.360, 8.368, 8.379, 8.388, 8.399, 8.411, 8.420, 8.429, 8.437, pp.71 to 80, 8.526 p.90, CDA.85).
- 5.82 The ALC asserts that "the only potential effects on tranquillity resulting from these traffic increases will be acoustic once the site is complete and fully occupied" (CDA.83 8.526 p.90).
- 5.83 I would challenge this assertion. The ALC has acknowledged that tranquillity is related to 'what you can see' and 'what you can hear' so the visual effects as well as the acoustic effects of an increase in traffic flows on local roads as a result of off-site traffic increases should be considered (CDA.83 8.477 p.86, 8.488 and 8.491 p.87, CDA.84).
- 5.84 Having made this assertion, the ALC then somewhat contradictorily addresses the issue of 'what you can see' and asserts that "All tranquillity receptors affect by the traffic increases already have views of the local roads and their traffic. Their perception of any wildness, peace or tranquillity is already affected by manmade elements such as the existing road network and low aircraft traffic. Any changes in the views toward existing roads and their traffic will not change the existing level of any perceived tranquillity" (CDA.83 8.530 p.90).

- 5.85 I would challenge this assertion. Quite apart from the fact that it conflates wildness and tranquillity (see paragraphs 5.5 and 5.6 above) it implies that what is at issue is absolute rather than relative tranquillity. What is in fact at issue is relative rather than absolute tranquillity (see paragraphs 4.4 and 4.5 above) and the impact of the audibility and visibility of local roads as a result of off-site traffic increases resulting from the proposed development. Therefore, to imply that because Tranquillity Receptors already have views of local roads and their traffic, any changes in these views as a consequence of an increase in vehicle numbers and the frequency of passing vehicles will not change the existing level of any perceived tranquillity is clearly fallacious.
- 5.86 I would also suggest that 'what you can hear' is not only dependent on changes in road traffic noise but also the increase in vehicle numbers and the frequency of passing vehicles.
- 5.87 The ALC states that "For the purposes of understanding the worst case scenario we have assumed year 1 and year 15 changes in noise levels to be as per the plan entitled '2033 Forecast vs 2033 Development' which considers a completed and occupied scheme" (CDA.83 8.526 p.90)
- 5.88 The Assessment of Road Traffic Noise dated November 2023 does not appear to include a plan entitled '2033 Forecast vs 2033 Development' so it is assumed that the ALC means the plans entitled 'Figure 2.5 Noise Level Change 2027 / 2033 Long Term' and 'Figure 2.7 Noise Effects 2027 / 2033 Long Term' (CDA.85)
- 5.89 With reference to the Consolidated ES text the sensitivity, change at year 1 and 15 (Magnitude), and effects at year 1 and 15 (Significance), of the change in noise levels of additional traffic resulting from the proposed development on Tranquillity Receptors (TRs) as assessed by the ALC are summarised in **Table 2** below (**CDA.83** 8.492, 8.500, 8.503, 8.505, 8.510, 8.517, 8.520, 8.523, 8.530 pp.88 to 90 and Table 8.4 p.91).
- 5.90 Though the terminology related to the significance of effects in year 1 and year 15 does not adhere to that given in Appendix 8.1 of the Consolidated ES it is assumed that by 'Slight Adverse' the ALC means 'Minor Adverse'; by 'Negligible to Slight Adverse' the ALC means 'Negligible to Minor Adverse'; and that by 'Negligible Adverse' the ALC means 'Negligible/Neutral' (CDA.22 Tables A8.3.1 and A8.3.2).
- 5.91 The ALC's conclusion "that any effects on tranquillity receptors within the AONB will be minor or negligible and the significance of these effects will not exceed slight" only considers the changes in noise levels between the 2027 forecast and the 2033 development, it does not consider the changes in traffic flows between the 2027 forecast and the 2033 development or the consequent impact an increase in traffic flows would have on the audibility and visibility of local roads as a result of off-site traffic increases resulting from the proposed development (CDA.83 8.530 p.90).
- 5.92 Furthermore, I would note that the assessment of traffic noise in appendix 8.8 appears to be based on Average Annualised Weekday Traffic (AAWT) data for 15 'link' sections of road only two of which are located within the NL/AONB (B3078 south of Cranborne

and B3078 south of Verwood) although presumably traffic on the B3078 between Cranborne and Batterly Drove will pass through Cranborne village and the NL/AONB and a proportion of traffic on the Sandleheath Road will pass thorough the NL/AONB.

Receptor	Susceptibility	Value	Sensitivity	Change at	Effects at
				Year 1 and 15	Year 1 and 15
				(Magnitude)	(Significance)
TR1	Low	High	Medium	Negligible to	Negligible to
				low	Slight Adverse
TR2	High	High	High	Negligible to	Negligible to
				low	Slight Adverse
TR3	Low	High	Medium	Low	Negligible
					Adverse
TR4	Med/Low	High	Med/High	Low	Negligible to
					Slight adverse
TR5	Low	High	Medium	Low	Negligible
					Adverse
TR6	High	High	High	Low	Slight Adverse
TR7	Low	High	Medium	Low	Negligible
					Adverse
TR8	Low	High	Medium	Low	Negligible
					Adverse

**Table 2:** Summary of ALC's Tranquillity Assessment

- 5.93 Since the submission of the Consolidated ES and appendix 8.8, traffic forecast data has been revised and a technical note which seeks to determine if there would be a significant change to the reported conclusions noise assessment has been submitted. It found that "the results of the noise assessment based on the revised traffic forecast data is unchanged from the previous assessment on all road links except for Hillbury Road (north) and Ringwood Road" (CDA.83, CDA.85, CDA.135 4.1 p.4).
- 5.94 However, the traffic figures submitted by the appellant are based on a disputed methodology and may therefore be higher than the Transport Assessment would suggest. The methodology used to derive the daily figures is also disputed.
- 5.95 Furthermore, the figures provided are based on the study area within the appellant's submitted Transport Assessment which is focused on roads and junctions close to the site, or to its south, and therefore there is little information regarding the distribution of vehicles throughout the NL/AONB (CDA.85, CDA.135).
- 5.96 The Council's Transport Consultant has therefore provided information relating to three routes which either run into or through the NL/AONB. Estimates of the percentage

increase in traffic are given in **Tables 3** and **4**. The Location of these routes is shown on **Figure 13**.

5.97 It is the Council's Transport Consultant's view that in all three cases the development would result in a material increase in daily traffic volumes whether the increase is measured in terms of percentage increase or absolute numbers.

				2027		2033		2033	%
	Link	2022	2027	+ Dev	2033	+ CD	Dev	+ Dev	increase
	B3028 S of								24.4%
Α	Cranborne	3106	3150	3340	3213	3213	785	3998	24.4%
	B3078 S of								13.8%
В	Verwood	8074	8849	9199	8448	8448	1170	9618	13.0 /0
	Sandleheath								48.1%
С	Road	2323	2356	2701	2403	2403	1155	3558	40.170

Baseline data is 2022 and some collected since 2019

Peak data not available for all links (as some based on work by others/DfT)

2027 + Dev means plus 500 dwellings (First Phase)

CD = Committed development

AAWT = Annual Average Weekday Traffic (5 day 18hr)

Table 3: Annua	I Average Week	day Traffic (AA	AWT) for selected routes
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	Link	2022	2027	2027 + Dev	2033	2033 + CD	Dev	2033 + Dev	% increase
	B3028 S of								24.4%
Α	Cranborne	2959	3001	3182	3061	3061	748	3809	24.4%
	B3078 S of								13.9%
В	Verwood	7692	8430	8764	8048	8048	1116	9164	13.9%
	Sandleheath								48.1%
С	Road	2213	2244	2573	2289	2289	1100	3389	40.1%

Baseline data is 2022 and some collected since 2019 Peak data not available for all links (as some based on work by others/DfT) 2027 + Dev means plus 500 dwellings (First Phase) CD = Committed development AADT = Annual Average Daily Traffic (7day 24hr)

**Table 4:** Annual Average Daily Traffic (AADT) for selected routes



Figure 13: Location of routes assessed for increase in AAWT and AADT

- 5.98 For the reasons I have outline above in paragraphs 5.83 and 5.86 it seems reasonable to suggest that the material increase in annual average weekday traffic volumes would result in a perceptible increase in the visibility as well as the audibility of traffic on roads within the NL/AONB. So, contrary to the assertions of the ALC, the significance of the effect on the perception of tranquillity by Tranquillity Receptors within the AONB may range from **moderate to major adverse** rather than not exceeding **slight adverse** (CDA.83 8.530 p.90).
- 5.99 It should also be noted that these figures relate to traffic movements for all purposes including journeys to work, education, and recreational activity. The Council's Transport Consultant is unable to extrapolate, from the information provided, the proportion of vehicle trips that may be related to recreational activity within the NL/AONB.

The assessment of additional recreational activity within the Consolidated ES

5.100 As noted in paragraph 5.10 it is asserted that the areas of open space and the proposed SANG will mitigate the recreational pressures on the AONB resulting from the development. However, as far as I am aware no evidence has been submitted to support this statement (CDA.83 Table 1.1 p.7 and 8.258 p.68).

- 5.101 The Walking, Cycling and Horse-Riding Assessment and Review does not include footpath connections from Alderholt to the AONB within its scope (CDA.21 Figure 3 p.8).
- 5.102 A 2005 Visitor Survey, a 2008 Dorset Household survey, a 2019 Visitor Survey, and a 2022 Visitor Count on the bridleway to Cranborne Common (E34/10) have been used to estimate potential changes in recreational pressure on Cranborne Common. However, a similar exercise does not appear to have been undertaken for the potential changes in recreational pressure of the proposed development on the NL/AONB nor, as far as I am aware, is there any assessment of what effect such additional recreational pressure would have on the tranquillity of the NL/AONB (CDA.30 8.1 to 8.31 pp. 38 to 43).
- 5.103 In the absence of any assessment data related to the footpath network leading from the settlement into the NL/AONB, and car or public transport facilitated visits to recreational footpaths and tourist attractions within the NL/AONB it is not possible to draw definite conclusions on the significance of the adverse effects of increased recreational activity within the NL/AONB associated with the proposed development or whether the proposed SANG would mitigate these adverse effects.

Additional recreational activity and Large Visitor Facilities - a sense check

- 5.104 However, in the absence of any data, and in order get some sense of the potential magnitude and thereby significance of the additional recreational activity that may be brought into the NL/AONB as a consequence of the proposed development, I have undertaken a very basic scoping exercise.
- 5.105 Assuming an increase in population size of 4,000 and, as a benchmark, the annual average frequency of my own visits to Kingston Lacy of, on average, five visits per annum I have assumed a figure of 20,000 additional visits per annum related to the proposed development.
- 5.106 With reference to the Association of Leading Visitor Attractions (ALVA) figures in Table 5 below for three large visitor attractions within the NL/AONB an additional 20,000 visits would not present a significant uplift in visitor numbers for 2023 or significantly exceed pre-pandemic levels of visitor numbers (alva.org.uk <u>ALVA | Association of Leading Visitor Attractions</u>).

Attraction	2018	<mark>2019</mark>	2020	2021	2022	<mark>2023</mark>
Stourhead	393,779	<mark>392,929</mark>	259,936	320,521	375,197	<mark>376,253</mark>
Longleat	904,714	<mark>1,011,314</mark>	495,037	727,800	814,263	<mark>800,056</mark>
Kingston	353,653	<mark>410,812</mark>	263,303	297,312	360,388	<mark>391,969</mark>
Lacy						

**Table 5:** ALVA figures for three large visitor attractions within the NL/AONB (pre andpost pandemic figures <a href="https://www.highlighted">https://www.highlighted</a>)

- 5.107 It seems unlikely therefore that the large visitor attractions and their infrastructure would be unable to cope with additional recreational visits generated by the proposed development, or that they would have a significant impact on the relative tranquillity experienced by Tranquillity Receptors in these locations, provided of course that my assumptions about the number of additional recreational visits are correct.
- 5.108 However, as noted in paragraph 5.99 above the Council's Transport Consultant is unable to extrapolate, from the information provided, the proportion of vehicle trips that may be related to recreational activity within the NL/AONB and it may be that the effect on smaller visitor attractions with lesser annual visitor figures and more limited facilities and car parking may be more significant.

Additional recreational activity on PRoWs within the NL/AONB – a sense check

- 5.109 It is approximately 2.5km from the site to the NL/AONB by the quickest route along PRoWs to the southern edge of the NL/AONB a round trip of 5km. The general recommendation of 10,000 steps a day equates to a 8km walk, of which 3km would therefore take place within the NL/AONB boundary.
- 5.110 Within the Ecology and Habitat Sites proof of evidence, estimates for visits from the 1,700 proposed dwellings of between 37 number (2008 Dorset Household Survey), and 206 number (2019 Visitor Survey), give an estimate of total visits per year, per household related to heathland of between 62,900 and 350,200 total visits per year. (CDG.6)
- 5.111 Assuming a similar level of visits on foot to the AONB, and that the visits are evenly distributed over 365 days, there would be between 172 and 959 visits per day.
- 5.112 The NL/AONB covers an area of 983km<sup>2</sup> and contains over 1,500km of PRoWs. Assuming people accessing the NL/AONB on foot don't get beyond the A354 before heading home, and assuming that it is a quarter of the area, and that it contains a quarter of the PRoWs, it would give an area of 245km<sup>2</sup> and a length of 375km of PRoWs.
- 5.113 Assuming a figure of 1000 visits per day, and assuming they all took place at the same time and were evenly distributed, that would be an additional 4 people per km2 or an additional person every 375m (roughly the length of three and a half football pitches).
- 5.114 Obviously, visits would not take place at the same time and walkers are unlikely to be evenly distributed both temporally and seasonally. In addition, it seems reasonable to assume that the SANG will provide an alternative that may both reduce recreational pressure from the proposed development and from the existing settlement.
- 5.115 As a consequence, I consider it unlikely that additional recreational pressure on the NL/AONB from people accessing the PRoWs within the NL/AONB from the proposed development on foot would be of sufficient magnitude to have a significant impact on the relative tranquillity of Tranquillity Receptors on PRoWs within the AONB. This is

provided, of course, that my assumptions about the number of additional recreational visits to PRoWs within the NL/AONB are correct.

5.116 However, as noted in paragraph 5.99 above, the Council's Transport Consultant is unable to extrapolate, from the information provided, the proportion of vehicle trips that may be related to recreational activity within the NL/AONB and it may be that the effect of ad hoc car parking by people driving into the NL/AONB before taking a walk may be more significant.

# 6. SUMMARY AND CONCLUSION

## Policy context

- 6.1 It is clear from the Cranborne Chase Partnership Plan that the high levels of tranquility within the NL/AONB are considered to be an important element of the natural beauty of the NL/AONB and are a significant part of what makes the area special.
- 6.2 Tranquillity is therefore a key element of the valued landscape of the NL/AONB which needs to be protected and enhanced in a manner commensurate with its identified quality. It is also a key element of the landscape and scenic beauty of the NL/AONB which needs to be conserved and enhanced.
- 6.3 The Principal Landscape and Planning Officer for the NL/AONB has noted the revised duty in s.85(A1) of CRoW Act 2000 as amended by the Levelling Up and Regeneration Act 2023 that relevant authorities "*must seek to further the purposes of designation*" of the NL/AONB and that those purposes include conserving and enhancing natural beauty and thereby tranquillity. [my emphasis in *bold*]
- 6.4 Local and National policy is clear that development within the setting of an NL/AONB needs to be sensitively located and designed to avoid or minimise adverse effects on the designated areas, that tranquil areas must be identified and protected, and that planning decisions must prevent new development from contributing to unacceptable levels of noise pollution and visitor pressure.

Additional traffic and recreational activity

- 6.5 It is a matter of common ground that the proposed development would generate additional traffic and recreational activity that would impact on the NL/AONB via the B3078 and its connections to the wider road network within the AONB, the footpath network leading from the settlement into the NL/AONB, and by car or public transport facilitated visits to recreational footpaths and tourist attractions within the NL/AONB.
- 6.6 It therefore seems reasonable to suggest that a development of 1,700 dwellings that would, on completion, increase the population of Alderholt by approximately 4,080, would be likely to result in an increase in traffic and recreational activity within the NL/AONB associated with the residents of the new development when compared with that of the current population of Alderholt.

## Tranquillity guidance and assessment

- 6.7 While there is no objective guidance on the subject of tranquillity, or a consistent application of approach to its assessment, it is clear that assessment at the national and local level has evolved. This commenced with GIS models which relied solely on expert opinion and factors which detract from tranquillity, to GIS models which involved active consultation with the general public to establish factors which both add to and detract from tranquillity and their relative importance. Later models include different stakeholder groups to identify commonalities and differences between them.
- 6.8 The evidence suggests that assessments should include an element of participatory appraisal, ideally from different stakeholder groups, the assessment of factors which have both a positive and negative impact on tranquillity, and the weighting of these factors related to the public perception of their relative importance. Assessments should also avoid being solely reliant on expert opinion and the assessment of negative factors.

## The assessment of additional traffic impact on tranquillity within the Consolidated ES

- 6.9 The overview of national and local tranquillity assessments establishes that a range of methodologies exist which meet these criteria to a greater or lesser degree. The NL/AONB Tranquillity Mapping ground truthing methodology includes the systematic recording and weighting of factors which contribute to and detract from the perception of relative tranquillity derived from the CPRE tranquillity mapping methodology. Given its simple survey methodology it might have been the easiest of the methods reviewed to utilise.
- 6.10 However, the assessment of tranquillity within the Consolidated ES, while referencing past methodologies, opts to adapt the standard methodology for landscape and visual impact assessment set out in GLVIA3. The method relies on the expert judgement of a landscape professional regarding the susceptibility of Tranquillity Receptors at one or more publicly accessible viewpoints adjacent to a selected locality. The Consolidated ES includes an annotated photograph from each Representative Viewpoint on which factors that add to or detract from tranquillity in that location have been noted, and a brief textual discussion of the locality and the factors that add to or detract from tranquillity in that location have been sensitivity of Tranquillity in that location, followed by the assessor's view on the likely sensitivity of Tranquillity Receptors in that location.
- 6.11 This approach relies on expert opinion; fails to involve the active participation of the general public, local people and stakeholder groups; fails to include the systematic scoring of factors which add to or detract from tranquillity derived from such active participation; and fails to weight these factors in terms of their relative importance.
- 6.12 While I would agree that the eight Tranquillity Receptors identified in the assessment have a high value, and that walkers west of Cranborne village (TR2) and visitors to the AONB Dorset Downs (TR6) would have a high susceptibility and a high sensitivity to an increase in the audibility and visibility of local roads as a result of off-site traffic

increases resulting from the proposed development, my views on the susceptibility and sensitivity of the other Tranquillity Receptors differ from those of the ALC.

- 6.13 This may, in part, be the result of a general undervaluing of the susceptibility of Tranquillity Receptors on the part of the ALC.
- 6.14 I also consider that the differences in our assessments of the susceptibility and sensitivity of residents of, and visitors to, Cranborne village (TR1), walkers east of Cranborne village (TR3), walkers at Castle Hill Wood (TR4), and visitors to the NL/AONB near Edmondsham (TR5) result in part, from the ALC implying that wildness and/or remoteness are essential to attaining a sense of tranquillity. The ALC also implies that environmental factors which reduce or negate a sense of wildness and/or remoteness necessarily reduce a sense of tranquillity and therefore the susceptibility and thereby the sensitivity of these Tranquillity Receptors.
- 6.15 Guidance suggests that tranquillity should not be conflated with wildness and remoteness and while a sense of wildness and/or remoteness may add to a sense of tranquillity, their presence is not a prerequisite for attaining a sense of tranquillity nor does their absence or reduction necessarily reduce or negate a sense of tranquillity.
- 6.16 I am unclear as to why a low susceptibility and a medium tranquillity sensitivity have been attributed to visitors to the AONB near Damerham (TR7) and Lopshill (TR8). In these two locations there seems to be an overreliance on baseline tranquillity mapping data from other assessments and also some disparity between the ALC's onsite assessment as summarised in the text and as illustrated in the annotated photographs especially in the case of visitors to the AONB near Lopshill (TR8).
- 6.17 The annotated representative view photographs in appendix 8.7 also appear to have an inherent bias through the omission of positive audible factors and/or the repetition of negative visual factors.
- 6.18 There is also no weighting of factors, so that those which are noted as being significantly more important and which are allocated a higher weighting in other tranquillity assessment methodologies appear to have the same importance and weight with regard to their impact on tranquillity within the ALC's assessment.
- 6.19 As a consequence, the higher frequency of negative factors noted on Representative Viewpoints TR1b, TR1c, TR1d, Tr1f, TR3, TR4a, TR5, 6d, and 7a appear to bias factors which detract from tranquillity, either through repetition, or the omission of factors which add to tranquillity. This conveys an impression of a lower level of existing relative tranquillity in these locations than appears to be the case in reality.
- 6.20 I also consider that within the text in the Consolidated ES and the annotations of the Representative Photographs in appendix 8.7 there is an exaggeration and/or overemphasis on the negative impact of the following factors on baseline tranquility:
  - The frequency, and/or audibility, and/or visibility of vehicles

- The frequency, and/or visibility of pedestrians
- The effect of buildings and streetscapes
- Intensively farmed/grazed fields
- Large scale farm buildings
- Street lighting, barriers, bollards, telegraph poles, pylons, and overhead cables, footpath surfacing, fencing
- 6.21 The use of the noise assessment data to imply a low magnitude of change to all locations, even in locations where Tranquillity Receptors are judged to be of high sensitivity, fails to take into account that the perception of tranquillity is not only dependent on what can be heard but also what can be seen.
- 6.22 I would also suggest that 'what you can hear' is not only dependent on changes in road traffic noise but also the increase in vehicle numbers and the frequency of passing vehicles.
- 6.23 The traffic figures submitted by the appellant are based on a disputed methodology and may therefore be higher than the Transport Assessment would suggest. The methodology used to derive the daily figures is also disputed.
- 6.24 Furthermore, the figures provided are based on the study area within the appellant's submitted Transport Assessment which is focused on roads and junctions close to the site, or to its south, and therefore there is little information regarding the distribution of vehicles throughout the NL/AONB.
- 6.25 The Council's Transport Consultant has provided information relating to three routes which either run into or through the NL/AONB.
- 6.26 It is the Council's Transport Consultant's view that in all three cases the development would result in a material increase in daily traffic volumes whether the increase is measured in terms of percentage increase or absolute numbers.
- 6.27 It seems reasonable to suggest that the material increase in annual average weekday traffic volumes would result in a perceptible increase in the visibility as well as the audibility of traffic on roads within the NL/AONB. So, contrary to the assertions of the ALC, the significance of the effect on the perception of tranquillity by Tranquillity Receptors within the AONB may range from **moderate to major adverse** rather than **not exceeding slight adverse**.

#### The assessment of additional recreational activity within the Consolidated ES

6.28 It is asserted within the consolidated ES that the areas of open space and the proposed SANG will mitigate the recreational pressures on the AONB resulting from the development. However, as far as I am aware no evidence has been submitted to support this statement.

- 6.29 Visitor Survey data has been used to estimate potential changes in recreational pressure on Cranborne Common. However, a similar exercise does not appear to have been undertaken for the potential changes in recreational pressure of the proposed development on the NL/AONB nor is there any assessment of what effect such additional recreational pressure would have on the tranquillity of the NL/AONB.
- 6.30 In the absence of any assessment data related to the footpath network leading from the settlement into the NL/AONB, and car or public transport facilitated visits to recreational footpaths and tourist attractions within the NL/AONB, it is not possible to draw conclusions on the significance of the adverse effects of increased recreational activity within the NL/AONB associated with the proposed development or whether the proposed SANG would mitigate these adverse effects.
- 6.31 However, in order get some sense of the potential magnitude and thereby significance of the additional recreational activity that may be brought into the NL/AONB as a consequence of the proposed development, I have undertaken a very basic scoping exercise.
- 6.32 My conclusion, following this scoping exercise, is that it seems unlikely that the large visitor attractions and their infrastructure would be unable to cope with additional recreational visits generated by the proposed development or that there would be a significant impact on the relative tranquillity experienced by Tranquillity Receptors in these locations. Provided of course, that my assumptions about the number of additional recreational visits are correct.
- 6.33 However, it may be that the effect on smaller visitor attractions with lesser annual visitor figures and more limited facilities and car parking may be more significant.
- 6.34 I also consider it unlikely that additional recreational pressure on the NL/AONB from people accessing the PRoWs within the ANONB from the proposed development on foot would be of sufficient magnitude to have a significant impact on the relative tranquillity of Tranquillity Receptors on PRoWs within the AONB. Provided of course, that my assumptions about the number of additional recreational visits to PRoWs within the NL/AONB are correct.
- 6.35 However, it may be that the effect of ad hoc car parking by people driving into the NL/AONB before taking a walk may be more significant.

## Conclusion

- 6.36 The loss of tranquillity within the NL/AONB as a consequence of additional traffic and recreational activity that would result from the proposed development has not been adequately identified. In the absence of its adequate identification and assessment, the Council cannot be certain that any adverse impacts on the tranquillity of the NL/AONB and thereby its landscape and scenic beauty have been adequately mitigated.
- 6.37 The ALC's conclusion "that any effects on tranquillity receptors within the AONB will be minor or negligible and the significance of these effects will not exceed slight" only

considers the changes in noise levels between the 2027 forecast and the 2033 development. It does not consider the changes in traffic flows between the 2027 forecast and the 2033 development or the consequent impact an increase in traffic flows would have on the audibility and visibility of local roads.

- 6.38 It is the Council's Transport Consultant's view that the development would result in a material increase in daily traffic volumes whether the increase is measured in terms of percentage increase or absolute numbers.
- 6.39 I consider that the significance of the material increase in daily traffic volumes on the perception of tranquillity by Tranquillity Receptors within the AONB may range from **moderate to major adverse** and that this would be contrary to local plan Policy HE3 and NPPF paragraphs 180, 182 and 191.
- 6.40 However, it seems unlikely that the large visitor attractions and their infrastructure would be unable to cope with additional recreational visits generated by the proposed development or that such visits would have a significant impact on the relative tranquility experienced by Tranquillity Receptors in these locations.
- 6.41 I also consider it unlikely that additional recreational pressure on the NL/AONB from people accessing the PRoWs within the NL/AONB from the proposed development on foot would be of sufficient magnitude to have a significant impact on the relative tranquillity of Tranquillity Receptors on PRoWs within the NL/AONB.
- 6.42 On consideration, it also seems reasonable to assume that the SANG would provide an attractive alternative that would be likely to mitigate, at least in part, if not in whole, additional recreational activity from the proposed development on the NL/AONB.