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ENVIRONMENTAL STATEMENT IN SUPPORT OF PLANNING APPLICATION

BY

HeliOperations

FOR

Erection of a Building for the servicing and maintenance of helicopters and additional facilities incidental to an existing heliport use

AT

Osprey Quay, Portland

PREPARED BY

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1.0 Introduction

- 1.1 The following Environmental Statement is prepared in support of planning application WP/20/00467/OUT which proposes to erect a building for the servicing and maintenance of helicopters and additional facilities incidental to an existing heliport use.
- 1.2 Dorset Council issued an EIA scoping opinion dated 05/01/2021 setting out the matters for which additional information was required.
- 1.3 Dorset Council issued a positive EIA screening opinion on 12th October 2020 where it identified what it considered to be the likely environmental impacts as being: -
- Disturbance impact from increased noise and flights
 - Drainage into Portland Harbour Shore SSSI
 - Recreational pressure on the Chesil and the Fleet SSSI
 - Potential effects on Portland Castle historic fabric and setting including views to and from the Castle and the effect of noise, dust and vibration on the experience of the site
- 1.4 The Applicants therefore submitted a scoping request to ascertain what particular information was required in respect of those particular matters.
- 1.5 The reason for the scoping request was because, the likely impacts identified in the screening response were potential impacts primarily as a direct consequence of additional helicopter flights on sensitive areas. The Applicants have been quite clear throughout the application process that there are no additional helicopter flights over and above the normal operational activity of the heliport as a consequence of the proposals and further that any flights that do already take place do not go near or impact upon the sensitive areas identified in accordance with and controlled by other legislation relating to aviation.

- 1.6 The scoping opinion is clear that the Environmental Statement should focus on the main or significant environmental affects to which the development is likely to give rise. The scope of the Environmental Statement should therefore need only address the consultation responses from Natural England and Historic England arising from 'increased' flights (and flightpaths) arising from the proposed development. As mentioned throughout the existing flights are not limited or restricted and the number of flights associated with the proposed building in this context is negligible.
- 1.7 The scoping opinion does set out a list of requirements which may be included within the Environmental Statement however many of these are not relevant to the main or significant environmental effects. Indeed, as set out below and within the Environmental Statement there are no main or significant environmental effects from the development. This is something which is acknowledged by the Environment Agency.
- 1.8 The relevant information required by the scoping opinion is information which has already been submitted as part of the application and is referenced as such within the Environmental Statement.
- 1.9 The scoping opinion is clear that the information provided must be relevant to a proposed development and environmental features likely to be significantly affected. Again, the screening opinion primarily sets out the likely significant impacts as being as a result of additional helicopter flights near the sensitive sites.
- 1.10 The Environmental Statement sets out why there are no significant impacts and a discussion and further information is provided where relevant in respect of the other identified impacts.
- 1.11 The main or significant environmental affects for the proposed development are set out within the scoping response to include: -
- Heritage (particularly regarding impact from additional flights or Portland Castle)
 - Ecology (particularly regarding impact from additional flights on sites of European or Internal importance);

- Flood risk

1.12 The scoping response repeats a section from the EIA regulations which provides guidance as to what should be included within an Environmental Statement and then a specific section in respect of responses from Historic England, Natural England and the Environment Agency. As standard the Applicants need only respond to these specific issues.

2.0 Agency Responses

2.1 The Scoping Opinion includes responses from the Environment Agency, Natural England and Historic England. The main areas of concern are set out within the main Council response with further information and requirements set out in an annexe. Much of the information required within the annexe is not relevant. For example, Natural England set out a whole list of information which is a standard list which is not relevant to the proposals. Natural England set out their main concerns within the body of the letter as being whether or not the development is willing to comply with the interim strategy for mitigating recreational impacts on the Chesil and the Fleet and also whether or not there is any disturbance impact from flights or any water quality issues. The Applicants will respond to each of these in detail but do not for example have to go into detail on bio-diversity and geology of the wider area because these impacts are not relevant.

2.2 The Environment Agency state, within their letter dated 24/12/20 and appended to the scoping opinion: -

'We do not believe that the scope of these works is likely to impact on a sensitive area that falls within the EA remit'.

2.3 The EA remit is a wide ranging and includes flooding and coastal change, land contamination, environmental risk, protected sites and species, ground water and wildlife and habitat conservation.

- 2.4 The EA state that the erection of the building and the use are not likely to impact. As discussed further above, information is only required in relation to likely impacts.
- 2.5 Indeed, the screening opinion originally issued does note that the site is not within an environmentally sensitive location. It is an industrial building on an industrial estate.
- 2.6 The EA continue by providing details of information they consider should be provided within the planning submission (as opposed to within an Environmental Statement), i.e. the planning application without the need for an Environmental Statement.
- 2.7 The EA state they require information on: -
- Flood risk – already provided with no EA objection
 - Impact on protected species – there is no impact
 - Construction environmental management plan, including pollution prevention measures and water management

Natural England

- 2.8 The Natural England letter dated 16/12/20 provides a host of requirements within Annexe A. This however is a repeat of published list of information requirements rather than specific information relevant to the development.
- 2.9 Again, it is noted above that the scoping opinion only requires the information relevant to the likely significant impacts of the development. The information requested is set out within the main body of the scoping opinion from the Council and includes: -

Impact from student accommodation

Impacts from additional flights

Drainage strategy

- 2.10 The above information has already been provided but again is set out in detail below. It is not necessary to undertake a full habitats survey of the site or indeed the surrounding area. The site is an industrial site completely covered in hardstanding with no habitat offer at all which would be affected by the proposal.
- 2.11 The Environmental Statement therefore considers the information under the three headings set out above which are considered to be relevant and does not consider any other information to be relevant.

Historic England

- 2.12 The Historic England response refers to concerns relating to the direct effects of flying upon the historic fabric of the Castle and the setting of the Castle including views to and from the Castle and the effects of noise, dust and vibration on the experience of the site.
- 2.13 Historic England set out that they would expect the Applicants to examine the potential impacts upon any designated heritage assets and their settings that are likely to be affected.
- 2.14 The Council will be aware that a full heritage statement of significance and impact was submitted with the planning application which did assess all potential impacts and demonstrated that there was no significant detrimental impacts.
- 2.15 A response is provided below in relation to these issues.

3.0 Environmental Statement

- 3.1 The scoping opinion sets out a list of requirements for the Environmental Statement including the requirement to provide a description of the development, the site, the surrounding area and other such information. These

matters are referenced A to F within the scoping opinion and are the responses provided below against the relevant heading.

A – Description of the proposed development

- 3.2 The development comprises the erection of a steel framed building externally clad to be used for the servicing and maintenance of helicopters and to provide additional training and operational facilities incidental to the heliport use.
- 3.3 The site location is the existing heliport, Coode Way, Portland, Dorset.
- 3.4 The details of the proposals are set out in the comprehensive suite of documents submitted with the planning application including the full set of plans and the statement prepared both by Architects and by Planning Consultants. These documents provide full details of the siting, size, design and other relevant features of the development.
- 3.5 The Applicants have made it clear that the purpose of the building is primarily as an engineering, maintenance and repair workshop.
- 3.6 The lawful use of the site is that of a fully functioning and operational heliport and SARS training facility. The use and number of flights or helicopters that can attend the site or fly from the site at any given time is unrestricted and does not require planning permission. The helicopters currently operate from the existing hangar and that will continue.
- 3.7 The proposed building will be used for the long term servicing, maintenance and repair of helicopters in service as and when required and the dismantling or harvesting of those no longer in service.
- 3.8 The servicing and maintenance involves a regular and complete strip of the machines with rotors taken off and engines removed. The process can take up to 6 months. In that time the helicopter will be stationed within the engineering building and will not be moved and will be unable to fly. When servicing is completed the helicopter will move to a new base. Or the helicopter will swap places with one of the other operational helicopters which will then

enter into its period of servicing. The operational helicopters require ongoing service and maintenance and when one helicopter is undergoing an in depth service another takes its place to operate when required.

- 3.9 The operation also includes dismantling helicopters which are no longer in service and these will come into and the parts taken away by way of road.
- 3.10 The number of helicopter flights associated with the new building will be negligible. Helicopters requiring servicing or maintenance/repair may be brought to the site by road and taken away by road. They may however fly to the site. Bearing in mind that a routine service period is between 3 and 6 months and the hangar can only accept 3 helicopters maximum at a time, the number of potential additional flights over a 12 month period, assuming all helicopters being serviced fly to and from the site would be an extremely small number.
- 3.11 Each bay can accept 1 helicopter for a minimum of 3 months which equals 4 helicopters per bay per year which over 3 bays is 12 helicopters per year with 2 flights each which would be the equivalent of 24 helicopter flights per year. However, as mentioned the helicopters being serviced will be rotated with other operational helicopters from the site.
- 3.12 The above calculation is assuming that all bays are being used and that all helicopters are being serviced in the shortest timeframe possible and fly to and from the site.
- 3.13 In reality at least one of the bays will be used for dismantling/harvesting. The majority of the parts from a helicopter are expensive and can be reused and so this is an important part of the operation. Furthermore, helicopters require regular deep servicing which is a complete rebuild which takes a minimum of 6 months and so a single bay will be taken up for this period of time without any resultant helicopter flights.
- 3.14 Currently helicopters owned by the company are serviced elsewhere and they fly to and from the place where they are being serviced and replaced by

another helicopter which undertakes the training and day to day operational requirements of the heliport. The proposals will mean that helicopters can be serviced on site rather than having to fly to another location. The helicopters can be moved from the operational hangar to the maintenance hangar on site without having to fly. The helicopter once serviced can then be rotated with another in the operational hangar again with no need to fly.

3.15 It is for this reason that there are no additional flights and thus no impact from additional flights. Even if there were more flights, these are irregular, infrequent and will not have any discernible impact over and above the current operation.

3.16 The number of helicopter flights is negligible over a 12 month period.

3.17 However the main point is that in and among the regular frequent flights associated with the operational heliport there will be no discernible impact and no impact different to or in excess of the existing operation.

B – Description of likely significant flights on environment

3.18 There are no likely significant effects of the proposed development on the environment in respect of the disturbance impacts from flights.

3.19 The engineering operations are all internal to the building and do not cause noise, dust, vibrations, odour or any other nuisance outside of the building. The working environment is clean for obvious reasons and the work conditions and requirements do not generate noise that will be audible outside of the building or site.

3.20 There are no effects of the actual building on the environment. Heritage impact is discussed further below.

3.21 Essentially the proposals are to erect a building similar to many other buildings in the designated and established industrial estate which will be used for the servicing of helicopters associated with the existing use and there will be no impact from the use over and above the existing use.

- 3.22 There will be no likely significant affects from the building and the operations within the building.
- 3.23 There will be no likely significant impacts from the infrequent helicopter flights that may be directly associated with the building. However, the flights are associated with the wider existing use.
- 3.24 Each flight which currently takes place is specifically recorded with flight monitoring equipment and there is a regulatory requirement on the operators to submit this information and to ensure that there are no flights near sensitive and protected sites or areas. This is a matter of fact and law; the use is already heavily regulated.
- 3.25 The runway associated with the heliport is in a fixed position and indeed has been in a similar position since the second world war. The operators are not introducing new activities or impacts into this area but simply continuing with activities that have been taking place from the site and within the area for a significant period of time.
- 3.26 There are no likely significant impacts of the proposed development on the environment in terms of construction of the building, the use of the building or from helicopter flights.
- 3.27 The EA acknowledged that there are no significant impacts. A flood risk assessment has been submitted and the EA have no objections.
- 3.28 Natural England have requested a drainage strategy which has been provided but again is attached to the Environment Statement for the sake of completeness. The drainage strategy shows that there are no likely significant impacts on the adjoining area.
- 3.29 Natural England have also raised the issue of students attending the site and particular impacts from visitors to Chesil Beach.

- 3.30 Again, as previously set out the proposals will not increase the number of students attending the site or the area but will be accommodating them within the site.
- 3.31 Notwithstanding this point, the Applicants are aware of a recent planning approval for 29 dwellings under reference WP/14/00921/OUT on the site of the former Ferrybridge Inn, Portland Road, Weymouth. The application was in respect of residential properties in closer proximity to Chesil Beach which would have a significantly greater impact on the SPA than the proposed accommodation.
- 3.32 The development was permitted subject to contributions being made towards ongoing warden activities undertaken from the Chesil Beach visitor centre. There have been other permissions for residential development in the immediate vicinity.
- 3.33 The Applicants are aware that there is lesser impact from tourism accommodation than there is from residential and contributions are charged proportionally as resolved. In the current case the accommodation is provided for student pilots who, unlike tourists, will be fully engaged in their training activities and will have little time for visiting the surrounding area.
- 3.34 However, the Applicants are aware of the precautionary approach and the tests of an appropriate assessment. On this point, the Applicants cannot say with absolute certainty that any person connected with the development will not walk on Chesil Beach. There is no certainty whether this would be more or less than would take place with the existing use and students living off site. However, the Applicants will commit to contributions towards either the warden activities on Chesil Beach or as suggested by NE, will comply with the interim strategy for mitigating recreational impacts on the Chesil and the Fleet suite of designated sites.
- 3.35 The provision of this mitigation means that there will be no likely impacts on the environmentally sensitive areas.

- 3.36 The NE concerns therefore set out within the body of the scoping opinion are dealt with. There will be no disturbance from flights, water quality is assured and contributions will be made towards mitigation of any likely impacts on Chesil Beach.
- 3.37 As set out the Applicants do not consider that there will be any likely significant impacts from the building or operation of the site.
- 3.38 The heritage issues raised by Historic England relate to impact on setting and effects from helicopter flights on the physical fabric of Portland Castle.
- 3.39 The heritage matters raised in respect of impact on setting and experience of assets are matters dealt with through the planning process with regard to the relevant legislation, the Development Plan and National Planning Policy contained within the Framework.
- 3.40 An Expert Heritage Statement has been submitted which demonstrates that there are no unacceptable visual impacts on the setting of the various heritage assets. The weight to attach to the Historic England representation is a matter for the Council in the context of consideration of the Applicants Heritage Statement and their own conclusions.
- 3.41 There is no evidence of any direct impact from helicopter flights on Portland Castles physical fabric. There is of course no increase in flights against an environmental baseline of no flight restrictions from a fully operational heliport.

C – Description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment

- 3.42 The only likely adverse impact is the potential for persons to visit the nearby Chesil Beach. The Applicants have advised that this can be mitigated through the contribution set out in the interim strategy.
- 3.43 Adherence to the recommendations set out in other technical reports dealing with drainage and other related matters will ensure there are no environmental

effects. These matters will be controlled in the normal way by the imposition of conditions.

D – Description of the reasonable alternatives studied by the Developer

- 3.44 There are no alternative positions on the site for the building due to the configuration of the site, the position of the existing buildings, the position of the runway, the position of site specific flood defences and the positions of the swale that serves the runway.
- 3.45 For operational reasons the building has to be sited as close to the existing hangar as possible and within the area that is subject to the specific flood defences. The building is sited in the most logical position in the context of operational requirements but also in visual terms being set within a group of similar size buildings. The building cannot be located any closer to the existing hangar because to do so would restrict access to that hangar.
- 3.46 The Applicants have considered all possibilities for the siting of their building including extending onto the existing building and the proposed location is the only and best option. There are no impacts on the environment in any event.

E – Non technical summary

- 3.47 The main issues raised by NE and HE are in respect of likely impacts from increased flights.
- 3.48 This consideration however should be against the baseline environmental position of unlimited flights within an unrestricted heliport with neither flights nor flight paths being limited or controlled from a planning perspective. Flights and flight paths are of course controlled through other aviation legislation.
- 3.49 Notwithstanding this point, the Environmental Statement demonstrates that the purposes of the proposal is to facilitate servicing, maintenance, repair and dismantling with negligible associated flights which will be negligible in impact and indiscernible over the baseline environmental position of the fully operational heliport.

- 3.50 The HE concerns over setting are a matter of planning judgement.
- 3.51 There is no noise or other nuisance associated with activities which will take place inside the building which will affect the experience of visiting Portland Castle or any other heritage setting or asset. Indeed, any noise within the building is unlikely to be heard outside the building and certainly not outside the site.
- 3.52 A drainage strategy is provided which shows that there is no impact.
- 3.53 Visitor pressure on Chesil Beach is mitigated by way of contribution.

F – Any additional information specified in Schedule 4

- 3.54 There is no additional information required.

4.0 Summary and Conclusions

- 4.1 To conclude there are no increased impacts as a consequence of the proposals in view of the existing environmental baseline and due to the nature of the proposed building and activities in any event.