

## Eight ♦ Portobello pumping station: introduction

### THE PROPOSED DEVELOPMENT IN OVERVIEW

8.1 Southern Water's planning application includes provision for a new pumping station at Portobello, an existing operational site set into the cliffs between Saltdean in the west and Telscombe Cliffs to the east.

8.2 Wastewater arriving at Portobello via the coastal flow transfer tunnel from the west will need to be pumped to a higher-level tunnel for onward transfer to the Peacehaven wastewater treatment works. This is the purpose of the proposed pumping station, which would comprise:

- a main vertical shaft, approximately 32 metres deep and 17.5 metres in internal diameter;
- a service building that would be set substantially into the ground beside an existing site access ramp;
- two vertical shafts, approximately 27 metres and 14.5 metres in depth and each six metres in diameter for the recovery of tunnel boring machines;
- a temporary construction compound of approximately 2,470 square metres in area.

8.3 The roof of the building would typically project 0.5 metres above the existing ground level when viewed from the north and will be covered in grass. The walls of the exposed south and eastern elevations of the pumping station would be finished in fairfaced concrete blockwork. Being set back from the coastline, the pumping station site lies outside of the Black Rock to Newhaven Site of Special Scientific Interest.

### SITE-SPECIFIC DEVELOPMENT PLAN POLICY

8.4 The design of the proposed pumping station has had regard to relevant development plan policy. The manner in which the project responds to general policies, as set out in the regional spatial strategy, the East Sussex and Brighton & Hove structure plan and the East Sussex and Brighton & Hove waste local plan is described in chapter three of this document. In terms of site-specific policies, the following 'saved' policies of the adopted Lewes District Local Plan 2003 remain applicable to the site and its immediate surroundings.

#### Countryside policies and the AONB

8.5 The pumping station site lies, close to, but outside, the 'planning boundary' for Telscombe Cliffs on the proposals map of the Lewes District Local Plan adopted in 2003, to which the following policy applies.

**CT1 Planning Boundary and Key Countryside Policy**

**Development will be contained within the planning boundaries as shown on the proposals map. Planning permission will not be granted for development outside the planning boundaries, other than for that specifically referred to in other chapters of the plan or listed below . . .**

- i). proposals which feature in an adopted minerals or waste disposal local plan;**
- j). provision for essential/service facilities to meet community or environmental needs for which a rural location is required . . .**

**The retention of the open character of the countryside is of heightened importance where it separates settlements and prevents their coalescence. Development referred to above may not be acceptable where its scale would significantly erode the gap between settlements and detract from their separate identities.**

8.6 Wastewater pumping stations are essential service facilities that meet community or environmental needs and often require a rural location. The need for enhanced wastewater treatment standards in the Brighton and Hove drainage catchment is acknowledged explicitly in policy WLP30A of the adopted waste local plan (see appendix II). Southern Water recognised that, by setting the pumping station largely underground with a green roof, it should not significantly erode the gap between Saltdean and Telscombe Cliffs. For all these reasons it is concluded that the pumping station would not conflict with saved policy CT1 of the adopted Lewes District Local Plan provided a suitable surface-level design solution is adopted.

8.7 The Portobello headworks, including the pumping station site, lies within the Sussex Downs AONB, which extends from downland to the north to the cliff edge in the south, across a corridor of land that includes Telscombe Tye. The following saved policy of the adopted Lewes District Local Plan is applicable to development in the Sussex Downs AONB.

**CT2 Landscape Conservation and Enhancement**

**In order to ensure the continued protection of the landscape and character of the Sussex Downs Area of Outstanding Natural Beauty (AONB) planning permission will only be granted where proposals:**

- (a) respect the natural beauty of the Downland area in terms of siting, use, form, layout, design and materials;**
- (b) complement, and are consistent with, the quiet informal enjoyment of the area by the public and**
- (c) respect the distinctive qualities of the AONB.**

**Opportunities will be taken, wherever possible, to enhance the landscape character of the AONB and secure long term positive management measures.**

**Major development would be incompatible with the protection of the character of the AONB. Only a demonstrable national need and lack of alternative sites could justify any exception.**

8.8 The most distinctive quality of this part of the AONB is the open view from Telscombe Tye across open downland to the sea. Again, Southern Water concluded that the development would best respect this distinctive quality if it was set into the ground and finished with a green roof. In any event, the pumping station site lies within an existing operational site beside a major road.

8.9 The quiet informal recreation features used by the public within the vicinity of the pumping station site include the Telscombe Tye area of grassland to the north with its sea views and numerous footpaths; the Badger's Watch pub and beer garden immediately to the east and a footpath along the eastern boundary of the headworks, which leads to the foot of the cliffs. The pumping station design should not detract from the quiet informal enjoyment of these neighbouring amenity areas.

8.10 For these reasons it is concluded that the pumping station proposal would be consistent with the requirements of saved policy CT2 if suitably designed.

### **The future of the Sussex Downs AONB**

8.11 The area between A259 and the clifftop near Telscombe Tye, incorporating the Portobello headworks and the pumping station site, was originally excluded from the proposed South Downs national park boundary. The Countryside Agency, since merged with English Nature to form Natural England, did not include the area in the national park because it did not consider that it met the qualifying criteria. Objectors suggested that the area should be included in order to form a corridor of the national park connecting the Downs to the sea. In response, the shore, cliffs and clifftop to the west of Southern Water's Portobello site are now proposed for inclusion in the South Downs national park. The Portobello site remains outside the draft park boundary, being an area that does not meet the statutory criteria for national park designation.

8.12 Natural England proposes that, once the final national park boundary is announced, the Sussex Downs AONB will be de-designated and the AONB status of the headworks would thus cease to exist. There are no policies in the adopted local plan that relate to development proposals near a proposed national park.

### **Design**

8.13 Saved policy ST3 of the adopted Lewes District Local Plan (overleaf) concerns the design, form and setting of development.

**ST3 Design, Form and Setting of Development**

**Development requiring planning permission will be expected to comply with the following criteria, and be supported by justification statements where necessary:**

- (a) development should respect the overall scale, height, massing, alignment, site coverage, density, landscaping, character, rhythm and layout of neighbouring buildings and the local area more generally;**
- (b) materials should be of a quality, type, colour and design which is appropriate to the character of the local area;**
- (c) development, including conversion, should respect the amenities of adjoining properties in terms of noise, privacy, natural daylight, and visual amenities and smell;**
- (d) development should not result in detriment to the character or the amenities of the area through increased traffic levels, congestion or hazards, noise levels and other environmental considerations;**
- (e) access circulation and parking to the development shall be provided in accordance with the policies in the Transport and Communications chapter. The site should be capable of accommodating the required parking provision without detriment to the visual amenities of the area through over intensive parking in a prominent position;**
- (f) development should not result in the loss of significant buildings, public views or spaces between and around buildings, or trees or other landscape features which make an important contribution to the character of the area;**
- (g) the design of hard and soft landscaping in spaces around buildings should enhance and complement new development where appropriate and should maximise wildlife potential by the use of native species and appropriate design in accordance with policies ST11 and ST12;**
- (h) development should consider the enclosure of spaces around buildings and should be designed to take account of overlooking, microclimate and the function of such spaces;**
- (i) in exposed locations, such as seafronts, materials used in new development will normally be required which have been demonstrated to be durable in comparable conditions and which complement locally used materials;**
- (j) development should seek to maximise the efficient use of energy, resources and materials through the influence of factors such as design, housing type, orientation, location and construction methods.**

8.14 As will be shown, the pumping station design responds to the applicable criteria in the policy. For example, it satisfies criteria (d) and (f) because the building would be set below the ground to ensure that it respects local amenity and avoids the loss of significant public views in the area.

## Listed buildings

8.15 The Badger's Watch Public House which occupies a clifftop location immediately to the east of the pumping station site is a grade II listed building. A single window on the western façade of the building affords a view across the pumping station site. More open views of the site can be gained from the pub garden at the rear of the building.

8.16 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special regard should be had to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses when considering applications for planning permission.

8.17 The following saved policy in the adopted Lewes District Local Plan is applicable.

### **H2 Listed Buildings**

**Consent will not be granted for any proposal which:**

**(a) involves the demolition of a listed building....**

**(b) would adversely affect the architectural or historic character of a listed building, its internal or external features of special architectural or historic interest, or its setting**

8.18 The pumping station would be visible in views to the west from the Badger's Watch pub and garden. However, as explained in chapter six of the *Environmental Statement* that accompanies Southern Water's planning application, the pumping station would represent only a modest change in the wider vista, which already includes the existing headworks site, adjacent twentieth century housing, the A259 and, further afield, suburban Saltdean.

8.19 The design of the pumping station can respond to policy H2 by avoiding any significant adverse effects on the setting of the listed building. By building the pumping station into the ground with a green roof, the setting of the Badger's Watch would not be affected adversely by the development in views from the A259 corridor and Telscombe Tye. As such, the pumping station proposals would not conflict with saved policy H2.

## PUMPING STATION SITE OPTIONS

8.20 The *Site Selection Report*, which is appended to the *Environmental Statement* and updated in the *Site selection review and update* report, explains the relationship between the selection of a site for a wastewater treatment works, and the identification of a route for the associated flow transfer infrastructure – the tunnels, tunnel shafts and pumping stations that would convey wastewater from a connection point with the existing sewerage network to the treatment works, and transfer treated wastewater effluent out to sea for final disposal.

8.21 Selection of a wastewater treatment works site at Peacehaven created a

requirement for a pumping station in the general vicinity of Southern Water's existing headworks at Portobello. Having regard to policy considerations including those identified in the preceding section and, in particular, the current AONB status of the area between Saltdean and Telscombe Cliffs, Southern Water considered five potential locations for siting the pumping station. These are shown in figure 8.1, and were as follows:

- Telscombe Tye
- Telscombe Cliffs county primary school playing fields
- Chatsworth Park
- Land to the east of the Portobello site, adjacent to Telscombe Grange
- The existing Portobello headworks site

8.22 The assessment embraced planning, environmental and engineering considerations, and the conclusions of the study were as follows.

- i). Whilst a pumping station at Telscombe Grange would be located outside the AONB and therefore reduce the long term impacts on the nationally designated landscape, it would increase the area of built development in an open clifftop landscape and would result in the loss of land which is currently open to public recreation.
- ii). No direct effect on the Badger's Watch listed building would arise from the construction of a pumping station at either Telscombe Grange or at the Portobello headworks site. Neither option was considered to affect significantly the setting of this building. However, the temporary and permanent effects of development of a pumping station at Telscombe Grange would be likely to be greater than for a pumping station at the existing Portobello headworks, given the increased area over which construction activity would be required and the introduction of built development into an area of currently undeveloped land.
- iii). Similarly, a pumping station at Telscombe Grange would result in a greater area of potential for archaeological effects and habitat loss.
- iv). The Telscombe Grange location is in close proximity to a number of sensitive receptors, including residential properties to the north of the A259 and at Telscombe Grange to the south east, commercial premises on the A259 and the Badger's Watch and Telscombe Tavern pubs to the west and east respectively. A pumping station at this location would exert more significant adverse visual effects than a comparable development located at Portobello headworks.
- v). The closer proximity of a pumping station at Telscombe Grange to sensitive receptors would require consideration in terms of the location of the access route and perceived effects on air quality and noise arising from lorry movements at this location. Nevertheless, there are not likely to be any significant effects in relation to noise, vibration, air quality or traffic resulting from the construction and operation of a pumping station at either

this location or at the existing Portobello headworks.

8.23 Overall, it was concluded that the construction of a pumping station at the existing Portobello headworks site would represent the best practicable environmental option. It would occupy an existing operational site to which there is no public access. It could be served by an existing site access from the public highway. Significantly, the falling terrain facilitates a design solution in which the building could be set into the ground and thus substantially concealed in many local views.

8.24 This choice of site and design approach was considered at the public inquiry into East Sussex County Council's non-determination of Southern Water's previous planning application for the project. Paragraph 32 of the appeal decision letter advised that:

*The Secretaries of State agree with the Inspector that, while the construction of the proposed Portobello pumping station would have a moderate adverse landscape and minor/moderate adverse visual effects, the operational effects would be neutral or minor, and that the impacts would be limited. They agree with the Inspector that the removal of the electricity sub-station would not be reasonable or justified.*

## CONCLUSIONS

8.25 In the light of its review of site options and relevant planning policy, Southern Water concluded that the design of a pumping station at Portobello would need to be sensitive to the following site-specific considerations.

- i). **Landscape and visual effects** – including the appearance of the development in views from Telscombe Tye to the north, residential areas on the edges of Saltdean and Telscombe Cliffs to the west and east, from the neighbouring Badger's Watch pub and from other publicly-accessible areas along the clifftop. As noted, the site lies within an AONB.
- ii). **Heritage** – the design should take into account the effects of development on the setting of, and views towards, the Badger's Watch pub, a statutory grade II listed building.
- iii). **Ecology** – the cliffs and foreshore are notified as a geological Site of Special Scientific Interest. It is important to avoid harm to the designated area.
- iv). **Local amenity** – given the presence of residential areas and amenity land in the vicinity of its Portobello headworks site, it was considered important to ensure that the pumping station design can incorporate appropriate measures to contain odour and noise whilst responding to the other design cues identified.