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**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**PORTLAND PORT, CASTLETOWN, PORTLAND DT5 1PP
Application No. WP/20/00692/DCC; Appeal Ref: APP/D1265/W/23/3327692)**

Thank you for your email of 11 September 2023 requesting our support with regards to the appeal to be heard at public inquiry. Due to limited resources we feel Historic England's support is best provided through a statement to Dorset Council summarising the advice given for the planning case.

Historic England raised concerns regarding the application on heritage grounds. Our concerns relate to the scale and massing of the waste recycling centre including the dominance of an 80m high stack that would visually compete with the Verne Citadel and be a dominant feature within the setting of several heritage assets within the area.

The historic and architectural interest of these heritage assets forms part of their significance as does the relationship and group value of these assets. Together they contribute to the understanding of Portland as an important strategic military site.

- *The Verne Citadel* (National Heritage List Entry No 1002411)
- *Battery 200 yards east of Naval cemetery* (National Heritage List Entry No 1002412) the battery is also Grade II listed (National Heritage List Entry No 1281863).
- *Battery approximately 160m NE of East Weares Camp* (National Heritage List Entry No 1447946)
- *East Weare Camp* (National Heritage List Entry No 1205814)
- *Battery approximately 80m SE of East Weares Camp* (National Heritage List Entry No 1444030)
- *East Weare rifle range* (National Heritage List Entry No 1428958)
- *The inner and outer breakwater including the coaling shed, storehouse jetty, coaling jetty, inner breakwater fort and outer breakwater fort* (NHLE 12005991)
- *Dockyard Offices* (National Heritage List Entry No 1428958)
- *Portland Castle* (NHLE 1015326, 1205262)
- *Captains House* (National Heritage List Entry No 1280817)

As a group these assets have associative value and therefore there is a particular sensitivity where the imposition of a large new development in this area would diminish their defensive context and bring a degree of harm. The batteries and rifle ranges were designed to have clear views out across Weymouth bay. These views are fundamental to their significance.

The scheme also has the potential to impact on the Outstanding Universal Value of the Dorset and East Devon Coast World Heritage Site. Known as the “Jurassic Coast” the World Heritage site was inscribed by UNESCO’s World Heritage Committee for its outstanding combination of globally significant geological and geomorphological features. The cliff exposures along the Dorset and East Devon coast provide an almost continuous sequence of rock formations spanning the Mesozoic Era, or some 185 million years of the earth's history. The area's important fossil sites and classic coastal geomorphologic features have contributed to the study of earth sciences for over 300 years. <https://whc.unesco.org/en/list/1029/>

The proposal for the energy recycling facility has the potential to impact negatively on the setting of the globally significant geological and geomorphological features. We agree with the Jurassic Coast Trust’s view that the proposed development would negatively impact the Outstanding Universal Value of the World Heritage Site as a result of development within its setting. We also refer you to the IUCN Technical Review report.

A programme of works to conserve and secure the long term future of the batteries, provide public access and interpretation could be considered a heritage benefit, but this benefit is unlikely to offset the harm to this large group of nationally significant heritage assets that would result from this proposal.

We also remain unconvinced that this could not be achieved by other means and several specialist interest groups have expressed an interest in becoming more involved in the upkeep of these significant historic sites.

Some of the monuments and buildings affected are heritage assets of the very highest significance, and NPPF paragraph 200 advises that the more important the asset, the greater the weight that should be given to its conservation. The NPPF defines “conservation” as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

cc Helen Skinner
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