



Landscape Response

30/10/2020

Proposal: Portland Energy Recovery Facility (ERF)

Application Number: WP/20/00692/DCC

Location: Land at Portland Port, Castletown.

By email

Dear Jerry Smith

Thank you for consulting me on the proposal to construct an energy recovery facility with ancillary buildings and works including administrative facilities, gatehouse and weighbridge, parking and circulation areas, cable routes to ship berths and existing off-site electrical sub-station, with site access through Portland Port from Castletown.

1. Site Location

The Energy Recovery Facility (ERF) is proposed in Portland port, Castletown and is approx. 600m east of Fortuneswell. The proposal is in the Dorset Limestone Peninsula Landscape Character Type and the Man Made Harbour Seascape Character Assessment.

2. Landscape & Environmental Designations in proximity to the proposal

- The closest section of the Dorset Heritage Coast is approximately 1.6km west of the proposed ERF.
- The closest section of the Dorset and East Devon Coast - UNESCO World Heritage site is approximately 1.6km to the boundary.
- The Dorset Area of Outstanding Natural Beauty (AONB) is approximately 7.5km from the proposed ERF.
- The Ridge and Vale is the closest AONB landscape character type to the proposed ERF.
- The Isle of Portland to Studland Cliffs Special Area of Conservation (SAC) - DT/A015 is approximately 130 metres south west of the proposed ERF.
- The Isle of Portland site of special scientific interest (SSSI) – SY67/002 is approximately 130 metres south west of the proposed ERF.

3. Limestone Peninsula key characteristics

- A dramatic and distinctive wedge-shaped limestone peninsula at the end of Chesil Beach with prominent cliffs.
- A unique coastal landmark with sweeping views along the coast.
- The pale grey Portland limestone rock dominates the natural and built landscape.
- Exposed, windswept and rocky landscape.
- Quarrying and military activity has and continues to significantly impact on the islands character.
- Little tree cover and a historic pattern of small fields separated by low stonewalls.
- A disjointed, untidy and neglected feel.
- An open skyline dominated by manmade structures and features.
- Many key nature conservation sites of importance.
- Portland Bill and the lighthouse are key landscape features.

4. Key land management guidance notes

- Conserve and enhance local stonewalls particularly around ancient field boundaries.
- Promote the islands industrial heritage.
- Conserve and enhance the biodiversity and landscape value of limestone grasslands and in quarry restoration schemes.
- Tree planting is not a desired management objective in this windswept coastal landscape.
- Prevention of spread of non-indigenous scrub like cotoneaster is a priority, while rotational scrub management of native species is desirable.
- Promote existing and future grazing initiatives as a way of controlling scrub and increasing biodiversity interest.
- Maintain the sensitive skyline from inappropriate development by ensuring any new development is sited off the skyline when viewed from key locations such rights of way.
- Conserve and enhance the rugged and rocky character of Portland by limiting the desire to 'tidy up' the landscape.
- Manage and control the impact of quarry spoil heaps and industrial buildings, in particular by controlling their heights, profiles and colour.
- Maintain the open character of the cliff tops e.g. by limiting the amount size and position of development and by considered zoning and/or identifying key cliff top character area.
- Encourage and promote a strategic approach to landscape restoration e.g. to link up future open spaces and/or habitats.

5. Building treatment and materials

The use of both a profiled metal cladding and printed PVC mesh is an architectural solution which will help break up the building mass which is very large. I do have 2 reservations over the use of PVC mesh.

- a. Durability of the PVC mesh.
- b. The main concern with the building treatment is the use of a 'printed image of the green wall to replicate the vegetation and tones.'

The photomontages show a snapshot of the vegetation taken of the backdrop. There will be a slight colour variation with the vegetation through the seasons and depending on the weather and intensity of light.

There needs to be more information on the printed mesh image as it seems like a theoretical idea with Little explanation as to the methodology of how this photo will be taken and how it will work through the seasons. The mesh may not look as recessive

during other points of the year. The slightest tone change during the seasons may reveal the buildings mass and form.

6. Landscape Proposal

I agree with the proposed landscape strategy and design. Shingle, boulders and gabions filled with local stone and coastal/marine themed planting will fit in with the Limestone Peninsula local character.

7. Plume Visibility

The visual impact and the effects on the landscape character associated with the plume is potentially the most problematic.

In the pre-app advice, it was asked that the emissions from the stack are represented in the photomontages which they do not.

The photomontages should represent a worst-case scenario of the visual impacts. With the plume not being included in the photomontages I would suggest they are not a fully accurate representation.

The Fichtner report on the plume visibility modelling results located in the in the technical appendices J Part 4 of the Environmental Statement shows on an average year the percentage of hours with a visible plume is 0.6%. Using the 2018 meteorological data when the 'Beast from the East' occurred, the maximum percentage of hours with any visible plume was 1.5%. These results include 20 – 200metre visible plume.

The Fichtner report explains how the 'model used for the detailed modelling of process emission includes a function to model when the plume is visible, based on the water content of the plume'. What is not apparent is if that model considers the coastal location with its dynamic weather conditions or if the results are based off a generic algorithm?

In the Landscape, seascape & visual effects of the Environmental Statement the plume is described in many of the selected viewpoints as a minor impact. For instance, in section 9.139 of the LVIA Viewpoint 9 the Visual Effects at Completion are noted as 'likely to only produce a very minor alteration to the view for a very limited number of hours.' The eventuality the plume will be visible only for a limited time is understood, but I question if when the plume is visible that it will only have minor landscape and visual impacts.

8. LVIA assessment

Chapter 9 of the Environmental Statement - The landscape, seascape and visual effects has an extensive description for each viewpoint and findings of the analysis. Many landscape and visual effects are noted as slight & not significant with only a couple described as moderate & significant with medium adverse magnitude of effects. For the purpose of this section I have selected 3 viewpoints to examine which could be considered as being the most sensitive areas for potential visual impacts and changes to landscape character.

a. Viewpoint 2, Figure 9.19 – Taken from public right of way S3/81.

This viewpoint is important to examine as it is the closest public right of way to the proposed ERF. The footpath is on an elevated position facing east overlooking Portland

Port. As noted in the LVIA the attention of the view is 'likely to be on the landscape' experienced by 'visitors of the footpath'. As the footpath is not a national footpath and therefore is not considered to have a high number of visual receptors, I agree with the assessment that the view has a medium sensitivity. The proposed ERF will be partially screened by the landform and scrub vegetation. The character of this part of Portland has an industrial character with the port and industrial units visible.

There will be a cumulative landscape and visual effect with the proposed ERF and industrial units. There is also a concern for inter-project cumulative effects with other proposed industrial units in this area. An assessment of these in relation to the proposed ERF would have been useful to address these concerns.

Magnitude of the effect on the view has been described as medium adverse with the Significance of the visual effects as moderate & significant.

I agree with these findings but would have liked to have seen a study on the inter-project cumulative effects as these may have had a greater adverse effect on the landscape and visual effects. Again including the plume will change these results to an adverse landscape and visual impact, if only for a limited time.

- b. Viewpoint 8 & Photomontage viewpoint 8, Figure 9.25 & 9.32 – Taken from Ferry Bridge by Fishermans Quay.

This view is considered one of this most sensitive and was highlighted on the ZTV analysis in the pre-application advice due to its proximity to the Dorset heritage coast and proposed ERF.

The view acts as a gate way view when crossing the causeway. The main concern with this location is how the proposed ERF would affect the character of Portland's 'distinctive wedge-shaped limestone peninsula'.

The conclusion in the LVIA of the magnitude of effect is negligible adverse and the significance of the visual effects are negligible & not significant.

I agree with this conclusion to a point. Sight lines of the users of the causeway will not be drawn to the ERF proposal but instead view the ERF, Fortuneswell and dominating presence of the limestone peninsula sequentially.

As explained in my response on the visibility of the plume I do have serious concerns how this will affect the landscape and the visual impact. A plume will draw the eye to the proposed ERF building and will create an industrial character in the wider landscape currently not associated with industrial activity. Not including the plume in the photomontages does raise questions in the LVIA conclusions. With the plume included this could cause a potential significant adverse landscape and visual impact for a short period of time.

- c. Viewpoint 9 & Photomontage viewpoint 9, Figure 9.26 & 9.33 - Taken from Sandsfoot Castle.

Sandsfoot castle is a popular spot for visitors and has panoramic views of Portland Harbour and the peninsula. The receptor level is higher here. The LVIA judges it to be high to medium which I agree with. The profile of the ERF is more apparent in this view

than it was in viewpoint 8. As the views move east along the coast the mass of the building becomes more apparent before the peninsula acts as a backdrop. In this view the ERF is no longer seen sequentially with Fortuneswell. Both are separated with slumped cliffs of vegetation. The ERF then breaks the natural end profile of the peninsula. One of the key land management guidance notes is to 'maintain the sensitive skyline from inappropriate development by ensuring any new development is sited off the skyline when viewed from key locations such rights of way'. Due to the ERFs location it is only visible on the skyline north of Portland Harbour.

The conclusion of the view in the LVIA states the magnitude of effect is negligible adverse and the significance of visual impacts is negligible & significant. My judgment is that the significance should be greater, before the consideration of a plume which will increase the landscape and visual impacts further.

9. Lighting

After reading the supporting Lighting statement September 2020 I do have reservations over the proposed lighting and its potential visual impacts.

Diagram 6.1.1 Horizontal Illuminance is a useful rendering and helps visualise the potential impacts.

An annotated plan of the rendering showing the optically solid boundary and how the building itself may help conceal any direct light would have helped further ease any doubts.

The mitigation against the potential Dynamic lighting impacts with an optically solid boundary along the length of the balaclava Bay boundary helps address concerns over the operation hours of the evening deliveries. How this boundary is treated or as to its height is unclear. The boundary will need to be constructed in a way that it also doesn't present any visual impact concerns. This can be achieved through a nonreflective treatment which matches the main ERF building.

The aircraft obstruction lighting on top of the 80metre high chimney although a minor impact will highlight the stacks height. Understandable this is safety feature which cannot be omitted.

Looking at diagram 6.1.1 the main source of concern for its lighting impact is the carpark which is proposed along the edge of Portland Port and Balaclava bay. After viewing this diagram, I believe the main extents of the carpark could have been concealed behind the building to help conceal it, this would have potentially meant a slight change to the buildings form and location.

The proposed columns in the car park and service yard are the largest proposed at 6-8metres as described in section 4.3 and 4.5 of the Lighting Statement. To ease concern, I would like to propose these are no more than 6metres and have the Flat glass luminaires fitted as specified in section 7.0 and a lighting cowl if this will also help prevent any light spill?

10. Conclusion

The applicant has made efforts to address the landscape and visual impacts from the proposed ERF through considered design of the building massing and cladding of what is ultimately a very large industrial building in a visually sensitive area. I do agree with the LVIA findings that the landscape and visual impacts are generally not significant with exception to the views selected earlier in my response. What is hard to understand is if the plume was added to the photomontages whether this would have a significant adverse effect? I have concerns that not showing the plume is not a true

representation of the building and not showing the worst-case scenario which an LVIA should consider.

I do not have any serious objections to this application, but the concerns raised in my response such as the methodology of selecting the right mesh colour/picture and the plume need to be fully addressed.

Kind regards,

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Landscape Officer

Environment and Wellbeing

Dorset Council

