

Planning

From: Sam Scriven <[REDACTED]>
Sent: 28 October 2020 15:57
To: Planning
Subject: FAO Jerry Smith re WP/20/00692/DCC Portland ERF

Dear Sir or Madam,

**Re: WP/20/00692/DCC, Portland Port, Castletown, Portland DT5 1PP
Construction of 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.**

Thank you for consulting the Jurassic Coast Trust.

The Dorset and East Devon Coast World Heritage Site (WHS), otherwise known as the Jurassic Coast, was inscribed in 2001 for its internationally significant geology, palaeontology and geomorphology. It is protected by a variety of UK planning and conservation laws and by specific guidance within NPPF and NPPG.

NPPF defines World Heritage Sites as designated heritage assets and relevant detail in respect of their protection can be found in NPPF paragraphs 11, 184, 185, 189, 190, 193, 194, 200, 201 and 205. Paragraph 184 is key in that it identifies World Heritage Sites as being of the highest significance and therefore the designated heritage assets of the greatest importance.

Paragraph 193 states that *'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)'* and paragraph 194 states *'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification'*.

The proposed Portland ERF is outside of the boundaries of the Dorset and East Devon Coast WHS meaning that any impacts from it will occur on the Site's setting. NPPF, supported by NPPG, both emphasise the need to protect a WHS and its setting.

The Jurassic Coast Partnership Plan 2020-2025 defines the setting Dorset and East Devon Coast World Heritage Site in the following ways;

Experiential setting	Functional setting
The setting should be regarded as the surrounding landscape and seascape, and concerns the quality of the cultural and sensory experience surrounding the exposed coasts and beaches. Although the Coast was not inscribed on the World Heritage list for its natural beauty, UNESCO recognised its value with respect to this criterion as 'nationally important', justified further by the UK Government's decades-long designation of the East Devon and Dorset Areas of Outstanding Natural Beauty (AONB), which cover more than 80% of the WHS area. An assessment of landscape and seascape character provides a	In the context of a moving boundary that keeps pace with erosion, the setting is important because development and activity within it may sooner or later impact on the World Heritage Site itself. The development of housing, for instance, may lead to a need for future coastal defences. In order to maintain OUV, the cliffs need to be allowed to erode into a natural setting. Secondly, the Site, most notably the coastal landforms and processes, are defined and explained by past and present geomorphological and hydrological systems that extend landward and seaward. Developments that impact on these systems

<p>starting point for evaluation of the impact of change in the setting. The special qualities of the AONBs, such as tranquillity and undeveloped character of coast and seascapes, are important for helping to determine how people experience and enjoy the setting of the WHS.</p>	<p>may well have a resulting impact within the Site itself.</p>
--	---

The proposed Portland ERF will not have an impact on functional setting, but I do have some concerns about its potential impacts on the ways people experience the WHS. The following comments are made in the context of the Jurassic Coast Partnership Plan 2020 - 2025, in particular the following policies:

R4: Those elements of landscape character, seascape, seabedscape, natural beauty, biodiversity and cultural heritage that constitute the WHS’s functional or experiential setting are protected from inappropriate development.

IM3: Proposals for aggregate or mineral extraction, oil or gas exploration and exploitation, and renewable energy developments outside of the inscribed area of the WHS, but which could have an impact on it, should consider potential harm to the OUV and/or setting of the Site during the earliest stages of planning and take measures to ensure that harm is avoided.

In line with policy IM3, we note that the developers seem to have made a sincere effort to mitigate the likely impacts of a building of this scale. This includes several iterations on the actual layout and massing of the various structures to arrive at a configuration that provides the best balance between operational requirements and visual impact mitigation. They have followed a similar process to the cladding and lighting of the building, testing various methodologies to soften and break up the building outline and reduce light pollution. The photographic visualisation comparisons for different viewpoints are welcome and give a useful indication of what the plant will look like once built. The context of the ERF as it will sit in the landscape, and how it will be largely viewed from the WHS, is within an already industrialised port area, backed by the much larger silhouette of Portland itself. I therefore do not consider that the building itself represents significant damage to the setting of the WHS.

However, the overall impact of an operational ERF is not restricted to the presence of the building within the landscape. In spite of the sincere efforts to reduce its visual impacts, there is no escaping that it is a very large industrial building, beyond the scale of what is already at the port. For example, the lighting necessary for a facility of this size, particularly on the stack, means there will inevitably be a change to the balance in how the views out of the WHS are perceived to be of an industrial or natural coastline. Of more significant concern is the potential impact of a visible plume. The LVIA describes a visible plume as having minor effects for a limited time. I would not dispute the limited time element, but it is hard to accept a visible plume as having minor effects, considering that there are no other industrial facilities of this type or scale along the WHS. It would be helpful if the visual impacts of a visible plume were modelled in more detail using existing viewpoints with perhaps additions from the top of Portland itself. This would help greatly in understanding more fully the operational reality of the ERF.

In summary, the application deals with impacts on the WHS fairly, with the exception of a detailed model for the visual impacts of a visible plume. My concern is whether or not an industrial development of this scale is appropriate within the setting of the WHS. The impacts of the structure itself on setting are not considered significant, but I question whether this reflects the ways in which an operational ERF might change how people perceive its surroundings as a natural or industrialised landscape.

kind regards

Sam

The Jurassic Coast Trust now has one phone number for everyone - please contact me on 01308 807000

If you love and value the Jurassic Coast, why not [join us here](#) for as little as £3 a month and help protect and conserve England's natural World Heritage Site



Sam Scriven | Head of Heritage and Conservation
The Jurassic Coast Trust, Mountfield, Rax Lane,
Bridport, DT6 3JP

T: [REDACTED]
E: [REDACTED]
W: jurassiccoast.org



The company accepts no liability for the content of this email, or for the consequences of any actions taken on the basis of the information provided, unless that information is subsequently confirmed in writing. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.