

Planning

From: Richard Brown
Sent: 24 September 2021 13:30
To: Planning
Subject: RE: Regulation 25 Consultation - Portland Port, Castletown, Portland - WP/20/00692/DCC

Follow Up Flag: Follow up
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Categories:

Dear Sir or Madam,

In response to the Council's Regulation 25 consultation on the application for the proposed Portland Energy Recovery Facility (application WP/20/00692/DCC), I have reviewed appendices 8.1 & 8.2, which provide further information regarding visible emissions.

Before responding to these, I would also like to take the opportunity to refer the authority to amendments to NPPF that have occurred since the application was submitted. The update to NPPF has amended the text previously contained in paragraph 172. In the updated version, paragraph 176 reads: "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas." The text, which I have underlined, represents a new reference to effects on the setting of AONBs.

As with my previous response, I would like to clarify that my comments relate only to landscape and visual effects on the AONB itself. The development site is, at closest, approximately 7.5km from the AONB boundary (this also being the closest area of overlap between the World Heritage Site and the AONB). Overall, it is foreseeable that substantially greatest magnitudes of effect will be experienced within the landscape and seascape environment of Weymouth and Portland, outside of the AONB boundary. Views of the proposed development from within the AONB are relatively long distances, but encompass sensitive panoramic sea views from the coastal margin and elevated inland hills, such as the South Dorset Ridgeway. The AONB's landscape and seascape character assessments make a number of references to sweeping panoramas along the AONB's coastline toward the Isle of Portland, with the landmass forming an instantly recognisable focal point.

I have previously observed that the introduction of the proposed power plant would add a new large-scale feature within the port area and that, due to the scale of the building, this would be a discernible feature within sensitive views out from the AONB. However, considering the distances involved, it is not considered that the addition of the power plant buildings alone would adversely affect the outlook from the AONB to a significant degree. I also previously noted that the worst-case scenario for the purposes of assessment included a potentially substantial plume (up to 200m). Within the further information that has been provided, appendix 8.1 contains technical analysis of the frequency and length of the plume, based on past atmospheric conditions. This information suggests the potential for relatively occasional plumes that could be of a scale that would substantively add to the impacts of the proposed building, due to the potential length of the plume and the potentially eye-catching characteristics of such a feature (for example, on occasions when the plume may be highlighted against a backdrop of cliff faces that are in shadow, resulting in a degree of colour contrast). The number of hours for which the feature may be visible is addressed through appendix 8.1 and the modelling of such data is a technical area where the AONB Team do not hold expertise. Consequently, it has been suggested that the authority consider commissioning expertise to adequately appraise the predictions provided.

The applicant contends (within the Landscape and Visual Impact Assessment), that the plume would be “likely to only produce a very minor alteration to the view for a very limited number of hours”. The alteration that would occur is represented within updated photomontages provided within appendix 8.2. The appendix utilises a range of locations, including two within the AONB (White Horse Hill and a location close to Ringstead). The montages are rendered to show a plume with a length of approx. 188m, this being the maximum length of plume that would have been visible within a recent 5-year period, according to the applicant’s modelling. In producing the images, a decision has been taken to account for a prevailing south-westerly wind direction, which has some bearing on the appearance of the plume within the images, particularly that from the direction of Ringstead, where the plume shown is foreshortened within the artistic impression provided.

The Environmental Statement for the project considers that the impact of the plume on the setting of the AONB would have a negligible impact on the qualities that underpin the area’s national designation. Although I recognise that the distances from which the plume would be visible from within the AONB are such that an overall ‘significant’ impact (in relation to the EIA Regulations) on the character of the AONB would not be expected, the assessment of a ‘negligible’ effect from the worst-case scenario appears to be an underestimation. Overall, as noted previously, the presence of a substantial plume would, at times, highlight the presence of a new overly industrial element within the seascape setting of the AONB. Consequently, some adverse effects on the landscape and scenic qualities of the designated area can be foreseen, in particular the ‘uninterrupted panoramic views’ and ‘exceptional undeveloped coastline’ special qualities.

I hope that these comments are helpful in informing your continued review of the application.

Kind regards

Richard

Richard Brown CMLI

Dorset AONB Landscape Planning Officer

Dorset AONB Partnership, hosted by Dorset Council, County Hall, Dorchester DT1 1XJ

Web: www.dorsetaonb.org.uk **Twitter:** [@DorsetAONB](https://twitter.com/DorsetAONB)

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The Dorset AONB covers over 40% of the county, from Lyme Regis to Poole Harbour and from Blandford to Chesil Beach, and is the 5th largest of the 46 AONBs in the UK.

The Dorset AONB Partnership brings together 20 organisations to care for the area and to keep this nationally important landscape in good shape for future generations to enjoy.

From: Planning <planning@dorsetcc.gov.uk>

Sent: 17 August 2021 13:24

To: Planning <planning@dorsetcc.gov.uk>

Subject: Regulation 25 Consultation - Portland Port, Castletown, Portland - WP/20/00692/DCC

Dear Sir/Madam

APPLICATION BY: Powerfuel Portland Limited

LOCATION: Portland Port, Castletown, Portland DT5 1PP

PROPOSAL: 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

Regulation 25 of the T&CP EIA Regulations 2017 – request for further information.

Further information has been submitted to complete the Environmental Statement on this application, on which I would welcome your comments.

Electronic copies of the application, the plans and other documents submitted with the application may be viewed by entering the application number WP/20/00692/DCC at <https://plan.dorsetcc.gov.uk/>

The case officer dealing with this application is Adrian Lynham, who can be contacted via planningteama@dorsetcouncil.gov.uk

Anyone who wishes to make comments about this application may do so online through the application web page or by writing to Planning and Community Services, Dorset Council, County Hall, Colliton Park, Dorchester DT1 1XJ by **27 September 2021**.

At present, during the COVID-19 emergency, we strongly encourage you to submit representations online if possible. Any representations you make will be available for public inspection. It is recommended that you avoid disclosing information of a sensitive nature in any representation to the Council.

NOTE:

Dorset Council's Planning Service during the COVID-19 emergency
Please note that the majority of Dorset Council's Planning staff are working remotely at home in accordance with Government guidance during the COVID-19 emergency, and our offices are closed to the public. Our ability to access files and post in the office is limited. We are working hard to minimise disruption to our service but please accept our apologies for any disruption during this time.

Yours faithfully

Mike Garrity
Head of Planning

**Planning Team A - Minerals & Waste
Economic Growth and Infrastructure
Dorset Council**

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