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Dorset Wildlife Trust  
Brooklands Farm  
Forston, Dorchester  
Dorset, DT2 7AA

27<sup>th</sup> September 2021

**Application No:** WP/20/00692/DCC

**Location:** Portland Port, Castletown, Portland DT5 IPP

**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.

Thank you for consulting Dorset Wildlife Trust (DWT) regarding the above application.

DWT **object** to this application on the grounds of climate change impacts, impacts on waste reduction targets and potential tourism impacts to the local area. In addition, DWT believe that the application has significantly overlooked the need to consider marine planning policy and impacts on marine designated sites.

DWT understand that Natural England (NE) are currently reviewing the updated information provided as part of the Updated Shadow Appropriate Assessment (dated August 2021). We support any comments made by NE regarding the conclusions drawn and the mitigation required to avoid impacts on the surrounding European Sites.

#### Climate change and carbon neutrality

DWT consider that the construction of the proposed Energy Recovery Facility (ERF) in this location is not compatible with local, national and global targets on climate change. Creating a demand and market for residual waste is in direct conflict with the urgent need to eliminate residual waste as far as possible and as quickly as possible. The lifetime of the ERF is projected to be at least 25 years, meaning that it is expected to be operational until approximately 2050. This means that a minimum quantity of residual waste will need to be supplied continuously to the facility throughout this period.

The Dorset Waste Plan provides projections to 2033 only and the Dorset Climate and Emergency Strategy commits Dorset Council to becoming carbon neutral by 2040. In order to meet its own climate targets, Dorset Council needs to prioritise waste prevention, re-use and recycling – a continued increase in residual waste produced is not compatible with achieving local and Government Targets for Net Zero by 2050.



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Renewable energy sources must be prioritised over combustion as the future of energy production in order to achieve carbon neutrality within the target period and must go hand in hand with radical changes in energy use, material consumption and waste production in order to achieve this.

### Tourism Impacts

Chesil Beach and the Fleet are important areas not only for wildlife but for giving people the opportunity to engage with the natural environment and learn to value these special habitats and protected sites. DWT's Chesil Beach Centre is a hub for visitors to Portland who are interested in discovering more about this protected area of coastline. It is particularly attractive to families and provides a hugely important opportunity to engage children and young people of all ages with the value of Dorset's environment and wildlife.

The proposed ERF will be a visible example of development on the coastline at Portland as viewed from the Chesil Beach Centre and DWT consider that the proposal will conflict with promotion of the area as an attractive location to experience wildlife and the natural world.

DWT are also concerned that the acknowledged increase in traffic volumes will have impacts on road safety and impact negatively on the visitor experience, both for visitors to Chesil Beach and for those visiting the wider Isle of Portland, many of whom are attracted by the nature and wildlife of the area. This has the potential to significantly impact the engagement of visitors and local people with the environment and natural world, at a time when it is more important than ever that people are able to care for and value biodiversity, both locally and globally.

### Marine Impacts and Planning Policy

DWT note that despite the coastal location of the development proposals, the marine environment and marine planning appear to have been overlooked. None of the submitted documents make reference to the *South Marine Plans (2018)* which is a statutory consideration for planning decisions affecting the sea, coast, estuaries and tidal waters.

The Environmental Statement (Chapter 10, dated September 2020) identifies all the Marine Protected Areas (MPAs) in the area as receptors of high (international or national) importance, with all Marine Conservation Zones (MCZs) having national importance, therefore it is expected that some consideration is given to how the proposals meet the policies within this policy framework.

Although the Shadow Appropriate Assessment (dated August 2021) now includes consideration of the marine Studland to Portland SAC, other statutory designated marine sites have not been considered. A similar two-stage assessment process should be undertaken to ensure that your authority can be certain that the proposals will not adversely affect these sites. Section 126 of the Marine and Coastal Access Act (MCAA) (2009) places specific duties on public authorities with respect to the authorisation of an act that is capable of affecting (other than insignificantly):

- (i) *the protected features of a Marine Conservation Zone (MCZ);*
- (ii) *any ecological or geomorphological process on which the conservation of any protected feature of a MCZ is (wholly or in part) dependent.*

The Marine Management Organisation (MMO) has created a two-stage MCZ assessment process to guide the implementation of Section 126. The first stage, MCZ screening, serves to identify whether any elements of the scheme have the potential (alone or in-combination) to cause effects (other than insignificant) on an MCZ site feature. If it is deemed that a proposed activity might significantly affect an MCZ feature, or a supporting process (wholly or in part), acting either alone or in-combination with other plans or projects, then the MCZ assessment should progress to Stage 1 Assessment.

Although mitigation measures are proposed to minimise the risk of pollutants entering the sea or the introduction of invasive non-native species through increased shipping, DWT recommend that your authority must be certain that these are sufficient to ensure that the marine habitats are safeguarded. Mitigation measures are only effective if enforced and any incident which may compromise the effectiveness of the measures proposed risks having serious, long-term and irreversible impacts on these marine ecosystems which are already under severe pressure.

I hope these comments are useful; please contact me should you have any queries about our response.

Yours Sincerely,



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Mariko Whyte  
Conservation Officer – Planning and SNCI  
Nature-based Solutions Team

