



Felicity Hart  
Dorset Council  
County Hall  
Colliton Park  
Dorchester  
Dorset  
DT1 1XJ

Our ref: P01276590

1 February 2023

Dear Ms Hart

**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**

Following our virtual meeting on 25 January 2023 regarding the above application for planning permission and on the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

We have provided detailed advice on 5 November 2020 (WP/20/00692/DCC Ref P01276590). We provided further advice on 25 August 2021 regarding the Environmental Statement and again on 11 February 2022.

Historic England has concerns regarding the potential impact of this proposal on the setting and significance of several nationally important scheduled monuments that form a key component of the historic port as well a number of listed buildings including the inner and outer breakwater and several undesignated heritage assets.

Portland and its harbour has been an important strategic military site since at least the 16th Century when Henry VIII built Portland Castle along with Sandsfoot Castle on the opposite shore to protect the sheltered bay against the threat of French invasion.

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 180m east of Naval cemetery* (National Heritage List Entry No 1002412)  
the battery is also Grade II listed (National Heritage List Entry No 1281863).



1ST FLOOR FERMENTATION NORTH FINZELS REACH HAWKINS LANE BRISTOL BS1 6JQ

Telephone 0117 975 1308  
HistoricEngland.org.uk





- *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)

The scheme also has the potential to impact on the Outstanding Universal Value of Dorset and East Devon Coast World Heritage Site, the management of which is led by the Jurassic Coast Trust. We concur with the Jurassic Coast Trust's view that the proposed development would negatively impact the setting of the World Heritage Site.

Known as the "Jurassic Coast" the World Heritage Site was inscribed by UNESCO for its geological significance. Within their advice the Jurassic Coast Trust have stated that World Heritage should always be considered as a highly sensitive environment. The key sensitivities relate to views into and out of the World Heritage Site where the overall scale of this proposal in a central and visible part of the World Heritage Site is a concern.

We had suggested that the local authority establish if there were any heritage benefits could be achieved. For example, a programme of works to conserve and secure the long-term future of the batteries, provide public access and interpretation could help offset any harm that may result from this proposal.

However, we maintained concerns regarding the application on heritage grounds relating 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 dominate the associative heritage assets within the area.

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.

There have been discussions with Dorset Council regarding a programme of repairs and provision of access to the scheduled battery 180m east of the Naval Cemetery. A new section of permissive path was suggested to allow public access and to provide





interpretation in and around the listed East Weares Camp and Battery. To be secured through a Section 106 obligation in respect to the heritage mitigation strategy. The Port Authority have proposed that the provision of access would need three-metre-high security style fencing as well as gated access and would therefore require planning permission. We have concerns that the introduction of three-metre-high security style fencing would also introduce harm.

Whilst we would welcome a programme of repairs to secure the long term future of the batteries we remain unconvinced that this could not be achieved by other means and we have been in discussion with several interest groups who would like to be more involved in the upkeep of these significant historic sites.

We consider that the proposal will cause considerable harm to the significance of several heritage assets from such a large and dominant development within their setting. We acknowledge that the provision of a path with repairs to the At-Risk registered battery is a heritage benefit, but this benefit is unlikely to offset the harm to this large group of nationally significant heritage assets. Their group value adds to their historic interest and makes an important contribution to their significance.

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.

Yours sincerely

[Redacted signature]

**Sasha Chapman**  
Inspector of Ancient Monuments

[Redacted contact information]

