

**Portland Energy Recovery Facility (ERF)**

**20/02/2023**

**Application Number: WP/20/00692/DCC**

**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.

**Landscape Comments Addendum**

With regards to the recent Terence O'Rourke letter and Landscape Response Report of 6<sup>th</sup> February 2023.

I provide the following additional information in relation to my previous comments and my disagreement with some of the conclusions within the submitted LVIA.

It is stated that the LVIA methodology and viewpoints are all as previously agreed before my involvement in this application.

I understand that the viewpoints are classified as 'representative' views and that the viewpoints themselves are not necessarily the specific subject of the accompanying analysis. However, these representative viewpoints do form the only photographic and visualisation references within the LVIA analysis for each of the visual receptor groups. They are used in conjunction with the descriptive text to make the judgements about the level of significance on the respective visual receptor groups.

For some of these visual receptor groups, taking the South West Coast Path (SWCP) visual receptor as my first example, the representative viewpoints (6, 7 and 14) that are used are all some distance from the site. The greatest impacts on receptors along the SWCP is likely to be from the closer stretches along the north and western sides of Portland Harbour as I have identified in my comments. However, there are no representative viewpoints shown within the LVIA along any of these parts of the SWCP. Viewpoint 8 comes the closest, but that viewpoint is only considered in terms of the impact on (the less sensitive) road users along the entire length of A354 between Dorchester and Portland.

Similarly, the Dorset and East Devon Coast UNESCO World Heritage Site (WHS) also has a number of popular and sensitive potential views in its extent along the northern shoreline of Portland Harbour, yet this part of the WHS has no representative viewpoints included. An example of this is Sandsfoot Beach. The West Dorset Heritage Coastline has closer views towards the site from the causeway and a long section of the western Shoreline of Portland Harbour at approximately 3km from the site. Yet the closest representative viewpoint is viewpoint 7 at over 8km from the site, and from a completely different angle such that the Portland landmass forms a backdrop to the site.

In each case the closer potential 'representative' viewpoint locations that I refer to are all clearly indicated as being within the 'Zone of Theoretical Visibility' in LVIA Figure 9.16.

I therefore believe that there are gaps within the LVIA's representative viewpoints that may have helped result in the significance of some visual impacts being understated. As requested by Terence O'Rourke in their letter and report of 6<sup>th</sup> February 2023, I have provided further analysis of examples of the visual effects on visual receptors to provide further evidence as to why I believe that this is the case. I have carried out the exercise below using the methodology given in the LVIA documentation. The following analysis relates to the areas that I have referred to in my previous comments and the points where there is the greatest disagreement.

Visual effects from the South West Coast Path (SWCP) (refer to representative viewpoints 6,7 and 14)

The LVIA concludes that the visual receptor is judged to be of high sensitivity. I agree with this statement and the reasoning given as to how this value was reached.

With reference to the analysis of visual effects on completion of the ERF. The LVIA concludes that the magnitude of visual effects at completion will be small/negligible adverse and permanent. I do not agree with this finding. The LVIA goes on to conclude that with regards to the overall significance of visual effects on this receptor on completion of the ERF, the degree of effect will be slight and not significant. I do not agree with this statement and believe that it understates the degree of significance.

The ERF buildings and stack will create a large scale Industrial development that will be visible from distant views from the SWCP in clear conditions. In the distant views from the east, it will not break the skyline and will have the Portland land mass behind it. However, as the viewer travels closer to the site and along the northern and western shores of Portland Harbour the building and stack will appear on the skyline as a new feature alongside the Isle of Portland landform. From some of these viewing positions it will become a conspicuous new element in views across the Harbour to Portland. Accepting that this visual receptor covers a range of experiences as the viewer travels along the SWCP I make the following judgements. I believe that the visual effects would be greater than a minor alteration to a small proportion of the field of views. Overall, there will be a partial alteration to the composition of views through the introduction of the new ERF building that will be of medium prominence. There will be an intermediate extent of views where the ERF is visible from a number of locations. This will include the more distant views east of Weymouth where the ERF is visible but at a distance with the Portland landmass behind. The greatest impacts are from the north of Portland Harbour and the causeway where the proposals are viewed as a conspicuous new element on the skyline and alongside the Isle of Portland. The sections of the route where impacts are at their greatest are relatively localised, in overall terms of this visual receptor. The duration of the visual effects at completion will be long-term, beyond 25 years. The visual effects will be permanent. I therefore believe that the overall magnitude of visual effects at completion will be small to medium adverse and permanent.

As agreed above, this visual receptor is judged to be of high sensitivity. The overall degree of significance of visual effects on this receptor will be moderate significant and permanent.

Visual effects from the Dorset and East Devon Coast UNESCO World Heritage Site (WHS) (refer to representative viewpoints 1,5,7 and 14)

The LVIA concludes that the visual receptor is judged to be of high sensitivity. I agree with this statement and the reasoning given as to how this value was reached.

With reference to the analysis of visual effects on completion of the ERF. The LVIA concludes that magnitude of visual effects at completion will be negligible adverse and permanent. I do not agree with this finding. The LVIA goes on to conclude that with regards to the overall significance of visual effects on this receptor on completion of the ERF, the degree of effect will be slight and not significant. I do not agree with this statement and believe that it understates the degree of significance.

The ERF buildings and stack will create a large scale Industrial development will be visible from distant views from the WHS in clear conditions. In the distant views from the east, it will not break the skyline and will have the Portland land mass behind it. However, the WHS designation also includes substantial, publicly accessible areas along the northern shoreline of Portland Harbour for which no representative viewpoint is provided in the LVIA. From these closer views the ERF building and stack will appear on the skyline as a new feature alongside the Isle of Portland landform. Due to the scale and bulk of the proposed development buildings, from some of these viewing positions they will become a conspicuous and visually intrusive new element in views across the Harbour to Portland. I do not agree that that this development would be barely perceivable when set within the context of the port and marina, with cranes, masts and shipping vessel funnels. I believe that from some of these WHS sites, such as Sandsfoot Beach, it would create a more conspicuous and visually intrusive new element at the bottom edge of the Isle of Portland land mass.

Accepting that this visual receptor covers a range of experiences from the wider sections of WHS, I make the following judgements. Overall, there will be a partial alteration to the composition of views through the introduction of the new ERF building that will be of medium prominence. There will be intermediate extent of views where the ERF is visible from a number of locations. The greatest impacts where the proposals are viewed as a conspicuous new element on the skyline and alongside the Isle of Portland are relatively localised, in overall terms of this visual receptor. The duration of the visual effects at completion will be long-term, beyond 25 years. The visual effects will be permanent. I therefore believe that the overall magnitude of visual effects at completion will be small to medium adverse and permanent.

As agreed above, this visual receptor is judged to be of high sensitivity. The overall degree of significance of visual effects on this receptor will be moderate significant and permanent.

As part of the process in reaching my final conclusions on this application, I have visited the application site itself and all of the 'representative viewpoints' within the LVIA.

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