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For the attention of Jerry Smith,
Planning Team A
Minerals and Waste
Economic Growth and Infrastructure
Dorset Council

Submitted via website

10 November 2020

Dear Mr Smith,

PLANNING APPLICATION: **WP/20/00692/DCC**

LOCATION: **Portland Port, Castletown, Portland DT5 1PP**

DEVELOPMENT PROPOSED: **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.**

1. Thank you for consulting the Ramblers on this matter. I am writing on behalf of Dorset Area of the Ramblers as their Countryside Secretary.
2. The Ramblers works to help everyone to enjoy the pleasures and benefits of walking, and to enhance and protect the places where people walk. As walkers we understand the importance of our environment for the health and wellbeing of all. We are committed to encouraging and supporting walking, protecting and expanding public rights of way and access land, and protecting the beauty of the countryside and other areas.
3. Ramblers policy
As Ramblers we recognise the threat posed to our countryside by climate change, which could severely alter many of our cherished landscapes and we support measures to reduce harmful emissions of carbon dioxide, including by increasing the amount of energy produced from a wide range of renewable sources. Energy efficiency and conservation should be prioritised and there should be significant investment in micro-generation and new technologies that would have the least impact on the countryside, such as wave energy.

We recognise that incineration is a recovery operation, so lies further up the waste hierarchy than landfilling and that producing electricity and heat from burning wastes avoids the need to burn fossil fuels, however, more energy is saved through recycling and there is the unavoidable fact that incineration also emits gases.

Like any other energy development, waste recovery facilities should be strategically planned and sensitively sited. Proper assessments must be carried out prior to development to ensure they do not damage precious landscapes, wildlife or historic places, with every effort made to minimise the impact on walkers.

4. Our objection

The Ramblers objects to the proposed development of an energy recovery facility at Portland Port because of its serious impact on the Portland landscape, its protected features, and the walking environment, which includes the England Coast Path. We also have concerns about the impact of increased heavy vehicular traffic on local residents and pedestrians.

5. The England Coast Path, public rights of way and access

We are concerned that the Environmental Statement prepared by the developers does not adequately address those issues. The photomontages included in the developers Environmental Statement (ES), only indicate the likely view of the buildings from some considerable distance and the maps included in the application papers do not show contour lines or public rights of way and other areas to which the public has access. The photographs do not show the plume which will arise from the 80m high stack and which would be visible from great distances.

The England Coast Path between Rufus Castle and Lulworth Cove was the first stretch of this nationally important path to be approved by the Secretary of State and opened in 2012 in time for the Olympics. The route runs across the causeway from the mainland, to the east of the A354 Portland Beach Road, it then runs beside Hamm Beach road, alongside the National Sailing Academy to reach Portland Castle and its view point (FP3/71). It passes along Liberty Road and crosses Castle Road to start to climb towards Verne Common up the Merchants Incline (FP 3/76). All land between the Coast Path and the coast is approved coastal margin, shown with a pink wash on Ordnance Survey maps. Coastal access rights apply within this margin but some parts of the shaded are not subject to these rights because they are excepted land or subject to local restrictions or exclusions. We acknowledge that some of the land around Portland Port and to the east of HM Prison The Verne, is excluded from public access but nevertheless we are very concerned that the developers make no mention of the England Coast Path which is important both for the health and recreation of Portland residents but is part of the attraction of the island to visitors and will become of increasing importance in the future, both nationally and internationally, once the England Coast Path is completed and runs to the west of Weymouth as well as to the east. (Note that the Environmental Statement refers to the South West Coast Path rather than the England Coast Path, although they are largely synonymous, the England Coast Path has the important additional feature of the approved coastal margin).

Leaving aside the England Coast Path, the National Sailing Academy and Portland Marina are places of public resort to which access on foot and bicycle has been provided and the views from those locations do not appear to have been adequately considered.

We are particularly concerned about the impact of the development on Footpath S3/72 which runs to the north of The Verne and is immediately to the south of the application site. This path passes very close to the Royal Naval Cemetery. The sensitivities attached to a military cemetery cannot be overlooked or underestimated. The cemetery is itself located within the Portland Coastline, part of the green infrastructure network, an area which is also designated as a site of National Importance for Nature Conservation and Land of Local Landscape Importance (see the West Dorset, Weymouth and Dorset Local Plan (inset map 29: Portland North).

The impacts on the green infrastructure have implications not only for local residents but also on tourism. The submission version of Portland's Neighbourhood Plan (June 2019) states that "Tourism is a key industry with potential to expand".

6. Transport

We note that the Stop Portland Waste Incinerator Campaign estimates that there could be an increase in articulated lorry movements of 200% at Castletown. This is the point at which England Coast Path users must cross the road. It is unacceptable for users of a nationally important path to have to contend with such traffic movements.

7. Landscape

The coast of the Isle of Portland is, apart from the small area around the proposed development site, part of the UNESCO designated Jurassic Coast World Heritage Site. The island provides an iconic view from the mainland stretches of the World Heritage Site and from the Dorset AONB. The land immediately to the south of the development site is designated on the Local Plan map as a Site of National Importance for Nature Conservation, Land of Local Landscape Importance and Portland Coastline. These designations alone mean that a development of the kind proposed would be contrary to numerous local planning policies. For example,

West Dorset, Weymouth and Portland Local Plan (adopted 2015)

ENV1: (Landscape, seascape and sites of geological interest)

(i) "Development which would harm the character, special qualities or natural beauty of the Dorset AONB or Heritage Coast, including their characteristic landscape quality and diversity, uninterrupted panoramic views ... will not be permitted."

ENV3: (Green infrastructure network*)

(ii) Development that would cause harm to the green infrastructure network or undermine the reason for the area's inclusion within the network will not be permitted unless clearly outweighed by other considerations.

(* The plan specifies that until such time as the green infrastructure network has been defined this policy will apply to the Portland Coastline, as identified in the previously adopted local plan for Weymouth and Portland.)

COM7 (Creating a safe and efficient transport network):

- i) Development that generates significant movement should be located where the need to travel will be minimised and the use of sustainable transport modes including public transport, walking and cycling can be maximised.
- ii) Development should be located where the volume of traffic likely to be generated can be accommodated on the local highway network without exacerbating community severance.

The vision for Portland set out in the Local Plan is that by 2031, Portland will:

- Have maintained and enhanced the unique character of the island in terms of its built and natural assets, whilst thriving economically and socially for the benefit of residents and visitors;
- Be the home of specialist maritime industries ...
- Have a broad tourist offer including activity based in sustainable tourism (water sports, climbing, walking and bird watching) that capitalises on its unique location.

The Bournemouth, Christchurch, Poole and Dorset Waste Plan (adopted 2019)

Policy 14 - Landscape and design quality

Proposals for waste management facilities will be permitted where they are compatible with their setting and would conserve and/or enhance the character and quality of the landscape.

Proposals for waste management facilities should achieve this through:

- a. sympathetic design and location;
- b. appropriate use of scale, form, mass, layout, detailing, materials and building orientation;
- and c. avoidance, or if this is not practicable, acceptable mitigation of adverse impacts on the landscape.

8. Summary

The Ramblers objects to the proposed development of an energy recovery at Portland Port because of its severe detrimental impact on land which is located in close proximity to an internationally designated landscape—the World Heritage Jurassic Coast, will be visible from the Dorset AONB and the England Coast Path, and will cause harm to the green infrastructure of Portland. These impacts have been understated by the applicants. The traffic generated is likely to impact adversely on both residents and visitors alike. The proposal appears contrary to numerous planning policies. We urge Dorset Council to reject the planning application.

Yours sincerely

Janet Davis

Janet Davis
Dorset Ramblers Countryside Secretary