



Historic England

Mr Jerry Smith
Dorset County Council
County Hall
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Direct Dial: [REDACTED]

Our ref: P01276590

5 November 2020

Dear Mr Smith

**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**

Thank you for your letter of 5 October 2020 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The proposed application is for a large (6.29ha) new energy recovery development which has the potential to impact on a number of nationally significant heritage assets within the immediate vicinity and beyond.

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: Verne Citadel, Portland Castle, East Weares Camp, Battery 200yds (180m) E of the Naval cemetery. As well as Underhill Conservation Area, the Grade II listed Dockyard Offices and a number of listed buildings including the inner and outer breakwater and several undesignated heritage assets.

The scheme also has the potential to impact on the Dorset and East Devon Coast World Heritage Site. As this is a natural World Heritage Site it is beyond the remit of Historic England to advise on this aspect of the application and we recommend that you should give full weight to the views of the Jurassic Coast Trust as the lead organisation in the management of the World Heritage Site.

Our concerns relate 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 heritage assets within the area



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Historic England Advice

Significance of 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 (NHLE 1015326,1205262) along with Sandsfoot Castle on the opposite shore to protect the sheltered bay against the threat of French invasion.

In 1845 the Royal Navy established a base at Portland, constructing a new harbour where its fleet of steam-driven warships could be replenished with coal. In 1859, due to concerns over a possible French invasion, Lord Palmerston, the Prime Minister, instigated the establishment of the Royal Commission on the Defence of the United Kingdom which recommended that vital points along the south coast including Portland be fortified.

The inner and outer breakwater (NHLE 12005991) were constructed between 1849 and 1882. Designed by the Chief engineer James Meadow Rendel, they have architectural and historic interest with Royal connections.

The Verne Citadel (NHLE 1002411) was constructed as part of Portland coastal defences between 1857 and 1881. Disarmed in 1906 it was used again in both World War I and II as a heavy anti-aircraft battery. The southern part of the citadel is now occupied by HMP Verne.

Between the proposed development and the Verne Citadel is the scheduled battery east of the Naval cemetery (NHLE 1002412). This is currently on our Heritage at Risk Register.

To the east of the proposed development is the scheduled East Weares rifle range (NHLE 1428958). East Weare Camp was established in about 1880 and from 1889 the rifle range was being built. The structure commanded Portland Harbour to its south east and can be seen from the higher slopes of The Verne. The site has both architectural and historic interest and despite being overgrown has a good degree of surviving historic fabric.

There are many non-designated assets such as the Breakwater railway built in 1878 and the Easton and Church Hope railway of 1867. The building of Verne High Angle Battery in 1892 and Upton Fort in 1902 demonstrates Portland's continuing role as an important strategic location

During World War II further military installations were built. These form part of the wider East Weares Camp including six pill boxes, a fuel store and anti-boat landing obstacles in Balaclava Bay.





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.

Impacts from Proposed Development

The proposal includes ancillary buildings, administrative facilities, a gatehouse and weighbridge, parking and circulation areas, cable routes to ship berths, an existing off site electrical substation and an 80 metre high stack. Site access will be past Portland Castle through Castletown Conservation Area and through Portland Port.

The proposal to develop within the setting of these nationally important sites could adversely impact the ability to appreciate them and would make a negative contribution to the setting. See NPPF Annex 2, Setting of a Heritage Asset.

Setting is the surroundings in which an asset is experienced and the setting may be more extensive than its curtilage. The extent and importance of setting is often expressed by reference to visual considerations. Although views to and from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration. NPPF Annex 2: Historic England, *The setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3*.

Clear views to and from the Verne Citadel and Portland Castle are critical to the heritage significance of these military sites. They were designed to provide views out across Weymouth bay and were also designed to be seen as impressive and dominating features in the landscape. The batteries and rifle ranges were designed to have clear views out. These views are fundamental to their significance.

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.

Account should be taken of the combined or collective impact of harm to the setting of the assets here, where the overall total impact on the group in combination is greater than is suggested by individual assessment of the separate assets.

Environmental Statement

Historic England previously responded to an Environmental Impact Assessment (EIA) scoping request on 23 January 2020 (SVO/2020/0699) expressing concerns that the proposal had the potential to result in harm to the significance to a number of designated heritage assets. Following this a Zone of Theoretical Visibility (ZTV) was produced to identify where long and close views from, towards and including the development could potentially be obtained. The ZTV covered 10km and





photomontages and wireframes were produced

he Environmental Statement prepared by Terence O'Rourke Ltd on behalf of Powerfuel Portland Ltd dated September 2020 assessed the likely significant effects of the proposed development with respect to impacts on the historic environment on heritage assets within a 1km radius of the main site.

The Environmental Statement, Chapter 7, Cultural Heritage acknowledges that the new buildings will be large, ranging between 19m and 47m in height for the energy recovery building and 6m and 17m for the office buildings and that the 80m stack will appear as a new landmark on the edge of the port.

7.83 of the Environmental Statement says that because of the overgrown nature of the East Weare Camp the inter visibility between them and other strategic assets such as the breakwater is no longer possible. Historic England disagrees with this view and is currently working with volunteers to remove scrub and vegetation from the monument.

Paragraph 7.84 says that the development will not affect the functional aspect of the batteries to the wider setting of the harbour or the group value of the structures of the naval base. We consider that the proposed development has the potential to significantly alter the relationship through a dominating new addition.

We disagree with 7.87 that the proposed development will appear as a localised addition within the foreground of the distinctive and dominant Verne Citadel which holds a commanding presence in views, both near and far. The proposed development will feature as a prominent addition to the foreground of several heritage assets and will have a detrimental effect on their significance as strategic military structures through visual dominance.

The group value of the heritage assets adds to their historic interest and makes an important contribution to their significance within their shared setting and surroundings in which they are appreciated. Of particular concern is the impact of views to and from these assets.

The proposed development will be visible in long distant views. The proposed development covers a wide area with a visually prominent 80m high stack. We believe both the height of the stack and the massing of the buildings will compete with the dramatic backdrop of the Verne Citadel sitting on the rocky outcrop, which is an evocative and prominent feature of Portland.

West Dorset, Weymouth and Portland Local Plan 2015

Portland Port is identified within the local plan as a major employment site with planning consent for port-related and B1 (light industrial) B2 (general Industrial) B8 storage and distribution) uses.

Historic England acknowledges that this is a working port and a protected employment





site in the Local Plan, however due to the historic importance and sensitivity of the site and its wider context any future proposals will have to take account of the relevant environmental policies in the plan notable those which relate to the historic environment and landscape.

Portland's port and the associative assets such as the batteries, Verne Citadel and Underhill Conservation Area all contribute to the areas local distinctiveness the Local Plan identifies that *High priority will be given to protecting and enhancing the area's heritage assets - including its Listed Buildings and Conservation Areas, and other features with local historic or cultural associations, particularly where they contribute to the area's local distinctiveness.* Historic England does not see how the proposed development will protect and enhance the outstanding built environment and the local distinctiveness within the area.

Historic England agrees with the Local Plan that when considering future development proposals within the port area, due to the number of designations within the locality the potential for any development to have direct and indirect and cumulative impact will need to be balanced against other sustainable development objectives.

Historic England's Position

Historic England has concerns regarding the potential impact on both visual and associative relationship of the proposed development on the significance of several nationally important heritage assets: Verne Citadel, Portland Castle, East Weares Camp, Battery 200yds (180m) E of the Naval cemetery, Underhill Conservation Area, Dockyard Offices and Dorset and East Devon Coast World Heritage Site including a number of listed buildings and non-designated assets.

Whilst it is acknowledged that the area has been a working naval base and in most recent years a working port, it is felt that the proposed development is too dominant a presence and will intrude in views to and from the heritage assets.

Having reviewed all the assessments we consider the impact on the individual assets within the area and the cumulative impact both close to the development and from distant views would be harmful from the introduction of a dominating and visually intrusive chimney and large industrial scale buildings.

It is for your authority to establish if any heritage benefits could be achieved that would offset any harm (NPPF 200).

Recommendation

Historic England has concerns regarding the application on heritage grounds. Our concerns relate 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 heritage assets within the area.





Historic England

Historic England recommends that your authority gives full weight to the advice of the Area of Outstanding National Beauty officers and the Jurassic Coast Trust for their views on the potential impact on the Dorset and East Devon Coast World Heritage site.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 190,193,194,197,200 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Sasha Chapman

Inspector of Ancient Monuments

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cc:Steve Wallis



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