

**LOCATION:** PORTLAND PORT, CASTLETOWN, PORTLAND

**APP REF:** 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.

**CASE OFFICER:** JS

**SITE VISIT:** 03/11/2020

### **CONSERVATION & DESIGN OFFICER – FURTHER COMMENTS**

<b>SUPPORT</b>	
<b>SUPPORT SUBJECT TO CONDITIONS</b>	✓
<b>UNABLE TO SUPPORT</b>	
<b>NO OBJECTION</b>	
<b>REQUEST FOR FURTHER INFORMATION</b>	
<b>OTHER / PRE-APP</b>	

### **SUMMARY**

These further comments follow those originally provided on 17 November 2020 and are provided in response to a Regulation 25 consultation, issued in response to a request for further information by Dorset Council. In this regard, the applicant has provided an Addendum to the Environmental Statement, which deals with Cultural Heritage (6.1-6.20, pp. 48-52) and provides a Framework Heritage Mitigation Strategy at Appendix 6.1. Para. 6.1 of the Addendum provides a summary of the further information requested by Dorset Council. The three main areas of information are commented upon briefly below:<sup>1</sup>

#### **Further mitigation measures to address cultural heritage issues**

The addendum outlines a package of works to the East Weare Battery (E Battery), a Scheduled Monument on the Heritage at Risk Register (see our previous comments for details of the asset), as well as enhanced public access to, and interpretation of, it and the nearby A-D Batteries (details of which are also to be found in our previous comments). In our earlier comments, we identified less than substantial harm to all these assets as a result of the proposals.

The proposed works will comprise scrub clearance, survey and repairs to the Scheduled Monument, together with an agreed programme of 'annual maintenance and quinquennial survey' which should secure its longer-term future. The footpath enhancement will reinstate an 'around the island' route and provide interpretation for the related heritage assets at East Weare, namely the A-E Batteries, the former detention camp and the non-designated Second World War features. The interpretation will comprise information boards at designated viewing areas, one near E Battery and one providing a prospect over A-D Batteries. It is proposed that the boards be in Portland Stone to match those elsewhere on the island (e.g. at Fancy's Farm).

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<sup>1</sup> It should be noted that we do not offer comment here on World Heritage Site matters, for which we defer to the Jurassic Coast Trust.

The package of works described will deliver significant public benefits which should be afforded weight in the planning balance commensurate with the significance of the assets affected. In particular, the removal of E Battery – an ‘asset of the highest significance’ in the context of NPPF, para. 200 – from the Heritage at Risk Register should be considered a highly significant outcome. Generally, the measures suggested will result in benefits to designated heritage assets whose significance is harmed by the proposals. Subject to further details, and taking into account the nature and extent of the harm previously outlined, we are broadly supportive of them as suitable mitigation.

### Impacts on public footpath S3/72

We broadly agree with the assessment (Addendum, 6.14, p. 50) of the potential impacts of the proposals on the visual experience of the historic environment from the public footpath and would consider that the works described above are sufficient mitigation for any changes in this regard as they will result in the better understanding and appreciation of designated heritage assets.

Specifically, the creation of an additional footpath here will enhance the visual experience of the following designated heritage assets, whose significance has previously been identified as harmed by the proposals through detrimental impacts on their setting:

- Verne Citadel (Scheduled Monument, 1002411)
- Inner and Outer Breakwater, including Coaling Shed, Jetties and Forts (Grade II, 1205991);
- Battery approximately 160m NE of East Weare Camp (Grade II, 1447946);
- East Weare Camp (Grade II, 1205814); and
- Battery approximately 80m SE of East Weare Camp (Grade II, 1444030)

The potential for an enhanced visual experience of these assets, including a Scheduled Monument of the ‘highest significance’, taken together with new interpretation described above, is considered to be a significant cumulative public benefit arising from the proposals.

### Effects associated with the provision of district heating

Paragraph 6.17 of the Addendum considers the potential effects of the distribution pipework on archaeology. We would defer here to any comments from the Council’s Senior Archaeologist, though we note that it is proposed to utilise existing ducts for the purpose.

## **CONDITIONS**

The following are suggested conditions relating to the content of the Addendum and should be read as additional to those suggested in our previous comments of 17 November 2020:

1. Further details of the works packages proposed within the Framework Heritage Mitigation Strategy are to be provided and approved in writing. These include:
  - methodology for scrub/vegetation clearance at E Battery in accordance with structural engineer’s recommendations for avoiding further damage;
  - specification of works to be carried out at E Battery to address such repairs as are identified by the structural engineer after the full survey;
  - confirmation of those responsible for ongoing maintenance and survey programmes at E Battery, as well as the procedure for, and frequency of, curated visits;
  - text and other content of proposed interpretation boards for A-E Batteries;
  - design of proposed information boards including sample of proposed material;

**OFFICER: Dr James Weir**  
**TITLE: Senior Conservation Officer (Spatial Planning & Majors)**  
**DATE: 15 October 2021**