



Mr Jerry Smith  
Dorset County Council  
County Hall  
Colliton Park  
Dorchester  
Dorset  
DT1 1XJ

[REDACTED]  
Our ref: P01276590

25 August 2021

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.

**Historic England Advice**

We previously provided advice on the planning application (WP/20/00692/DCC) for the construction of an energy recovery facility (ERF) with ancillary buildings and works with administrative facilities, gatehouse and weighbridge, parking and circulation areas, cable routes to ship berths and existing off site electrical substation, with site access through Portland Port from Castletown on land within Portland Port.

Further information in support of the application was requested by Dorset Council in accordance with Regulation 25 of the EIA Regulations and Section 62(3) of The Town and Country Planning Act 1990.

The Environmental Statement (ES) addendum dated August 2021 provides further information within the following headings:

Air Quality, Carbon balance and greenhouse gas emissions, Community health and economic effects, Cultural heritage, Ground conditions, Water quality, Landscape seascape and visual effects, Natural heritage, Traffic and transport, Waste, Dorset and East Devon Coast World Heritage Site.

Our primary focus will be on the heritage assets that have the potential to be impacted by this proposed development. Paragraphs 6.4 - 6.20 of the ES addendum provides the framework for the heritage mitigation that we are broadly supportive of.

**East Weares Batteries**

This nationally important site is currently on Historic England's Heritage at Risk Register. Recorded as *Battery 200 yards east of Naval cemetery* (National Heritage



List Entry No 1002412) the battery is also Grade II listed (National Heritage List Entry No 1281863).

East Weare Batteries were built in about 1870 and broadly contemporary with its near neighbour the Verne Citadel. Consisting of three gun platforms with a rear magazine the battery is constructed of fine Portland stone ashlar beneath substantial “bomb proof” earthworks. The battery was used during World War II when it formed part of the Dorset Coast defences and the Isle of Portland defences.

A programme of works is proposed here that will secure the long-term future of the batteries, will lead to its removal from Historic England’s at Risk Register and allow public access. Any development within the scheduled area would require scheduled monument consent (SMC) from Secretary of State for the Department for Digital, Culture, Media & Sport (DCMS) before any works could commence.

#### Footpath Extension

A new section of permissive path will be created to allow public access. Interpretation will be provided to the group of heritage assets in and around East Weares Battery.

#### Provision of District Heating

The proposal is to provide heating across the Island. As the pipes will follow the road network and will be at a depth of approximately 500mm below ground surface the ES addendum concludes that should be no impact on archaeology. We recommend that your Senior Archaeologist Steve Wallis is consulted on any works here to mitigate against any potential areas of significance that may be identified on the Historic Environment Record. Any development within the scheduled area would require scheduled monument consent (SMC) from Secretary of State for the Department for Digital, Culture, Media & Sport (DCMS) before any works commence.

#### Policy Context

Historic England’s advice is provided in line with the importance attached to significance and setting with respect to heritage assets as recognised by the Government’s *National Planning Policy Framework* (NPPF) and in guidance, including the *Planning Practice Guidance* (PPG), and good practice advice notes produced by Historic England on behalf of the Historic Environment Forum (*Historic Environment Good Practice Advice in Planning Notes* (2015 & 2017)). In recognition of the other consent required it is also provided in line with the controls placed on works to scheduled monuments by the *Ancient Monuments & Archaeological Areas Act, 1979* and government policy relating to scheduled monuments (*Scheduled Monuments & nationally important but non-scheduled monuments, DCMS 2013*).

### **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. A programme of works that will





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conserve and secure the long term future of the batteries, provide public access and interpretation will help offset any harm that may result from this proposal.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

Yours sincerely

*Sasha Chapman*

**Sasha Chapman**

Inspector of Ancient Monuments

cc: Steve Wallis, Senior Archaeologist Dorset County



*HistoricEngland.org.uk*



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