

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

1.Summary

I object to these development proposals due to their resulting significant landscape and visual impacts.

The main concerns are due to the scale of the buildings and their location at the very edge of the exposed and highly distinctive Portland Peninsula Landform. The Isle of Portland is a dramatic landform that creates a natural focal point in numerous far-reaching views along the coast and mainland, and from the waters within and around Portland Harbour.

The resulting landscape and visual impacts of this development would be at their most apparent in the many views from the northwest on and across Portland Harbour. Due to the angle of the viewer in relation to the development site, the new buildings would be seen alongside the Portland Isle profile. From these views the buildings form a new skyline and are at their most conspicuous. These adverse impacts are further compounded by the fact that these are also some of the closest and most sensitive views towards the development site. The views are also clearly visible for continuous, well used, sections of public paths and spaces stretching around the harbour from the beaches along the causeway to Sandsfoot Castle.

Supporting information within this application predicts that a visible plume of vapour will be emitted from the stack and that this will be an infrequent occurrence, influenced by specific atmospheric conditions. These conditions appear to be most common between February and April. The plume will appear as a conspicuous additional new element and draw attention to the development on the occasions that it is visible. It also has the effect of giving a more industrial character to the proposals here.

This planning application is supported by an accompanying LVIA which describes and assesses the extent of Landscape and Visual Impacts arising from the proposals. The LVIA does not give full consideration to all the landscape effects of the proposed development. It fails to give appropriate analysis of the potential landscape effects to the Portland Peninsula Landscape Character Area, despite this being the actual character area in which the proposals would be located.

The LVIA also understates some of the visual impacts that will arise from this development. Despite this, the submitted LVIA still goes on to conclude that there will be significant adverse Visual Impacts arising from this development.

The LVIA concludes that significant visual effects will occur within the area of Portland Port and the breakwaters, including the Sailing Academy, Portland Marina and Portland Harbour, public rights of way S3/68, S3/70, S3/72 and S3/81 immediately adjacent to the site, Sandsfoot Castle and Nothe Fort.

The main building has been designed and orientated in way that does lessen some of the potential adverse impacts created by this development. The building finish initially proposed in the first iteration within this application does raise some concerns. The subsequent addendum submission points to some ways in which this could be better approached. Despite these measures, the fact is that the proposed buildings are substantially larger than any existing or previous development that has occupied this area of the port. The size and bulk of the proposed development will still create a highly conspicuous new built element within this sensitive landscape.

2. Description of the Landscape and Visual Impacts of these proposals

The operational buildings associated with this development are grouped together. The main ERF building housing the boiler and furnace is the largest building at 201m in length with a top ridge level of 47m in height. The single large stack sits in close proximity to the north of the buildings and is 80m in height.

The main concerns over these proposals are due to the scale of the buildings and their location at the very edge of the Portland Peninsula Landform. The Isle of Portland is a distinctive feature of the Dorset Landscape, highly visible from large areas of the Dorset coast and mainland.

The unique wedge-shaped profile of the Isle of Portland is the key feature which most stands out in descriptions and analysis of this landscape. The relevant Landscape Character Assessments, at varying regional scales, repeated make specific reference to the Isle's distinctive shape. The proposed development has the potential to directly impact on the perceived shape and appearance of this highly valued natural landform.

The landscape and visual impacts of these proposals are at their most significant in views from the northwest, where they will create a new skyline rising up vertically from the base of the gently sloped Portland landform. Views of this nature will be apparent from a continuous section of the South West Coast Path long distance walking route (SWCP). They are also visible from Sandsfoot Castle Grade II* listed building, the designated Heritage Coast area, the Dorset and East Devon Coast World Heritage Site and the Portland harbour waters.

The harbourside path network along these sections has virtually no tree cover or other screening of the views out over the water. The section from Sandsfoot Castle to the A354 has a wide, smooth tarmac surface to accommodate the high number of walkers and cyclists that use it. Many of these people are enjoying the path for purely recreational benefits and a large part of that recreational experience comes from the iconic and uninterrupted views across Portland Harbour and of the entire outline and view of the Isle of Portland opposite. The viewer's gaze is naturally drawn to the Isle of Portland. The view across the harbour to Portland is an almost continuous focus as the viewer travels along the path and causeway for over 2km. These are not just occasional or isolated views over the harbour towards Portland and the development site.

Even though the land-based viewpoints are from some distance away from across the harbour, the very large scale of the proposed building and stack is such that they will still create significant, adverse impacts.

If a vapour plume is also emitted, even on a very infrequent basis, this would add a further significant adverse landscape and visual impact. As well as the visual appearance of the plume, the perception of this additional element would need consideration. That is to say that the presence of visible emissions gives the impression of a more industrial use and development on this part of Portland Peninsular.

3. Site Context

With regards to my landscape comments on this application, the main focus is on the main ERF Building, the chimney structure and any visible emissions that may be generated during operation. The main, largest, ERF buildings occupy the triangular shaped area (in plan view) within the planning redline boundary that is edged by Canteen Road, Balaclava Road and Incline Road. This part of the application site is currently a relatively flat area of cleared, but previously developed, brownfield land which lies at the transition between the Grade II Listed Inner Harbour Wall and the rising slopes of the northeast tip of the Isle of Portland.

The location of the main buildings and chimney are such that they occupy a very exposed position on the edge of the harbour. Incline Road runs between the new buildings and the start of the rising landform of this side of the Isle of Portland. Incline Road and the service yard area has the effect of further separating the proposed buildings from the rising landform of Portland. The separation of the buildings slightly away from the bottom of the sloping Portland landform means that in some views they will be seen against a backdrop of completely open sky. From these viewpoints the profile of the new built structures will create their own, entirely new skyline sitting alongside the Isle of Portland skyline.

In that respect, this particular site differs from much of the developed Portland Port and most of the other developed areas along Portland's northern edge. These other sites are more capable of accommodating large development where there is the backdrop of the Portland landmass rising up behind the development and within the context of other built development and substantial buildings. Whereas the application site appears to be set out on its own away from the toe of the Portland landform, other developments benefit from appearing more nestled into the lower slopes, visually less exposed with the backdrop of the Isle of Portland rising up behind them and usually in the immediate context of other large buildings.

The effect of having the Portland landform as a backdrop does begin to help provide a degree of mitigation, to this proposed development site as the viewer travels further to the east along the Dorset Coast and within the designated Dorset Area of Outstanding Natural Beauty (AONB). It is also the case that these north-eastern, land based views are from a greater distance.

It is accepted that this is a busy working harbour and that associated development, including buildings, ships and even the harbour walls themselves already form a substantial element 'man-made' skyline in this exposed location. However, the main difference in terms of the wider landscape impacts is that these existing built structures are of a smaller scale than the proposals submitted here. Most the existing buildings in the more exposed parts of the port are less than 20m in height. The relatively low-lying nature of much of the existing built form means that it effectively appears as waterfront development which does not extend its influence up to a height and scale where, from distant views, it begins to compete with the larger dramatic and dominating landform of the Isle of Portland.

The large ships that are sometimes docked within the harbour can also create a prominent, man-made feature and their impacts will be increased due to the fact that they are physically closer to the visual receptors from some of the sensitive views around the north and north-western edges of Portland Harbour. However, these are clearly transitional impacts. Large ships that are very obviously a temporary feature form part of the activity, variety, and interest that you would expect from views across a busy working port.

4.Landscape Character

The development site is located within the Limestone Peninsula Landscape Character Type (LCT) of the Dorset wide, Dorset Landscape Character Assessment of 2009. It is within the Portland Peninsula Landscape Character area of the Weymouth and Portland Landscape Borough Council Character Assessment of 2013. It is also with LCA2: The Grove and The Verne in the January 2020 Referendum Version of the Neighbourhood Plan for Portland 2017-2031.

At the national level scale, this site lies within National Character Area 137. Isle of Portland

Due to the scale of these proposals, they would also be visible from and have the potential to impact on surrounding landscape character areas. The surrounding landscape character areas are identified and the potential effects upon each examined in more detail within the LVIA section below.

Several of the Landscape Character Assessments specifically highlight the distinctive shape and landform of the Isle of Portland as a Key Characteristic of the landscape.

5.Visible plume from emissions

The Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3) highlights the requirement that the operational characteristics of a proposed development are assessed during the LVIA process. GLVIA3 quotes 'visible plumes from chimneys' as an operational aspect that would need consideration. Appendix J of the LVIA does provide further details of the plume. However, the implications of these are not covered in the narrative covering the descriptions of the Landscape Effects on the different selected landscape receptors.

The potential visibility of the plume is discussed in the Visual Effects section of the LVIA and I discuss this in more detail in section 8 of my comments below.

If a vapour plume is also emitted, even on a very infrequent basis, this would add a further significant adverse landscape and visual impact. As well as the visual appearance of the vapour plume, the perception of this additional element would need consideration. The presence of visible emissions gives the perception of a more industrial use and development on this part of Portland Peninsular.

From the data provided in the August 2021 Addendum Design and Access Statement, there also appears to be a seasonal variation in the likely effects caused by the plume. Certain atmospheric conditions result in the plume becoming a visible element associated with the operation of this development. From the tables provided it would appear that these conditions are most likely to occur at certain times of the year, in particular from February to April.

Whilst the overall conclusion is that averaged over a year of normal weather conditions the percentage occurrence is small. It does appear that the occurrences that do arise will be relatively concentrated during this specific time of the year. This seasonal variation in potential impacts from the plume should have been considered as part of the LVIA process.

6. Landscape and Visual Impact Assessment (LVIA): General Comments

A full Landscape and Visual Impact Assessment (LVIA) was submitted in September 2020 as part of the Portland ERF Planning Application. Following the subsequent Regulation 25 requests Addendum LVIA documents were submitted as additions and revisions to the original 2020 LVIA. These include new LVIA Figures 9.38 to 9.41 where the image of the vapour plume has been added to the photomontages.

The applicant states that the updated and new figures do not result in any changes to the original LVIA analysis. Therefore, all LVIA analysis and conclusions remain as originally assessed in the 2020 LVIA.

The Landscape and Visual Impact Assessment (LVIA) accompanying this application has understated the significance of some of the landscape and visual effects that will be created by this development.

There are also some omissions in the way in which the viewpoints and existing documentation has been applied during this assessment. These are covered in more detail in the further LVIA sections of my comments below.

The methodology applied to the assessment of these impacts is in accordance with the Guidelines for Landscape and Visual Impacts Assessment (3rd Edition) and is appropriate. However, I do not agree with many of the judgements that have been reached in applying the methodology.

I also have some reservations regarding the application of the selected viewpoints in assessing visual impacts. Rather than assessing viewpoints individually, these are mostly combined to relate to a more general group of visual receptors. As a result of this approach, when reading the accompanying narrative to some viewpoints they are also intended to account for a range of views, which may be very different from the one illustrated. This may contribute to some of the differences in the judgements arising and I have highlighted below, some examples where I believe the resulting judgements understate the ultimate level of significance of visual effect.

It is important to note that the submitted LVIA does conclude that there will be significant effects arising from this development.

Despite the omissions, which I describe in more detail below, the submitted LVIA concludes that there will be significant visual effects arising from this development on several of the visual receptors within Portland Harbour area and from the Isle of Portland itself. Quoting from 'summary of significant residual effects' section, paragraph 9.149 states; -

"Significant Visual effects will be felt only within the area of Portland Port and the breakwaters, including the Sailing Academy, Portland Marina and Portland Harbour, public rights of way S3/68, S3/70, S3/72 and S3/81 immediately adjacent to the site, Sandsfoot Castle and Nothe Fort. The highest degree of effect predicted is moderate."

It should be remembered that the LVIA forms part of the wider EIA and that resulting effects that have been assessed as moderate or above (including moderate to slight) are classed as significant effects in EIA terms.

LVIA Table 9.3 also seems to indicate that the LVIA is concluding that there will be significant Landscape and Seascape effects arising from this development of moderate or moderate to slight significance following completion. LVIA Table 9.3 seems to be later contradicted by paragraph 9.149

which states;- “ It is important to note that no significant effects are predicted on the character of the landscape or seascape”.

I have split my analysis of the submitted LVIA documents into separate sections below. The first subsection focusses on the assessment of the landscape effects of these proposals. This section reviews the LVIA findings in terms of its assessment on the effects on the landscape as a resource. The next section considers the visual effects of these proposals. This section reviews the LVIA findings in terms of its assessment on the effects on views and visual amenity as experienced by people (the visual effects).

The potential impacts of the plume are not discussed within the LVIA in any of the analysis of Landscape Effects and in relation to the surrounding Landscape Character Areas.

7. LVIA: Landscape Effects

The LVIA fails to identify and give due consideration to the district level Landscape Character Area in which the application site is located. The ‘Portland Peninsula Landscape Character Area’ is not assessed in terms of the potential landscape effects of this development on this character area. Paragraph 9.35 lists the Weymouth and Portland (WPBC) LCA February 2013 character areas but omits the Portland Peninsula Landscape Character Area from this list.

The Portland Peninsula LCA is shown in LVIA Figure 9.12 but is not given any further consideration beyond this. Paragraph 9.39 lists the character areas/types that the baseline study indicates will be assessed further through the LVIA process. Neither the paragraph 9.39 list, or the subsequent analysis includes reference to the Portland Peninsula Landscape Character Area.

This is the most important character area to be considered with regards to assessing the landscape effects of this development. The purpose of this stage of the LVIA process is to assess and effects of the development on the actual landscape as a resource in its own right. A key part of this process is in assessing the proposed development with regards to the Key Characteristics of that landscape as identified in the relevant Landscape Character assessments.

The WPBC Landscape Character Assessment has identified several key characteristics that define the Portland Peninsula Landscape Character Area. These should have been considered by this LVIA. These include the following key characteristics; -

- **A dramatic and distinctive wedge-shaped limestone peninsula with prominent cliffs.**
- An **open skyline** with sweeping views along the coast.
- The pale grey Portland limestone rock dominates the natural and built landscape, and results in areas of calcareous grassland.
- An exposed, windswept, rocky and raw landscape
- Quarrying and military activity has and continues to significantly impact upon the island’s character.
- Areas of the more sheltered north-eastern coast are dominated by scrub, trees and woodland.
- Networks of open spaces separate the settlements and provide an important buffer to urban and industrial development.
- A number of distinctive landmark features such as Portland Bill and the lighthouse, and The Verne.

Detrimental features that impact on landscape character are also listed in the LCA and include the following; -

- The open skylines are dominated by manmade structures and features.
- Impacts of active quarrying works through visual intrusion, noise and movement of large-scale plant.
- Often a neglected and disjointed feel, resulting from a complex and diverse range of land uses both historic and current.

I believe that if the LVIA had assessed the Landscape effects on this particular landscape receptor, that adverse effects at a significant level would have been identified. This is in conflict with the current concluding statement on landscape effects which appears in paragraph 9.149 of the LVIA. Paragraph 9.149 summarises the landscape effects predicted by the LVIA and currently states that "It is important to note that no significant effects are predicted on the character of the landscape or seascape"

It should also be noted that the Limestone Peninsula Landscape Character Type (LCT) from the Dorset County Landscape Character Assessment could also have been considered in the full LVIA assessment. Again, this LCT has been identified in the relevant figure (Figure 9.10) of the LVIA but not been considered any further than this. I could understand an argument for not including generic and repeated LCTs if they occur at several locations throughout a County. However, in this instance the Limestone Peninsula LCT is unique in its occurrence only on the Portland Peninsula within Dorset. Further to this, other Landscape Character Types (Harbour/Wetland/Lagoon) have been given full assessment under this LVIA.

Key Characteristics of the Limestone Peninsula LCT include; -

- a dramatic and distinctive wedge-shaped limestone peninsula at the end of Chesil Beach with prominent cliffs
- a unique coastal landmark with sweeping views along the coast
- the pale grey Portland limestone rock dominates the natural and built landscape
- exposed, windswept and rocky landscape
- quarrying and military activity has and continues to significantly impact on the islands character
- little tree cover and a historic pattern of small fields separated by low stonewalls
- an open skyline dominated by manmade structures and features
- Portland Bill and the lighthouse are key landscape features

Key land management guidance notes include ; -

- maintain the sensitive skyline from inappropriate development by ensuring any new development is sited off the skyline when viewed from key locations such rights of way
- manage and control the impact of quarry spoil heaps and industrial buildings, in particular by controlling their heights, profiles and colour
- maintain the open character of the cliff tops e.g. by limiting the amount size and position of development and by considered zoning and/or identifying key cliff top character area

As can be seen form the above lists of Key Characteristics and detracting features/pressures on landscape character at least one, if not both, the Limestone Peninsula LCT and Portland Peninsula LCA should have been given full consideration as part of the LVIA for these development proposals.

Both of these Landscape Character Assessments identify the distinctive shape and profile of the Portland landform as the first Landscape Characteristic defining this particular character area/type. We can therefore see the importance that should be given to any new development that has the ability to impact on that key characteristic.

The buildings of this very large scale have the potential to compete with and become new additions alongside the existing distinctive shape and silhouette of the isle of Portland. Thereby eroding the most important key characteristic, the distinctive shape of the landform, that is referred to in the immediate Landscape character types as well as a reference in influencing other nearby landscape character areas.

The Portland Neighbourhood Plan Character areas have been assessed as part of the Landscape effects LVIA analysis. However, these are not intended to supersede or be used in place of the district level Landscape Character Assessment. The district level LCA was carried out in full compliance with the 'Landscape Character Assessment Guidance for England and Scotland'.

Landscape Impacts of the Plume

The Landscape Effects section of the LVIA does not consider the potential impacts arising from an emissions plume. The occasional, visible presence of the emissions plume would add further to the landscape impacts both on the immediate and surrounding landscape receptors.

The Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3) highlights the requirement that the operational characteristics of a proposed development are assessed during the LVIA process. GLVIA3 quotes 'visible plumes from chimneys' as an operational aspect that would need consideration. Appendix J of the LVIA does provide further details of the plume. However, the implications of these are not covered in the narrative covering the descriptions of the landscape effects on the different Landscape receptors. The presence of the plume does have the potential to impact on the key characteristics and perceptions of character of the different landscape receptors and this needs to be assessed during this stage of the LVIA process.

The seasonal variation in the potential for additional impacts from the emissions plume should also be given consideration in the relevant sections of both the landscape effects and visual effects tables within the LVIA.

8. LVIA: Visual effects

I have some reservations regarding the application of the selected viewpoints in assessing visual impacts. Rather than assessing viewpoints individually, these are mostly combined to relate to a more general group of visual receptors. As a result of this approach, when reading the accompanying analysis to some viewpoints the descriptions are also intended to account for a range of views, which may be very different from the one illustrated.

Viewpoint 8 (Figures 9.24 & 9.32, Data sheet 9.136)

Viewpoint 8 is the representative viewpoint on the causeway between Weymouth and Portland just to the north of Ferrybridge. There are continuous views across the harbour towards the development site from the SWCP, from Small Mouth Bay to the north until the viewer gets towards Portland Marina and Osprey Quay development as the SWCP reaches the main Isle of Portland to the south.

The sensitivity of this visual receptor is judged to be of low sensitivity by the LVIA. I disagree with the narrative and judgements made by the LVIA in reaching this judgement. There are a number of recreational walkers travelling along the SWCP with open views across the harbour who should also be regarded as visual receptors from this viewpoint. This viewpoint is also representative of the continual views along this section of SWCP, the many informal harbourside paths along here and people visiting the length of beach and shoreline to the south of Ferrybridge. Figures 9.24 and 9.32 are set some way back from the waters edge, when a significant number of the more sensitive receptors walk along the water's edge at various points along this causeway.

Viewpoint 8 is close to the designated Heritage Coast area and the continued views from this section of waterfront south of Ferrybridge are within the designated Heritage Coast area.

I would have expected viewpoint 8 to have, at least, a similar level of visual effects to those experienced from viewpoint 9 at Sandsfoot Castle. The Sandsfoot castle viewpoint 9 is considered by the LVIA to experience moderate and significant visual effects when considering the final site on completion. These judgements seem more appropriate here.

The LVIA has attempted to group all the sensitive recreational walkers along the SWCP as being addressed by a separate table (data sheet 9.129). However, this table also fails to fully consider the continuous visual impacts on these sections of the SWCP that run closer to the development site.

Visual effects on receptors along the South West Coast Path (SWCP). Data Sheet 9.129

The visual effects on recreational users along the South West Coast Path (SWCP) long distance walking route have not been given sufficient consideration by the LVIA. LVIA Data Sheet 9.129 is described as assessing the visual impacts from the SWCP which it has acknowledges as a highly sensitive visual receptor. However, the only viewpoints considered as representative in this part of the assessment are the more distant viewpoints 6, 7 and 14.

Data sheet 9.129 gives only minimal consideration to the fact that the SWCP continues southwards around Portland Harbour and has much closer views toward the site that are continuous views along substantial sections of the SWCP. In addition, for most of these closer views the impacts are at their greatest due to the northwestern directions from which the views are available meaning that the new building appears alongside the backdrop of the Isle of Portland landform. Therefore, these views are such that the entire upper outline of the proposed development is seen against a backdrop of open sky, the effect of the separation of the proposed buildings from the bottom of Portland landform is very apparent.

For many of these closer visual receptors along the SWCP I believe that the relevant LVIA conclusions that the significance of visual effect is 'slight' and 'not significant' is an understatement of their significance.

A section of the SWCP route, between Sandsfoot Castle and Small Mouth Bay, also forms part of the Rodwell Trail recreational walking and cycling route. There is an existing interpretation board along this route which explains the historic value of the route.

As further evidence of the importance of views along this section, another existing Interpretation board depicts a large image of this view across the harbour towards the Isle of Portland from this route. The clearly distinguishable, existing landmarks along the northern edges of Portland are identified and described on this board.

From the numerous viewpoints along the northern edge of Portland Harbour, the viewer is clearly able to see the entire Portland landform. This gives an awareness of the Isle's distinctive overall shape and profile which is referred to in the various character assessments. This view of the Isle in its entirety applies to Viewpoints 9 and 8 and the continuous views that are available between these points. In clear conditions the viewer is able to see the whole profile of the Isle of Portland within their central field of vision.

Visual effects on receptors along the Dorset and East Devon Coast UNESCO World Heritage Site. Data Sheet 9.143

The World Heritage Site (WHS) continues for around 2km along the northern shoreline of the Portland Harbour and visual receptors along these stretches of coastline, which includes popular beaches, will be subject to some of the most conspicuous views of the development. These views will also be where the development is seen against open sky as the angle from which the development is viewed means that it will appear at the base of the Portland landform.

Visual receptors within the WHS include those from the causeway and top of Chesil Beach shingle bank.

The representative viewpoints 1, 5, 7 and 14 do not give the impression that the viewer gets from these closer views from the northwestern direction where the visual effects of this development would be at their greatest.

I do not agree with the LVIA findings in this respect that visual impacts on views from the WHS will be of negligible adverse magnitude and that the overall degree of visual effect will be slight and not significant.

Visual effects from the West Dorset Heritage Coastline. Data Sheet 9.142

The designated West Dorset Heritage Coastline also has some conspicuous views towards the proposed development. These are relatively close views from the western shoreline of Portland Harbour where the angle of viewing is again from the northwest. The direction of these viewpoints means that the building and stack will appear on the skyline alongside the Portland landform. There are other port developments and built structures visible in the foreground however, the scale of the proposed development is such that it will tower above these.

The representative viewpoints 7, 11, 12 and 14 do not give the impression that the viewer gets from these closer views from the north-western direction where the visual effects of this development would be at their greatest. Viewpoints 7, 11, 12 and 14 are all taken from a much greater distance away and from the north and northeast of the development where the Portland landform does provide a backdrop to the proposed development.

Assessment of the Visual Impacts caused by the plume

Selected LVIA Photomontages were updated and resubmitted in an August 2021 Addendum to show the presence of an emissions plume arising from the stack. Figures 9.38 to 9.41 were revised. The narrative accompanying the LVIA scoring process within the data tables remained unchanged from the original 2020 submission. The narrative does mention the occasional possibility of a visible plume, but I believe it understates the additional visual impacts that will be created when the plume is visible.

The plume, even when at its lesser scale, will be a conspicuous new element that will in turn draw further attention towards the new stack and industrial building.

Considering two examples of the plume from viewpoints 8 and 9 as illustrated by photomontages in the revised figures 9.38 and 9.39 respectively.

The two LVIA data sheets that analyse these views (data sheets 9.136 and 9.139) both quote that “the plume is likely to produce only a very minor alteration to the view for a limited number of hours”. Whilst the duration of hours for which the plume is visible may be limited, I disagree that the plume when visible will only create a minor alteration.

The seasonal variation in the potential for additional impacts from the emissions plume should also be given consideration in the relevant sections of both the landscape effects and visual effects tables within the LVIA.

Summary of significant residual effects

In paragraph 9.149 the LVIA concludes there will be significant visual impacts arising from this development. The LVIA concludes that significant visual effects will occur within the area of Portland Port and the breakwaters, including the Sailing Academy, Portland Marina and Portland Harbour, public rights of way S3/68, S3/70, S3/72 and S3/81 immediately adjacent to the site, Sandsfoot Castle and Nothe Fort. The highest degree of effect predicted is moderate.

I agree with the identification that all the above areas will be subject to significant visual impacts. I believe that this should also have been extended to include the continuous viewpoints from north and western edges of Portland Harbour, including from viewpoint 8. These significant visual effects would be experienced by recreational walkers, cyclists etc using the SWCP, parts of the Rodwell Trail, and from within the Dorset and East Devon Coast UNESCO World Heritage Site, West Dorset Heritage Coastline.

9. Building Design and finish

The largest eastern elevation faces of the group of new buildings will be seen in views from the sea and distant land-based views from the east and northeast. From these views the entire 201m building length will be apparent. The architects have designed a building whose eastern elevations, in particular, take their inspiration from the shapes and geology of the Portland landmass that will be their backdrop. The rooflines of the buildings, their relative positions and overlap and detailing have been designed to help the building sit as sympathetically as possible within the sensitive location.

The main concepts are an imaginative solution to help address some of the issues faced by the siting of such a large industrial building in this very exposed location. I have concerns over the printed PVC mesh finish and discuss these in more detail below.

The areas of building designed as ‘broken’ light grey with darker bands seem to be an appropriate concept for this site. This also responds well to the landscape character descriptions of pale grey Portland limestone dominating the existing natural and built landscape.

The concept of printed Portland vegetation images on a PVC mesh causes several concerns. As well as the concerns over how robust this finish will be, it is very prone to appearing out of tune with the

colours and textures of the surrounding native vegetated cliff faces throughout the changing seasons and light conditions. The images that have been depicted appear out of scale, the individual bushes and other cliffside scrub type vegetation are at a much larger scale than the real vegetation would be. In certain views, the abrupt and straight outer edges (forming the tops and sides of the printed vegetation images) will appear alien and at odds with the printed image of varied, textured natural vegetation. A fully vegetated cliff face such as this would naturally form a varied and uneven outer edge as its profile.

In some of the elevation drawings it can be seen that the vegetated image will also be added to the western building elevations. This means that it would be seen in views out to sea from the Isle and from the west of the building. In these instances, the printed vegetation finish does not make sense.

The additional level of fixings and the outer material give an increased requirement for maintenance, which if not undertaken very regularly would soon lead to a rapid deterioration in the quality of the buildings finish.

To my mind the concept of using a photographic image in this application is simply too literal. The image that is used can only ever be a snapshot in time. This makes it at far greater risk of appearing artificial and highlighting any scale or tonal differences that constantly occur in the highly changeable natural world.

The Addendum D&A Statement of August 2021, suggests other possible finishes to try and achieve the same intended results. I feel that some of these more recent ideas could be developed further and be more successful to this end.

The greatest land based adverse landscape and visual impacts arising from these proposals are from the closest public views from the north and northwest. In particular from viewpoints 9, 8 and between and south of these viewpoints. From here the issue is with the scale of the building and its relative position with regards to the Portland landform. It begins to appear separated from the Portland landform and forms its own new skyline. The issue here is of the silhouette of the building which is determined by the buildings mass and scale and is less able to be influenced by details of the buildings finish.

With regards to the closer views from the northern and western shores of Portland Harbour, I agree that the building has probably been orientated as well as it can be in order to present its narrowest elevations towards these vantage points. However, its sheer size and height means that this is still a conspicuous and substantial new element from these viewpoints.

In summary measures have been taken to reduce the landscape and visual impacts of this building, and these have been able to lessen some of the potential impacts. However, the very large scale of this building and its highly exposed location will still result in significant impacts from many of the viewpoints, particularly around the north and western edges of Portland Harbour.

10.Previous Development and Planning Permissions granted at this site

This is a brownfield site and with the precedent of previous development here. It forms part of the Portland Northern Arc, a key employment area. Employment related buildings of a smaller scale than these proposals are likely to be considered acceptable here.

Smaller buildings, of less than 20m in height would be more effectively screened, and their impacts lessened, by the foreground activity of boats and existing structures, caissons and general busy activity of the port. However, the proposed ERF building is at such a scale that it will tower above these same foreground features.

11. Conclusion

The combination of the scale of the proposed buildings and stack at this very exposed location at the base of the Portland Landform leads to significant landscape concerns with this development.

There are numerous sensitive viewpoints around the edge of the harbour where the changes created by these proposals would be at their most apparent. The new buildings would create a substantial new built form sitting alongside, and detracting from, the very distinctive form of the Isle of Portland.

The LVIA document that supports this planning application understates some of the Landscape and Visual Impacts that will be associated with this development. Despite this the submitted LVIA still concludes that there will be significant adverse Visual effects arising from this development.

The LVIA concludes that significant visual effects will occur within the area of Portland Port and the breakwaters, including the Sailing Academy, Portland Marina and Portland Harbour, public rights of way S3/68, S3/70, S3/72 and S3/81 immediately adjacent to the site, Sandsfoot Castle and Nothe Fort. The highest degree of effect predicted is moderate.

The building design, layout and orientation has been carefully considered to attempt to minimise these impacts as far as possible. There are still some details of the building finishes that are yet to be fully resolved. I do feel that the work undertaken in this respect has reduced the impacts as far as possible considering the constraints on this development at this site. However, the very large scale of the buildings, combined with the highly prominent and exposed location means that there will still be significant adverse landscape and visual impacts.

The significance of these impacts combined with the number and sensitive nature of the many viewpoints that are affected means that I do not believe that these proposals are acceptable in landscape terms.

I therefore object to these development proposals due to their resulting significant landscape and visual impacts.

Martin Peacock

Landscape Architect