



Landscape Proof of Evidence

**Produced on behalf of Rule 6 Bodies
Stop Portland Waste Incinerator and The Portland Association**

In respect of

The Proposed Portland Energy Recovery Facility (ERF)

DOCUMENT REF. 0272-ST-002

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DATE: 7th November 2023

Proposed Development: Construction of an Energy Recovery Facility
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Site Address: Portland Port, Castletown, Portland, DT5 1PP
Local Planning Authority: Dorset Council
Appellant: Powerfuel Portland Ltd
Date of Inquiry: 5th December 2023

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Client:

Stop Portland Waste Incinerator (SPWI) / The Portland Association

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CONTENTS

Foreword

About the Authors and Endorsement

1.0 Introduction

2.0 Jurassic Coast World Heritage Site and Setting

3.0 Seascape

4.0 Tranquillity – A Perceptual Quality of the Landscape

to be read in conjunction with the Tranquillity Report by Sharps Acoustics LLP

5.0 Conclusions

Appendix – List of References

FOREWORD

This statement has been prepared by Coe Design Landscape Architecture Limited. This statement provides information in support of the Statement of Case (SoC) of Rule 6 parties, The Portland Association (TPA) and Stop Portland Waste Incinerator Group (SPWI), as submitted to the Planning Inspectorate (PINS) on 10th October 2023

It is the focus of this statement to consider the topic of landscape, providing evidence of landscape impacts of the proposed ERF, including and with a focus on the perceptions of the local community in which it would be situated. Considerations relating to perceptions of the local community are informed by the co-authors having lived and worked in the locality for an extensive period of time, Jennifer Coe since 1993 and Jim de Bertrand since 2006, with perspectives endorsed by our own objective professional judgements.

It is the focus of this statement to consider landscape topics that are deeply valued as aspects of the local environment and of specific importance in relation to landscape impacts of the proposed ERF.

Within this Proof of Evidence it is shown that the extent of harm to the landscape goes beyond that stated in Dorset Council's Reason for Refusal in a number of key areas with emphasis in respect of the impacts on the World Heritage Site Jurassic Coast and its setting, the local Seascape Character and of Tranquillity, as a perceptual quality of the landscape.

ABOUT THE AUTHORS AND ENDORSEMENT

This Proof of Evidence is co-authored by Jennifer Coe (Director) and Jim de Bertrand (Senior Landscape Architect) at Coe Design Landscape Architecture Limited.

Jennifer Coe – DipLA CMLI

Jennifer Coe has 44 years experience practising as a Landscape Architect. Jennifer qualified in 1979 from Thames Polytechnic and has been a Chartered Member of the Landscape Institute since 1996.

Jenny has broad experience across many sectors and scales of schemes from Masterplanning, Culture, urban and green infrastructure, public realm, parks and gardens, education, residential, hospitality and heritage.

Jennifer has been a board member of Trinity Buoy Wharf, a Charitable Arts Centre since 2004. She has been both a visiting tutor at universities and was a member and Chair of the LI Course Accreditation Committee. Jennifer was appointed to an RIBA jury for a major international design competition and is a member of the Southampton Design Review Panel.

Prestigious awards include the AJ/Bovis Design Award at the Royal Academy of Arts, the Stirling Prize for Peckham Library and Media Centre by Alsop and Störmer and the 2010 Sorrell Foundation Award for St. Luke's CE Primary School.

Jim de Bertrand – BA (hons) PGDipLA (Distinction) CMLI

Jim de Bertrand has 18 years experienced practising as a Landscape Architect. Jim is qualified with a BA (hons) Landscape Architecture in 2004 and a Post-Graduate Diploma (Distinction) in Landscape Architecture in 2006, becoming a Chartered Member of the Landscape Institute in 2009.

Jim has worked and led projects across a broad range of sectors including education, commercial, residential, public realm and sustainability exemplar projects. He has undertaken schemes across the UK, in Europe, the Middle East and Africa. He has more than 10 years experience leading Landscape and Visual Impact Assessment work for the practice with recent studies undertaken for Education, Arts, Tourism, Defence and Aviation clients.

Endorsement

The evidence which has been prepared and provided for this appeal, within this statement, is true and has been prepared and given in accordance with the guidance of our professional institution. The opinions expressed within this statement are the true and professional opinions of the authors.

1.0 INTRODUCTION

Portland Landscape Background

- 1.1 This introduction sets out the significance of the island and its community. The Isle of Portland is a distinctive place and is recognised nationally and internationally for many environmental aspects, primarily for its geological formations, geomorphology, the physical connection by Chesil Beach to the mainland, rich coastal flora and fauna associated with limestone grassland and scrub coastal habitats, which make Portland especially attractive to migrating bird species.
- 1.2 Portland, as noted by the Portland Neighbourhood Plan 2021¹, is a distinct place for geological, ecological, cultural and industrial heritage. There is a coming together of a unique range of factors based on the limestone geology - the upstands of exposed geological strata, cliffs exposed by the quarrying from the sea, the network of inland quarries and latterly mines and extensive deposits of overburden. The fragments and remnants of the quarry process create a historical time line. Many of these are notable, from the track ways, arches, tunnels, railway inclines and stone stacks.
- 1.3 The community has been closely involved with the tangible inheritance of the Portland stone over hundreds of years. Many families have a long legacy on the island and employment in the quarries. The island is referred to as Underhill and Tophill, and broadly associated with fishing off Chesil Beach and stone from the top of the island, respectively.
- 1.4 There is a strong pride amongst Portlanders in the inheritance of the Portland stone and its associated legacies, including its use around the world and legacies of former sites.
- 1.5 All parts of the island are valued and the community has cohesion about its significance within this part of the coast. There has been an accumulation of visitors and tourists over time with the island supporting a diverse range of recreational pastimes. The establishment of the South West Coast Path and the staging of the Olympics and Para-Olympics for sailing events in Portland Harbour and Weymouth Bay, have continued to open the area to an expanding audience.
- 1.6 The range of recreation includes water sports of all kinds, walking, climbing, exploration of geology and fossils, botany, entomology and bird-watching, as well as visiting the coast and beaches and enjoying the tranquil and quiet nature of the island.
- 1.7 The culture of Portland has been strong and distinct, with stories handed down and documented by its people, including about the quarries by its stonemasons. The island has attracted and inspired authors, architects, artists and scientists - Sir Christopher Wren with stone for buildings in London, novels of Dickens and Thomas Hardy, landscape paintings of John Constable and Sir Robert Hooke's pioneering link regarding fossils in Portland stone and

¹ Neighbourhood Plan for Portland 2017-2031 Made Version

the earth's extensive legacy of species extinction over geological eras. The island continues to inspire many artists, and the quarries provided a perfect setting for a sculpture park with a contribution from Antony Gormley. The setting of Portland has created backdrops for plays, songs, kinetic sculpture and installations.

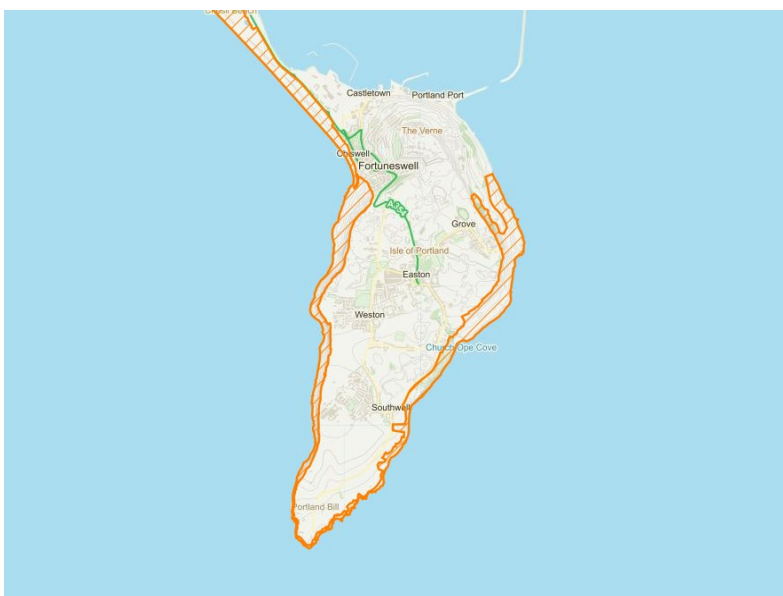
- 1.8 Former quarry sites together with natural coastal grasslands encompass nature with places designated as SSSI, butterfly conservation areas and an idea for a quarry park that creates links between the main quarries, for connectivity for people and enables rewilding and the reclaiming of habitats.
- 1.9 The Isle of Portland is a Royal Manor and parts are Crown Land. The island's open land remained mainly unenclosed over centuries and told us about a long held story about a freedom to roam on the island. Many sites have been restricted for access including - the Naval Base - latterly Portland Port, MOD sites, active quarries and the prisons amongst other sites.
- 1.10 Walking is a popular pastime on the island, with roads generally to the centre of the island, particularly on Tophill, access to the coast and cliffs is gained mostly by walking. Walking across Chesil Beach and around the island's coast has a long history, which has been enormously popularised by the establishment of the South West Coast Path along the Dorset coast and around Portland.

2.0 JURASSIC COAST WORLD HERITAGE SITE AND SETTING



© Coe Design – UNESCO World Heritage Site Jurassic Coast

- 2.1 The Proposed Portland ERF would be situated within the setting of the Jurassic Coast World Heritage Site (WHS). The Jurassic Coast became a WHS in 2001, England's only 'natural' WHS. There are a few gaps in this 95 mile stretch, such as Portland Port and Weymouth Bay, where there are a greater degree of man-made influences. Much of the Jurassic Coast is undeveloped, with geological attributes of international importance interwoven with landscape, scenic beauty and other natural assets recognised and protected as part of the objectives of the World Heritage Site's Management Plan and by other overlapping designation, including Area of Outstanding Natural Beauty (AONB).
- 2.2 Portland is uniquely situated in relation to the attached mainland coastline at the heart of the WHS, a distinct and recognisable entity, in this diverse landscape. Portland, with its distinctive wedge shape and predominantly undeveloped coastline forms an unmistakable landmark, experienced from within the wider WHS and setting of the AONB. Portland, along its coastline, offers unique positions from which the Jurassic Coastline on the mainland can be experienced. From here, the Jurassic Coast can be perceived as the extensive and contiguous landscape that it is, seen as panoramic views from the Isle.



UNESCO World Heritage Site Jurassic Coast on the Isle of Portland - from Dorset Explorer

WHS Policy Context

- 2.3 The National Planning Policy Framework (NPPF) prescribes the conservation of World Heritage Sites as follows:
Para. 189 prescribes that *“World Heritage Sites, internationally recognised as of Outstanding Universal Value, and as an irreplaceable resource, should be conserved, appropriate to their significance, for the enjoyment of their contribution to the quality of life of existing and future generations”*.
Para. 197 prescribes that *“in determining applications, local planning authorities should take account of (b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and (c) the desirability of new development making a positive contribution to local character and distinctiveness.”*
Para. 200 prescribes that *“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification”* and that, *“Substantial harm to or loss of assets of the highest significance”, including World Heritage sites, “should be wholly exceptional”*.
- 2.4 The objectives of the World Heritage Site Management Plan are a material consideration for planning applications in accordance with Local Planning Policy **ENV1 Landscape, Seascape and Sites of Geological Interest**² which prescribes that: *“(i) The plan area’s exceptional landscapes and seascapes and geological interest will be protected, taking into account the objectives of the Dorset AONB Management Plan and World Heritage Site Management Plan. Development which would harm the character, special qualities or natural beauty of the Dorset Area of Outstanding Beauty or Heritage Coast, including their characteristic landscape quality and diversity, uninterrupted panoramic views, individual landmarks, and sense of tranquillity and remoteness, will not be permitted.”*
- 2.5 The current WHS Management Plan is the Jurassic Coast Partnership Plan 2020-2025. Further to Local Plan Policy ENV1, the objectives of the WHS Management Plan include the following five Strategic Aims³:
“Aim 1 Protect the Site’s Outstanding Universal Value (OUV) and World Heritage Status.”
“Aim 2 Conserve and enhance the Site, its attributes, presentation and setting.”
“Aim 3 Inspire and engage people with the Site and deepen their understanding of its value.”
“Aim 4 Maintain and improve access to and experience of the Site.”
“Aim 5 Enable the Site’s World Heritage Status to be of benefit to people and communities.”
- 2.6 The Jurassic Coast Management Plan has the following particularly relevant policies:
Policy R2⁴ - *Any development resulting in a negative impact to the OUV of the WHS will only be acceptable if it is both essential and unavoidable. In these circumstances mitigation measures will be undertaken.*

² West Dorset, Weymouth & Portland Local Plan p.20

³ Jurassic Coast Partnership Plan 2020-2025 p.09

⁴ WHS Management Plan p.45 ‘Regulation Policies – R2’

Policy R4⁵ - *Those elements of landscape character, seascape, seabedscape, natural beauty, biodiversity and cultural heritage that constitute the WHS's functional or experiential setting are protected from inappropriate development.*

Policy CSS5⁶ - *The conservation and enhancement of biodiversity, the historic environment and landscape character in the WHS and setting will be supported in ways that are complementary with its OUV.*

WHS Setting and Buffer Zone

2.7 UNESCO⁷ guidance requires the protection of an area around a World Heritage Site, typically referred to as its setting, through sensitive management, as part of the protection of OUV. The Partnership has agreed that the 'setting' can be understood as having both an Experiential Setting and a Functional Setting. The Experiential setting, which is of particular relevance, is defined, as below.

"The setting should be regarded as the surrounding landscape and seascape, and concerns the quality of the cultural and sensory experience surrounding the exposed coasts and beaches. Although the Coast was not inscribed on the World Heritage list for its natural beauty, UNESCO recognised its value with respect to this criterion as 'nationally important', justified further by the UK Government's decades-long designation of the East Devon and Dorset Areas of Outstanding Natural Beauty (AONB), which cover more than 80% of the WHS area. An assessment of landscape and seascape character provides a starting point for evaluation of the impact of change in the setting. The special qualities of the AONBs, such as tranquillity and undeveloped character of coast and seascapes, are important for helping to determine how people experience and enjoy the setting of the WHS."

2.8 With regards to UNESCO World Heritage Sites 'Buffer Zones' are delineated areas beyond the inscribed WHS boundary which contribute to the "protection, conservation, management, integrity, authenticity and sustainability of the Outstanding Universal Value of the property"⁸. The Jurassic Coast WHS does not have a defined Buffer Zone, which has been established and confirmed through review based on the existing conservation protection and planning policies relating to the Site and its surrounds, which have been viewed as being sufficiently robust as to make the definition of a specific buffer zone unnecessary. It is therefore important that designated areas within the surrounding areas of the WHS which have sensitivities relating to the development are protected in relation to their role as part of the wider setting of the WHS and as a buffer zone to the inscribed WHS property.

2.9 This need to protect the settings of the World Heritage Site from significant impacts was recognised in respect of the Navitus Bay Wind Farm proposal setting a precedent for the refusal of a development outside the World Heritage Site, but within its setting. The 'Navitus Bay Wind Farm' a National Infrastructure Proposal, was turned down by the Secretary of

⁵ WHS Management Plan p.45 'Regulation Policies – R4'

⁶ WHS Management Plan p.49 'Conservation of Site and Setting Policies'

⁷ Jurassic Coast Partnership Plan 2020-2025 p.22 'The Setting of the Site'

⁸ The World Heritage Resource Manual Preparing World Heritage Nominations (2nd edition, UNESCO 2011)

State due to the impact on the very same WHS. The wind farm would have been approximately 25 miles east of the proposed Portland Port site. The Department of Energy and Climate Change ‘Secretary of State Decision Letter and Statement of Reasons’⁹ states that:

“The Secretary of State considers that this is a high hurdle for a project to cross where it is engaged. Though the Site is protected for its geology, the protected feature being its outstanding combination of globally significant geological and geomorphological features; the ExA considered that the offshore elements of the project would bring about changes in the way the World Heritage Site would be experienced or enjoyed in its surroundings and would have adverse implications for the Site’s significance and its Outstanding Universal Value (“OUV” – the test of “exceptionability” for World Heritage Sites). The ExA considered there was a risk that the Site would be presented and transmitted to future generations in a form significantly different from what was there at the time of inscription until today. The ExA concluded that there is limited scope to mitigate the impacts of the Development on the World Heritage Site and that, even with mitigation measure in place, the harm to the setting, significance and OUV of the Site carries significant weight against a decision to grant consent”

Jurassic Coast Trust Planning Application Consultation Response 28-10-2020

- 2.10 The Jurassic Coast Trust, which manages this UNESCO World Heritage Site has commented on the application with the following representation:
- “...the overall impact of an operational ERF is not restricted to the presence of the building within the landscape. In spite of the sincere efforts to reduce its visual impacts, there is no escaping that it is a very large industrial building, beyond the scale of what is already at the port. For example, the lighting necessary for a facility of this size, particularly on the stack, means there will inevitably be a change to the balance in how the views out of the WHS are perceived to be of an industrial or natural coastline. Of more significant concern is the potential impact of a visible plume. The LVIA describes a visible plume as having minor effects for a limited time. I would not dispute the limited time element, but it is hard to accept a visible plume as having minor effects, considering that there are no other industrial facilities of this type or scale along the WHS. It would be helpful if the visual impacts of a visible plume were modelled in more detail using existing viewpoints with perhaps additions from the top of Portland itself. This would help greatly in understanding more fully the operational reality of the ERF.”*
- 2.11 In their summary the Jurassic Coast Trust questions whether a waste incinerator in this location is appropriate, and concludes...
- “My concern is whether or not an industrial development of this scale is appropriate within the setting of the WHS. The impacts of the structure itself on setting are not considered*

⁹ Secretary of State Decision Letter and Statement of Reasons, para. 24-25

significant, but I question whether this reflects the ways in which an operational ERF might change how people perceive its surroundings as a natural or industrialised landscape.”

- 2.12 These comments have been widely reflected and agreed with by other organisations including Historic England, CPRE, UK Gov. Department for Culture Media and Sport in their own representation on the planning application.

Value of the WHS to the Community

- 2.13 A 2020 report¹⁰ found that *“not only are UNESCO designations delivering financial benefits (£151 million each year), UNESCO designations have a far-reaching impact on communities, culture and nature. They are custodians of heritage, drivers of knowledge, and testing grounds for innovation. They build bridges between people, culture and nature. They are triggers of creativity and stepping stones for collaboration.”*
- 2.14 Data from the Association of Leading Visitor Attractions (ALVA) within the report (p.73) shows the Jurassic Coast to be one of the most visited World Heritage Sites in the UK with annual visitors in 2018 at 15 million.
- 2.15 A 2015 Report¹¹ produced by Ash Futures with Vallance Economics, on behalf of Dorset Council and the Jurassic Coast Partnership involved extensive survey work to ascertain value placed on the Jurassic Coast from within the local community, concluding that:
“The results from the extensive survey work undertaken shows that visitors, businesses and residents all place a high value on the Jurassic Coast. The extent of survey responses received allows us to have some confidence in the findings being broadly representative of the wider population.”
“The visitor survey showed that the Dorset environment and the Jurassic Coast in particular were highly influential in attracting people to visit Dorset and East Devon and businesses who responded to the business survey recognise that the higher visitor numbers have had a beneficial impact upon their business.”
“The Jurassic Coast is clearly valued by Dorset and East Devon residents”.
- 2.16 It is our opinion that within Portland the WHS designation is similarly very highly valued by the local community, and across the Dorset Coast. The designation gives recognition that the coastal landscape is of global significance, which is a source of civic pride and raises the profile of the landscape to both local residents and visitors. This, we believe, imparts a significant benefit to local residents and visitors in terms of recreational enjoyment of the landscape, with an enriched understanding of the place and with tangible benefits to quality of life, in addition to economic benefits. Our view is that the WHS designation has become a significant part of the identity of the landscape for the local community.

¹⁰ ‘National Value of UNESCO to the UK’, June 2020 (UK National Commission from UNESCO)

¹¹ ‘Dorset’s Environmental Economy PLACING AN ECONOMIC VALUE ON THE JURASSIC COAST’, Ash Futures Ltd 2015

- 2.17 The magnitude and breadth of concern relating to negative impacts of this proposed ERF from within the local community is significant.

Assessment of Effects on the WHS from the Proposed ERF

- 2.18 It is our opinion that the size and scale of the proposed ERF is inappropriate in this location. Despite being set in an area with adjacent industrial elements, our view is that the size and scale of the main bulk of the building, as well the 80m high chimney, sets it apart from the surrounding existing industrial features of the Port.
- 2.19 The chimney particularly, is considered to extend the visibility of the ERF significantly into the most undeveloped and sensitive areas of the WHS and its setting. The facility is also considered likely to be extensively visible at night with the red aviation obstacle navigation lighting atop the 80m high chimney indicating the presence of the ERF from afar.
- 2.20 The plume, when visible, will also further exacerbate impacts and effects relating to the visible size and scale of the proposed ERF, with effects of a substantial magnitude and significantly extending the area from which it can be seen. This will also be a factor at night, where it is likely to be illuminated by surrounding sources of light, based on observation of the illumination that occurs on the island's often present cloud cap. The plume during day and night, when present, will be extensively visible and instantly recognisable as a feature of an industrial nature beyond the scale of surrounding features.
- 2.21 The visible presence of the proposed ERF will have adverse impacts on a number of key views and important areas within the WHS and its setting.
- 2.22 The presentation of the north cliff face of Portland is predicted to be harmed by the presence of the ERF, detracting from the presentation of the geology of the hard cliff top and slumped cliffs below and their associated natural vegetation.
- 2.23 There will be adverse effects on the seascape character of the harbour as result of the size and scale of the proposed ERF, which will further industrialise the setting of the port by detracting from the predominantly natural characteristics of the existing backdrop of Portland.
- 2.24 At longer distance, there will be adverse effects on the Dorset AONB and distant WHS coastline, with the proposed ERF being seen as a feature of an industrial character detracting from the largely natural backdrop and degrading the strength of the existing character of Portland as a distinct geological feature with natural characteristics.
- 2.25 The proposed ERF will be seen from the north and east on an area of coastline where the views are predominantly of wild eastern cliffs which present the inclined geological strata in detail from the adjacent seascape and as a silhouette at longer distance, from key locations

to the east of the WHS mainland coast and Dorset AONB. The presence of the Portland ERF would dramatically detract from the geological presentation and special landscape qualities that are perceived from the sea in the immediate setting of the WHS.

- 2.26 There will be effects on the north-orientated views from the island, which are important for the panoramic outlook over the WHS coastline on the mainland, both west to Devon and East to the Purbecks. The presence of the ERF will introduce an industrial feature of a size and scale incongruous with other visible port features including the chimney, which will detract from views of the distance coastline degrading the perception of the wider landscape from Portland.



©Coe Design – View North from the WHS boundary

- 2.27 There will be an adverse impact on tranquillity as experienced in surrounding seascape and adjacent terrestrial areas within the WHS to the south-east and WHS setting behind the Port as a result of the presence of an feature incongruous with the existing environment, with impacts on visual quality, open views, natural skylines and natural characteristics. The sense of place would be degraded somewhat and the quality of the experience on important walking routes in the surrounds negatively affected.

Summary

- 2.28 It is our opinion that key aspects of the WHS landscape would be harmed by the Proposed Portland ERF.

- Degradation of the natural qualities of the surrounding landscape and seascape

- Erosion of natural qualities of Portland as a feature within views from the WHS coastline and Dorset AONB to the north
- Degradation of the experience of views to the WHS coast to the north as seen from Portland, by the introduction of a large industrial feature of an incongruous scale on an otherwise largely undeveloped coastline
- Detraction from the natural features of the Portland coastline from important areas of seascape within and around the WHS - with effects on the sensory experience from the sea
- The visible effects relating to the operation of the ERF including additional lighting, noise and the plume when visible
- Degradation to the presentation of geological features including Hard and Slumped cliffs and visible and inclined strata within the WHS and its setting
- Effects on natural beauty recognised within the UNESCO designation
- Visitors' enjoyment of the Jurassic Coast would be degraded, including from public rights of way with experiential qualities of the natural landscape including presentation of the geology affected

2.29 The adverse effects on the WHS that we consider would arise from the Proposed Portland ERF, are profoundly at odds with WHS Policies, Objectives, identified critical success factors and National and Local Planning Policy that sets out to ensure its appropriate conservation and safeguard the Outstanding Universal Value, on which the designation is founded and dependent on.

3.0 DORSET COAST LANDSCAPE and SEASCAPE CHARACTER ASSESSMENT

- 3.1 Dorset Council has produced and initiated information regarding the identification and description of the diversity of Landscape and Seascape Character in the form of the Dorset Coast Landscape and Seascape Character Assessment¹² (DCLSCA) and Landscape Character Assessment Map. The Assessment was undertaken in order to:
- “produce a robust and useable Landscape and Seascape Character Assessment of the Dorset Coast and offshore areas that will inform and assist in the planning and decision making process. As the classification and description of landscape/seascape types is a factual and objective process it can be used in a range of planning and management situations. These can include informing development plan policies at both strategic and local levels, and in the consideration of development potential as well as to inform the siting, spacing, scale and design of development and as an input to Environmental Assessment both at the level of plans and policies and at the level of individual development proposals. Character assessment can also provide a basis for the preparation of landscape management strategies, plans and initiatives, to guide change and contribute to wider environmental initiatives”*
- 3.2 These Character Assessments are a classification of existing landscape and seascape types that are based on a variety of geo-physical parameters. These include geographical and geological features, topography, vegetation and habitats for land based and types of coast and adjoining waters, water depth, for sea based. The character types are distinctive when applied to specific landscape locations but also apply to a broader classification across geographical areas.

Landscape Protections

- 3.3 Landscape designations relate to both landscape and seascape areas are nationally and internationally important. The area that we are considering is subject to a range of protections, the multiple designations and the accompanying Planning Policies. The classification and wording is set out in a number of sources and extracts, as set out below from the DCLSCA.
- 3.4 *WORLD HERITAGE SITE – “Jurassic Coast designated by UNESCO 2001-Dorset and East Devon Coast (95 miles). The World Heritage Site is recognised for the geological importance along the Dorset coast a unique stretch of outstanding geology, which represents 185 million years of earth history. The overlying sequence of Jurassic rocks is amongst the best sections of marine Jurassic and Cretaceous-age rocks to be found anywhere in the world.”*

¹² Dorset Coast Landscape and Seascape Character Assessment - LDA Design, 2010 - http://www.cscope.eu/_files/results/activity_1/dorset/Supporting%20Documents/C-SCOPE%20Seascape%20Report.pdf

- 3.5 *RAMSAR SITE – “A designation that provides protection of significant wetlands for wildlife covering Chesil Beach, including Hamm Beach and the Fleet Lagoon.”*



© Coe Design – Fleet Lagoon looking North

- 3.6 *SPECIAL PROTECTION AREAS (SPA) – “Chesil Beach of international importance for Birds, Includes the coastal lagoons, annual vegetation of drift lines, perennial vegetation of stony banks Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*).”*
- 3.7 *SPECIAL AREAS OF CONSERVATION (SAC) – “Chesil Beach and the Fleet & Isle of Portland to Studland Cliffs. Includes Vegetated sea cliffs of the Atlantic and Baltic coasts, Semi-natural dry grasslands and scrubland facies.”*
- 3.8 *SITES OF SPECIAL SCIENTIFIC INTEREST (SSSI) – “These sites have been notified in order to maintain selected communities of plants and animals within a broad range of habitats including coastal limestone grassland, maritime coast and cliffs and outstanding geological features and landforms along the Jurassic Coast.”*
- 3.9 *GEOLOGICAL CONSERVATION SITES (GCR) AND REGIONALLY IMPORTANT GEOLOGICAL SITE (RIGS). “GCRs are non statutory, nationally important Geological Conservation Sites, of which there are 66 alone in the World Heritage Site. RIGS are non statutory Regionally Important Geological Sites.”*
- 3.10 In addition to designations the essential characteristics of the landscape are specifically protected through planning policy including:
NPPF 130¹³. *“Planning policies and decisions should ensure that developments: c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.”*

¹³ NPPF_Sept_23 Chp 12

- 3.11 Local Planning Policy **ENV 1 LANDSCAPE, SEASCAPE AND SITES OF GEOLOGICAL INTEREST**¹⁴ prescribes that: *“(i) The plan area’s exceptional landscapes and seascapes and geological interest will be protected, taking into account the objectives of the Dorset AONB Management Plan and World Heritage Site Management Plan. Development which would harm the character, special qualities or natural beauty of the Dorset Area of Outstanding Beauty or Heritage Coast, including their characteristic landscape quality and diversity, uninterrupted panoramic views, individual landmarks, and sense of tranquillity and remoteness, will not be permitted.”*
- 3.12 The proposed ERF is required to comply with the Dorset Waste Plan Policy 14¹⁵, which prescribes that it would need to *“be compatible with their setting and to conserve and/or enhance the character and quality of the landscape, to be achieved through, among other things, appropriate use of scale, form, mass and materials, as well as a sympathetic location”*.

Perception of Landscape and Seascape Types

- 3.13 The Assessment (DCLSCA) discusses the principle of perception of Landscape and Seascape by individuals and via a cultural experience. *“It is evident that perceptions of the landscape vary, and that much depends on scale, knowledge and understanding of the landscape and the issues relating to it. Perceptions are subjective, and their formation is dependent on a vast range of cultural and physical experiences and associations. In some cases the perceptions and images evoked by these areas are based on actual experience of the landscape and seascape and their interrelationship. Factors that can contribute include the weather, noise and smell, naturalness, remoteness, and feelings of safety as well as scenic quality, distinctiveness, rarity and visibility.*
- 3.14 We consider that the Jurassic Coast (WHS) and the Isle of Portland both have distinctive identities and evoke strong images for the local community, visitors and tourists, as well as providing internationally recognisable images.
- 3.15 The view to the island from the iconic Chesil Beach and approach along the Beach Road has an important sense of homecoming for residents or arrival for a visitor. The shape of the island is unique and is a landmark from afar, with both west and east coastlines with the ‘Jurassic Coast’ World Heritage Site.

¹⁴ West Dorset, Weymouth & Portland Local Plan p.20

¹⁵ Dorset Waste Plan 2019 - Policy 14 Landscape and Design Quality



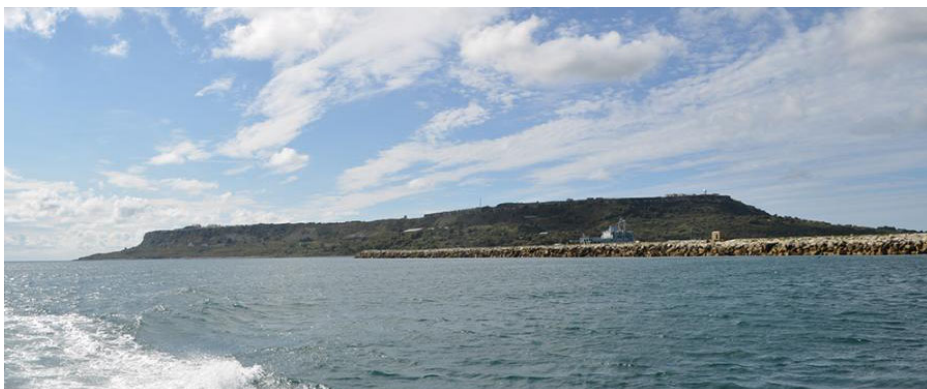
© Coe Design – View of Portland along Chesil Beach, showing Hamm Beach, Portland Harbour and Lyme Bay

- 3.16 Recreational Value of the Area - The long arrival from before Ferry Bridge, prefaces and sets the scene and of dramatic landscapes. The sea, the harbours of Portland and Weymouth, the beaches at Chesil and Hamm, with their coastal waters are highly popular recreational areas throughout the year, particularly in the summer and school holidays. A wide variety of water sports are taking place, notably sailing, with the National Sailing Centre based on Portland Harbour. Numerous beach and water based activities, such as swimming, canoeing, paddle-boarding, wind and kite surfing are increasingly popular. Walking is a major pastime in the area, including using the long distance footpaths, the South Dorset Coast Path, of which part, is the round the island route on Portland. Bird watching is of importance in the area, water birds on the Fleet SSSI and cliffs and migratory birds along the coastal edges. The area is important for environmental education, particularly about wetlands and shorelines at the Chesil Beach Visitor Centre and a centre for Geological and Geographical field trips.

Landscape and Seascape Character Types

- 3.17 The following Landscape and Seascape Character types, as extracted from the DCLSCA, are considered to be affected by the proposal. Terrestrial Landscape Type affected as 'Limestone Peninsula', 'Shingle Beaches', 'Slumped Cliffs' and 'Hard Rock Cliffs'. Seascape Character Types affected, as 'Marine', 'Man-made Harbour' and 'Coastal Waters'. We consider the effects of the ERF impacts these Character Types as a whole, due to the scale and nature of the development.

Limestone Peninsula



© Coe Design- View to the Peninsula East Coast from the sea in Weymouth Bay

- 3.18 Characteristics - *“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 peninsula extends from mainland, creating a sense of exposure and remoteness, The pale grey Portland limestone rock dominates the natural and built landscape; Exposed, windswept and rocky landscape.”*
- 3.19 Location - *“The Limestone Peninsula is a prominent feature which forms the Isle of Portland, well known locally as well as further afield. Forming a distinctive wedge shape with more elevated landform to the north, the peninsula is visible from many areas of the Dorset coast, higher points further inland and also from large areas of the sea, from which it is an important landfall. Views from the Peninsula extend to the west and east along the coast and out to sea, with prominent landmarks such as the vertical hard cliffs being evident within views. The location of the Peninsula also affords wide open panoramic views across the Dorset coast and sea beyond.”*

Valuations Relating to Landscape Character Type

- 3.20 From our experience there is a strong, special character to the peninsula, primarily its relationship with the sea. The inheritance and heritage of the manmade Portland Harbour, its breakwaters and walls, the connections with the maritime history, ships, the Navy and military defence of the UK and until recently part of the coastguard response to ships, and people using the coast.
- 3.21 There is a community pride in the nature of the Island with its distinctive form as an Isle peninsula, being metaphorically out at sea, and consequentially the environment and culture is affected by the inherent sea conditions. The distinctive shape is highly visible from out at sea and from along the Dorset Coast and higher points inland.
- 3.22 The other primary special sense of landscape value is the inherent nature of the peninsula, its formation from sedimentary Portland stone and the geological heritage contained within its strata. The stone has for centuries been utilised for notable architecture in cities and for sculpture. The heritage of the stone quarrying is evident throughout the landscape with fragments remaining from the past centuries. These contribute to a rich cultural history of the island.

Identification of Effects

- 3.23 The location of a large industrial development which is not part of the maritime nature of Portland Harbour, is considered to be out of context with the character of the Isle of Portland. The proposed ERF is not compatible with Dorset’s key characteristic “dramatic and distinctive wedge shaped limestone peninsular” where the overall management objective is to “maintain the integrity of the skyline”.
- 3.24 Locating the ERF on the Isle of Portland, the proposed development will be evident in long distant views from the sea, from the other side of Weymouth Bay, Ringstead Bay, from the

coastal waters to the East of Portland and from within and outside the Portland Harbour.
This will have an adverse effect on the seascape and long views.

Shingle Beaches



© Coe Design-Chesil Beach on landward side with vegetation and walkers

- 3.25 Characteristics - *“Large often raised shingle beaches and spits, with predominance of shingle forming beach substrate the Size of shingle varies from very fine to large shingle and sometimes mixed with sand.”*
- 3.26 Location - *“Chesil Beach is an impressive example of the type due to its height and extent and is a unique feature on the Dorset coast, a raised shingle spit which links Portland to the mainland”.*

Valuations Relating to Landscape Character Type

- 3.27 Chesil Beach is unique within the Jurassic Coast World Heritage Site that was once the only physical land connection. The Beach changes form and shape with the sea conditions and weather and acts as a storm protection for the Beach Road access and the Hamm Beach on the edge of Portland harbour. This is a major feature of the Coast and has a rich local history, many of the local of the stories and culture emanate from Chesil Beach and Lyme Bay. Part of this heritage is the openness and wildness of Lyme Bay and the prevailing winds and storms that caused many shipwrecks on the Chesil Beach.

Identification of Effects

- 3.28 Chesil Beach is a major destination for visitors and tourism, as an attractor for the Jurassic Coast and as a coastal area. The ERF will have an adverse effect on the iconic nature of Chesil Beach and will have an experiential and the perception impact for users.
- 3.29 It is of concern that the increase in HGV vehicle movements delivering to the ERF has an experiential effect on the Chesil Bank, Hamm Beach and Portland Harbour, its value for recreation and will diminish the overall landscape character.

Slumped Cliffs



© Coe Design- Slumped Cliffs and exposed Rock Strata, West Coast of Portland

- 3.30 Characteristics - *“Softer rock cliffs, susceptible to erosion and landslips although may be stable for long periods. Softer substrate provides habitat for colonisation of cliffs with vegetation over time. Beaches, usually shingle, protect cliff bases. Significant fossils often present. Important cliff type within the internationally protected Jurassic Coast WHS.”*
- 3.31 Location - *“To the east of Portland and on the Isle of Portland, Slumped cliffs alternate or combine with Hard Rock Cliffs limestone which form harder caps or seams above the slumped slopes. The Slumped Cliffs are generally dark grey shales, mudstones and clays which have slipped and slumped at various time. The cliffs support a variety of plant communities, depending on exposure and sea spray, and sheltered parts can develop undercliff vegetation such as scrub, tall herb and grassland.”*



© Coe Design- Slumped Cliffs on the East Coast of Portland showing vegetation cover

Valuations Relating to Landscape Character Type

- 3.32 The Slumped Cliffs with the Hard Rock Cliffs, together, make up a significant proportion of the Jurassic Coast World Heritage Site, which is also designated for its scenic beauty through the Dorset AONB. The Slumped Cliffs Landscape Character is an evocative part of the Island, which is more apparent on the East Coast of Portland. There is a mixture of both types of rocks among the cliffs on each coast. The Slumped Cliffs are more vegetated than the harder rocks of the West Coast, this vegetated nature is establishing upwards and along the coast from the looser rocks at the base and slopes of the cliffs.

- 3.33 From the sea, on rounding the head of the island after the breakwater, the appearance of greening along the eastern cliffs is very noticeable. Passing along the coast by boat there is a strong sense of a contiguous habitat of scrub, small trees and lower flora which has been establishing over time.
- 3.34 The establishment and presence of vegetation is assisted by the more sheltered aspect of this coast from prevailing south-westerly winds. The vegetation is relatively continuous and at Church Ope Cove, there is sufficient shelter for trees and elements of woodland to have become established. This scrub vegetation is recognised as an important contributing factor to support birds and provides a significant support for migrating birds, some rare. The RSPB observatory monitors and keeps records of bird sightings.

Identification of Effects

- 3.35 It is our opinion that the siting of the ERF, which is a very large scale, has an adverse impact on the landscape character of the Slumped Cliffs to the East Coast of Portland and consequently the Jurassic Coats WHS. It is a development of such a sufficient larger scale than, for example, the existing low industrial sheds that are towards the edge of Portland Port, with the existing scrub habitat both below and above, that it has a substantial and prominent impact, in views from the land from the Slumped Cliffs at a variety of levels.
- 3.36 The ERF has greater effects and impacts when viewed from the sea, from Portland Harbour and the coastal waters by Portland and Weymouth Bay. The Appellants LVIA has considered one receptor in terms of the ERF effects on seascape, which was based on land. It is our opinion that the effects on Seascape should be evaluated from receptors based in the sea. Consideration should be taken for the different categories of view, from small boats, sailing yachts, pleasure craft, fishing boats to larger vessels such as Cruise Ships, Naval and other ships. The passage along the East Coast is frequently used for boats, for recreational and commercial activities, such as fishing.

Hard Rock Cliffs



© Coe Design- Hard Rock Cliffs with exposed strata

- 3.37 Characteristics - *“Hard cliffs of limestone with vertical or near vertical faces and ledges, often dramatic, with pinnacles and pillars. Highly visible from long distances due to height and colour. Clifftops provide significant panoramic views especially when associated with high points; Generally un-vegetated but may support some vegetation; Any ledges provide important habitat for nesting seabirds; Important cliff type within the internationally World Heritage Site, representing the Jurassic Periods, are some of the best exposed geological formations of this age in the World.”*
- 3.38 Location - *“Hard rock cliffs occur mainly on the Isle of Portland and eastwards , are often highly visible from long distances, because of their height and profile and colour, which varies from dark greys, to light greys. The cliff tops often have significant panoramic views from the paths above and the coastal high points are often formed by the cliffs or run close to the cliff tops, limiting views inland. The cliffs, due to their vertical or near-vertical faces are often un-vegetated.”*

Valuations Relating to Landscape Character Type

- 3.39 The Hard Rock Cliffs and Slumped Cliffs together, are a significant proportion of the Jurassic Coast World Heritage Site, which is also designated for its scenic beauty through the Dorset AONB. Hard rock cliffs are exposed by geological formations, weather, erosion and early quarrying from the sea. They are often combined with Slumped Cliffs and are an important geological and visual character, occurring through both coastlines. These cliffs are enhanced by the interesting flora, birds and the amazing and important number of lichen species.
- 3.40 Within parts of these Hard Rock cliffs there remain a rich heritage of interesting remnants of former quarry workings, including former trackways, level former train tracks, inclines, tunnels, bridged stone, sites of piers and docks for boats. At high levels overlooking the sea, there also remains evidence of fortifications and bases for emplacements. The history of Portland is evident in its landscape and this is highly valued by the community and visitors.

Identification of Effects

- 3.41 The Landscape and Seascape characters are harmed by the effects of the scale of the ERF on the setting of the Jurassic World Heritage Site due to the importance of perceiving these elements in the context of an undeveloped landscape, in order to preserve their presentational and experiential qualities

MARINE - Man Made Harbour



© Coe Design- View within Portland Harbour from the sea to the East Coast of Portland



© Coe Design- Views o Portland Harbour Walls and Features from the sea



© Coe Design- View from outside a Portland Harbour Breakwater to East Coast of Portland from the sea

- 3.42 Characteristics - *“Large area of deep water enclosed by man-made sea wall; Important habitats and biodiversity; High intensity of port activities including commercial shipping, naval vessels, cruise ships; High intensity of water-based recreational activities including water sports, sailing and diving. Important shellfish fisheries. Very large protected and sheltered expanse of water. Associated extensive land based activities and industries. Important setting for Portland and Weymouth.”*



Courtesy of SPWI- View from the Portland North Coast overlooking Portland Harbour

3.43 Location - *“The Man-Made Harbour Seascape Character comprises the enclosed deep water Portland Harbour”.*

“It comprises a large expanse of water enclosed by a man-made harbour wall which dates back to the 1840s. It is also enclosed on the west side by the stabilised shingle spit at the western extent of Chesil Beach which forms the causeway linking the mainland to the Isle of Portland.”

“The Harbour is characterised by intensive uses ranging from commercial shipping, naval vessels and cruise ships to recreational activities including sailing, watersports and diving as well as small fishing boats exploiting the shellfish resource. The Harbour is a refuge for small ships seeking shelter from strong winds and storms, especially in winter, as well as providing an important recreation resource. This includes hosting the sailing events for the 2012 Olympics at the Weymouth and Portland National Sailing Academy, located on its southern side.”

“The protected waters are used intensively for sailing (the National Sailing Academy is set to host the Olympic sailing events at Portland). Other watersports are also popular, including diving Portland Harbour and the backdrop of the Isle of Portland are significant landmarks of the Dorset and South Coast of England.

The Harbour itself is dominated by the high Portland cliffs that form the backdrop to the south.

“Shaping the Future Seascape any new development should be planned to improve the character, layout and architectural quality of land based facilities around the Harbour and take account of visual impact on adjacent land areas such as the upper reaches of Portland and other coastal areas.”



© Coe Design- Panoramic view from the North Coast footpath overlooking Portland Harbour, Chesil and Hamm Beach, Weymouth and Lyme Bay and WHS Dorset Coast East beyond Weymouth

Valuations Relating to Landscape Character Type

- 3.44 Portland Harbour is a very important part of the Isle of Portland Peninsula and it is integral with the island. There are layers of history in the making of the Harbour, its breakwaters, buildings out on these in the harbour, the shipwrecks, and the naval and maritime stories that accompany the use of the harbour over centuries.
- 3.45 Many Portlanders have a long association with the Harbour, working on the water, servicing the navy fleet, the helicopter base and the latterly the coastguards, over the twentieth century. Ships, shipping and the maritime nature of the harbour are considered to be part of this long association. Sailing and water sports are highly and increasingly popular on the calmer waters of the harbour. The recognition for sailing at Portland was informed by the establishment of the National Sailing Centre. The Harbour is now a location for education, training, racing and competitive sports, for residents and visitors. The island welcomed many participating sailors for the Pre- Olympic sailing trials and for the Olympics in 2012.

Identification of Effects

- 3.46 The ERF is proposed to be located at the Port is a large scale additional development and in our opinion will have an adverse impacts the Landscape and Seascape value of the Marine Man Made Harbour Seascape.
- 3.47 With reference to the DC Landscape and Seascape Assessment guidelines above, it is our opinion that the visual impact is substantial due to the scale of the ERF as seen from the Portland Harbour, waters by the upper reaches of the Portland East side and from the sea in Weymouth Bay. This would course harm to views associated with the island as a backdrop which is highlighted as of importance in the assessments.
- 3.48 We consider that the ERF will have a negative impact of the on the perception of residents and visitors, who are part of the busy recreational use of the harbour waters and the Hamm Beach edge, whether for water sports, walking, swimming and beach visits.
- 3.49 The Appellants LVIA has considered one receptor in terms of the ERF effects on Seascape, which was based on land. It is our opinion that effects on Seascape evaluated from receptors based at sea, taking account of different categories of view, from small boats,

sailing yachts, pleasure craft, fishing boats to larger vessels such as Cruise Ships , Naval and other ships. Our view is that consideration of impacts in greater detail and breadth from sea, including to a broader range of receptors give additional weight to the adversity of predicted effects, increasing the magnitude of harm.

Coastal Waters



Courtesy of SPWI- Panoramic view from the Portland East Coast overlooking Portland Port, Portland Harbour, coastal waters of Weymouth Bay and East to the WHS Dorset Coast

- 3.50 Characteristics - *“Shallow waters up to 30 metres deep, Sheltered or moderately sheltered coastal waters, Underlain by complex superficial sediments over bedrock, High importance for marine biodiversity with varying levels of statutory protection, Low level of activity from, often seasonal, sailing and water sports. Valuable fishing activity - includes potting and shellfish - generally small boats, both private and commercial.”*
- 3.51 Location - *“The SCT to the east of Portland ties limestone cliffs together with vegetated slumped cliffs. These end abruptly at the coast and contain views within a relatively narrow coastal strip, as the cliffs often form high points or are close to ridge tops. Here the intertidal area is often very restricted either consisting of a narrow shingle beach or intertidal rock ledges or no beach at all. These are often inaccessible.”*

Valuations Relating to Landscape Character Type

- 3.52 This seascape character includes the coastal waters of Weymouth Bay and the seas to the East side of Portland, from which the ERF will be visible from all types of boats and yachts which can often be seen fairly close to the coastline travelling in both directions. Fishing vessels and Pleasure craft are travelling to and from Portland and Weymouth harbour or east towards Poole Harbour and further along the coast. This seascape area is considered to be sensitive with proximity to the natural coastline and away from principal Port activities.

Identification of Effects

- 3.53 In our opinion the scale and size of the ERF will have an adverse impact on the value of the Seascape character in Coastal Waters due to adverse effects on the visual quality of the seascape and the Portland backdrop which is integral to the enjoyment of the adjacent coast and the presentation of the natural coastline and its geology. The noise of the ERF would

detract from the natural soundscape and degrade the experience of water-based activities in the adjacent seascape.

- 3.54 The ERF has greater effects and impacts when viewed from the sea. The Appellants LVIA has considered one receptor in terms of the ERF effects on Seascape, which was based on land. It is our opinion that the effects on Seascape should be evaluated from receptors based in the sea taking account of different categories of view, from small boats, sailing yachts, pleasure craft, fishing boats to larger vessels such as Cruise Ships, Naval and other ships. Our view is that consideration of impacts in greater detail and breadth from sea, including to a broader range of receptors give additional weight to the adversity of predicted effects, increasing the magnitude of harm.



©Coe Design- Views from the sea in Portland Harbour towards Portland Port, with the North and East Coast more sheltered Slumped Cliffs and contiguous scrub vegetation, of high value to migrating birds.



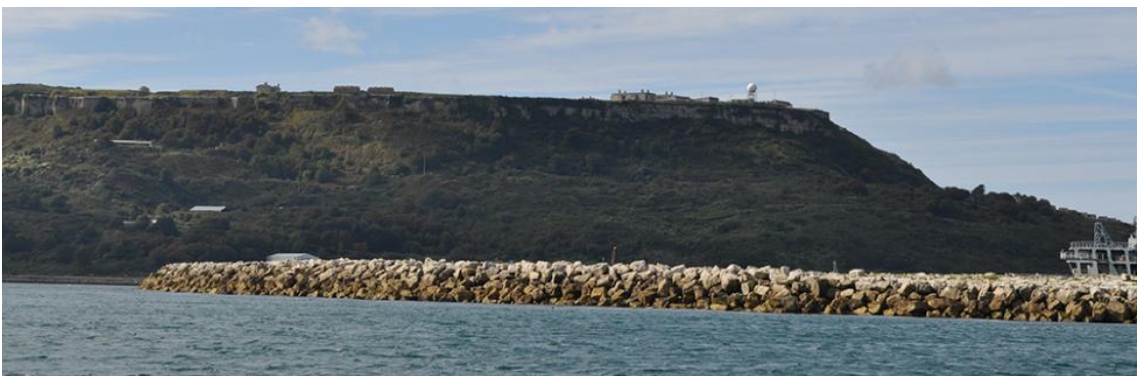
Courtesy of SPWI- View from Portland Harbour to the North Coast from the sea and passing boats



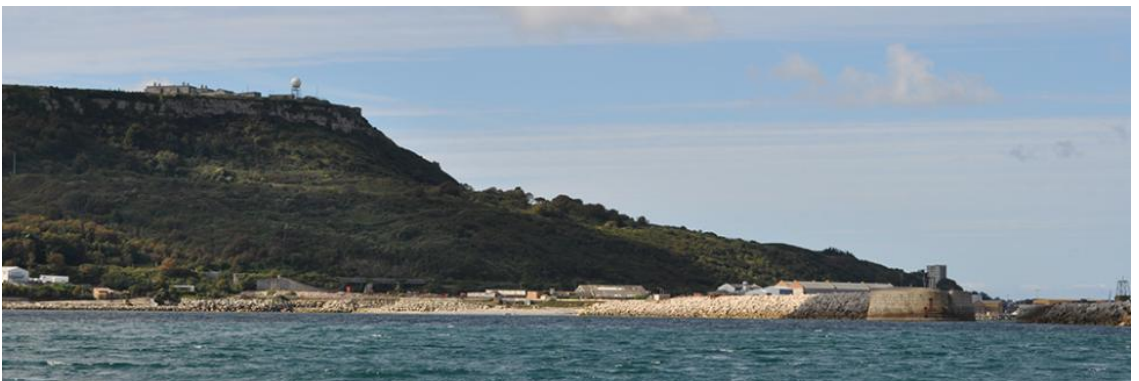
©Coe Design- View to the East Coast from the sea in Weymouth Bay at a range of distances



©Coe Design-View to the East Coast form the sea in Weymouth Bay at a range of dista



©Coe Design-View to the East Coast form the sea in Weymouth Bay at a range of dista



©Coe Design- View to the East Coast form the sea in Weymouth Bay at a range of dista

Summary

- 3.55 Having followed the guidance set out in the Dorset Landscape and Seascape Character Assessment (DCLSCA) in our opinion there are adverse impacts, including, visual, character, perception and experiential qualities of Landscape and Seascape characteristics.
- 3.56 In our opinion the scale and size of the ERF will have an adverse impact on the value of the Seascape Character. We consider that the ERF will have greater impacts, when viewed from the sea, from Portland Harbour and the Coastal Waters near Portland and from Weymouth Bay.

- 3.57 It is our opinion that the effects of the EFR on the Seascape as evaluated in the ERF LVIA does not give sufficient weight to the effects of Seascape Character and that the effects are considered to be of an adverse nature of a greater significance as a result. The Appellants have considered a single receptor in terms of the ERF effects on Seascape, which was based on land, which is considered to be not sufficient for a proper assessment of the effect on the Seascape Character.
- 3.58 The seascape should have been evaluated from receptors based in the sea and from multiple viewpoints to fully evaluate the effects and impacts on the scenic quality of the Harbour and Coastal Waters and presentation of the WHS. Consideration should also be taken to the zones of view from the areas of sea and different categories of view, from smaller craft, such as canoes and paddle boards, small boats, sailing yachts, pleasure craft, fishing boats to larger vessels such as Cruise Ships, Naval and other ships.
- 3.59 It is our opinion that the ERF is an inappropriate large scale development in this coastal area, due to its Landscape and Seascape Character and sensitivity. It will have effects on the Jurassic Coast WHS, the Harbour and the Island as a whole. The siting of an ERF in a place that has such substantially special Landscape and Seascape characteristics, has a negative impact on these on the landscape and scenic beauty which are interwoven with the unique geological values.

4.0 TRANQUILLITY - A PERCEPTUAL QUALITY OF THE LANDSCAPE

Introduction

- 4.1 This statement has been provided in complement to, and is intended to be read in conjunction with, the report by Sharps Acoustics LLP who have been commissioned by SPWI to provide an acoustic assessment of the change in sound character and the effect on tranquillity on the Isle of Portland, as a result of the operation of the proposed Energy Recovery Facility (ERF).
- 4.2 SPWI raised a concern that the noise from the proposed ERF would have an adverse effect on the tranquillity currently experienced at:
- the Royal Naval Cemetery;
 - on the footpath which heads south from the cemetery before stopping at a gate to Port owned land (S3/72); and
 - on the footpath at the top of the East Weares to the south (S3/81), for which there is a strong aspiration for it to be reconnected to the aforementioned footpath through Portland Port land



©Coe Design – Footpath alongside Naval Cemetery wall

- 4.3 In addition to the main areas of concern, this statement considers impacts on tranquillity in relation to the landscape at large, where protected by relevant designations and landscape planning policy
- 4.4 Tranquillity is a recognised environmental quality that can be established by a number of suitable indicators and is widely accepted as contributing to health, well-being and quality of life.

- 4.5 Tranquillity is an important perceptual attribute of the local Landscape and Seascape, for residents and visitors alike, and an essential characteristic of the local and wider landscape, as recognised in the Dorset Landscape and Seascape Character Assessment and as identified attributes of designated and protected landscapes.
- 4.6 In relation to the proposed Portland ERF, of particular importance, locally, is the sense of tranquillity experienced in and around the Royal Naval Cemetery, adjacent Public Rights of Way and East Weares, which are enjoyed and valued for recreation and contemplation and are SSSI and SAC designated. The area is also of significance due for what it contributes to the WHS as part of its setting. Also of importance are the experiential qualities from the adjacent seascape including the presentation of natural features, including those within the WHS.
- 4.7 The value of the experiential quality of the WHS designation to the South and East is of significance, as is the experiential qualities and characteristics of the adjacent seascape for what they contribute the presentation of the WHS.
- 4.8 Tranquillity is a recognised key attribute of these areas. As a perceptual quality shared across a wide landscape, it is considered essential to the appreciation of the landscape and its constituent parts and integral to the many ways in which this landscape is enjoyed and appreciated within the local area.
- 4.9 It is considered likely that the Proposed ERF will cause harms to the level of tranquillity, which has not been taken into detailed account to date and thus does not enable the full impact on our senses to have been considered.

Tranquillity Planning Context

- 4.10 National Planning Policy Framework Chp 15 Conserving and Enhancing the Natural Environment, Para. 185b¹⁶:
Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: (b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason
- 4.11 Planning Practice Guidance (PPG) – Noise¹⁷ provides guidance on relevant factors in identifying areas of tranquillity, as below:

¹⁶ NPPF Chp 15 - <https://www.gov.uk/guidance/national-planning-policy-framework/15-conserving-and-enhancing-the-natural-environment>

¹⁷ PPG – Noise, Para. 008 <https://www.gov.uk/guidance/noise--2>

“For an area to justify being protected for its tranquillity, it is likely to be relatively undisturbed by noise from human sources that undermine the intrinsic character of the area. It may, for example, provide a sense of peace and quiet or a positive soundscape where natural sounds such as birdsong or flowing water are more prominent than background noise, e.g. from transport.”

- 4.12 Tranquillity is a recognised factor in the landscape characterisation process which the landscape profession uses as a basis for landscape assessment in the planning process.
- 4.13 West Dorset, Weymouth & Portland Local Plan 2015 – Protecting and Enhancing the Natural Environment. The Local Plan states that *“Many of the more rural parts and some of the coastal areas have an undisturbed feeling and sense of tranquillity that are hard to find in our modern world and some of these landscapes have been captured by famous artists, such as Turner and Constable.*
- 4.14 ENV1 Landscape, Seascape and Sites Of Geological Interest¹⁸ states that *“(i) The plan area’s exceptional landscapes and seascapes and geological interest will be protected, taking into account the objectives of the Dorset AONB Management Plan and World Heritage Site Management Plan. Development which would harm the character, special qualities or natural beauty of the Dorset Area of Outstanding Beauty or Heritage Coast, including their characteristic landscape quality and diversity, uninterrupted panoramic views, individual landmarks, and sense of tranquillity and remoteness, will not be permitted”.*
- 4.15 The Jurassic Coast Partnership Plan - Theme 3, outlines the following Critical Success factors with regards to Presentation of the WHS (and setting).
- Tranquillity and sense of place are maintained or enhanced
 - Walking routes accessing the Site continue to be improved & managed to a high standard
 - Visitors’ enjoyment of the Jurassic Coast is maintained or enhanced

Tranquillity Definitions

- 4.16 A general idea of tranquillity, in landscape terms, is provided in the Landscape Institute’s ‘Tranquillity – An Overview’¹⁹ which sets out to provide both a summary of what is understood by the term ‘tranquillity’ and to inform any future discourse and action on the topic.
- 4.17 ‘Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013, produced by the Landscape Institute and Institute of Environmental Management and Assessment

¹⁸ West Dorset, Weymouth & Portland Local Plan Adopted 2015 p.20

¹⁹ Technical Information Note 01/2017, revised 2017, The Landscape Institute

(GLVIA3) defines tranquillity to be: *“a state of calm and quietude associated with peace, considered to be a significant asset of landscape”*

- 4.18 The Welsh Government and National Resources Wales have defined that: *“Tranquillity can be measured in terms of the absence of unwanted intrusions, or by a balancing of positive and negative factors. These include the presence of nature, feeling safe, visually pleasing surroundings and a relaxing atmosphere.”*²⁰
- 4.19 Tranquillity has a link to perceptions of the natural environment. ‘Wildness’, ‘Remoteness’ and ‘quietness’ are all important factors, although neither is synonymous. The perception of tranquillity is said to arise from a range of environmental factors on our senses and our perceptions of place. Both human perceptions and factual studies must therefore be considered in studies relating to the term.
- 4.20 Tranquillity can also be talked about as absolute or relative tranquillity. It is said that *“both sorts are important to recognise and value, but for different reasons, the commonality being the achievable state of mind rather than the environmental setting”*.
- 4.21 Within the Landscape Institute’s ‘Overview of Tranquillity’ it is defined as a perceptual quality of landscape, a ‘state of mind’, where all factors contributing to its makeup are not readily measurable. However, for defining and establishing geographical data related to tranquillity, it has commonly been regarded as an environmental quality, established by a number of suitable indicators and as contributing to health, well-being and the quality of life. It is noted that *“This may seem a little confusing but represents where the subject is and this cannot be ignored”*.
- 4.22 Whilst some indicators of tranquillity can be quantified or measured in the field (such as noise levels, or remoteness), many indicators of tranquillity are subjective with judgements coloured by personal experience of the individual. A 2004 Countryside Agency survey (PEANuT)²¹ set out to define perceptions, values and beliefs in relation to tranquillity in order to establish consensus views on what was, and was not, tranquillity. It also concluded that *“unless the experiential or ‘felt’ aspects of landscape are considered alongside more easily quantified characteristics, landscape, countryside and environmental quality can only be partially accounted for.”* A number of common indicators emerged from the study. Further investigations into subjective factors relating to Tranquillity Mapping (Jackson et al, 2008)²² revealed 3 key themes – people, landscape and noise which were used to identify

²⁰ Environmental noise - Tranquillity [online] Welsh Government. 2012.

²¹ Understanding tranquillity: The role of Participatory Appraisal consultation in defining and assessing a valuable resource (CRN92), Natural England, 2005 (ref: CRN92)

²² Jackson, S. Fuller, D., Dunsford, H., Mowbray, R., Hext, S., MacFarlane, R., Haggett, C. (2008) Tranquillity Mapping: developing a robust methodology for planning support, Report to the Campaign to Protect Rural England, Countryside Agency, North East Assembly, Northumberland Strategic Partnership,

indicators for assessing levels of tranquillity. A summary of indicators from these studies are shown below:

Tranquillity Indicators	Tranquillity Detractors
Perceived links to nature and natural features - seeing, hearing and/or experiencing nature and natural features.	Presence of humans/too many people - Certain behaviour/activities undertaken by people which created unwanted noise and disturbance.
Landscape - experiencing (particularly in visual terms) the landscape or elements of it including wild landscapes and rolling countryside as well as characteristics such as fields, moors, woodlands, flora and fauna, natural colours and open views and the sound of water.	Negative impacts of various forms of transport including vehicle noise.
Observing wildlife behaving naturally, hearing birdsong.	Negative impact of various forms of development including commercial and industrial development as detractors.
Peace, quiet and calm – the absence of noise and the feeling of ‘getting away from it all’, including a need for solitude.	Negative impact of sky glow.

Considerations of Existing Tranquillity

- 4.23 Derived directly from its nature as a distinct geological entity, characteristics of wildness, and remoteness, which encompass the coastal landscape of Portland, are pervasive. These qualities arise from the perception of natural features, wild habitats and the openness of coastal views, which provide an unmatched outlook over a most exceptional extent of the mainland. These strong and enveloping qualities, in combination, provide a perception of tranquillity essential to the uniqueness of the landscape.



©Coe Design – Footpath (S3/72) looking west from Naval Cemetery

- 4.24 The area of Portland most susceptible to potential harm to perceived tranquillity encompasses the under-cliff area between the Verne and Portland Port and East Weares. This area includes places of recreational and amenity value and community importance; the Royal Naval Cemetery; the footpath (S3/72) which heads south from the cemetery before stopping at a gate to Port owned land. Regard is also given to the footpath adjacent to Nicodemus Knob (S3/81) above East Weares and including the potential permissive footpath linking both of these footpaths where access is not possible within Portland Port land. The area forms part of the setting of the Jurassic Coast WHS with a particular relationship to the eastern coastal stretch.
- 4.25 The area is well linked to surrounding residential areas and Verne Common Road via the footpath between Verne Common Road and the Royal Naval Cemetery (S3/72) and adjoining branch paths. The footpath is also accessible via the incline footpath linking Verne Common Road with Castletown and Osprey Quay (S3/76) which is on the Southwest Coast Path route. Despite not being a through-route for coastal access, which is a firm ambition of the community, the footpath is well used by local walkers, dog walkers, long distance walkers and visitors exploring the area. The footpath forms the main access to Royal Naval Cemetery accommodating access for memorial events and funerals.
- 4.26 The Naval Cemetery, accessible to the public, is exceptionally well cared for and valued as a local green area with seating, offering opportunities for quiet contemplation and memorial and provides a valuable link to the naval history of the area. The wider area includes historical features in the landscape, that can be seen from public access areas including the Verne Citadel, site of the East Weares Battery and the Portland Harbour Breakwater and other feature of the historic harbour, in addition to the Naval Cemetery.



©Coe Design – Royal Naval Cemetery

- 4.27 The area has strong natural features, dense scrub and trees in the shelter afforded by the undercliff – partially sheltered from the westerly and easterly winds and the landform hard cliff to the Verne and slumped cliff below is a strong visual features. One can experience the geology, and the natural processes that have shaped that landform as well as Portland as a geological entity, it's relationship to the mainland including Chesil Beach and the varied landforms of the West Dorset and Purbeck, largely undeveloped coastlines, through the exceptional panoramic views containing strong positive features. Other visual features include a unique side by side view of Lyme Bay and Weymouth Bay facing the mainland. There is a strong sense of place.
- 4.28 The positive soundscape sometimes includes the sounds generated by moving water, when westerly weather drives waves on to Chesil Beach and the rhythmic movement of pebbles is audible. The scrubland setting forms a valuable habitat for birds and continuous birdsong is often heard and birds can be observed moving about the scrub and trees and in the sky above.
- 4.29 There is a sense of calm, derived from the scale of the surrounding landscape at large. The landscape setting lends itself to feelings of remoteness despite proximity of surrounding residential areas and the port. The setting of the cemetery provides a quiet and contemplative atmosphere.
- 4.30 Whilst well-used the nature and frequency of use does little to detract from tranquillity. One encounters walkers and other dog walkers regularly but without intrusion to one's own activity and sense of being in the landscape. Use of the area is not confined to daylight hours and for many people walking under the stars is a part of the freedom and pleasure of the Isle.



©Coe Design – Footpath heading east to Naval Cemetery from Incline & Verne Common Rd

- 4.31 Sounds from the Port at lower levels, when heard, do little to detract from tranquillity on their own and are able to be tolerated easily with a state of mind of acceptance relating to the long-standing proximity of the port and sea-faring history. Higher noise levels can detract from the ability to experience more positive soundscape elements.
- 4.32 The passage of boats in the harbour is generally slow and predictable. Many operational areas of the port below are screened by the dense surrounding vegetation and provide little disturbance to the tranquil setting.
- 4.33 The experience of descending the coastal path above East Weares, alongside Nicodemus Knob (S3/81) is one where you are dropping into the natural landscape, alongside the hard cliff and into the scrub that covers the slumped cliff face. This is an important point at which the landscape is perceived and where tranquillity from natural elements is manifest. This is considered very sensitive to the changes associated with the proposed Portland ERF which would be visible, both main building and stack, over the scrub line and seascape backdrop.

Consideration of Potential Perceptual Impacts

- 4.34 The visibility of the ERF including its visible stack is predicted to adversely affect the perception of tranquillity across the area in question. Visual dis-amenity experienced by those located near energy from waste plants is a recognised important issue as acknowledged by DERFA²³.
- 4.35 The presence of the 80m high chimney topped with a red obstacle aviation navigation light and the visible plume (only predicted to be very infrequently visible) would provide additional adverse effects. The plume when present after dark will also be subject to illumination from the facility and surrounding existing ambient light which can be seen in effect on the natural cloud cap when present.

²³ DERFA Resource efficiency and waste reduction targets Detailed Evidence report: 28 April 2022.

- 4.36 The visible effects of the ERF are considered to have an adverse impact on the tranquillity of the seascape, particularly in areas outside of the breakwater walls to the east where the perception of other detracting features within the Port is lower.
- 4.37 Operational noises as covered in Sharp’s Acoustics Tranquillity indicate an adverse effect of noise from the ERF, particular when other port noise is low and most notably towards the southern end of the footpath where noise will be heard from relatively high along this sections of path. The report indicates detectable noise levels which are consider having negligible impact on overall levels experiences further north and west along the footpath.
- 4.38 In our view adverse impacts relating to the experience of walking the coast path near Nicodemus Knob to the south (S3/81) would occur, with the main building and stack visible, over the scrub line. This would add an un-ignorable bulk seen in front of the distant undeveloped coastline background, and also from the adjacent seascape area, that would draw the eye away from natural elements, even more so should proposed solar panels reflect late morning sunlight.

Summary

- 4.39 Overall the landscape is considered to be of high recreational and amenity value with other special memorial usage that has specific sensitivities relating to changes in tranquillity. This is demonstrated by use of the site throughout the day and into the night, including on Public Rights of Way, despite the existing dead-end where the PRow meets the Port security fence, and through local policy that aims to protect the landscape for this purpose.



Courtesy of SPWI – Sailing east of Portland including the site of the Proposed ERF

- 4.40 The amenity value of coastal walks is thus of profound importance, providing immense enjoyment of the landscape, and with additional meaning for the local population. One day it is hoped that there will be a complete round the island footpath with the missing section

through the Port reinstated. To blight the future of this desired circular footpath would not be in the public interest.



©Coe Design – View to southeastern extent of footpath to Port security fence (S3/72)

- 4.41 Access to tranquillity is considered to be particularly beneficial to local residents, with demonstrable benefits to quality of life, and an important aspect of the experience of this landscape prized for its natural qualities and recreational and amenity benefits by residents and visitors alike.
- 4.42 The planning application documentation acknowledges the harm to the Rights of Way as a moderate, significant adverse effect, during day time. Effects experienced during night time are considered to be negligible. We would not concur with this due as we would consider that the combined effects of noise, lighting, visible building and stack and potential plume, illuminated by ambient light would give this a much higher magnitude of adverse effect which would be harmful to the quality of using the PRow including through adverse impacts on tranquillity.
- 4.43 The area forms an important green space between Fortuneswell, Castletown and the Port holdings and existing levels of tranquillity are considered vulnerable to change. Levels of tranquillity are considered to be high with a valuable relative tranquillity considering the nearby operation port and residential areas which is valuable to users of surrounding areas.
- 4.44 The importance of tranquillity in the landscape is highlighted in national and local planning policy, WHS designation, the associated WHS Management Plan²⁴ and landscape and seascape character assessment (see section 3) and local landscape character.

²⁴ Jurassic Coast Partnership Plan 2020-2025

- 4.45 There are predicted adverse impacts which are considered to be harmful to the overall levels of tranquillity, including in relation to the soundscape when noise from operations in the port are quieter or less perceptible due to wind direction. The visual impacts associated with the ERF are considered to be detrimental to the perception of tranquillity. Harm to levels of tranquillity is noted to be a consideration in relation to national and local planning policy, including policy concerned with landscape and seascape character and with the protection of the Jurassic Coast WHS setting, which is a designation of particular value to the local community.

5.0 CONCLUSION

Introduction

- 5.1 In this statement, specific and overlapping topics have been considered relating to landscape impacts on the World Heritage Site Jurassic Coast and its setting, the local Seascape Character and Tranquillity, as a perceptual quality of the landscape.
- 5.2 This statement looks at the wider concerns of the community on the impact of the proposal upon the landscape of Portland and its setting. The evidence provided in this statement shows that the extent of harm to the landscape goes beyond that stated in Dorset Council's Reason for Refusal in a number of key areas.
- 5.3 This statement look at greater depth in relation to WHS landscape impacts including in the immediate setting, the quality of the surrounding Landscape and Seascape and also perceptual aspects.
- 5.4 The statement provides evidence in relation to impacts on Landscape Character and Seascape which considers a greater breadth of receptors than has been currently considered, most notably from the sea.
- 5.5 The statement looks at Tranquillity as an important characteristic of the local landscape and constituent characteristic of surrounding Landscape and Seascape Character types and experiential quality of the landscape, including the World Heritage Site and Setting.

Conclusions

- 5.6 The proposed ERF is considered to be of an inappropriate size and scale, incongruous with its surroundings and inappropriate in this location of coastlines, cliffs, harbours and sea, with far reaching visual and landscape impacts.
- 5.7 The visible ERF and the impacts of its operation would degrade the landscape in which it is located with adverse effects on Portland, from the sea and surrounding land , as far as the West Dorset and Purbeck Coast, which are WHS and AONB designated.
- 5.8 The impact of the ERF within the setting of the WHS would be to degrade the presentation of geological features, the existing Landscape and Seascape characteristics and the experiential qualities of the WHS, which contradict National and Local Planning Policy and World Heritage Site policies, intended to safeguard the Outstanding Universal Value of the Jurassic Coast WHS.
- 5.9 We consider that the ERF is an inappropriate large scale development in this sensitive coastal area and the lack of water-based assessment of landscape and visual effects has led to an under-representation of effects in relation to seascape.
- 5.10 The area has an abundance of recreational water based activities, with a high level of resident participation and attracting a vast number of visitors. This type of industrial development, of a large scale with a visible plume at certain times, has an experiential impact on the recreational value of the area, particularly from Portland Harbour.

- 5.11 The surrounding terrestrial landscape is also considered to be of high recreational and amenity value with certain special usage associated with heritage and memorial features particularly near the proposed site. The landscape is enjoyed by walkers, climbers, mountain bikers and for naturalist pursuits, primarily focused around the island's wild coastline.
- 5.12 Tranquillity is an essential experiential quality of this landscape, enjoyed by the local community and visitors and has recognised benefits relating to quality of life. Adjacent terrestrial and maritime areas have specific sensitivities relating to tranquillity which are important aspects of recognised Landscape and Seascape characteristics and given importance within planning policy and WHS designation.
- 5.13 Adverse impacts on tranquillity are predicted, that have not considered to be taken into account in existing assessments, arising from changes in visual character, noise and night times impacts from light pollution. Harm to levels of tranquillity are a consideration in relation to national and local planning policy, including policy concerned with Landscape and Seascape character and with the protection of the Jurassic Coast WHS and Setting

Closing Statement

- 5.14 It has been found that the Proposed Portland ERF would cause additional harms to the landscape that not been taken into account in existing assessments. This would affect the existing Landscape and Seascape character and perceptual qualities of the landscape, including tranquillity, which would harm the WHS and its setting and adversely affect the enjoyment of the landscape by its broad and numerous users on land and sea.
- 5.15 It is our opinion that as a result of the landscape and environmental harms associated with the proposed ERF, the perception of Portland and the associated Terrestrial and Seascape Landscape character will be negatively impacted, which will consequently devalue this as a place for living, recreation, visiting and tourism with consequential impacts on the wider region looking towards the ERF site.

APPENDIX

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