

Town and Country Planning Act 1990

Town and Country Planning Appeals (Determination by Inspectors) (Inquiry procedure) (England) Rules 2000



<b>Proposed development</b>	Construction of an Energy Recovery Facility
<b>PINS reference</b>	APP/D1265/W/23/3327692
<b>LPA reference</b>	WP/20/00692/DCC
<b>Site Address</b>	Portland Port, Castletown, Portland, DT5 1PP
<b>Local planning authority</b>	Dorset Council
<b>Appellant</b>	Powerfuel Portland LTD

**THE PORTLAND ASSOCIATION**

**RULE 6 PROOF OF EVIDENCE: TRAFFIC, AMENITY AND SOCIO-ECONOMICS**

**DEBBIE TULETT**

**7 NOVEMBER 2023**

**CONTENTS**

- 1.0 Rule 6 Party Witness Introduction and Scope of Evidence
- 2.0 Traffic, amenity and quality of life
  - Transport and access
  - Traffic and amenity
  - Visual amenity
- 3.0 Socio-Economics & Tourism
  - Tourism and leisure
  - Benefits and need for the ERF
  - Jurassic Coast
  - Deprivation
- 4.0 Conclusion
- 5.0 Appendices

## 1. INTRODUCTION AND SCOPE OF EVIDENCE

- 1.1. My name is Debbie Tulett. I have lived in Dorset for over 40 years, and on Portland for 5 years. Three of my children live in Dorset too. I live in the Underhill ward and am familiar with the location of the proposal and the surrounding area.
- 1.2. I am on The Portland Association Committee and have been involved in contesting this planning application since November 2019. I am giving evidence as a witness on behalf of The Portland Association as its Research Officer (a voluntary role), having spent the last 4 years working full-time on researching the impacts of the Appellant's proposal.
- 1.3. I have reviewed the planning application, the regulation 25 requests additional documents, and the EA Environmental Permitting Application, as well as Dorset Council's Committee Report, Update sheet and Decision Notice. I have also reviewed the appeal documentation.
- 1.4. This evidence considers the impacts of the proposed Energy Recovery Facility ("ERF") on (a) the amenity and quality of life of local residents and (b) the local economy. In my evidence, I deal with matters pertaining to certain policies of the Dorset Waste Plan 2019, as well as other local planning policies.
- 1.5. The evidence I have prepared and provided for this appeal in this Proof of Evidence is true and I confirm that the opinions expressed are my true opinion.
- 1.6. My evidence is considered against the background of the following documents, together with other relevant referenced documents from Appendix A:
  - Bournemouth, Christchurch, Pool and Dorset Waste Plan 2019 ("DWP 2019").
  - Portland Neighbourhood Plan 2017-31 ("Neighbourhood Plan").
  - West Dorset, Weymouth and Portland Local Plan 2011-2031 ("Local Plan").
  - Jurassic Coast Partnership Plan 2020 – 2025.

## 2. TRAFFIC, AMENITY AND QUALITY OF LIFE

### Transport and access

2.1. Policy 12 of the DWP 2019 states that:

*“Proposals for waste management facilities which could have an adverse impact as a consequence of the traffic generated will be permitted where it is demonstrated... that...  
(a) safe access to the proposed site is provided...”<sup>1</sup>*

2.2. Policy COM7 of the Local Plan (Creating a Safe and Efficient Transport Network) requires development *“to be located where the volume of traffic likely to be generated can be accommodated on the local highway network without exacerbating community severance.”<sup>2</sup>*

2.3. Highways England has not objected to the proposal on the basis that the proposed ERF would not have severe impacts on the Strategic Road Network (“SRN”). Dorset County Council has also not objected to the ERF on highways grounds. However, neither the Appellant nor the County Council have appreciated that the proposed ERF would have adverse impacts on the safety, capacity and use of the local road network, and that the ERF would also not provide safe access to the proposed site.

2.4. In terms of the adverse impact of the ERF on the safety, capacity and use of the road network, the Appellant has not demonstrated adequately that the channeling of HGVs through a high-density outdoor leisure area, which is used for both residents and tourists, would be safe. For example, the final part of the journey of an HGV lorry to Portland, from the Chesil Vista Roundabout, enters this leisure area. There is parking on one side of the road at the Fine Foundation Chesil Beach Centre, opposite a highly popular beachside café and the shallow waters of Portland Harbour used for various watersport activities, with families and children darting across the road along which the HGVs would be passing.

2.5. There is also insufficient evidence to demonstrate that the ERF would not result in an unacceptably high increase in congestion levels. The Appellant anticipates that an

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<sup>1</sup> Dorset Waste Plan 2019.

<sup>2</sup> West Dorset, Weymouth and Portland Local Plan 2011-2031.

additional 80 HGV movements would occur as a result of the ERF. But this traffic would have an impact on an already constrained road. For example, many people use the pedestrian crossing to pass safely from one side to the other, which can then cause a bottleneck of traffic and during the summer the traffic can queue back all the way into Fortuneswell. The HGVs would also pass very close by residential properties. Many young families live at these properties and so the road therefore cannot be considered to provide safe access to the proposed site.

- 2.6. The impact of 80 additional HGV movements would not only affect Castletown and Beach Road. It would also be felt all the way from Portland Port to Foord's roundabout (over 3 miles) and beyond. The A354 can bottleneck at various points during the 11-mile journey from Dorchester to Portland Port. The impact of a further 80 HGV movements past residential houses and along roads congested with holiday traffic, cruise ship coaches and general traffic, makes for an inefficient transport network.
- 2.7. The Appellant has underestimated the extent of the ERF's impacts on the road network. It has provided evidence in its Transport Assessment that "*all links included in [its] study area would experience negligible change with a maximum of less than a 3% increase in traffic flow*": see para 7.26 of ES Tech Appendix, Traffic and Transport, Part 1.<sup>3</sup> However, this appears to be based on the percentage increase of overall vehicles rather than HGVs specifically. A local traffic survey, which was carried out in Castletown on 26 October 2023 between 06:00 and 22:00, noted 161 daily HGV movements, which would mean that the additional 80 HGVs would represent a 50% increase in HGV movements.<sup>4</sup>
- 2.8. The Appellant has also stated in its Transport Assessment that "*the main and only access to the Port from the public highways is at the eastern end of Castletown, which in turn provides a link to the recently constructed Lerret Road and then onto Portland Beach Road around 1km from the main Port access. Castletown is a wide street that has on-street parking whilst still maintaining two-way vehicle flow, it carries all traffic to and from the Port.*" However, this fails to recognize that HGVs would rumble through Ocean Views/ Atlantic House apartments, Portland Castle, Osprey Leisure Centre, Castletown D-Day Centre & Museum, Crabbers Wharf Holiday apartments, Dive Beyond, Hotel Aqua, Dorset Adventure Café, Castletown Stores, The Jolly Sailor pub,

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<sup>3</sup> ES Tech Appdx L1 Traffic and transport pt1.

<sup>4</sup> Castletown Traffic count 26.10.23.

a public car park, a slipway for local water sports, a Hair Salon, a Wedding Shop and residential terraced housing which line the road.

### Traffic and amenity

2.9. Policy 13 of the DWP 2019 states that:

*“Proposals for waste management facilities will be permitted where it is demonstrated that any potential adverse impacts on amenity arising from the operation of the facility and any associated transport can be satisfactorily avoided or mitigated to an acceptable level, having regard to sensitive receptors, specifically addressing all, but not limited to, the following considerations:*

- (a) noise and vibration;*
- (b) airborne emissions, including dust;*
- (c) odour;*
- (d) litter and windblown materials;*
- (f) lighting;*
- (h) visual impact*
- (i) site related traffic impacts...”*

2.10. Policy ENV16 of the Local Plan provides *“i) Proposals for development should be designed to minimize their impact on the amenity and quiet enjoyment of both existing residents and future residents within the development and close to it. As such, development proposals will only be permitted provided: ... they do not generate a level of activity or noise that will detract significantly from the character and amenity of the area or the quiet enjoyment of residential properties; they do not generate unacceptable pollution, vibration or detrimental emissions unless it can be demonstrated that the effects on amenity and living conditions, health and the natural environment can be mitigated to the appropriate standard”*. Policy ENV16 also provides that *“ii) Development which is sensitive to noise or unpleasant odour emissions will not be permitted in close proximity to existing sources where it would adversely affect future occupants.”*

2.11. As the Officer’s Report recognises, *“the absence of a highway objection cannot, however, be interpreted as meaning there will be no amenity impacts. The entrance route to the facility would be directly through Castletown (Underhill Conservation Area) along a road which has residential properties and other uses such as shops, pubs and hotels, together with tourist facilities such as water sports hire and a museum. The proposal is less compatible with these uses, and their amenity could be affected by the*

*additional traffic bringing RDF to the site.*<sup>5</sup> The officer considers that these impacts could be mitigated through a condition to control delivery hours, but such a condition is unlikely to be effective in a tourist area where traffic flows are unpredictable.

- 2.12. In reality, the residents of Castletown would be impacted by HGVs passing through residential roads on a 24/7 basis. The HGVs will pass by residential properties emitting airborne toxins, dust and odours. According to ClientEarth, *“people living near incinerators complain of noise, litter, increased vehicle traffic, smells and air pollution. As temperatures rise in the summer, the smell often gets worse, forcing people to close their windows and avoid sitting outside.”*<sup>6</sup> Due to the constant hum of the ERF and rumble of the HGV lorries there would be reduced quiet enjoyment by existing or future residents if the proposal is approved. Castletown is a conservation area, and it would feel the impact of 80 extra HGV movements daily.
- 2.13. A continuous supply of waste lorries driving past is not in keeping with the character of a conservation area, nor the amenity of the area, and it certainly would not enable the quiet enjoyment of these residential properties. Waste lorries do smell, particularly in warmer months, the smell of the waste, together with the exhaust of the waste lorries, coupled with the vibrations caused with HGVs passing within 2 metres of residential properties this proposal would be unacceptable to both residents and visitors.
- 2.14. The ERF would also have an impact on the operation of emergency services. This concern is shared by other representatives. For example, the manager of Portland Bunkers Ltd, who works within the Port, has concerns about the proposed ERF and notes that *“One of our duties as an upper tier COMAH site is to ensure that we maintain 24/7 access to our facility for emergency services”* and that:<sup>7</sup>

*“... the road infrastructure onto the island and within the port isn't suitable for this type of operation. We have recently raised this with the port as we have had numerous access issues to our loading berth along the inner breakwater road.*

*I believe part of the proposal is the intended use of the 50T crane berth for RDF to be shipped in and out and possibly bottom ash being shipped out, the inner breakwater road isn't suitable for HGV use and this will impact the safety of our terminal (access to our loading berth being blocked by HGV / mobile cranes loading and unloading).*

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<sup>5</sup> DC Case Officers report for STPC.

<sup>6</sup> Environmental impacts of waste incineration – Client Earth - 9th March 2021.

<sup>7</sup> Gary Hamer 17-8-2021 [Portland Bunkers].

*We would also like to raise the problem of the road through Castletown leading to the port main gate. This narrow road regularly gets blocked / heavily congested with the current HGV use from the other tenants that move products in and out of the port by road. Adding another 50 HGV movements a day to this would be ridiculous and massively hinder emergency service response time in the event of an emergency within the port estate.”*

2.15. The Council’s Emergency Management & Resilience response<sup>8</sup> also states that:

*“Another consideration refers to significantly increased traffic within the Port and via the main gate, as ‘fuel/waste’ is being transported to the incinerator by road. This increased traffic, and potential vehicle queues at the main gate, could delay or hinder the response of Emergency Services. To mitigate this however there is an option to use a secondary entrance from the top of the port, but its appropriateness needs fully investigated.”*

2.16. As explained above, the Appellant has not taken the impact of Bibby Stockholm into consideration. There is no consideration of the amenity and quality of life of the occupants of the barge, and how this will be affected by the ERF. Nor is there any consideration of how the future effects of operating the barge, for example through deliveries, could combine with the ERF’s effects. The residents of the barge would be subjected to the construction noise, plant movements, concrete deliveries, dust and other associated construction site negative impacts, living on the edge of a major construction site. This is in contravention of DWP Policy 13, amenity and quality of life.

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<sup>8</sup> DC Emergency Management & Resilience - 25/08/2021.





*Images taken: 22/10/2023 credit: Steve Coggins*

### Visual amenity

- 2.17. Although the full visual effects of the ERF are considered in the Rule 6's Landscape Proof of Evidence, it is important to note that the ERF and stack would be very visible from important locations and that this would have a negative impact on local residents and businesses.
- 2.18. The lighting on top of the stack, in particular, would create light pollution and be highly visible. This would affect the visual amenity in the area and be a reminder to residents, businesses and visitors of the presence of the stack and its unsightly plume.
- 2.19. The Appellant has not adequately assessed the visibility of the plume during nighttime in particular. But this is important because Portland is a tourist area and leisure pursuits go well into the night. Therefore, the stack could be perceived negative by night time visitors and residents who enjoy the tranquil, dark night time skies.



*Shepperton Waste Incinerator at night*

### 3. SOCIO-ECONOMIC IMPACTS OF THE ERF

#### Tourism and leisure

3.1. Tourism and leisure are important parts of Portland's local economy. *The Future Portland - Portland Economic Vision and Plan* states on page 14 that tourism, leisure and hospitality are "growth sectors" and that tourism could "achieve growth and provide better quality jobs".<sup>9</sup> On page 19, the *Portland Economic Vision and Plan* states that:

*"the Island does have a number of strengths, opportunities and assets that could be a focus for future economic growth activities, including:*

- Employment sectors that offer future growth potential;*
- A potentially strong tourism and leisure offer;*
- Outstanding and unique natural environment and built heritage;*
- Areas of job creating potential, including Portland Port and Osprey Quay;*
- A 'green technology' opportunity cluster. "*

3.2. The *Socio-Economic Study of the Dorset Marine Management (2011)* reports that in Weymouth and Portland "Leisure & tourism alone accounting for 13% of employment in the C-SCOPE area, compared with about 5% in DCC Dorset as a whole, the most significant broad employment sector is Distribution, hotels & restaurants which covers more than a third of employment in the area: considerably more than the proportions seen nationally or in the county".<sup>10</sup>

3.3. *Forgotten Towns - Weymouth, Portland and the coastal economy* also notes the importance of the leisure and retail sector for the economy of Portland. A high proportion of jobs in Weymouth and Portland are in hotels, holiday camps and parks, caravan camps, shops, restaurants, cafes and fast-food outlets, pubs, clubs and entertainment.<sup>11</sup>

3.4. Planning policy recognizes the importance of tourism and leisure in Portland. The Local Plan's Vision for Portland at para 26.2.1 includes the following aims:

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<sup>9</sup> Future Portland - Portland Economic Vision and Plan – Jan 2016.

<sup>10</sup> -SCOPE - Socio-Economic Study Of The Dorset Marine Management Area - Research & Information Group Dorset County Council March 2011.

<sup>11</sup> Forgotten Towns - Weymouth, Portland and the coastal economy a report from the South Dorset Research Group compiled by Philip Marfleet and Jenny Lennon-Wood – July 2022.

*“in 2038 Portland will have maintained and enhanced the unique character of the island in terms of its built and natural assets, whilst meeting its needs and thriving economically and socially for the benefit of residents and visitors; and also be the home of specialist maritime industries and other growth sectors that benefit from its unique location, providing it with a good supply of well-paid jobs that benefit the local community and wider area... and have a responsible and sustainable tourist offer including those based on activities such as water sports, climbing, walking and bird watching, that capitalises on its unique location”.*

3.5. The Neighbourhood Plan<sup>12</sup>, para 13.12 states that:

*“The Town Council has agreed that Portland’s natural focus should be on activity-holidays and adventure-seekers. It supports an approach to tourism that makes Portland an activity hub with reference to diving, mountain biking and climbing responding to distinctive offer and making Island a destination. These activities will fit with the major projects as they develop. On Portland this would include activity centres, camping pods, glamping sites and cafes”*

3.6. Policy Port/ST1 of the Neighbourhood Plan states that:

*“Sustainable tourism development proposals,” which are “Proposals relating to land outside the settlements will need to demonstrate that the use proposed: (1) promotes the unique characteristics of the area; and (2) will not lead to significant loss or damage to any of the Island’s natural assets including landscape character, amenity, historic environment, views, ecology and wildlife corridors, archaeological or geological values of the coast, shoreline, beaches, adjacent coastal waters, and countryside”*

3.7. Paragraph 3.11.2 of the UK Marine Policy Statement<sup>13</sup> also notes that:

*“The sea can provide a variety of tourism and recreational opportunities. These will vary from area to area but will include pleasure boating, sailing, recreational diving (including diving on wrecks), sea angling, kayaking and surfing, as well as exploration of underwater and coastal heritage assets. The coast also provides inspiration for a range of artistic and cultural activities and food-based tourism. There is also growing interest in eco-tourism and wildlife experiences. All these activities can generate a considerable amount of income for the economy and can be a mainstay for many coastal towns, supporting their quality of life, and providing health and well being benefits, with many local businesses relying on the marine environment for their livelihoods. These activities will be enhanced by a well-*

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<sup>12</sup> Portland Neighbourhood Plan 2017-31.

<sup>13</sup> UK Marine Policy Statement.

*managed and healthy marine environment, attractive and well-maintained beaches, seashore and clean bathing water.”*

- 3.8. The ERF has the potential to harm Portland’s tourism and leisure industry and undermine its potential for growth in this area for the following reasons.
- 3.9. The proposed ERF’s mass and scale would be incongruous with Portland’s landscape and would impact upon the unique character of our island as well as our outdoor leisure activities. The landscape and heritage impacts of the ERF – for example, its harm to the distinctive wedge-like nature of the island – would undoubtedly affect tourism within Portland. For example, as tourists cross the bridge at Ferrybridge, instead of the ‘wow’ factor on seeing the iconic shape of the Isle of Portland, their first impressions would be of a massive industrial plant, which is not conducive to attracting outdoor adventure seeking tourism to Portland.
- 3.10. There is the potential for a loss of jobs in the area during construction, due to the loss of visitor numbers to Portland during this period, as the ERF would be built adjacent to a tourist accommodation area, which would not be conducive to attracting visitors to accommodation and leisure activities within a construction site access area. The construction of the ERF over a three-year period – with HGVs passing through accommodation areas, tourist attractions and amenities – would affect tourist businesses in the area and could lead to a loss of jobs. Unlike most of the Portland Port industrial activities, which tend to operate during normal working hours, the ERF’s construction hours would be 7am to 7pm and it would operate on a 24/7 basis. Again, this would not be conducive to attracting visitors to the area.
- 3.11. The ERF would overshadow the marine recreational area of Portland Harbour, which hosted the 2012 Olympics Sailing event (see page 19 of the *Portland Economic Vision and Plan* which notes that “*The London 2012 Olympic sailing event based at Portland and the development of the National Sailing Academy has provided an unprecedented opportunity for the island.*”).<sup>14</sup> An ERF at this location would have a negative impact on our Olympic legacy especially around water sport and outdoor activity. An ERF at this site would also not be conducive to attracting activity-holidays and adventure-seekers, which is seen as a growth sector in the Neighbourhood Plan.

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<sup>14</sup> Future Portland - Portland Economic Vision and Plan – Jan 2016.

- 3.12. These concerns are shared widely by local businesses and residents. For example, in its representation, Weyfish<sup>15</sup> stated that:

*“Potential harm from pollutants on marine life and shellfish and the impact on the local fishing economy.*

*Weyfish is a successful community business with strong ties to a vibrant local fishing industry. We work with many local restaurants and cafes, both locally and further afield, providing the highest quality, sustainably caught seafood.*

*Our local coastline benefits from some of the cleanest marine environments which are home to some of Britain's finest seafood and shellfish. This is a unique selling point and an incredible asset which cannot be underestimated, not just for our business, but also for the rest of the Dorset seafood and shellfish industry. Any potential harm on the local marine ecology would likely lead to significant negative impacts on the local economy. Moreover, the siting of the proposed heavy industry development in such close proximity to sensitive marine environments could damage the perceived quality of Dorset seafood and shellfish, resulting in actual economic harm.”*

- 3.13. Weymouth Hoteliers Guesthouse Leaseholders Association, which represents 43 local accommodation providers, has also expressed concerns<sup>16</sup>:

*“Many of our guests come to Weymouth with the intention of visiting Portland to engage in activities such as cycling, hiking, running, fishing and the wide range of water sports. So, although our guests like to reside in Weymouth, they are attracted by the various attractions that Portland has to offer. We feel that the construction of this site would deter holidaymakers from visiting Portland and consequently residing in Weymouth. This would have a detrimental effect on the economies of both towns, by impacting on the already short window where we do most of our business - the Summer break. For guests that stay in Weymouth the appearance of the waste incinerator would be very unappealing, and despite any statements to the contrary, most visitors would be wary of the health implications of having a large facility continuously burning waste brought in from far afield.”  
And continued...*

*How can it be justified that this construction could possibly be in the best interests of locals, tourists or day-trippers to Weymouth and Portland to have such a project agreed and accepted on this site? Weymouth is a ‘gateway’ to the Jurassic Coast. The whole area is a draw for leisure walkers, hikers and charity fundraisers,*

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<sup>15</sup> Weyfish 9-11-2020.

<sup>16</sup> WHGLA December 2020.

*many of whom are experiencing the South West coast path for the first time. Imagine their memories of Portland & Weymouth after seeing a waste incinerator on their travels complete with an 80-metre chimney stack and visible plume... It would hardly seem a 'return to' destination."*

- 3.14. The effect on businesses that provide accommodation *outside* of the island has been raised by the Society of Poole<sup>17</sup>, which noted that:

*"...Poole has a great number of hotel beds and less formal overnight accommodation for visitors to Dorset who come to experience something of our natural assets that warrant National Park status. The natural assets are not just restricted to openness and views but include an amazing and special variety of flora and fauna adapted to the current ecosystems that should not be disrupted. ...The whole Dorset economy is particularly vulnerable to the adverse effects of the proposed unnecessary incineration plant since tourism is of major importance to so many businesses (and consequently communities) across the County. Whilst it is hoped the matter is obvious, visitors are not normally attracted to incinerators – the reverse can be expected."*

- 3.15. Similar concerns are shared by B-side, an arts organization based in Portland, who have stated that the ERF *"would be detrimental to tourism which is very important to the local economy, and its future"* because it would *"make Portland less attractive to visitors and hence undermine that future and the investment of public and private funding and huge volunteer input that is supporting the promotion, protection and enhancement of this special environment"*. B-side noted that the *"relatively small amount of jobs created by the proposed development is potentially outweighed by the potential job losses due to adverse impact on other businesses related to tourism and outdoor activities and the loss of future jobs and related economic growth"*.<sup>18</sup>
- 3.16. The National Trust expressed *"concerns about the long-term implications for the tourism and visitor economy along this stretch of coast. Large scale industrial-type development such as this (which looks to be a far more sizeable structure than the previously consented energy plant) could alter the public perception of this part of the Dorset, particularly given the prominent location"*.<sup>19</sup> And Dorset Wildlife Trust has

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<sup>17</sup> Society for Poole - 01-11-2020.

<sup>18</sup> B-Side representation.

<sup>19</sup> The National Trust - 27-09-21.

expressed concerns about the effect of the ERF on the use of Chesil Beach (including tourism there):<sup>20</sup>

*“Chesil Beach and the Fleet are important areas not only for wildlife but for giving people the opportunity to engage with the natural environment and learn to value these special habitats and protected sites. DWT’s Chesil Beach Centre is a hub for visitors to Portland who are interested in discovering more about this protected area of coastline. It is particularly attractive to families and provides a hugely important opportunity to engage children and young people of all ages with the value of Dorset’s environment and wildlife.*

*The proposed ERF will be a visible example of development on the coastline at Portland as viewed from the Chesil Beach Centre and DWT consider that the proposal will conflict with promotion of the area as an attractive location to experience wildlife and the natural world.*

*DWT are also concerned that the acknowledged increase in traffic volumes will have impacts on road safety and impact negatively on the visitor experience, both for visitors to Chesil Beach and for those visiting the wider Isle of Portland, many of whom are attracted by the nature and wildlife of the area. This has the potential to significantly impact the engagement of visitors and local people with the environment and natural world, at a time when it is more important than ever that people are able to care for and value biodiversity, both locally and globally.”*

- 3.17. Lastly, it is worth noting that the ERF could have an effect on a proposed visitor attraction at Bower Quarry & Jordans Mine with an associated park and ride site at Osprey Quay (known as “the Eden Project Portland”).<sup>21</sup> This is a planned tourist theme attraction expected to bring in tens of thousands of visitors a year and employ ten times more staff than the ERF. The Eden Project Portland is a live proposal; having had funding from the DLEP, yet the ERF proposal could prevent this project from going ahead if the in-combination traffic from the ERF together with the predicted new visitor traffic would impact on the integrity of the designated sites. If the Eden Project does not go ahead, this would cause a loss of holiday visitor revenue, and the loss of many potential local jobs. The Eden Project would benefit the community and local economy in a far greater way than the ERF.

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<sup>20</sup> Dorset Wildlife Trust\_Redacted (Reg 25) 29-09-21.

<sup>21</sup> MEMO Project Decision Notice.





*Crabbers' Wharf are brand new and innovative luxury holiday apartments show casing leading design and ingenuity. Sitting right on the quayside, on the edge of Portland harbour it makes the most of the stunning views across the sea and Jurassic Coastline of Dorset and gives quick access to the water. Set in the heart of the water sports area on Portland, home of the 2012 Olympic sailing events, if the ERF is built these apartments would also enjoy views towards the incinerator, its stack and its plume. (photo source unknown)*

### Benefits of and need for the ERF

- 3.18. The Appellant overstates the economic benefits of the ERF.
- 3.19. The Appellant states in its Statement of Case that *“Shore power is increasingly requested by the cruise operators as is evidenced by the letter of support provided at application stage by Carnival”* and that *“the inability to provide shore power to its customers risks the Port becoming uncompetitive with other ports that are increasingly able to offer this facility, leading to a significant decline in business and associated socio-economic impacts on the local and wider economies.”*

- 3.20. However, there is no evidence that the visiting of Portland by cruise ships would decline if new onshore power connections were not provided. Carnival has not provided any certainty that it would even use the onshore power connections that would be provided: Carnival has stated that “*our cruise ships which visit the Port which are capable of receiving shore power would connect to and use the ERF Shore Power Facility, subject to the power being made available on commercially viable terms.*” (emphasis added)<sup>22</sup>
- 3.21. There is also evidence that cruise ships do not tend to use onshore power connections where available. A recent *Guardian* report called “Cruise ships polluting UK coast as they ignore greener power options” (4 November 2023) notes that “*Cruise ships visiting Britain are frequently failing to plug into ‘zero emission’ onshore power.*”<sup>23</sup> The report quoted by *the Guardian* also notes that an “*analysis of ship schedules at Southampton found that between April 2022 and July 2023, there were about 300 days when at least one cruise ship was docked at the port, but the onshore power facility was only used 71 times over the same period.*” This suggests that even if onshore power were made available, it might not be taken up. As such, the provision of onshore power does not make a port more attractive to cruise ships. Portland would remain an attractive destination for cruise ships without the provision of onshore power.
- 3.22. In fact, it is unrealistic to think that cruise ships would base their itineraries around – and increase their trips to locations that have – onshore power provision. According to the Cruise Lines International Association, “*less than 20 ports worldwide currently provide shore power for large cruise ships – three of these are in Germany.*”<sup>24</sup> This amounts to a very small proportion of global ports: according to [www.cruisemapper.com](http://www.cruisemapper.com), there are 1,769 cruise ports globally. The Cruise Lines International Association states that “*Over the next five years, about 7% of berths will be equipped with shore power facilities, globally.*” It is not realistic for a cruise operator to only call at ports with onshore power. This would restrict their itinerary, making the cruise schedule less attractive to customers.
- 3.23. In addition, although the ERF would create some jobs, it would lock 2.14 hectares of employment land into an industrial plant that only offers 30 permanent jobs. There would be no future employment growth potential for 30 or more years. This would reduce the areas of potential future employment growth in Portland Port.

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<sup>22</sup> Carnival Corporation & PLC - 20-12-22.

<sup>23</sup> *The Guardian*, Cruise ships polluting UK coast as they ignore greener power options (4 November 2023).

<sup>24</sup> Cruise industry invests in shore power - CLIA Europe.

- 3.24. In respect of Osprey Quay employment land, which is yet to be developed and which will be a key for economic growth on Portland into the future, the presence of an ERF would not be conducive to attracting new developments to Portland for two reasons.
- 3.25. Firstly, it would be harder to attract new business ventures to an employment area, overshadowed by an ERF and associated stack, due to the perceptions of impact on health and well-being in respect of the emissions from the stack. These perceptions coupled with 80 HGV waste lorries trundling through Osprey Quay on the way to the Port is an unappealing prospect, particularly as the activity and movement of distinctive waste carrying HGVs would identify the use of the Port for processing waste, rather than as the “*home of specialist maritime industries*” as per the objectives of the *Portland Economic Vision and Plan* set out on page 25.<sup>25</sup>
- 3.26. Secondly, the power constraints of an ERF supplying irregular onshore power to cruise ships, which relies on drawing 5mw from the National Grid, would be of concern to any potential light industry development. The Appellant states at para 1.5.2.3 in the *ES Tech Appdx F2 Economic Effects* that “*It is understood that the Chickerell primary substation (currently offering 18MW for the island’s needs) has a maximum demand of 10.72MW, so has a very reasonable 7.28MW (40%) spare capacity.*” This spare capacity would allow for both a reasonable domestic growth, as well as light industrial growth and therefore without the proposed ERF, Portland has sufficient power supply for many years future growth. The proposed ERF will therefore reduce the Isle of Portland’s spare electrical capacity by nearly 70%. If the proposed ERF were built, whilst onshore power is utilized and 5mw is drawn from the National Grid, this would reduce spare capacity to 2.28mw. It is therefore apparent that the ERF will accelerate the need for the very costly upgrade of the Chickerell Bulk Power Supply and in doing so means the ERF would no longer be needed to provide power to the Isle of Portland, or Portland Port. Additionally if the proposed ERF were to be built and require the 5mw from the National Grid as stated in their SOC (albeit for an intermittent use), and a new light industrial development were to consider developing their business at Osprey Quay, this would trigger a requirement for that potential new development to fund the required costly power network upgrade, thus making a potential new development at Osprey Quay, should the ERF be built, unviable.

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<sup>25</sup> Future Portland - Portland Economic Vision and Plan – Jan 2016.

3.27. Lastly, in respect of the “*employment sectors that offer future growth potential*”, landfill and incineration offer the worst prospects for future economic growth in the waste sector. As the Global Alliance for Incinerator Alternatives (GAIA) note in their GAIA Jobs-Report 2021 on p.3, “*waste management approaches that have the best environmental outcomes also generate the most jobs*”.<sup>26</sup>

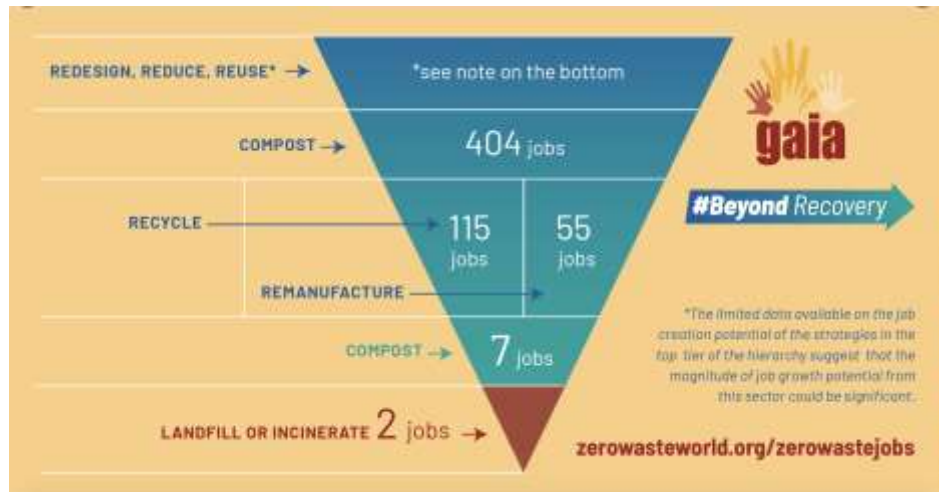


Figure 2: Waste Hierarchy with mean job generation figures per ten thousand tonnes of waste processed per year. *The data show that waste management approaches that have the best environmental outcomes also generate the most jobs.* Source: GAIA

### Impact on tourism along the Jurassic Coast

3.28. The Jurassic Coast Partnership Plan<sup>27</sup> indicates how important the World Heritage Site is to the local economy:

*“In Dorset and East Devon we are extraordinarily lucky to be home to England’s only natural World Heritage Site. A stretch of coastline of Outstanding Universal Value (OUV), globally recognised for its scientific importance as well as beloved by its residents and visitors for its beauty and the cultural and economic opportunities and advantages it provides.”*

...

*“World Heritage Status itself is thought to influence around £100 million a year of economic activity in the local area, evidencing the value of ongoing Site protection and management.”*

<sup>26</sup> GAIA Jobs-Report-2021.

<sup>27</sup>Jurassic Coast Partnership Plan 2020 – 2025.

- 3.29. The surveys undertaken to support the Jurassic Coast WHS Environmental Economy Report state that<sup>28</sup>:

*“The Jurassic Coast team have played an important role in developing a brand which has helped attract more people to the area, and to assist organisations extract value from the designation through leveraging additional funding. The surveys indicate that the majority of businesses feel that the Jurassic Coast significantly helps with wider branding/marketing of the area, and a large proportion of those businesses adopt the brand for their own purposes. Significant public investment has flowed into the area and, although difficult to quantify, much of this is associated with the World Heritage Site and the Jurassic Coast brand.”*

- 3.30. Although the location of the proposed site itself sits just outside the boundaries of the WHS, due to the lay of the land, the proposed site would have an impact on those visitors and residents who enjoy the natural beauty and heritage features of the Isle of Portland and therefore have an impact on the appreciation of the WHS itself. The WHC Nomination Documentation at para 3(e) states that<sup>29</sup>:

*“One of the principal objectives of Heritage Coast definition is ‘to facilitate and enhance their enjoyment, understanding and appreciation by the public by improving and extending opportunities for recreational, educational, sporting and tourist activities that draw on and are consistent with the conservation of their natural beauty and the protection of their heritage features’ (Countryside Commission, 1991)*

- 3.31. The importance of tourism in relation to the Jurassic Coast was considered by the Secretary of State in the Navitus Bay Wind Park decision. At para 38 of the report, it was noted that<sup>30</sup>:

*“... that the Applicant erred in some of its assessments by lessening any negative impacts on tourist-related jobs in the Dorset area. Its overall conclusion is that while the overarching impacts on tourism across the area as a whole are not significant, there would be much greater impacts at a local level, for example, at Purbeck where there would be “significant residual harm to tourism in the area” ... The Secretary of State*

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<sup>28</sup> Dorset’s Environmental Economy - Placing An Economic Value On The Jurassic Coast – December 2015.

<sup>29</sup> WHC Nomination Documentation 2001.

<sup>30</sup> Navitus Bay Wind Park - SoS Decision notice Refusal.

*broadly agrees with the ExA's analysis and conclusions on tourism impacts".*

- 3.32. The same under-estimation has occurred in this case. Appellant has denied that will be any negative impacts on tourist-related jobs. For example, in its Planning Support Statement at para 6.341, the Appellant states that "*It has been suggested by objectors that the Portland ERF would have an adverse impact on local tourism. There is no evidence to suggest that the provision of this type of facility has such a negative impact.*"<sup>31</sup>

### Deprivation

- 3.33. Portland falls into the lower scale on the deprivation index on almost every metric other than "living environment". It falls within the 10% most deprived places in the UK. Portland's main assets are its landscapes and seascapes. They are the one thing that Portland has going for it. Harming these assets would be catastrophic in an area that is trying to regenerate itself against a history of very hard economic and social times.
- 3.34. After 1995, when the Royal Navy pulled out of Portland Port, the island experienced a period of economic decline (as the *Forgotten Towns and the Coastal Economy* report notes). When Portland hosted the sailing events at the 2012 Olympic Games, a £400m programme of development was under way to turn a town until recently known predominantly for its naval base into a major tourism destination. The investment and building boom marked a reversal of fortunes for the area, which feared huge job losses when the navy pulled out in 1995. Locals hoped the Olympics would help redress the balance and draw a flood of new visitors to the island.
- 3.35. The siting of an ERF in Portland would undermine this hope. The overall appearance of the ERF would make the area look very industrial. Visual amenity, landscape and seascape are important to the people of Portland who have spent over 25 years trying to move away from being considered a bleak and run down place since 1997 when the navy left, by enhancing the unique character of our island in terms of its built and natural assets. This proposal would negate the hard work undertaken to regenerate the Castletown Conservation Area into the current thriving tourist and outdoor leisure activity hotspot that it has become.

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<sup>31</sup> Planning support statement Sept 2020.

- 3.36. The economic “benefits” of the ERF do not outweigh these harms. The Appellant’s ES Ch.6 Community Health and Economic Effects states at para 6.109 that “*The benefit of increased employment during construction to residents of the level 1 and 2 areas would be a change of small magnitude to a receptor of medium sensitivity, leading to a slight beneficial effect that would not be significant.* (emphasis added) This indicates that the employment benefits during the construction period would not be significant.
- 3.37. At para 6.122 of ES Ch.6, the Appellant predicts that post-construction the ERF will result in a number of jobs being created.<sup>32</sup> At para 6.125, the Appellant recognizes that this equates to a “*small magnitude of change predicted as a result of increased job creation in the level 1 area post-construction, a moderate, significant beneficial effect is predicted.*” (where Level 1 is Weymouth and Portland), yet according to para 6.179, the significant residual effects which are summarised in table 6.12. state that “*Creation of employment in the Weymouth and Portland area post-construction has a Small Impact Magnitude.*” And at para 6.121, the Appellant states that “*Overall, the benefit of the proposed ERF to existing and new businesses in the level 1 and 2 areas as a result of increased expenditure post-construction would be a change of small magnitude to a receptor of medium sensitivity, leading to a slight beneficial effect that would not be significant.*” (emphasis added).

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<sup>32</sup> ES Ch6 Community health and economic effects erratum.

## 4. CONCLUSION

- 4.1. Para 4.1.4 of the Local Plan defines Portland succinctly, stating that the “*area has an outstanding natural and historic environment which makes an important contribution to the economy by making the area an attractive place to live, work and visit. The high quality of the coast and countryside, with its designated landscapes and heritage assets, is particularly valuable for tourism and attracting inward investment.*”
  
- 4.2. In my opinion, this development proposal falls at the first hurdle as it would undermine this description of Portland as “*A great place to live, work and visit*”. I consider that the ERF would have a detrimental impact on local amenity and would result in negative socio-economic impacts.



## 5. APPENDICES

### APPENDIX A

b-side

Carnival Corporation & PLC - 20-12-22

Cruise industry invests in shore power - CLIA Europe

Cruise Ports Schedules 2023-2024-2025 | CruiseMapper

Cruise ships polluting UK coast as they ignore greener power options | Shipping emissions | The Guardian

DC Emergency Management & Resillience - 25-08-2021

Environmental impacts of waste incineration | ClientEarth

GAIA Jobs-Report-2021

Gary Hamer 17-8-2021 [Portland Bunkers].pdf

Greenwashing cruise ships fail to use shore power in UK ports | openDemocracy

MEMO Project Decision Notice

Proposal Does Not Comply With The Dorset Waste Plan 2019 (Adopted December 2019) Policies 12 – 13

Society for Poole - 01-11-2020.pdf

The National Trust - 27-09-21

Tolvik UK EfW Statistics - 2022 Report published May 2023

Traffic count 26.10.23

waste-plan-2019-part-3-appendix-1 p1 only

West Dorset, Weymouth and Portland/ Portland Neighbourhood Plan - 13 Sustainable Tourism

Weyfish 9-11-2020.pdf

WHGLA Dec20