

THE PORTLAND ASSOCIATION

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

DEBBIE TULETT

7 NOVEMBER 2023

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APPENDIX A

b-side - public representation page 1 of 3



Thursday, 19 November 2020

Planning Team A

Dorset Council

County Hall Colliton Park

Dorchester

DT1 1XJ

by-email

Planning Application: Minerals and Waste WP/20/00692/DCC

b-side is a not for profit arts and culture Community Interest Company based on the Isle of Portland with strong local and international recognition.

b-side is embedded in the community and attracts public funding and other income to Portland that supports jobs and training opportunities for young people, promotes health and wellbeing, educates and informs about local history and environment and contributes to the local economy. b-side is an Arts Council England national portfolio organisation. Our biennial festival attracts thousands of visitors to South Dorset.

Underpinning our work is the practice of Geotourism as defined by National Geographic as “tourism that sustains or enhances the distinctive geographical character of a place – its environment, heritage, aesthetics, culture and the well-being of its residents.” This approach is valued by national and international partners and collaborators. We have been working with communities, businesses and organisations on the Island and further afield for 10 years.

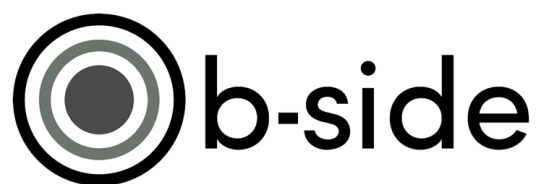
Portland is a multilayered landscape defined by remarkable sites of natural diversity and different levels of human development and application of the landscapes related to its location and geology. It is a unique and special place but its beauty is too often overlooked due to a perception that it is an industrial landscape based on the domination of quarrying in the past. Many of these former quarries have now been successfully re-wilded as habitats for rare insect and plant species and in themselves have now become a tourist attraction. With increased recognition of Portland's historical and environmental assets and associated recent investment, Portland is on the cusp of greatly enhanced and forward thinking cultural and environmentally sustainable tourism development.

Human environmental impact and the climate crisis requires an urgent global, community and individual response. As policies of growth and the impact of climate change collide, the opportunities to develop a sustainable community are challenged. We believe there is a way forward that supports economic growth on Portland but that harmonises Portland's industry with tourism in a way that benefits residents and the environment.



b-side cic, outpost, 77 fortuneswell, isle of portland. dt5 1ly
www.b-side.org.uk | 

b-side community interest company • company no: 7091166



Whilst we understand the need for environmentally sustainable secure and safe waste disposal and a need to create new jobs on Portland having given careful consideration to the application for planning permission for an incinerator we find ourselves having to **object strongly** to it.

The basis for our objection is drawn from our involvement with the local community, partnerships with local businesses and our unique relationship with the landscape and physical environment of Portland.

We **OBJECT** to this planning application for the following reasons:

1. Impact on the special landscape and UNESCO World Heritage Site

It would have a detrimental effect on the landscape of the Island, the settings of the Jurassic Coast UNESCO World Heritage Site and of the Dorset Area of Outstanding Natural Beauty, and the settings of heritage assets such as Portland Castle, Sandsfoot Castle and the Portland Conservation Areas. This would seriously damage the area's visitor economy.

Consequently the application is not compliant with: Jurassic Coast Partnership Plan 2020-2025 Strategic Aim 1 and Regulation Policies 2 and 4; IM Policy 3; Strategic Aims 2 and 4; Waste Plan 2019 inv Policy 14; Local Plan Strategic Objectives 'will have special regard to the conservation of the area's natural beauty'; LP ENV1, ENV2 'over-riding policy consideration'; NPPF 172, 173

The site may technically be a brown field site in an industrial area but this fails to describe its value to local ecology and its historic context related to Portland's military and quarrying industries, It contains numerous 19th century (and earlier) structures and their ancestry.

The site forms a key part of the Jurassic coast within the context of the World Heritage Site designated area.

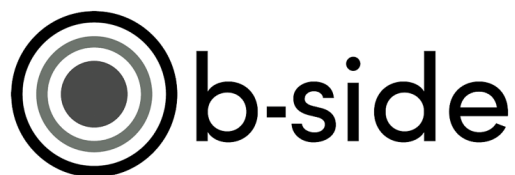
b-side knows how much the combination of the incredible landscape and the rich economic and social history of Portland is admired by artists, historians, ecologists and those involved in arts, heritage and culture from across the world. It attracts them to South Dorset. This is too precious to put at risk.

2. Economic impact on tourism

The development would be detrimental to tourism which is very important to the local economy, and its future.

Portland's unique and special limestone landscape includes multiple historic sites, incredible biodiversity and thriving outdoor pursuits businesses. As a growing tourism attraction (exemplified by its popularity this summer 2020 even during the Covid crisis) the destination economy could be at the heart of Portland's future.

The proposed incinerator 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.



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.

3. Traffic issues

The local road network is not suitable for or able to cope with the increased generation of vehicle movements, particularly of articulated lorries of about 25-tonne capacity. Counts of articulated lorries by the Stop Portland Waste Incinerator campaign suggest an increase in such movements of 133% at Foords Corner, already a bottleneck and with three schools in the immediate vicinity; and of 200% at Castletown, a narrow residential street with businesses and shops.

An increase in heavy goods vehicle traffic movement would be detrimental to local residents and businesses, the local environment, and in every likelihood would reduce tourist visits to Portland.

The application is, therefore, not compliant with: Dorset Councils and BCP Waste Plan 2019 Policies 3 and 4, and see e.g. 3.16, 9.15, 9.20.

4. Planning conditions

Whilst b-side hopes that the application is rejected should it be approved we would urge the following conditions be part of the permission:

- any development of structures would have to be sensitive to the site and not obtrusive so avoiding blighting the landscape and sight horizons
- traffic movements be controlled by time restrictions, numbers and size of vehicles and routes
- a local stakeholder group be established to monitor the impact of the incinerator operations
- strict limits on emissions in line with best international practice be applied, enforced, and monitored, and the results of such monitoring be shared with the local community
- public access to historic features in the vicinity and wider site area and reinstatement of the public footpath that runs through it is facilitated.
- the applicant be required to make an initial and then subsequent contributions to local community and cultural projects

Yours truly,

A black rectangular redaction box covering the signature of Rocca Holly-Nambi.

Rocca Holly-Nambi, Director, b-side

On behalf of b-side CIC

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15th December 2022
M Garrity Esq
Head of Planning
Dorset Council
DORCHESTER
DT1 1UZ

Dear Mr Garrity,

Portland Energy Recovery Facility, Portland Port, Dorset
Application Reference: WP/20/00692/DCC

Letter of Support

Introduction

I am writing in respect of the above planning application for an Energy Recovery Facility (ERF) at Portland Port, and Carnival Corporation's specific interest in the infrastructure that would allow power from the proposed ERF to provide shore power to ships at berth in the Port (the **Portland ERF Shore Power Facility**). This letter explains our intent that **if shore power is available at Portland Port, Carnival cruise ships visiting the Port which are capable of receiving shore power would connect to and use the ERF Shore Power Facility, consistent with our published corporate sustainability policies, and subject to viable commercial terms and agreements being reached.**

Carnival Background and Sustainability Commitment

Carnival Corporation is the world's largest cruise operator and parent company of nine global cruise line brands. These include AIDA, Carnival, Cunard, Costa, Holland America, Princess, P&O Cruises and Seabourn.

Carnival is an important customer of Portland Port and a number of our ships call at this port including some of the largest ships in our fleet. This relationship has been established through consistent calls over many years. We have additional bookings with Portland Port in 2023.

As a major international cruise operator we take sustainability seriously. Our Sustainability Policy "*From Ship to Shore*" (available [here](#)) sets our sustainability goals for 2030, and aspirations for 2050, developed to reflect the United Nations' Sustainable Development Goals. Our 2030 goal is aligned with the International Maritime Organization's commitment to reduce carbon emission intensity by 40% by 2030 and we aspire to achieve net carbon-neutral ship operations by 2050. In addition to decarbonisation we have committed to targeting initiatives that reduce air quality emissions. To meet these goals we are actively improving the existing fleet's energy efficiency and specifically "*expanding shore power capabilities*".

Cruise industry invests in shore power connections as a contribution to environmental and climate protection

Port of Hamburg shore power

Cruise industry invests in shore power connections

More and more cruise ships are being built or retrofitted with shore power facilities so that they can largely switch off their own machinery in ports, eliminating local emissions from ships while they are in port. It also supports the overall cruise industry efforts to cut CO2 emissions, which can represent between 6% and 10% of the overall CO2 emissions of a cruise vessel.

Already, 35% of the global capacity of cruise ships is equipped with shore power connections. However, less than 20 ports worldwide currently provide shore power for large cruise ships – three of these are in Germany.



sources.

Not only German ports are continuing to expand their shore power capacities, but massive investments are also planned in other countries, e.g. in the Mediterranean region. Over the next five years, about 7% of berths will be equipped with shore power facilities, globally. As part of the EU's Fit for 55 programme, all essential ports in the European Union will have to use shoreside electricity by 2030. CLIA is encouraging ports where cruise ships are scheduled to dock to prioritise the investment in shore power supply facilities at the cruise berths.

Cruise lines are committed to connecting to shoreside electricity when it is available and to working closely with ports to make this possible.

Helge Grammerstorf, National Director, CLIA Germany

“Cruise lines are committed to connecting to shoreside electricity when it is available and to working closely with ports to make this possible. Connecting a large cruise ship with a power consumption of up to 12 megawatts to the shore power grid is not as simple as it sounds. In addition to a technical infrastructure including a power plant, supply lines and conversion equipment, various tests and synchronisation measures are required to ensure uninterrupted ship operations. This procedure must be repeated for every ship in every port before the permanent connection can be made,” explains Helge Grammerstorf, National Director of the Cruise Lines International Association (CLIA).

CLIA members are committed to working with ports and local authorities to support

these projects. So far, however, more cruise ships are equipped with shore power connections than there are ports internationally that offer this option. CLIA is encouraging all ports to consider equipping their cruise berths with this capability, to the benefit of their local population and to support the decarbonisation of the maritime sector.



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TO WORK
WITH
SERVICENOW

Cruise Ports Schedules


SCHEDULES, TERMINALS, WIKI, NEWS, LIVE PORT MAPS

CruiseMapper currently has 2435 ports in its database, including 666 riverports




Gibraltar, UK
Gibraltar is an UK cruise port and a British Overseas Territory on the Iberian Peninsula, at the entrance to the Mediterranean Sea from the Atlantic Ocean. Gibraltar is connected to mainland...

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Puerto Vallarta, Jalisco, Mexico Riviera
Puerto Vallarta is a major Mexican cruise port city located on Bahía de Banderas (Mexico's biggest natural bay), featuring over 100 mi (160 km) of mountains-encircled coastline. The city has...

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Kailua-Kona, Hawaii Island
Kailua-Kona is a port town on Hawaii Island (Hawaii USA, North Kona District) with population around 12,000. It is West Hawaii's center of commerce and tourism industries. Kailua is served by Kona...

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Kusadasi, Ephesus, Turkey
Kusadasi is a cruise port and resort town on Turkey's central Aegean Sea coast, and located south of Izmir. Kusadasi is also a major ferry port and serves as seaport for Ephesus (ancient Greek city)...

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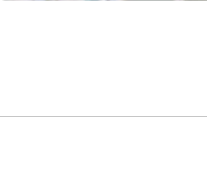
Montego Bay, Jamaica
Montego Bay (aka MoBay) is Jamaica's second-largest cruise port and city (after Ocho Rios) located on the island's northwestern coast. The city has population around 110,000 and was founded as a port...

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Harvest Caye Belize, NCL private island
Norwegian Cruise Line (NCL) postponed the launch of Harvest Caye Island until November 2016 - 9 months after it was scheduled for inauguration. The 75-acre (0,12 mi² / 303,500 m²) private island...

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Malaga, Spain Granada
Malaga is a major port city and cruise port (together with Motril) to Granada City - the capital of Spain's Granada Province (Autonomous Community of Andalusia). By population (around 580,000) the...

2435 CRUISE PORTS BY REGION

| | |
|-------------------------------------------------|-----|
| Africa - Indian Ocean Islands | 84 |
| Alaska | 38 |
| Amazon River | 7 |
| Arctic - Antarctica | 78 |
| Asia | 216 |
| Asia Rivers | 81 |
| Australia - New Zealand - Pacific Ocean Islands | 239 |
| Bahamas - Caribbean - Bermuda | 165 |
| Baltic - Norwegian Fjords - Russia | 185 |
| Canada and USA Rivers | 121 |
| East Coast USA and Canada New England | 85 |
| Europe Rivers | 311 |
| France Rivers | 102 |
| Galapagos Islands | 21 |
| Hawaii - Mexico - Panama Canal | 49 |
| Iceland - Greenland - Faroe Islands | 60 |
| Ireland - UK - British Isles | 114 |
| Mediterranean - Black Sea | 280 |
| Nile River | 14 |
| Russia Rivers | 30 |
| South America | 75 |
| West Coast USA and Canada | 27 |

Cruise ships polluting UK coast as they ignore greener power options | Shipping emissions | The Guardian – page 1 of 2

The Observer
Shipping emissions

**Ben Webster, Lucas Amin
and Jon Ungoed-Thomas**

Sat 4 Nov 2023 12:00 GMT

Cruise ships polluting UK coast as they ignore greener power options

Most liners rely on marine gas oil when docked, despite claims they reduce emissions by plugging into low-carbon electricity



Cruise ships docked in Southampton, where an analysis of ship schedules found most did not make use of onshore power facilities. Photograph: Chris Ison/PA

Cruise ships visiting Britain are frequently failing to plug into “zero emission” onshore power and instead running their engines and polluting the local environment with fumes.

The industry is under scrutiny over air pollution and contribution to greenhouse gases, with some European cities **banning vessels from central ports**. Cruise operators say ships can reduce emissions by switching off engines and plugging into low-carbon electricity when moored. But an investigation by openDemocracy has found that cruise ships regularly fail to use onshore power at Southampton, Britain’s largest cruise port.

They instead rely on marine gas oil, which contributes to local air pollution, or liquefied natural gas (LNG), which has lower air pollutants but leads to some methane being emitted into the atmosphere. Both fuels contribute to greenhouse gas emissions.

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.

Some ships have not been adapted to use cleaner onshore power, but the UK Chamber of Shipping says one factor is cost, because onshore power is more expensive than marine fuel. Cruise firms can also pay for their ships to be retrofitted with new technology so they can use cleaner onshore power.

Jon Hood, UK sustainable shipping manager at **Transport & Environment** (T&E), Europe’s leading clean transport campaign group, said: “There’s clean power available but the cruise companies don’t want to pay for it.”

He said greater transparency was required and cruise operators should be forced to disclose when they use onshore power and for how long, and that the government should require cruise ships to plug into onshore power when it was available.

Katherine Barbour, Southampton’s first Green party councillor, said: “If cruise liners aren’t mandated to change, this will continue and our residents will suffer. We need all berths to be able to provide onshore power, and ships need to be adapted to use it.

“Every ship is like a small town, spewing out pollution when they are not

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When Britain most decent leader, we have a derelict at the helm
Andrew Rawnsley

Cruise ships polluting UK coast as they ignore greener power options | Shipping emissions | The Guardian – page 2 of 2


using electricity.”

The *New York Times* reported in December 2019 that a single docked cruise ship can emit in a day as much diesel exhaust as 34,400 idling lorries, but that that was almost eliminated with onshore power. The cruise industry says the analysis does not consider advanced technologies on cruise ships used to reduce emissions, the use of alternative fuels, or restrictions on emissions in ports.

While cruising is one of the fastest growing tourism sectors, with 31.5m passengers forecast for 2023, there are concerns about its environmental impact. A study published in the journal *Marine Pollution Bulletin* in December 2021 found a large cruise ship could have a carbon footprint greater than 12,000 cars. An analysis published in June by T&E found that despite the introduction of a new cap of sulphur in marine fuels in 2020, 218 cruise ships operating in Europe in 2022 **emitted more sulphur oxides than a billion cars**.

In 2021, **Venice banned cruise ships** from its historic centre. **Amsterdam banned cruise ships** from its centre earlier this year and **Barcelona followed suit** from 22 October.

The industry also says it is committed to greener practices, with a target of net zero carbon cruising by 2050. Carnival Corporation, the world's largest leisure travel company, is building new ships powered by LNG, and cruise operators are also conducting trials with biofuels. New LNG engines reduce emissions of sulphur oxides but campaigners say the engines and the fuel production process leak methane, an extremely potent greenhouse gas.

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In April 2022, Associated British Ports (ABP), which operates the cruise port at Southampton, announced the launch of an onshore power facility offering “zero emissions at berth”. The project cost £9m, supported by £4.4m from the Solent local enterprise partnership, which has significant public funding. But only one ship can plug into that facility at a time.

The 2022 Solent LEP annual report said shore power had saved 1.7m kg of CO₂ in a year; that is only a fifth of the annual savings predicted by ABP in its business case submitted to the LEP to obtain the £4.4m grant. ABP said implementation takes time to “work up”.

The Cruise Lines International Association says 46% of its member fleet can connect to shoreside electricity. It said in September that 32 ports had at least one cruise berth with shoreside power, and plugging in could reduce emissions by up to 98%. A spokesperson said: “Connecting to shoreside electricity is a long-term element in the cruise industry's decarbonisation strategy.”

ABP said: “ABP Southampton is proud to be a UK leader in the provision of shore power. It's a service to our shipping customers that we want to grow. We see shore power as an integral part of the transition to net zero for both ABP and our customers.

“The port of Southampton has a UK-leading air-quality improvement and emissions reduction strategy, backed by a network of air quality monitors around the port. Real world air-quality monitoring research by Southampton city council demonstrates that air quality levels for port-related emissions are a fraction of other sources such as traffic.”



Revealed: plan to b anyone 'undermini extremist

Emergency Management & Resillience - 25/08/2021

Dear Adrian,

Re: application number WP/20/00692/DCC Emergency Planning (EP)

Dorset Council have been consulted in the past on the application above, as well as submitted comments to both the MoD and ONR (Office for Nuclear Regulation) in respect of this development. The reason for this is because Portland Port provides an operational berth for Royal Navy nuclear powered warships (NPW's), hence this application also falls under the impact of REPPIR Regulations (2019).

The proposed development is located within the DEPZ (detailed emergency planning zone) in what the Portland Port off site reactor emergency plan is concerned, and very close to the ACMZ (automatic counter measures zone).

Having assessed application WP/20/00692/DCC , Dorset Council's Emergency Planning see however no major reason for not accommodating this application into the Portland Port off site reactor emergency Plan arrangements, similarly to all other businesses located and operating within this location (including PBUK – another COMAH site that EP also write an off-site plan for).

We are prepared to work with the business to ensure that they are fully integrated into all our emergency plans, including some issues/considerations as below:

As per the current Portland Port off-site Reactor Emergency Plan, all businesses will have to be evacuated at declaration of OSNE (off site nuclear emergency) in a highly unlikely emergency stemming from the nuclear reactor of a MoD submarine. Does the business have, during its operation, processes that require constant supervision i.e. it is an 24/7 essentially manned building?

One consideration would look at the site possibly not being used during an NPW visit (These are very infrequent, and normally last between 1 week to 10 days). If this is not a viable economic option we can work around it, and include the proposed facility into our countermeasures plan (stable iodine pre-distribution). I note however that amongst the extensive feedback, the response received from the MoD (on May 11) does not show any particular concern about this application.

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.

Similarly, the operation of any vessels in connection with the proposed facility will have to be controlled (possibly even stopped altogether) during an NPW visit to Portland Port. This applies to all other vessel movements within the Port, and the applicant must be aware of this.

The business should demonstrate that its operation does not pose any specific/increased risk to a visiting NPW (berthed at the 'Deep Water Berth'), or the wider port environment, including explosive risks, or more conventional ones, including an increased fire risk due to the specifics of the operation. This includes hazards such as the containerised gas solutions mentioned at section 6.184 of the ERF Planning Supporting Statement September 2020.

While Dorset Council's Emergency Planning is confident that the off-site planning arrangements for

the operational berth at Portland Port, and PBUK COMAH site are robust enough to secure the protection of all the Port's employees, we would like the applicants to be aware of, and to consider some of the points above, which will need to be included into our emergency plans.

We acknowledge that comments above are mostly not EIA related – however in what the EIA is concerned, EP considers that the EA, Flood risk leads, Natural England, and other similar organisations are in a position to make more pertinent comments – including professional feedback re: impact on air quality and general pollution concerns.

Ovi Rominger
Emergency Mgt & Resilience Office

burnt. So while the electricity grid should be decarbonising as a result of more renewable energy sources coming online, electricity produced at the incinerator will become a major climate issue.

Due to increasing quantities of waste sent to incineration, **incinerators will emit more toxins and pollutants that harm local air quality.** Incineration makes a more significant negative contribution to local air quality than landfill.

What is the social impact of waste incineration?

Waste incineration contributes to air pollution and like many other [forms of air pollution](#), it seems toxic fumes from incinerators are likely to affect deprived areas, as well as areas with high populations of people of colour the most.

An investigation by Greenpeace's Unearthed has found that waste incinerators are [three times](#) more likely to be built in the UK's most deprived neighbourhoods while more than two thirds of the potential incinerators in England are planned for the northern half of the country.

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.

Executive Summary

Employment opportunities are important in any economy, and especially in times of economic downturn. As governments and the private sector invest in economic recovery strategies, particularly “green” or climate-neutral approaches, it is important to evaluate their employment potential. C4Q estimates that the waste management sector has the potential to create 2.9 million jobs in its 97 member cities alone. Zero waste—a comprehensive approach to waste management that prioritizes waste prevention, re-use, composting, and recycling—is a widely-adopted strategy proven to minimize environmental impacts and contribute to a just society. In this study, we evaluate its job generation potential.

The data for this study came from a wider range of sources spanning 16 countries. Despite the diversity in geographic and economic conditions, the results are clear: zero waste approaches create orders of magnitude more jobs than disposal-based systems that primarily burn or bury waste. Indeed, waste interventions can be ranked according to their job generation potential, and this ranking exactly matches the traditional waste hierarchy based on environmental impacts (Figure 1). These results demonstrate the compatibility of environmental and economic goals and position zero waste as an opportune social infrastructure in which investments can strengthen local and global economic resilience. This study also finds evidence for good job quality in zero waste systems. Multiple studies of zero waste systems cite higher wages and better working conditions than in comparable fields, and opportunities to develop and use varied skills, from equipment repair to public outreach.

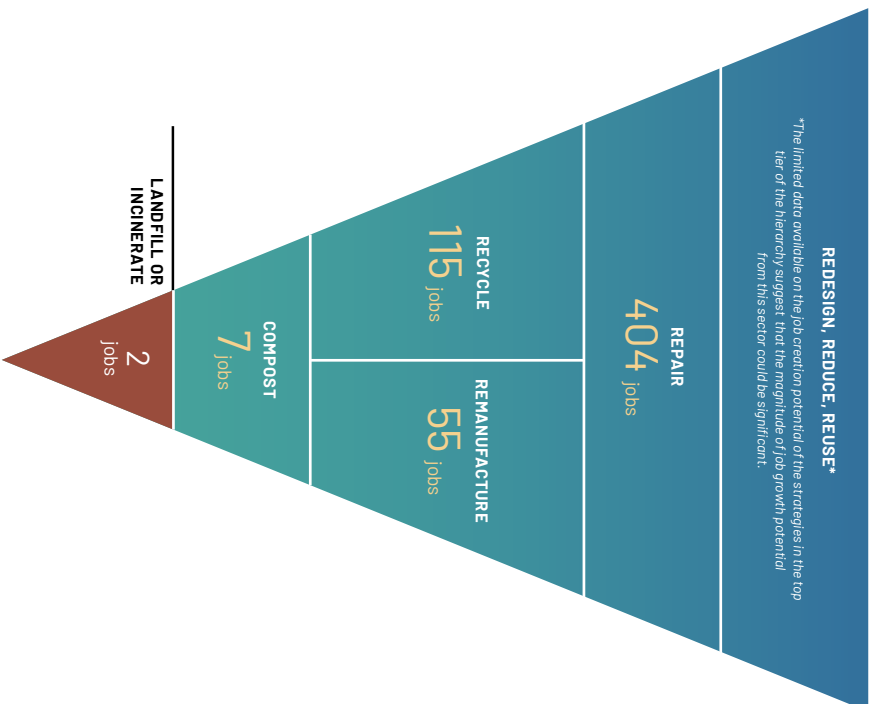


Figure 1: Waste hierarchy with mean job generation figures per ten thousand tonnes of waste processed per year. The data show that waste management approaches that have the best environmental outcomes also generate the most jobs.

Comment received **17/08/2021** for **WP/20/00692/DCC**
from **Gary Hamer**

Objection

We operate a Marine bunkering facility (upper tier COMAH site) in Portland Port and have pipelines, associated equipment and a (24/7) manned workshop / control room in close proximity to the proposed incinerator site.

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.

We object to the proposed incinerator as we feel 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).

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.

We also have major concerns about the impact of this site on the health and wellbeing of our 10 employees, due to the proposed plant being in very close proximity to our workshop / control room and pipelines.

This site may emit dangerous / noxious gases at ground level, the smell will be horrendous and much like a landfill, we are also concerned about the bottom ash from the stack and how this will be handled / transported to avoid it entering our premises / equipment or coming into contact with our employees who will be working nearby.

There may be an argument for having a waste incinerator and disposing of waste in a different manner to landfill but this is certainly not the right place for it.

Greenwashing cruise ships fail to use shore power in UK ports | openDemocracy PAGE 1 of 6

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

05/11/2023, 10:31



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HOME: INVESTIGATION

Revealed: 'Greenwashing' cruise ships burning diesel despite energy pledge

Exclusive: Cruises 'pour poison into the air' by failing to plug into low-carbon electricity while in UK ports

[Ben Webster](#) [Lucas Amin](#)

4 November 2023, 12.00pm



Many cruise ships are choosing to burn fossil fuels while in port in Southampton instead of plugging into low-carbon electricity | Ben Marans/SOPA Images/LightRocket via Getty Images

Greenwashing cruise ships fail to use shore power in UK ports | openDemocracy PAGE 2 of 6

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

05/11/2023, 10:31

The cruise industry has been accused of misleading tourists with false claims that ships use green energy with “zero emissions” while in port in the UK.

Cruise companies claim the giant vessels – which some experts believe are worse for the climate than flying – are reducing emissions by switching off their engines and plugging into low-carbon electricity while moored.

But an investigation by openDemocracy has found that cruise ships regularly fail to use the ‘shore power’ available in port, and instead burn diesel, which is cheaper but has a huge carbon footprint.

Data from the UK’s biggest cruise port in Southampton shows that only around one in ten cruise ships has plugged into shore power since it became available at the port last year.

Help us uncover the truth about Covid-19

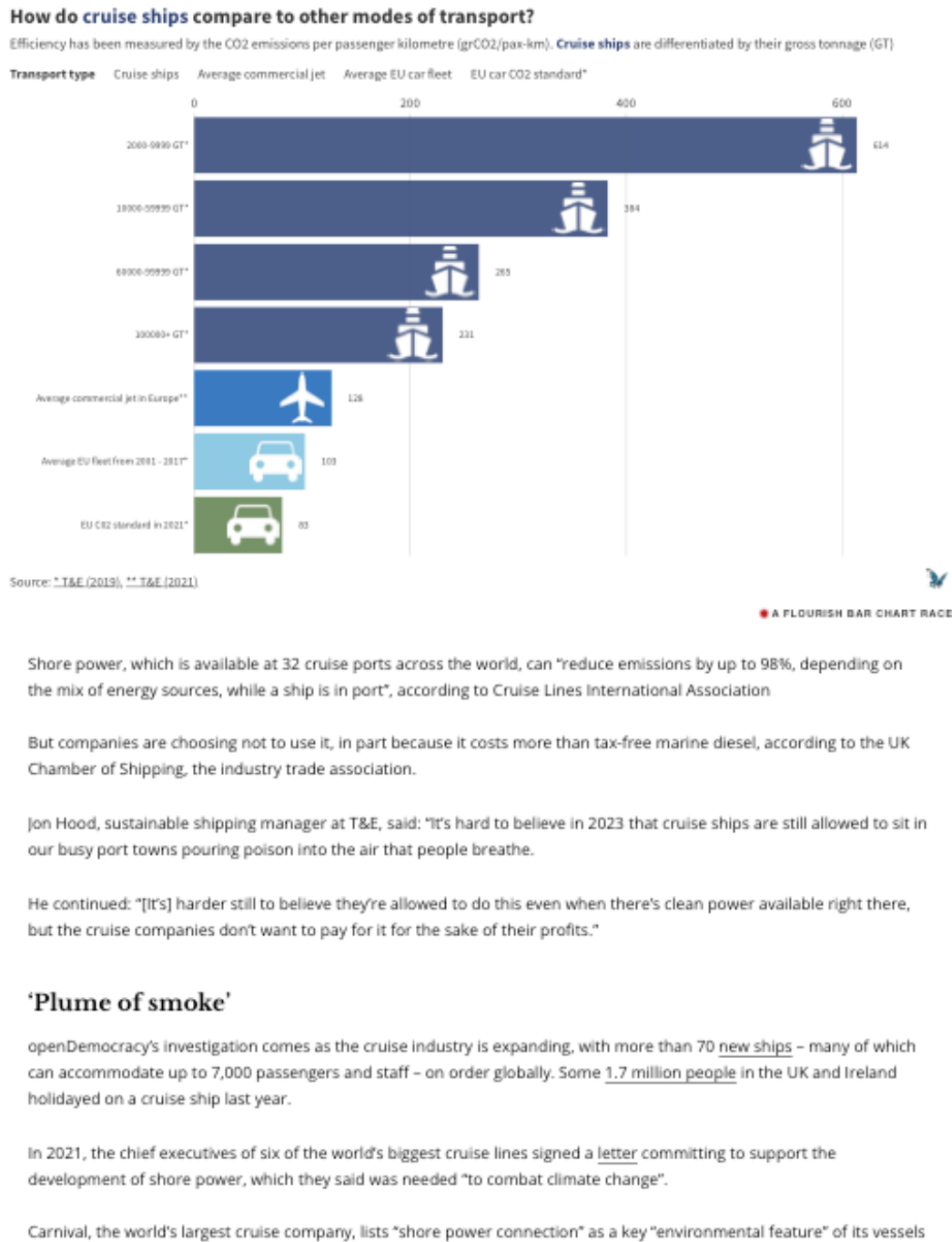
The Covid-19 public inquiry is a historic chance to find out what really happened.

MAKE A DONATION

The data also suggests that the few ships that did use the energy plugged in for only about five hours per visit on average, despite typically spending 12 hours in port.

Cruise ships’ failure to use the shore power appears to be worsening air pollution in Southampton. Just 45 ships visiting the port produced almost ten times more harmful pollutants than the city’s 93,000 cars combined, according to a study published by the Transport & Environment (T&E) think tank in June.

T&E also found that cruise ships emit two to five times more CO₂ per passenger kilometre than the average commercial aeroplane in Europe.



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in its [2022 sustainability report](#).

But the industry is frequently failing to use shore power when it is available. Southampton port's owner, Associated British Ports (ABP) [announced](#) that shore power was ready for use at two of its five terminals where cruise ships can dock in April 2022, saying ships could plug in to achieve "zero emissions at berth".

Between then and the end of July 2023, there were more than 300 days when at least one cruise ship was berthed at Southampton, according to openDemocracy's analysis of ABP's schedule.

This suggests shore power could have been used 300 times over that period – even with local grid constraints that mean only one ship can use shore power at any one time.

But in August, ABP told openDemocracy that shore power had been used on just 71 "occasions" since April 2022, though it refused to say exactly when these occasions were.

“

One only has to look at the plume of smoke from the cruise liners to see the pollution being discharged over our city

Katherine Barbour, Southampton councillor

The failure to use shore power can partly be explained by cruise lines delaying the necessary investment to upgrade their ships to be compatible with the energy source.

Only 46% of cruise ships globally can connect to shore power, according to CLIA – despite the [first shore power port connection](#) for cruise ships being installed more than 20 years ago. CLIA says 72% of ships will be able to do so by 2028.

Carnival admitted that the Iona, Ventura and Queen Victoria, which visited Southampton 80 times between May 2022 and February 2023, were not capable of taking shore power in that period.

Yet even cruise ships that can use the electricity regularly fail to do so in Southampton.

The cruise company AIDA, which is owned by Carnival, [said](#) in 2021 that the use of shore power "is a decisive step for AIDA cruises to reduce local emissions to zero during berthing over time, as a cruise ship typically stays in port around 40% of its operating time".

AIDA has also [claimed](#) to be "campaigning for the development" of shore power infrastructure at other ports.

But the company's flagship vessel, the AIDAprima, did not connect to shore power in Southampton on 80% of its visits, despite being [able to do so](#), according to ABP data from May 2022 to February 2023 obtained by openDemocracy.

Katherine Barbour, who became Southampton's first Green councillor in May, said: "One only has to look at the plume of smoke coming up from the cruise liners to see the pollution that is being discharged over our city."

A spokesperson for Carnival said: "Our ships leverage shore power whenever possible where available at our

<https://www.opendemocracy.net/en/cruise-ships-greenwashing-energy-shore-power-diesel-uk-ports-mislead-tourists/>

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destinations.”

‘Greenwashing’

Southampton port owner ABP successfully applied in 2020 for a £4.4m public subsidy to install shore power.

In its [business case](#) for the grant – which was awarded via the Solent Local Enterprise Partnership (LEP), a voluntary partnership between the local authority and businesses to encourage economic growth in the area – ABP stated that cruise ships were at berth for an average of 12 hours and could plug in for “96% of time in port”.

But figures published in Solent LEP’s [annual report](#) suggest that the 55 ships that used shore power in Southampton in the 12 months to the end of March 2023 did so for an average of only five and a half hours, spending the remaining six hours in port burning fossil fuel to generate power. A cruise ship consumes an average of 2,700 litres of diesel an hour in port.

The report stated that the 55 ships used shore power to draw a total of 1.5 million kilowatt hours of electricity. One large cruise ship is likely to use at least [this amount of energy](#) in less than two weeks.



It’s hard to believe cruise ships are allowed to pour poison into the air even when there’s clean power available right there

Peter Aylott, the director of policy at the UK Chamber of Shipping, told openDemocracy: “The current price of electricity is so high that no cruise company is going to use it unless they had to by a mandatory requirement.”

A spokesman for the chamber later clarified Aylott’s comment, saying that the high price of electricity was one reason why cruise ships do not always plug in at Southampton when shore power is available.

The UK is lagging behind the EU in forcing the cruise industry to reduce its emissions via shore power. Cruise ships visiting EU ports will be required to connect to shore power from 2030 under the FuelEU Maritime Regulation. By contrast, the UK government is still considering “options” for expanding shore power use, including [“exploring the potential”](#) of requiring vessels to use it when in port.

Jon Hood of T&E said cruise companies that “trumpet their use of shore power in an effort to seem green” but fail to actually use it are guilty of greenwashing.

“The government must require cruise ships to plug into shore power when it’s available,” Hood added. “As a first step, cruise companies should have to publish when their vessels take shore power, and for how long.”

Southampton councillor Katherine Barbour said: “If cruise liners are not mandated to change this will continue and our residents will suffer. We need all berths to be able to provide shore power and ships need to be adapted to use it.

“At the moment every ship is like a small town, spewing out pollution when they are not using electricity.”

<https://www.opendemocracy.net/en/cruise-ships-greenwashing-energy-shore-power-diesel-uk-ports-mislead-tourists/>

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Cruise companies have separately been accused of misleading the public with their claims that ships are becoming more environmentally friendly because they can burn liquified natural gas (LNG) instead of diesel.

Environmental group Opportunity Green said research showed that leaks of unburned methane could cancel out the claimed climate benefits of LNG.

A spokesperson for MSC Cruises, whose ships regularly visit Southampton, said it "intends for all ships belonging to MSC Cruises to fully utilise shore power facilities at all other ports they visit once available". They added that "there exists a variety of reasons for not utilising shore power" but said cost was not one of those reasons.

A spokesperson for ABP said: "ABP Southampton always seeks to maximise the use of its shore power facility subject to asset availability constraints, including grid capacity outside the port, and in response to customer demand.

"The numbers presented to us by [openDemocracy] seem to be taken out of context and to contain important flaws."

The numbers were either supplied directly by ABP or based on analysis of ABP data.

Asked how many times a cruise ship had failed to plug in at Southampton when shore power was available, the spokesperson said: "We don't collect the data."

The Solent LEP report said shore power had saved 1.7 million kilograms of CO2 in a year. That is only a fifth of the annual savings predicted by ABP in its business case submitted to the LEP to obtain the £4.4m grant. ABP said: "Implementation always takes a while to work up as both users and providers become familiar with use in practice."



Weymouth & Portland
Borough Council



2009-2010
Olympic Games and
Paralympics legacy

Town and Country Planning Act 1990
Town and Country Planning (Development Management Procedure) Order 2010

GRANT OF PLANNING PERMISSION

This permission does not carry any approval or consent which may be required under any enactment, bylaw, order or regulation (eg in relation to Building Regulations or the Diversion of Footpaths etc) other than Section 57 of the Town and Country Planning Act, 1990.

Application No: 11/00940/FULES

Location of Development:
Bowers Quarry Wide Street Portland Dorset

Description of Development:
Construction of a spiralling memorial tower and learning centre built into the existing slope of Bowers Quarry, with associated access ramp, secondary access route, car park with bicycle shelter and main access road from Wide Street

Approved plans:

Location plan MEMO-10-001 P1 received on 31 October 2011
Block plan MEMO-10-003 received on 31 October 2011
Site layout MEMO-10-004 P1 received on 31 October 2011
Floor plans MEMO-11-001 P1 received on 31 October 2011 ground floor
Floor plans MEMO-11-002 P1 received on 31 October 2011 Spiral tower plan 1
Floor plans MEMO-11-003 P1 received on 31 October 2011 Spiral tower plan 2
Floor plans MEMO-11-004 P1 received on 31 October 2011 Spiral tower plan 3
Floor plans MEMO-11-005 P1 received on 31 October 2011 Spiral tower plan 4
Floor plans MEMO-11-006 P1 received on 31 October 2011 Spiral tower plan 5
Floor plans MEMO-11-007 P1 received on 31 October 2011 Spiral tower plan 6
Floor plans MEMO-11-008 P1 received on 31 October 2011 Spiral tower plan 7
Floor plans MEMO-11-009 P1 received on 31 October 2011 Spiral tower plan 9
Roof plan MEMO-11-010 P1 received on 31 October 2011
Elevation drawing MEMO-13-004 P1 received on 31 October 2011 North
Elevation drawing MEMO-13-003 P1 received on 31 October 2011 West
Elevation drawing MEMO-13-002 P1 received on 31 October 2011 South
Elevation drawing MEMO-13-001 P1 received on 31 October 2011 East
Section MEMO-10-002 received on 13 October 2011
Section MEMO-12-001 received on 13 October 2011 Section AA
Section MEMO-12-002 received on 13 October 2011 Section BB
Section MEMO-12-003 received on 13 October 2011 Section CC
Section MEMO-12-004 received on 13 October 2011 Section DD
Section MEMO-12-005 received on 13 October 2011 Section EE

In pursuance of their power under the above mentioned Act, the Local Planning Authority
HEREBY GRANT PLANNING PERMISSION for the above development.

Subject to the following condition(s):

TPA - Proposal Does Not Comply With The Dorset Waste Plan 2019 (Adopted December 2019) Policies 12 – 13 – public representation - page 1 of 2

Ref: Planning application: WP/20/00692/DCC

EXTRACT FROM: Objection To The Powerfuel Portland Ltd Planning Application This Proposal Does Not Comply With The Dorset Waste Plan 2019 (Adopted December 2019) Policies 12 – 13
(original version available from Core Documents)

THE ROUTE TO THE JOURNEY'S END FOR SINGLE-USE PLASTICS (and other non- recyclables):
the last 12 miles of the HGV's journey from the Stadium Roundabout at Dorchester to the Portland Port site.

- From Dorchester's Stadium Roundabout down the A354 towards Weymouth, across the ridgeway through the **Dorset AONB** and
- Down to the Jurassic Roundabout - a congestion pinch point for traffic.
- Down the Weymouth Relief Road passing **Lorton Meadows Nature Reserve & Conservation Centre**
- Down past **Radipole Lake Nature Reserve** and through into the built up area of Weymouth
- Passing housing on one side and **Weymouth Marina Inner Harbour** on the other
- Up to **Boot Hill**, past the AQM automatic analyser, constantly monitored as it is close to being above the permitted levels for emissions and another congestion pinch point for traffic.
- Then past the dense housing along and near Buxton Road
- Passing the **112 local allotment sites at Sandsfoot Allotments**
- Passing **All Saints Church of England Academy** school
- To the Foord's Corner roundabout - another congestion pinch point
- Past **Wyke Regis Infant School and Nursery Schools**
- Close to **Wyke Regis C of E Junior School**
- Past the **Wyke Regis Health Centre and Library**
- Past the **Wyke Regis Methodist Church, Play Area** and close to the **Tennis courts**
- Stopping at the pedestrian traffic lights as the children cross the road for school, the traffic lights causing more congestion
- Past various food shops at Wyke, including the **Smugglers** pub and other eating outlets
- Along the residential Portland Road where children walk along the pavements to the schools
- Through the traffic lights, another congestion point and onwards
- Down the house-lined A354 to the roundabout by **Chesil Vista Holiday Park**

TPA - Proposal Does Not Comply With The Dorset Waste Plan 2019 (Adopted December 2019) Policies 12 – 13 – public representation - page 2 of 2

- From Ferrybridge along the causeway it passes **Chesil Beach**, with the breeding **Little terns**, an associated feature of the **Chesil Beach and The Fleet SPA** - both are part of the **Jurassic Coast and a UNESCO World Heritage Site**
- Over the mouth of **the Fleet**, which is a **Special Area of Conservation (SAC)**, a **Special Protection Area (SPA)** under the EU Birds Directive a **Ramsar site**, a **Site of Special Scientific Interest (SSSI)** and a **designated bass nursery area**
- Past the **Fine Foundation Chesil Beach Centre** - an information centre for wildlife and environmental exhibitions and boat trip bookings
- Past the **Portland Harbour Shore SSSI**, and kite surfers, paddle boarders, windsurfers, dinghy sailors, yacht sailors, beach combers, dog walkers, kite fliers, holiday makers, and fishermen that all use the area.
- Past **Portland Harbour's Sensitive Marine Area**, then in towards Castletown (a **Conservation Area**) which has been subject to regeneration in recent years and is fast becoming a tourist hotspot
- Passing all the youngsters on the **skate park**
- Past the **Atlantic Academy Portland Early Years First School**
- Past the current **206 flats in Atlantic House** and the old Hardy Complex to be developed into 157 apartments, and 191 new homes to the rear –a total of 554 homes on the site.
- Close to **Portland Castle a 16th Century Grade 1 Listed coastal fort and gardens**
- Then past the **Osprey Leisure Centre** and swimming pool.
- Passing within feet of many of the houses of the **Conservation area of Castletown**
- Passing **The D-Day Centre tourist attraction, Hotel Aqua, Crabbers Wharf holiday lets, The Green Shutters Pub** and a grocery shop.
- Then in through the gates of Portland Port to unload, before the lorry repeats the journey back to the depot.

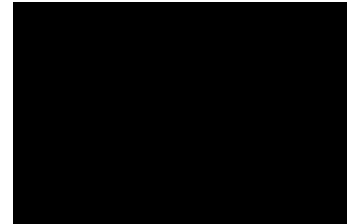


The Society For Poole

Founded 1924



The Head of Planning,
Planning & Community Services,
Dorset Council,
County Hall, Dorchester,
Dorset,
DT1 1XJ.



1st November 2020

Dear Sir / Madam,

**CONSTRUCTION of ENERGY RECOVERY FACILITY at PORTLAND.
APPLICATION Nr : WP/20/00692/DCC.**

It is understood that national policy is to reduce waste (through recycling and composting) and that existing incineration facilities are thus likely to be more than capable of dealing with residual waste. It therefore seems unwise to erect a facility requiring feedstock to be acquired from overseas (perhaps even involving more heavy lorries crossing Dorset) that will inhibit the future of existing plant elsewhere. It is appreciated that planning is not necessarily concerned with such wisdom, however we do object to any approval of the above application and therefore comment as follows :-

1 : 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.

2 : The UK is becoming increasingly aware of the dangers associated with micro-particles in our atmosphere (*arising from brake linings or from any sort of combustion*), in our oceans (*arising from leakages or erosions*) and in our soils (*arising from deliberately applied or wind distributed pollutants*) to the point that our food chain is at risk. and

3 : 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.

1 of 2

**CONSTRUCTION of ENERGY RECOVERY FACILITY at PORTLAND.
APPLICATION Nr : WP/20/00692/DCC (Cont'd).**

Consequently the above-mentioned proposal (to construct an energy recovery facility) that increases exposure to such disruptions, dangers and adverse effects should be refused. Such action should help in :-

- a) protecting the health and well-being of so many local communities (including visitors – who could be deterred if such action is not taken), and
- b) promoting the vitality of the various wildlife heritage ‘hotspots’ in Dorset that would otherwise be devastated.

Please note, whilst every effort has been taken to present accurate information for due consideration, that as we are neither a decision-maker nor a statutory consultee, we cannot accept any responsibility for any unintentional errors or omissions.

No doubt the decision-makers will satisfy themselves on any facts relating to our comments before reaching the appropriate sustainable decision.

Yours faithfully,

Gerald Rigler, Chairman : Planning Sub-Group

2 of 2

The National Trust

27/09/2021

FAO Adrian Lynham Planning application ref. WP/20/00692/DCC | Construction of an energy recovery facility (and ass'd development) | Portland Port, Castletown, Portland

The National Trust is a conservation charity that looks after nature, beauty and history for the nation – for everyone, for ever. Established over 125 years ago and supported by over 5 million members, the Trust promotes the conservation of places of historic interest and natural beauty in England, Wales and Northern Ireland.

The Trust owns Portland House, a grade II listed building that overlooks Portland Harbour, and is one of the very few remaining examples of the Art Deco 'Hollywood Spanish' style. The Trust also owns coastal lands at Ringstead Bay, West Bexington and Cogden Beach, which form part of the Dorset AONB and Jurassic Coast WHS. These locations are popular with walkers and beach-goers (and are traversed by the South West coast path).

Landscape and heritage National planning policies state that great weight should be given to conserving the significance of designated heritage assets, and their settings (including listed buildings and the Jurassic Coast WHS). Planning decisions should contribute to and enhance the natural and local environments, including by protecting and enhancing valued landscapes; and conserving and enhancing landscape and scenic beauty of AONBs and their settings. In these respects, we have concerns regarding the significant scale of the proposed facility, the impact it would have on views (in profile, it may be particularly prominent from Chesil Beach and parts of Weymouth including Portland House), and the impacts of any visible plume from the flue, which would potentially be seen along a wide stretch coast.

Tourism and the local economy The proposed development would create new jobs. We do, however, have 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.

Wider environmental issues Finally, we would ask the Council to consider the proposed development's effect on the natural environment and the urgent need to tackle climate change. Does it represent best practice – and the most sustainable solution – for dealing with Dorset's waste and meeting the energy needs of the port? Have all possible alternatives been considered? Does the proposed development accord with all relevant legislation, policy and guidance, including that relating to atmospheric pollution?

Conclusion We would ask the Council to give the appropriate weight and attention to the issues and concerns that we have raised, before it comes to a decision on the application, to ensure the best possible outcomes for the port, Portland and Dorset.

Regards Mark Funnell MRTPI
Planning Adviser National Trust SW Region (Dorset, Wilts, Somerset, Glos)
nationaltrust.org.uk



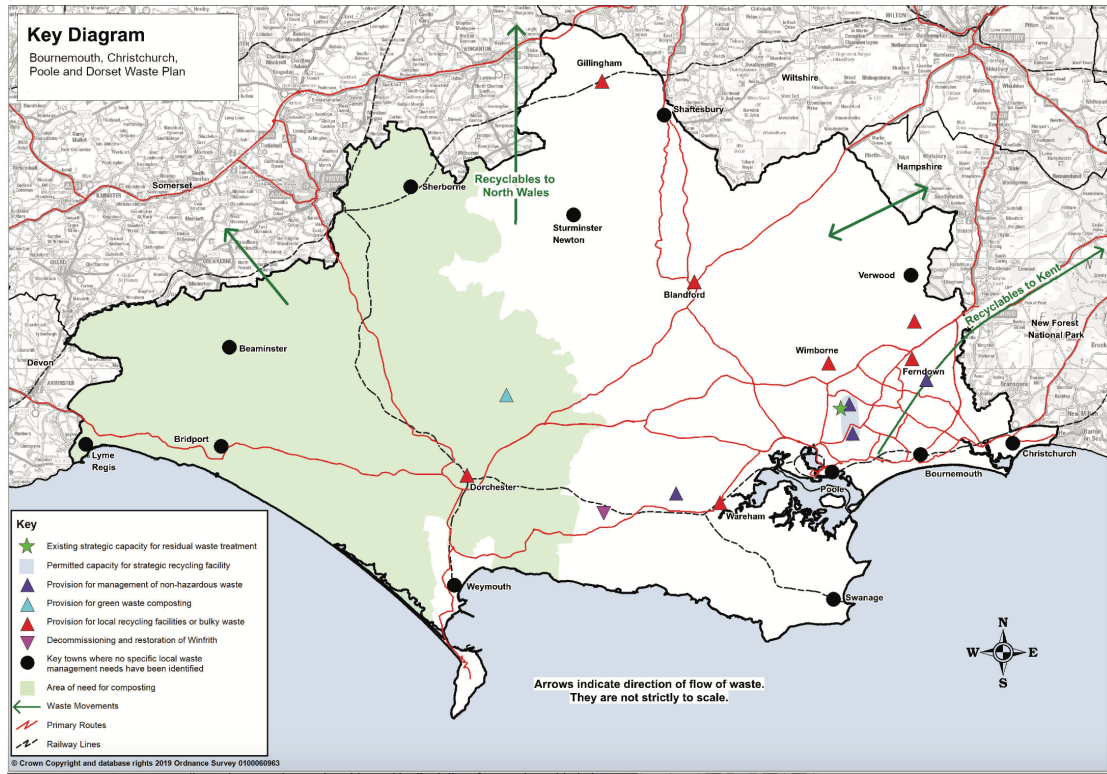
Operational EfWs (i.e. those providing an APR for 2022)

(P) denotes Public Sector

| Permitted Name | Known As | Location | 2022 Operator | Permit Capacity (ktpa) | Processed (ktpa) | |
|-----------------------------------------|-------------------|-------------------|------------------|------------------------|------------------|---------------|
| | | | | | 2021 | 2022 |
| 1 Runcorn EfW Facility | Runcorn | Hellon | Vindor | 1,100 | 957 | 930 |
| 2 Riverside Resource Recovery Facility | Riverside | Bexley | Cory | 850 | 782 | 789 |
| 3 Tees Valley - EfW Facility | Tees Valley | Stockton-on-Tees | Suez | 756 | 675 | 675 |
| 4 Ferrybridge Multifuel 1 | Ferrybridge FM1 | Wakefield | enfirium | 725 | 656 | 621 |
| 47 Ferrybridge Multifuel 2 | Ferrybridge FM2 | Wakefield | enfirium | 725 | 669 | 633 |
| 51 Kemsley Park EfW | Kemsley | Kent | enfirium | 657 | 527 | 542 |
| 5 Edmonton EcoPark | Edmonton | Enfield | LondonEnergy (P) | 620 | 516 | 489 |
| 55 Rookery South ERF | Rookery South | C Bedfordshire | Encyclis | 585 | 170 | 477 |
| 6 Allington Waste Management Facility | Allington | Kent | FCC | 560 | 472 | 464 |
| 9 Wilton 11 EfW | Wilton 11 | Middlesborough | Suez | 500 | 459 | 356 |
| 8 Lakeside EfW | Lakeside | Slough | Lakeside | 468 | 382 | 425 |
| 12 Severnside Energy Recovery Centre | Severnside | S Gloucestershire | Suez | 467 | 402 | 383 |
| 7 SELCHP ERF | SELCHP | Lewisham | Veolia | 464 | 434 | 428 |
| 11 Tyseley ERF | Tyseley | Birmingham | Veolia | 441 | 375 | 376 |
| 10 Cardiff Energy Recovery Facility | Trident Park | Cardiff | Vindor | 425 | 378 | 360 |
| 54 Severn Road RRC | Avonmouth | Bristol | Vindor | 377 | 285 | 364 |
| 45 Beddington Energy Recovery Facility | Beddington Lane | Croydon | Vindor | 347 | 320 | 334 |
| 13 Greatmoor EfW | Greatmoor | Buckinghamshire | FCC | 345 | 303 | 297 |
| 14 Staffordshire ERF | Four Ashes | Staffordshire | Veolia | 340 | 339 | 340 |
| 15 Ardley EfW Facility | Ardley | Oxfordshire | Vindor | 326 | 334 | 309 |
| 43 Dunbar Energy Recovery Facility | Dunbar | East Lothian | Vindor | 325 | 307 | 314 |
| 41 Allerton Waste Recovery Park | Allerton Park | North Yorkshire | Thalia | 320 | 287 | 284 |
| 16 CSWDC Waste to Energy Plant | Coventry | Coventry | CSWDC (P) | 315 | 295 | 298 |
| 58 Hull Energy Works | Energy Works ACT | Hull | BIG | 315 | 35 | 52 |
| 17 SUEZ Suffolk - EfW Facility | Great Blakenham | Suffolk | Suez | 295 | 292 | 283 |
| 18 Devonport EfW CHP Facility | Devonport | Plymouth | MVV | 265 | 243 | 260 |
| 20 Sheffield ERF | Sheffield | Sheffield | Veolia | 245 | 228 | 224 |
| 21 Newhaven ERF | Newhaven | East Sussex | Veolia | 242 | 229 | 229 |
| 19 Cornwall Energy Recovery Centre | Cornwall | Cornwall | Suez | 240 | 242 | 240 |
| 25 Envirecover EfW Facility | Hartlebury | Worcestershire | Severn | 230 | 216 | 213 |
| 22 Integra South West ERF | Marchwood | Southampton | Veolia | 220 | 210 | 200 |
| 23 Integra South East ERF | Portsmouth | Portsmouth | Veolia | 220 | 200 | 206 |
| 24 Stoke EfW Facility | Hanford | Stoke-on-Trent | MESE/Cobalt | 210 | 185 | 194 |
| 26 Eastcroft EfW Facility | Eastcroft | Nottingham | FCC | 200 | 186 | 182 |
| 48 Parc Adfer ERF | Parc Adfer | Deeside | enfirium | 200 | 192 | 198 |
| 28 Lincolnshire EfW Facility | North Hykeham | Lincolnshire | FCC | 190 | 171 | 172 |
| 46 Millerhill Recycling and ERC | Millerhill | Edinburgh | FCC | 190 | 161 | 157 |
| 49 Javelin Park ERF | Javelin Park | Gloucestershire | Urbaser | 190 | 191 | 189 |
| 27 Leeds Recycling and ERF | Leeds | Leeds | Veolia | 190 | 181 | 187 |
| 31 Baldovie Waste To Energy Plant | Baldovie | Dundee | MVV | 175 | 161 | 182 |
| 44 Glasgow RREC | Glasgow ACT | Glasgow | Vindor | 154 | 99 | 132 |
| 29 Kirklees EfW Facility | Kirklees | Huddersfield | Suez | 150 | 134 | 120 |
| 52 Full Circle Generation EfW | Belfast ACT | Belfast | FCG | 144 | 49 | 99 |
| 56 Baddesley EfW | Baddesley | Warwickshire | Kantor | 130 | 71 | 74 |
| 32 Wolverhampton EfW Facility | Wolverhampton | Wolverhampton | MESE/Cobalt | 118 | 112 | 110 |
| 33 Integra North ERF | Chineham | Hampshire | Veolia | 110 | 105 | 97 |
| 30 Bolton ERF | Bolton | Gtr Manchester | Suez | 107 | 42 | 65 |
| 34 Dudley EfW Facility | Dudley | Dudley | MESE/Urbaser | 105 | 97 | 93 |
| 35 Battlefield EfW Facility | Battlefield | Shropshire | Veolia | 102 | 99 | 94 |
| 53 Liversheat Renewable Energy | Liversheat ACT | West Lothian | Liversheat | 97 | 50 | 55 |
| 42 Milton Keynes Waste Recovery Park | Milton Keynes ACT | Milton Keynes | Amey | 94 | 56 | 56 |
| 36 Peterborough EfW Facility | Peterborough | Peterborough | Vindor | 85 | 81 | 91 |
| 37 Enviropower Ltd, Lancing | Lancing | West Sussex | Enviropower | 75 | 67 | 53 |
| 38 Exeter ERF | Exeter | Devon | Paprec/Vindor | 60 | 60 | 60 |
| 39 Integrated Waste Management Facility | NewLincs | NE Lincolnshire | Paprec | 56 | 51 | 51 |
| 57 Charlton Lane Eco Park | Eco Park ACT | Surrey | Suez | 55 | 0 | 27 |
| 40 Energy Recovery Plant | Grimsta | Shetland Islands | SHEAP (P) | 26 | 19 | 23 |
| Other EfWs | | | | | 100 | 167 |
| Totals | | | | 17,522 | 14,941 | 15,323 |

Traffic count 26.10.23 – page 1 of 1

| Traffic Count, Castletown 26th October 2023 | | | | | | | | |
|---------------------------------------------|------|-----|------|-----|---------------|------|------|-----|
| Time | Cars | | Vans | | Buses/Coaches | | HGVs | |
| | In | Out | In | Out | In | Out | In | Out |
| 06.00 - 06.15 | 6 | 2 | 1 | 1 | 0 | 0 | 3 | 0 |
| 06.15 - 06.30 | 6 | 0 | 1 | 0 | 0 | 0 | 0 | 0 |
| 06.30 - 06.45 | 6 | 1 | 3 | 1 | 0 | 0 | 1 | 1 |
| 06.45 - 07.00 | 10 | 2 | 1 | 2 | 0 | 0 | 1 | 3 |
| 07.00 - 07.15 | 6 | 2 | 0 | 0 | 0 | 0 | 2 | 2 |
| 07.15 - 07.30 | 19 | 8 | 7 | 0 | 0 | 0 | 1 | 1 |
| 07.30 - 07.45 | 24 | 5 | 6 | 1 | 1 | 0 | 1 | 2 |
| 07.45 - 08.00 | 36 | 5 | 6 | 5 | 0 | 0 | 2 | 1 |
| 08.00 - 08.15 | 32 | 3 | 6 | 2 | 0 | 1 | 0 | 2 |
| 08.15 - 08.30 | 13 | 7 | 8 | 5 | 0 | 0 | 2 | 2 |
| 08.30 - 08.45 | 13 | 5 | 3 | 5 | 1 | 0 | 1 | 2 |
| 08.45 - 09.00 | 6 | 9 | 5 | 3 | 0 | 0 | 3 | 3 |
| 09.00 - 09.15 | 2 | 5 | 4 | 7 | 0 | 1 | 1 | 1 |
| 09.15 - 09.30 | 7 | 2 | 3 | 3 | 0 | 0 | 2 | 0 |
| 09.30 - 09.45 | 7 | 11 | 4 | 2 | 1 | 0 | 3 | 1 |
| 09.45 - 10.00 | 6 | 6 | 5 | 5 | 1 | 0 | 2 | 1 |
| 10.00 - 10.15 | 11 | 2 | 4 | 5 | 1 | 0 | 2 | 3 |
| 10.15 - 10.30 | 10 | 12 | 3 | 5 | 0 | 0 | 1 | 2 |
| 10.30 - 10.45 | 8 | 7 | 8 | 2 | 0 | 0 | 0 | 3 |
| 10.45 - 11.00 | 7 | 5 | 4 | 4 | 2 | 0 | 3 | 1 |
| 11.00 - 11.15 | 14 | 9 | 3 | 4 | 5 | 1 | 1 | 1 |
| 11.15 - 11.30 | 15 | 14 | 5 | 2 | 5 | 0 | 6 | 1 |
| 11.30 - 11.45 | 17 | 10 | 4 | 4 | 6 | 0 | 4 | 2 |
| 11.45 - 12.00 | 10 | 4 | 10 | 0 | 2 | 0 | 2 | 2 |
| 12.00 - 12.15 | 6 | 9 | 1 | 4 | 0 | 1 | 1 | 2 |
| 12.15 - 12.30 | 11 | 11 | 8 | 7 | 0 | 2 | 3 | 2 |
| 12.30 - 12.45 | 19 | 15 | 3 | 4 | 3 | 6 | 0 | 2 |
| 12.45 - 13.00 | 15 | 13 | 7 | 8 | 2 | 8 | 2 | 2 |
| 13.00 - 13.15 | 15 | 13 | 7 | 8 | 2 | 8 | 2 | 2 |
| 13.15 - 13.30 | 12 | 15 | 3 | 13 | 5 | 3 | 2 | 1 |
| 13.30 - 13.45 | 7 | 6 | 5 | 10 | 9 | 3 | 1 | 2 |
| 13.45 - 14.00 | 13 | 5 | 5 | 6 | 5 | 3 | 1 | 4 |
| 14.00 - 14.15 | 17 | 9 | 4 | 8 | 5 | 7 | 1 | 3 |
| 14.15 - 14.30 | 17 | 15 | 9 | 2 | 4 | 3 | 1 | 1 |
| 14.30 - 14.45 | 10 | 19 | 4 | 4 | 3 | 2 | 4 | 3 |
| 14.45 - 15.00 | 11 | 18 | 1 | 3 | 4 | 3 | 0 | 0 |
| 15.00 - 15.15 | 9 | 11 | 3 | 5 | 2 | 5 | 2 | 2 |
| 15.15 - 15.30 | 11 | 16 | 5 | 5 | 5 | 6 | 2 | 4 |
| 15.30 - 15.45 | 2 | 7 | 1 | 1 | 3 | 2 | 0 | 1 |
| 15.45 - 16.00 | 9 | 8 | 3 | 9 | 4 | 4 | 3 | 3 |
| 16.00 - 16.15 | 5 | 38 | 1 | 4 | 4 | 6 | 1 | 2 |
| 16.15 - 16.30 | 4 | 11 | 1 | 2 | 3 | 3 | 0 | 0 |
| 16.30 - 16.45 | 5 | 32 | 3 | 4 | 7 | 3 | 1 | 0 |
| 16.45 - 17.00 | 11 | 10 | 1 | 8 | 6 | 3 | 1 | 1 |
| 17.00 - 17.15 | 16 | 34 | 1 | 3 | 4 | 6 | 1 | 0 |
| 17.15 - 17.30 | 11 | 20 | 2 | 3 | 3 | 5 | 0 | 1 |
| 17.30 - 17.45 | 11 | 14 | 2 | 0 | 4 | 3 | 0 | 1 |
| 17.45 - 18.00 | 8 | 6 | 4 | 2 | 6 | 3 | 1 | 0 |
| 18.00 - 18.15 | 6 | 12 | 3 | 2 | 4 | 3 | 0 | 1 |
| 18.15 - 18.30 | 9 | 8 | 3 | 7 | 1 | 8 | 0 | 1 |
| 18.30 - 18.45 | 1 | 7 | 2 | 2 | 3 | 2 | 1 | 0 |
| 18.45 - 19.00 | 6 | 6 | 0 | 0 | 3 | 2 | 1 | 0 |
| 19.00 - 19.15 | 7 | 4 | 1 | 1 | 4 | 4 | 0 | 1 |
| 19.15 - 19.30 | 15 | 21 | 0 | 0 | 1 | 2 | 1 | 2 |
| 19.30 - 19.45 | 15 | 14 | 3 | 2 | 2 | 4 | 0 | 1 |
| 19.45 - 20.00 | 4 | 7 | 0 | 1 | 2 | 1 | 0 | 0 |
| 20.00 - 20.15 | 10 | 7 | 0 | 1 | 0 | 1 | 0 | 0 |
| 20.15 - 20.30 | 3 | 2 | 1 | 0 | 1 | 1 | 0 | 0 |
| 20.30 - 20.45 | 4 | 9 | 0 | 0 | 0 | 0 | 0 | 0 |
| 20.45 - 21.00 | 0 | 4 | 0 | 1 | 0 | 0 | 1 | 0 |
| 21.00 - 21.15 | 7 | 16 | 1 | 0 | 0 | 1 | 0 | 0 |
| 21.15 - 21.30 | 6 | 2 | 0 | 0 | 0 | 0 | 0 | 0 |
| 21.30 - 21.45 | 3 | 5 | 2 | 1 | 1 | 0 | 1 | 0 |
| 21.45 - 22.00 | 1 | 1 | 1 | 2 | 1 | 0 | 0 | 0 |
| | 643 | 616 | 205 | 211 | 141 | 130 | 79 | 82 |
| | 1259 | | 416 | | 271 | | 161 | |
| | | | | | | | | |
| | | | | | | 2107 | | |



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13. Sustainable Tourism

Overview

13.1 There is widespread feeling that Portland’s tourism potential has not been fully tapped. The community recognises its benefits and is supportive of making efforts to attract and accommodate more visitors. Green and sustainable tourism should be the objective. The Island’s natural environment and unique heritage are there to be ‘enjoyed’, but only if ways can also be found to safeguard and protect all that is precious to us. There is scope too for much more in the way of activities and events in the village centres that will attract tourists and will also make a difference to the social and community life of the Island. The community accepts that increased tourism is a valuable lever. Many local people would welcome and derive benefit regular evening activities, outdoor events and festivals, more public art installations, and a general uplift in the scale and quality of facilities and services.

13.2 The current constraints on tourism growth are readily identifiable. We are lacking in visitor accommodation. There is insufficient capacity in the road network and parking areas. Many of our public venues fall short on several levels. Moreover, there are currently not enough tourist attractions and specific visitor destinations to increase meaningfully the average visit time and expenditure.

13.3 There are a tourism ‘assets’ that can be taken advantage of. Portland Port has witnessed significant growth over the last five years and is now regularly hosting cruise ships. The tendency however, has been for passengers to be taken by coaches off the Island to other established destinations during their short stay.

13.4 The Island offers significant activity adventure opportunities. The Weymouth & Portland National Sailing Academy hosts world class facilities for sailors and Portland Harbour provides a safe venue with a full range of water sports including diving, paddle boarding and kayaking. The adventure tourism sector continues to grow, and the Island’s topography, quarries and wildness are there to be taken advantage of, responsibly. Portland needs to establish an identity distinct from Weymouth. The Portland Brand needs to be defined and marketed in consistent way.

13.5 We should be helped significantly by the development of a major tourist attraction such as the proposed ‘Eden Portland’ project (formerly the Jurassica and MEMO projects). We must plan to help them succeed and ensure adequate infrastructure is in place, so that we can take full advantage of the benefits that can accrue to Portland and its community. This also means realising what else we have with tourist potential and how it can be sustainably and appropriately developed. Thereby ensuring that, even with enhanced visitor appeal, the Island continues to provide a pleasant, safe and affordable place for future generations of Portlanders to live, work and play.

13.6 We are mindful however that whilst the tourism and recreation potential of Portland is substantial, it cannot be realised at the cost of the important and sensitive natural environment. Accordingly, our policies take heed of the recommendations of recently carried out Strategic Environmental and Habitat Regulations Assessments. We also endorse fully the requirements of Local Plan Policy ENV2 and the Conservation of Habitats and Species Regulations 2017 (as amended)⁵².

| | |
|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sustainable Tourism | |
| Aim | Accommodate responsible and sustainable tourism development |
| Objectives | <ul style="list-style-type: none"> • Support sustainable tourism-related development in appropriate locations • Support the creation of individual, or a network of, tourist trails • Facilitate appropriate new marine developments |

Our Neighbourhood Plan Policies and their Explanation/Justification

Policy No. Port/ST1 Sustainable Tourism Development

Sustainable tourism development proposals, including extensions to or expansion of existing tourism uses, are supported in principle where they are proportionate to their location in scale and type.

Proposals relating to land outside the settlements will need to demonstrate that the use proposed:

1. promotes the unique characteristics of the area;
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; and
3. avoids conflict with the prevailing strategic policies designed to protect the environment, ecology and mineral reserves.

Support will not be given to any tourism development that will adversely affect European sites.

13.7 Sustainable tourism is tourism committed to generating a low impact on the surrounding environment and community by acting responsibly while generating income and employment for the local economy and aiding social cohesion. Rather than a type of

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product, sustainable tourism is an ethos that underpins all tourism activities and is integral to all aspects of tourism development and management and not just an add-on. The 2014 Community Consultation for the Neighbourhood Plan showed that 91% of respondents recognised tourism and visitors as an important part of our economy. The community response to the 1st Consultation Version of the Portland Neighbourhood Plan drew a significant amount of support and several imaginative ideas for tourism development that would not harm the Island environmentally, may stimulate earlier re-instatement of some of the worked quarries and could bring benefits to the community and the local economy.

13.8 The NPPF (para. 83) encourages us to enable “*rural tourism and leisure developments which respect the character of the countryside*”.

13.9 In 2013, the Portland Community Partnership prepared and consulted upon a draft Portland Tourism and Visitor Management Strategy⁵³. It reflects the community’s aspirations towards tourism:

- *Tourism will be managed on Portland in a way that will:*
- *Protect the coastal and marine environment including unique natural and heritage assets*
- *Support visitor safety and enjoyment whilst ensuring a balance between the needs of tourists and the preservation of existing and evolving community values*
- *Minimise adverse visitor impacts on the social, economic and physical environment*
- *Add economic, social and environmental benefits to the community*

There will also be economic, environmental and social benefits:

- *Economic through a reduction in energy use, water use or waste production*
- *Environmental reinforces Portland’s nature-based brand and natural visitor experiences.*
- *Social through local jobs for local people*

13.10 One of Dorset’s economic strengths and ‘drivers’ is its tourism industry. Many tourist visits are heavily dependent on the appeal of the natural environment. The Dorset Local Nature Partnership claims that the seaside, beaches and coast is the most frequently listed reason for visiting Dorset, and 62% of tourist visits are motivated by coast, scenery or countryside. There is much on Portland that can be exploited but equally there is much on Portland that can be damaged if tourism and its impact is not managed.

13.11 Recent research (2016) remarked that Portland had: very little serviced accommodation, no provision in terms of touring caravan and camping sites, only one small 5-star holiday park, a small supply of self-catering accommodation and only three hostel/bunkhouse accommodation operations. The resulting action plan recommended, in particular, redressing the lack of “*suitable accommodation for activity visitors, particularly in terms of a lack of provision for camping, and the potential for camping pods as an accommodation offer that would appeal to this market*”⁵⁴.

13.12 The Town Council has agreed⁵⁵ 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.

13.13 The challenges we face include:

- establishing more effective links with Weymouth
- a closer association with Jurassic Coast
- ensuring tourism growth respects quality of landscape
- managing and improving road access
- identifying appropriate areas for sensitive tourism development

13.14 We have concluded from our own studies that there are locations on Portland that may be suitable for additional tourism activity and facilities including activity centres, activity-friendly accommodation, camp sites, camping pods, hostel/bunkhouse, self-catering accommodation. We included the quarries with substantial reserves amongst these locations. Any tourism-related development in or adjacent to the quarries should ensure these reserves are safeguarded and conform to the restoration requirements of the Minerals Strategy (Policy PD5).

13.15 Policy Port/ST1 is specifically designed to encourage small-scale sustainable tourism development proposals that provide for activity and adventure holidays to come forward within those areas of the Island that offer can offer an outdoor, rugged and rural location that is away from the most environmentally sensitive areas. We would expect any such proposal to demonstrate its sustainability credentials and be accompanied by an environmental impact assessment.

13.16 In accordance with the recommendations of the Habitat Regulations Assessment, tourism development proposals requiring planning permission should comply with the requirements of Local Plan policy ENV2 ‘Wildlife and Habitats’, which is aimed at protecting international, national and local designated wildlife sites and water bodies. The importance of the European sites, even to the tourist potential of the Island, means our support for sustainable tourism development proposals is conditional on the development proposal not having an adverse effect on these important sites and locations.

Policy No. Port/ST2 Beach Huts

Proposals for replacement beach huts at West Weares, Church Ope Cove and Portland Bill that match the footprint of existing huts, and minor extensions to the rear of beach huts on the Beach Hut fields at Portland Bill (see Map 15), will be supported where they:

1. are of a single-storey design which is in keeping with the traditional character and topography of the site;
2. do not result in a disproportionate increase in the ridge height or include loft storage areas;
3. are finished in timber, that is stained or painted to match the hut it is replacing or extending;
4. have no significant impact on the existing and essential character of the site;
5. are for day-time recreation use with non-permanent residence; and,

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6. avoid any significant negative impact on the biodiversity, landscape and setting of the site and the surrounding area. Where some impact is unavoidable, it will be satisfactorily mitigated.

Further extensions to previously extended beach huts will not be supported, except in special circumstances, neither will the provision of further patio, decking or veranda areas or 'garden' enclosures.

Development proposals to provide additional beach huts will not be supported.

13.17 Portland Bill, Church Ope and West Weares are the location of beach huts (former fisherman's huts) that are a long-established and well-known feature of the landscape. For many years they have been used for recreational purposes. Many are no longer owned by Portlanders. We concur with the Weymouth and Portland Supplementary Planning Guidance on Portland's Beach Huts⁵⁶, which says "*by their nature, these huts are located on the open coastline in sensitive areas. It is important that future developments are controlled to prevent damage to the open landscape, nature conservation interest and recreational value of these sites, both for the benefit of existing hut owners and for the wider local community and visiting public who enjoy these precious landscapes*".

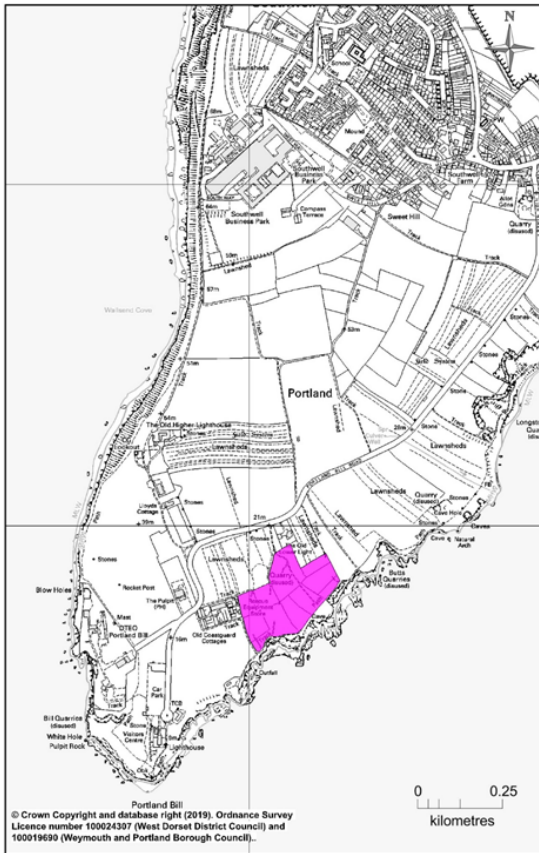
13.18 Beach huts on Portland are being sold for considerable sums of money. Our concern is that those that can afford to purchase a beach hut may feel inclined to invest further in their asset. We wish to place some control on the development changes that are acceptable. We want to protect the sensitive landscape, with its species-rich grasslands, from damage.

13.19 The approach taken by the Beach Huts Supplementary Planning Guidance seems reasonable and is generally echoed in policy Port/ST2. At West Weares, Church Ope Cove and outside the hut fields at Portland Bill, additional beach huts, extensions to beach huts and the replacement of beach huts with larger structures are considered most unlikely to be appropriate due to the critical landscape, nature conservation and recreational interests in these areas. Small-scale extensions to facilitate necessary adaptation for the disabled may be acceptable.

13.20 In the hut fields at Portland Bill, south of Coastguard Cottages and the Old Lower Lighthouse (see Map 15), the huts are arranged along the field boundaries, forming nearly complete squares in some cases. Here, minor extensions to beach huts in non-sensitive locations might be acceptable, but "*great care is required to preserve this sensitive balance and to avoid the character of the hut fields tipping over into one of consolidated development.... extensions should normally be to the rear of existing huts, towards the nearest field boundary. Extensions to the sides of huts will rarely be acceptable, as they would increase the enclosure of the fields. Likewise, extensions towards the centre of the fields are unlikely to be acceptable, as these would reduce the important openness of the fields.*"⁵⁷. A hut that has previously been extended should not receive permission for further extensions.

Map 15 Portland Beach Hut Fields

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Policy No. Port/ST3 Tourist Trails

Proposals that further the creation of a network of tourist and leisure trails will be supported provided:

1. the construction and appearance of new paths, tracks or links are appropriate in scale and sensitive to the character of the locality;
2. they avoid sensitive ecological areas and habitats;
3. they avoid any significant negative impact on the biodiversity, landscape and setting of the surrounding area; and
4. they provide for improved accessibility for wheelchairs and those with impaired mobility.

Signage and interpretation facilities should be in keeping with the established standards for local tourist trails; and, where appropriate, they further links to the strategic cycle network of the area.

13.21 Portland is criss-crossed by a network of designated footpaths. In addition to these there are many undesignated footpaths which are used regularly. There is also one bridleway on the Island.

13.22 Most significant, perhaps, is the **Legacy Trail**, that runs from Littlemoor on the mainland to Portland Bill (about 20km), with information 'way points', it links all the heritage sites, nature reserves and interpretation centre (see Map 16). This local long-distance path running from Littlemoor to Portland Bill was established to celebrate the Olympics. At the same time there was linked improvement work to Merchants Railway gulleys in the Tilleycombe, Waycroft, Tout and King Barrow area. A lot of this work however has fallen into disrepair.

13.23 There are opportunities to establish similar legacy or themed trails, using established routes across the Island, and thereby manage the pressure on existing footpaths and open access land, including the South West Coastal Path National Trail. The following routes indicate the potential for further enhanced walking and/or cycling opportunities on the Island (also shown on Map 16):

Merchants Railway - was a horse drawn and cable operated incline railway, built for the stone trade on the Island. It was the earliest railway on Portland and in Dorset, opening in 1826 (one year after the Stockton and Darlington railway). The railway ran two miles from many working quarries at the north of Tophill, such as Tout, King Barrow and Waycroft Quarries, along the edge of Verne Hill (where the Verne Citadel is located), to a pier at Castletown, from where the Portland stone was shipped around the world. It was operational from 1826 to 1939.

Since becoming disused the original path of the railway has become a popular public footpath. The remaining earthworks of the main line, amongst other remains, can still be traced today.

Merchants Incline - a section of the Merchants Railway Network of about 550m which serves as footpath to and from Castletown,

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which is included in the Castletown Conservation Area.

Belle Vue Terrace/Higher Lane - these characterful step pathways are an integral part of any heritage pathway in Underhill
Cemetery Rd to the Engine Shed, Grove - is a route of some 1.5 km, which cannot be fully accessed due to the Port's security concerns. If fully open and repaired, it would open up the East side of Island and improve the SW Coast Path offer. The road up to the Cemetery is in reasonable condition but the old army road beyond this is badly overgrown and in poor condition. A potential route from here using the pathways close to the cliff face, the track bed of the High Level Railway and appropriate routing around the open ground adjacent to Nicodemus is potentially viable, subject to detailed assessment. The route in places would require additional security fencing to the seaward side.

Old Hill - is the original pathway between Underhill and Tophill. Horses were separated from foot traffic by fencing. Old Hill is in a poor condition and needs development funding. If improved the path could be a significant heritage route.

Church Ope - to access the beach there are two paths. The main path follows the road past Portland Museum and leads under the arch bridge of Rufus Castle, then down concrete steps to the cove. These were laid out by the Portland Urban District Council in 1906 at a time when the beach was becoming increasingly popular as a recreational area. The other path runs through a small area of woodland around the outside of Pennsylvania Castle, and passes through the ruins of St Andrew's Church (close to John Penn's Bath), before linking up over midway down the concrete steps to the cove.

Railway Line - whilst much of the old railway line has now been developed on, Sections could still be used as footpaths, cycleways and bridleways but need management, conservation and interpretation.

Southwell Ancient Cart Tracks - are an indication of rural setting and farming history. The Cart Tracks with sensitive management could serve as cycleways and bridle-paths. Those that have been lost could be restored and used in a similar manner.

Quarry Haul roads - are a network of routes that connect the quarries. Some could provide the basis to an Island distributor road network, but the surface materials would have to be appropriate to the setting and heritage

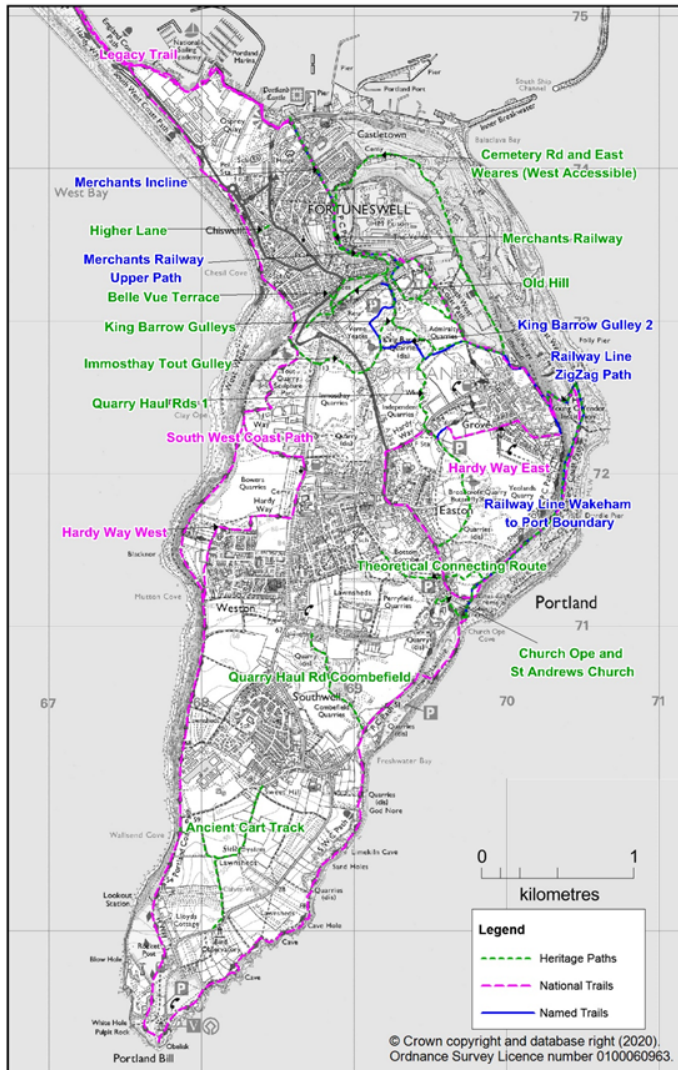
Verne Hill - according to the historic map of early 1700s Verne Hill was the basis to the main path to the East Coast. This linkage could prove an effective route to interpret and act as a basis for conservation.

13.24 The NPPF (para. 98) says we should "*protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users,*". Local Plan Policy COM7 'Creating A Safe and Efficient Transport Network' promotes the delivery of a strategic cycle network and supports improvements to the public rights of way network. Development, it states, "*should not result in the severance or degradation of existing or proposed routes*". It requires links within the rights of way network to be improved, if possible, through new developments.

13.25 Policy Port/ST3 supports the creation of new tourist routes that will attract visitors to walk and cycle and enjoy what the Island has to offer by way of environment, views, character and heritage. Such trails need to meet appropriate accessibility standards, in terms of slope, width and surface yet, at the time, be sensitively designed into the landscape to minimise intrusion and avoid destruction or disturbance of natural habitats.

Map 16 Tourist Trails, Portland

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Policy No. Port/ST4 Marine Berths for Tourists

Development proposals that enable the provision of new and additional marine berths and facilities at Osprey Quay, Castletown and Portland Port in the interests of increasing tourism are encouraged if there will be no harmful impact on:

1. landscape character;
2. wildlife, biodiversity or protected habitats;
3. the setting and character of heritage and historical assets; and
4. security and commercial operations in the area.

13.26 The marine environment has the potential to serve as much of a tourist draw as other environments on the Island. For most of the last century, Portland was defined by its role as a Royal Navy base. Since 1997 Portland Port has been developed largely on a commercial basis. The land area is becoming a successful business park. The harbour serves as an important commercial gateway. The latest business development plan for Portland Port emphasises its intention to continue to grow the following: “*agribulk*’ (animal feeds, grains and fertilisers), ship repair yard, enhanced vessel services offshore and marine renewables and energy and recycled commodities”⁵⁹.

13.27 Portland Port offers a safe, sheltered and deep harbour which makes it a viable choice for all vessels, from small yachts to some of the largest cruise ships in the world. The cruise business is already a success story. A significant financial investment in berth infrastructure should open up in excess of 95% of the global cruise fleet enabling continued expansion into international markets. We are pleased that the tourism potential of the Port is being realised.

13.28 Alongside the Port, the Olympic Games of 2012 provided us with Osprey Quay and the National Sailing Academy. These have put us on the marine tourist map. We wish exploit this growing status and recognition by supporting more marine berths and facilities in the vicinity of the Osprey Quay and Castletown in particular, which will encourage an even broader marine tourist offer

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and more visitors. We believe that marine-based tourism could revitalise the Castletown area significantly. Portland Heritage and Character Assessment of 2017 recommends that "development at Castletown should reflect the maritime and naval history of the area including the sensitive restoration of public houses and properties that maximise the views and physical relationship with the Port"⁶⁰.

13.29 Policy Port/ST4 is supportive of the provision of further berths in the interests of increasing tourism, provided it is done on a scale that does not harm the environment nor jeopardise security and commercial operations in the area.

⁵² <http://www.legislation.gov.uk/ukxi/2017/1012/contents/made>

⁵³ *Portland Tourism and Visitor Management Strategy (draft), Portland Community Partnership, 2013*

⁵⁴ *Western Dorset Growth Corridor Study, Hotel Solutions, Jun 2016*

⁵⁵ *Marine, Environment and Tourism meeting, Portland Town Council, 6th Sep 2017*

⁵⁶ *Revised Supplementary Planning Guidance Portland Beach Huts, Weymouth & Portland BC, Feb 2006*

⁵⁷ *Revised Supplementary Planning Guidance Portland Beach Huts Weymouth & Portland BC Feb 2006*
<https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/west-dorset-and-weymouth-portland/other-planning-documents/pdfs/sg/portland-beach-huts-2006.pdf>

⁵⁸ <https://www.visit-dorset.com/explore/areas-to-visit/weymouth-and-portland/wild-about-weymouth-and-portland-legacy-trail>

⁵⁹ *Portland Port Business Development Plan, Portland Port, 2014* <http://www.portland-port.co.uk/>

⁶⁰ *Portland Heritage and Character Assessment of 2017, AECOM for Portland Town Council, March 2017*

Comment received **9/11/2020** for **WP/20/00692/DCC**
from **Weyfish**

Objection

FOA: Planning Team A, Dorset Council

Email: planningteama@dorsetcouncil.gov.uk

Planning application: Minerals and Waste WP/20/00692/DCC

I wish to submit an objection to this planning application on the following grounds:

It would have a detrimental effect on the landscape of the Island, the settings of the Jurassic Coast UNESCO World Heritage Site and of the Dorset Area of Outstanding Natural Beauty (It is not compliant with: Jurassic Coast Partnership Plan 2020-2025 Strategic Aim 1 and Regulation Policies 2 and 4; IM Policy 3; Strategic Aims 2 and 4; Waste Plan 2019 Policy 14; Local Plan Strategic Objectives 'will have special regard to the conservation of the area's natural beauty'; LP ENV1, ENV2 'over-riding policy consideration'; NPPF 172, 173).

'In combination' pollution from stack and traffic emissions would have an adverse impact on international, national and locally designated areas that protect wildlife, marine environments and diverse sites of ecological importance. (This is not compliant with: NPPF 174, 175, 177; Waste Plan 2019 9.31, Policy 6f; Portland Neighbourhood Plan Port/EN0, Port/EN2, Port/BE6).

Potential harm to ecology of Sensitive Marine Areas, and to nearby Marine Conservation Zones.

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.

I believe this is an inappropriate site for the proposed development.

Yours sincerely,

Sean Cooper

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| WHGLA | 10/12/2020 |
| Comment | |
| <p>Objection compiled on behalf of the Weymouth Hoteliers Guesthouse Leaseholders Association (W.H.G.L.A.) by Claire Wall (Chairperson) & Richard Amphlett (Deputy Chairperson).</p> <p>As representatives of 43 local accommodation providers, we wish to object to the proposed construction of an incinerator plant on Portland. We have studied the various other specialist opposition papers, but feel there is room for more input from our particular industry.</p> <p>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.</p> <p>Weymouth is well renowned for its fresh fish and shellfish, and for the many restaurants cooking these local delicacies, however consumers would be sceptical, knowing that their “catch of the day” may well have come out of local waters adjacent to an incinerator. If the marine life suffers as a result of any ensuing construction, this will also have an impact on the local fishing fleet, as well as the vast amount of charter boat fisherman that come to Weymouth and use our facilities. Charter boats who rely on sightseeing tours and fishing trips will also be affected due to the adverse impact on the views coming out of Weymouth and passing by the Isle of Portland.</p> <p>Furthermore, the lorries bringing the baled materials to burn, would access the site either Weymouth or Wyke - either way worsening the pollution in an already polluted area. This would be particularly apparent between Westwey road and Buxton road (Boot Hill where the pollution has already been recorded in high levels) and along the already extremely busy Portland beach road. With the higher concentration of traffic using these roads, highway repair will increase and traffic (especially in the Summer season) will be further impacted. This will also incur higher highway maintenance costs.</p> <p>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, 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.</p> <p>Should this enormous monument to waste disposal end up in our midst, we feel that entrepreneurs would be deterred from wanting to invest in this area – in the hospitality & tourism industry, or indeed other sectors that have far reaching benefits to the community. It is also likely that, should the proposal be accepted, this would result in more industrial investment in the area – a scenario which would further impact on hospitality and tourism industries here in Weymouth, Portland and beyond.</p> <p>Kind Regards Claire Wall Richard Amphlett On behalf of W.H.G.L.A.</p> | |