

Town and Country Planning Act 1990

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



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

**RULE 6 PROOFS OF EVIDENCE REBUTTALS**

**By Debbie Tulett**

on behalf of

**THE PORTLAND ASSOCIATION**

**28 NOVEMBER 2023**

## 1.0 PLANNING [P] & SOCIOECONOMICS [SE] PoE OVERVIEW:

The Appellant's socioeconomics proof of evidence does not give sufficient consideration to the socioeconomic disbenefits of the ERF, and therefore overstates the ERF's overall benefits.

With respect to the tourist and leisure industry of Portland and Weymouth, the Appellant's proof of evidence considers the purported benefits of having 65 days' worth of cruise ship visitors. However, the Appellant overlooks the mainstay year-round tourist and leisure industry. The Appellant's proof of evidence therefore underestimates the ERF's potential harm to Portland's wider tourism and leisure industry.

## 2.0 PROVISION OF ONSHORE POWER & THE CRUISE SHIP INDUSTRY:

2.1 **SE PoE Paras 5.3.18:** Mr Elliott states that his assessment of the impact of "no onshore power" provision is "based on IMO policy objectives to reduce maritime emissions by 50% by 2050."

2.2 Mr Elliott does not provide the details of the particular IMO policy on which he bases his assessment, however the latest IMO strategy dated 7<sup>th</sup> July 2023 entitled IMO STRATEGY ON REDUCTION OF GHG EMISSIONS FROM SHIPS [see Appendices] states under the heading "Supporting global availability and uptake of zero or near-zero GHG emission technologies, fuels and/or energy sources: (para 7) "consider and analyse measures to both encourage port developments and activities globally to facilitate reduction of GHG emissions from shipping, including provision of ship and shoreside/onshore power supply from renewable sources, and infrastructure to support supply of zero or near-zero GHG emission fuels and/or energy sources, and to further optimize the logistic chain and its planning, including ports." (emphasis added)

It is important to note that the IMO strategy on onshore power is considered a 'candidate mid-term measure' coming under the heading "Other candidate mid-term GHG reduction measures" and that "mid-term GHG reduction measures could be finalized and agreed by the Committee between 2023 and 2030." Therefore, the date that the "measure can effectively start to reduce GHG emissions" has not yet been defined and thus the Appellant's claims that without a near-term solution to onshore power provision the Portland Port cruise ship business would go into rapid decline appear to have no basis.

It is also important to note that based on IMO policy (and on the Clean Maritime Plan [CD9.20]) the provision of onshore power supply should be sourced from renewables, however an ERF can only claim to be partially-renewable. Additionally, onshore power source should use infrastructure to support the supply of zero or near-zero GHG emissions energy sources. ERFs emit a substantial amount of GHGs and although the Appellant has stated in their ES Ch2 Site description and development proposal [CD 1.36c] that they are "committed to using verified carbon offsets to ensure the process operations are 'net zero' over the lifetime of the plant," neither the planning application, nor the Appeal Proposal makes any mention of endeavouring to achieve zero or even near-zero GHG emissions.

2.3 **SE PoE Paras 5.4.1:** on the subject of the local tourism industry, Mr Elliott concludes "the concerns regarding the direct adverse economic impacts of the Proposed Development are illogical and cannot be sustained. Therefore, I given them no weight."

The Appellant does not appear to have taken into consideration the concerns of the various businesses that have objected to the planning application including the 140 businesses who registered with 'Coalition against the burner,' "a coalition of local businesses and groups who

*oppose this development due to its potential impact on the economy of the area — in particular, its impact on sectors such as tourism, food production, sailing and local adventure sports, which rely on clean air and water.” [see Appendices]*

### **3.0 ENERGY SECURITY (including GRID INFRASTRUCTURE & CAPACITY)**

#### **3.1 SE PoE Para 4.1.1: energy security effectively takes four forms:**

- 1. The higher the proportion of our own energy needs that we can generate ourselves, the better our energy security.*

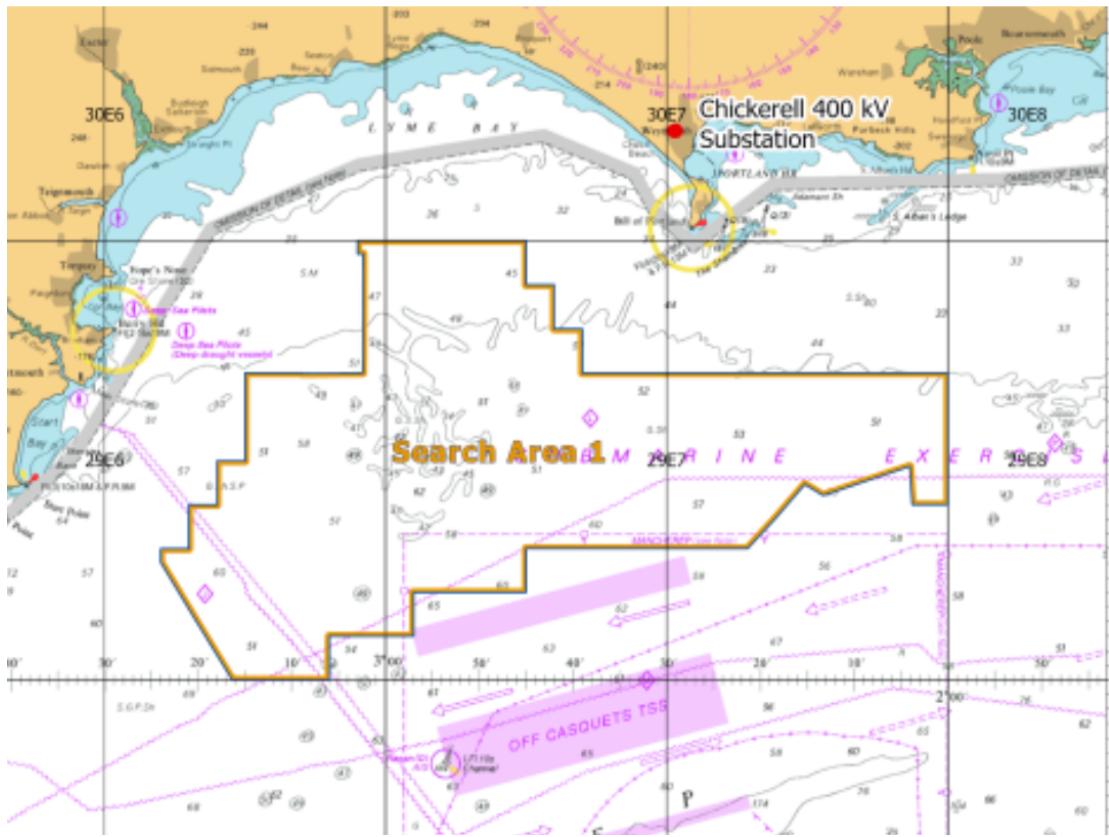
As the Appeal Proposal dismisses wind and solar as alternative forms of energy supply, even though these renewables are in line with the neighbourhood plan [CD 7.4], the Appeal Proposal could have an adverse impact on renewable energy generation supply to Portland.

#### **3.2 P PoE Para 8.2.3ii Wind energy: “...I see no practical prospect of securing planning permission for commercial scale wind turbines on Portland.”**

The Appellant has not given any consideration to offshore wind farms, and merely dismisses onshore wind energy as an alternative solution. However, SE PortWind Ltd is currently “seeking to develop a circa 2 GW offshore wind farm off the south coast of Dorset and East Devon, from Portland across to East Devon,” and has announced that “a grid connection for the project has been secured from National Grid at the Chickerell 400 kV substation, contributing to energy security in the south west of England.” [see Appendices]

The current situation in respect of onshore power provision, is that the Chickerell substation that feeds the power supply to Portland needs upgrading, a costly affair, and that without the upgrade is unable to supply the capacity of power required to supply onshore power to cruise ships berthed at Portland Port.

The proposed ‘PortWind’ wind farm off Portland, has already secured a national grid connection to the Chickerell substation and therefore would fund the costly Chickerell substation upgrade, thus enabling a clean renewable power supply to the whole of Portland, including Portland Port and it’s need for onshore power. This would be in line with Government and international policy for onshore power to be supplied from renewable sources, and an infrastructure which supports the supply of zero or near-zero GHG emission fuels and/or energy sources



## RULE 6 PROOFS OF EVIDENCE REBUTTALS

### APPENDICES

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IMO Strategy on Reduction of GHG Emissions From Ships

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**ANNEX 15**

**RESOLUTION MEPC.377(80)**  
**(adopted on 7 July 2023)**

**2023 IMO STRATEGY ON REDUCTION OF GHG EMISSIONS FROM SHIPS**

THE MARINE ENVIRONMENT PROTECTION COMMITTEE,

RECALLING Article 38(e) of the Convention on the International Maritime Organization concerning the functions of the Marine Environment Protection Committee (the Committee) to consider and take appropriate action with respect to any other matters falling within the scope of the Organization which would contribute to the prevention and control of marine pollution from ships,

ACKNOWLEDGING that work to address greenhouse gas (GHG) emissions from ships has been undertaken by the Organization continuously since the adoption of Conference resolution 8 on *CO<sub>2</sub> emissions from ships* in September 1997, in particular, through the adoption of global mandatory technical and operational energy efficiency measures for ships under MARPOL Annex VI,

ACKNOWLEDGING ALSO the decisions of the Assembly at its thirtieth and thirty-second sessions in December 2017 and December 2021, respectively, that approved for the Organization a strategic direction to "Respond to climate change",

RECALLING that the Committee at its seventy-second session (MEPC 72) in April 2018 adopted, by resolution MEPC.304(72), the *Initial IMO Strategy on Reduction of GHG Emissions from Ships* (Initial IMO GHG Strategy),

NOTING that the Initial IMO GHG Strategy foresees that a revised IMO GHG Strategy should be adopted in 2023,

RECALLING the United Nations 2030 Agenda for Sustainable Development,

RECALLING ALSO the Paris Agreement adopted at the UN Climate Change Conference (COP 21), which identifies the long-term goal to hold the increase in the global average temperature to well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels, recognizing that this would significantly reduce the risks and impacts of climate change, as was also reaffirmed in the Glasgow Climate Pact at COP 26 and in the Sharm el-Sheikh Implementation Plan at COP 27,

RECALLING FURTHER IMO Assembly resolution A.998(25) on the need to develop capacity-building for the development and implementation of new instruments and amendments to existing instruments,

RECALLING that the Maritime Safety Committee at its 107th session decided to initiate work on the "Development of a safety regulatory framework to support the reduction of GHG emissions from ships using new technologies and alternative fuels",

HAVING CONSIDERED, at its eightieth session, the draft 2023 IMO strategy on reduction of GHG emissions from ships,

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1 ADOPTS the *2023 IMO Strategy on Reduction of GHG Emissions from Ships* (2023 IMO GHG Strategy) as set out in the annex to the present resolution;

2 ACKNOWLEDGES the challenges that developing countries, in particular least developed countries (LDCs) and small island developing States (SIDS), may face in the implementation of the 2023 IMO GHG Strategy;

3 ALSO ACKNOWLEDGES the importance of addressing the human element, including the impact on seafarers and other maritime professionals, in the safe implementation of the 2023 IMO GHG Strategy;

4 INVITES the Secretary-General to make adequate provisions in the Integrated Technical Cooperation Programme (ITCP), the IMO GHG TC-Trust Fund and any other means of support related to follow-up actions to the 2023 IMO GHG Strategy that may be further decided by the Committee and undertaken by developing countries, in particular LDCs and SIDS;

5 AGREES to keep the 2023 IMO GHG Strategy under review with a view to the adoption of a revised IMO GHG Strategy in 2028;

6 ALSO AGREES that the 2023 IMO GHG Strategy revokes the 2018 Initial IMO GHG Strategy, as from this date.

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ANNEX

**2023 IMO STRATEGY ON REDUCTION OF GHG EMISSIONS FROM SHIPS**

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## 1 INTRODUCTION

1.1 The International Maritime Organization (IMO or the Organization) is the United Nations specialized agency responsible for safe, secure and efficient shipping and the prevention of pollution from ships.

1.2 The *2023 IMO Strategy on Reduction of GHG Emissions from Ships* (the 2023 IMO GHG Strategy) represents the continuation of work by IMO as the appropriate international body to address greenhouse gas (GHG) emissions from international shipping. This work includes Assembly resolution A.963(23) on *IMO policies and practices related to the reduction of greenhouse gas emissions from ships*, adopted on 5 December 2003, urging the Marine Environment Protection Committee (MEPC or the Committee) to identify and develop the mechanisms needed to achieve the limitation or reduction of GHG emissions from international shipping.

1.3 In response to the Assembly's request, work to address GHG emissions from ships has been undertaken by the Organization, as summarized in appendix 1.

1.4 The *Initial IMO Strategy on Reduction of GHG Emissions from Ships* (resolution MEPC.304(72)) was the first milestone set out in the *Road map for developing a comprehensive IMO strategy on reduction of GHG emissions from ships* (the Road Map) approved at MEPC 70. The Road Map identified that a revised strategy was to be adopted in 2023.

1.5 The adoption of the 2023 IMO GHG Strategy is the latest milestone set out in the Road Map. The 2023 IMO GHG Strategy also sustains the momentum and represents the continuation of work by IMO as the appropriate international body to address GHG emissions from international shipping.

### Context

1.6 The 2023 IMO GHG Strategy falls within a broader context that includes:

- .1 other existing instruments related to the law of the sea, including UNCLOS, and to climate change, including the UNFCCC and its related legal instruments, including the Paris Agreement;
- 2 the leading role of the Organization in the development, adoption and assistance in implementation of environmental regulations applicable to international shipping;
- .3 the decision of the thirty-second session of the Assembly (A 32) in December 2021 that adopted for the Organization a strategic direction entitled "Respond to climate change"; and
- .4 the United Nations 2030 Agenda for Sustainable Development.

### Emissions and emission scenarios

1.7 The Third IMO GHG Study 2014 estimated that GHG emissions from international shipping in 2012 accounted for some 2.2% of anthropogenic CO<sub>2</sub> emissions and that such emissions could grow by between 50% and 250% by 2050.

1.8 The Fourth IMO GHG Study 2020 estimated that GHG emissions from shipping in 2018 accounted for some 2.89% of global anthropogenic GHG emissions and that such emissions could represent between 90% and 130% of 2008 emissions by 2050.

1.9 Future annual IMO emission and carbon intensity estimates using the available data from the IMO Ship Fuel Oil Consumption Database (IMO DCS) and other relevant sources would help reduce the uncertainties associated with these emission estimates and scenarios.

### **Objectives of the 2023 IMO GHG Strategy**

1.10 The 2023 IMO GHG Strategy is aimed at:

- .1 enhancing IMO's contribution to global efforts by addressing GHG emissions from international shipping. International efforts in addressing GHG emissions include the Paris Agreement and its goals and the United Nations 2030 Agenda for Sustainable Development and its SDG 13: "*Take urgent action to combat climate change and its impacts*";
- .2 identifying actions to be implemented by the international shipping sector, as appropriate, while addressing impacts on States and recognizing the critical role of international shipping in supporting the continued development of global trade and maritime transport services; and
- .3 identifying actions and measures, as appropriate, to help achieve the above objectives, including incentives for research and development and monitoring of GHG emissions from international shipping.

## **2 VISION**

IMO remains committed to reducing GHG emissions from international shipping and, as a matter of urgency, aims to phase them out as soon as possible, while promoting, in the context of this Strategy, a just and equitable transition.

## **3 LEVELS OF AMBITION, INDICATIVE CHECKPOINTS, AND GUIDING PRINCIPLES**

### **Levels of ambition**

3.1 Subject to amendment depending on reviews to be conducted by the Organization in accordance with section 7, the 2023 IMO GHG Strategy identifies levels of ambition for the international shipping sector noting that technological innovation and the global introduction and availability of zero or near-zero GHG emission technologies, fuels and/or energy sources for international shipping will be integral to achieving the overall level of ambition.

3.2 The levels of ambition and indicative checkpoints should take into account the well-to-wake GHG emissions of marine fuels as addressed in the *Guidelines on life cycle GHG intensity of marine fuels* (LCA guidelines) developed by the Organization<sup>1</sup> with the overall objective of reducing GHG emissions within the boundaries of the energy system of international shipping and preventing a shift of emissions to other sectors.

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<sup>1</sup> Resolution MEPC.376(80)

3.3 Levels of ambition directing the 2023 IMO GHG Strategy are as follows:

**.1 carbon intensity of the ship to decline through further improvement of the energy efficiency for new ships**

to review with the aim of strengthening the energy efficiency design requirements for ships;

**.2 carbon intensity of international shipping to decline**

to reduce CO<sub>2</sub> emissions per transport work, as an average across international shipping, by at least 40% by 2030, compared to 2008;

**.3 uptake of zero or near-zero GHG emission technologies, fuels and/or energy sources to increase**

uptake of zero or near-zero GHG emission technologies, fuels and/or energy sources to represent at least 5%, striving for 10%, of the energy used by international shipping by 2030; and

**.4 GHG emissions from international shipping to reach net zero**

to peak GHG emissions from international shipping as soon as possible and to reach net-zero GHG emissions by or around, i.e. close to, 2050, taking into account different national circumstances, whilst pursuing efforts towards phasing them out as called for in the Vision consistent with the long-term temperature goal set out in Article 2 of the Paris Agreement.

**Indicative checkpoints**

3.4 Indicative checkpoints to reach net-zero GHG emissions from international shipping:

.1 to reduce the total annual GHG emissions from international shipping by at least 20%, striving for 30%, by 2030, compared to 2008; and

.2 to reduce the total annual GHG emissions from international shipping by at least 70%, striving for 80%, by 2040, compared to 2008.

**Guiding principles**

3.5 The principles guiding the 2023 IMO GHG Strategy include:

.1 the need to be cognizant of the principles enshrined in instruments already developed, such as:

.1 the principle of non-discrimination and the principle of no more favourable treatment, enshrined in MARPOL and other IMO conventions; and

.2 the principle of common but differentiated responsibilities and respective capabilities, in the light of different national circumstances, enshrined in UNFCCC, its Kyoto Protocol and the Paris Agreement;

- .2 the requirement for all ships to give full and complete effect, regardless of flag, to implementing mandatory measures to ensure the effective implementation of this Strategy;
- .3 the need to consider the impacts of measures on States, including developing countries, in particular on LDCs and SIDS, and their specific emerging needs, as recognized in the Revised Strategic Plan for the Organization (resolution A.1149(32)); and
- .4 the need for evidence-based decision-making balanced with the precautionary approach as set out in resolution MEPC.67(37).

#### **4 CANDIDATE SHORT-, MID- AND LONG-TERM GHG REDUCTION MEASURES WITH POSSIBLE TIMELINES AND THEIR IMPACTS ON STATES**

##### **Timelines**

4.1 Candidate measures set out in this 2023 IMO GHG Strategy should be consistent with the following timelines:

- .1 short-term GHG reduction measures are the measures finalized and agreed by the Committee between 2018 and 2023, as included in appendix 1;
- .2 the basket of mid-term GHG reduction measures should be finalized and agreed by the Committee by 2025. Dates of entry into force and when the measure(s) can effectively start to reduce GHG emissions could be defined for the basket or for each measure individually;
- .3 other candidate mid-term GHG reduction measures could be finalized and agreed by the Committee between 2023 and 2030. Dates of entry into force and when the measure can effectively start to reduce GHG emissions would be defined for each measure individually; and
- .4 possible long-term measures could be measures finalized and agreed by the Committee beyond 2030, to be developed as part of the 2028 review of the IMO GHG Strategy.

4.2 The list of candidate measures is non-exhaustive and is without prejudice to measures the Organization may further consider and adopt.

##### **Short-term GHG reduction measures**

4.3 In accordance with regulations 25.3 and 28.11 of MARPOL Annex VI, a review of the mandatory goal-based technical and operational measures to reduce carbon intensity of international shipping (the "short-term GHG reduction measures") shall be completed by 1 January 2026.

4.4 The Committee may decide to initiate a review of the other short-term measure(s) as included in appendix 1.

##### **Basket of candidate mid-term GHG reduction measures**

4.5 In accordance with the timelines set out in this Strategy and the Work Plan, a basket of candidate measure(s), delivering on the reduction targets, should be developed and finalized comprised of both:

- .1 a technical element, namely a goal-based marine fuel standard regulating the phased reduction of the marine fuel's GHG intensity; and
- .2 an economic element, on the basis of a maritime GHG emissions pricing mechanism.

The candidate economic elements will be assessed observing specific criteria to be considered in the comprehensive impact assessment, with a view to facilitating the finalization of the basket of measures.

The mid-term GHG reduction measures should effectively promote the energy transition of shipping and provide the world fleet with a needed incentive while contributing to a level playing field and a just and equitable transition.

4.6 In accordance with Phase III of the Work Plan, the measure(s) in the basket should be developed and adopted, along with the assessments of impacts on States.

4.7 The development of the basket of candidate mid-term GHG reduction measures should take into account the well-to-wake GHG emissions of marine fuels as addressed in the LCA guidelines developed by the Organization with the overall objective of reducing GHG emissions within the boundaries of the energy system of international shipping and preventing a shift of emissions to other sectors.

#### **Synergies with existing measures**

4.8 In addition, the potential synergies with other existing measures such as the Carbon Intensity Indicator (CII) will be considered, in particular regarding incentives for energy efficiency and for the adoption of better operational practices in the shipping value chain or other technologies to reduce emissions from ships.

#### **Other candidate mid-term GHG reduction measures**

4.9 In addition to the basket of candidate mid-term GHG reduction measures, the Organization should continue to develop other mid-term GHG reduction measures to reduce GHG emissions from ships. All the following candidate mid-term measures represent possible mid-term further action by the Organization on matters related to the reduction of GHG emissions from ships:

##### *Informed policymaking:*

- .1 the Secretariat to undertake annual IMO GHG emission and carbon intensity estimates using the available data from the IMO DCS and other relevant sources; and other studies to inform policy decisions;
- .2 development of a feedback mechanism to enable lessons learned on implementation of measures to be collated and shared through a possible information exchange on best practice;

##### *Supporting global availability and uptake of zero or near-zero GHG emission technologies, fuels and/or energy sources:*

- .3 further development of the LCA guidelines;

- .4 undertake a regulatory assessment of safety aspects associated with reducing GHG emissions in accordance with this Strategy and develop a road map to support the safe delivery of the Strategy;
- .5 consider and analyse measures to address emissions of methane and nitrous oxide and further enhance measures to address emissions of volatile organic compounds;
- .6 incentives for first movers to develop and take up new technologies; and
- .7 consider and analyse measures to both encourage port developments and activities globally to facilitate reduction of GHG emissions from shipping, including provision of ship and shoreside/onshore power supply from renewable sources, and infrastructure to support supply of zero or near-zero GHG emission fuels and/or energy sources, and to further optimize the logistic chain and its planning, including ports.

#### **Impacts on States**

4.10 The impacts on States of a measure/combination of measures should be assessed and taken into account as appropriate before adoption of the measure(s) in accordance with the *Revised procedure for assessing impacts on States of candidate measures*.<sup>2</sup> Particular attention should be paid to the needs of developing countries, in particular LDCs and SIDS.

4.11 The Committee should consider the comprehensive impact assessment in order to inform further consideration of the proposed measure(s), and take action as appropriate.

4.12 When assessing impacts on States, the impact of (a) measure(s) should be considered, as appropriate, inter alia, in the following terms:

- .1 geographic remoteness of and connectivity to main markets;
- .2 cargo value and type;
- .3 transport dependency;
- .4 transport costs;
- .5 food security;
- .6 disaster response;
- .7 cost-effectiveness; and
- .8 socio-economic progress and development.

4.13 Once the comprehensive impact assessment is completed, and disproportionately negative impacts assessed and addressed, as appropriate, the measure(s) may be considered for adoption.

4.14 Once a measure is adopted and enacted, the Committee should keep its implementation and impacts under review, upon request by Member States, so that any necessary adjustments may be made.

#### **5 BARRIERS AND SUPPORTIVE ACTIONS, CAPACITY-BUILDING AND TECHNICAL COOPERATION, AND R&D**

5.1 The Committee recognizes that developing countries, in particular LDCs and SIDS, have special needs with regard to capacity-building and technical cooperation.

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<sup>2</sup> MEPC.1/Circ.885/Rev.1

## Planning

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**Subject:** FW: Objection to planning application: WP/20/00692/DCC

**From:** Hannah Borno [REDACTED]  
**Sent:** 23 November 2020 00:58  
**To:** Planning <planning@dorsetcc.gov.uk>  
**Subject:** Objection to planning application: WP/20/00692/DCC

From:  
Hannah Borno representing Coalition Against The Burner  
[REDACTED]

Re: Planning Application: WP/20/00692/DCC

To whom it may concern,

I am writing from the campaign group Coalition Against The Burner to object against planning application WP/20/00692/DCC.

Coalition Against The Burner is a coalition of local businesses and groups who oppose this development due to its potential impact on the economy of the area — in particular, its impact on sectors such as tourism, food production, sailing and and local adventure sports, which rely on clean air and water.

The Coalition is a diverse and growing group — from cafes to campsites, dive centres to art galleries — we already have more than a dozen guest houses signed up, along with some significant local stakeholders such as the Weymouth Civic Society and the arts organisation 'b-side'. Please see below for the list of members at the time of writing, and for a full list please visit our website:

<http://coalitionagainsttheburner.org/>

Many Coalition members are very much dependent on the visitors drawn to Weymouth and Portland's famed fresh breezes, stunning views and sparkling sea waters. Portland is a place of outstanding natural beauty placed right in the middle of the Jurassic Coast — with unique natural habitats, wonderful walks and fantastic local food. Should this development go ahead it would reframe Portland as a centre for waste management and incineration — which would be fundamentally detrimental to the economy and future of the region, as well as permanently destroying the iconic view of the Isle of Portland.

The incineration plant would have a chimney stack twice the height of Portland Bill, and the main incinerator would be a huge building, which (despite the developers' best efforts to "camouflage" it with printed PVC netting) must inevitably impact on the landscape, changing it irrevocably. Sightseeing tours and boat trips coming out of Weymouth would never be the same again. You'll see that many charter skippers have signed up to the coalition already, alongside the Weymouth and Portland Licensed Skippers Association. They have a unique viewpoint of that side of the island, coming out of Weymouth as they do so frequently on angling trips and sightseeing tours, and are convinced the development would impact negatively on their business.

Artists and photographers have historically been drawn to Portland as a source of inspiration. A large waste incinerator dominating the landscape as one approaches the Isle would hardly be in keeping with the history and character of the area.

Another consideration is the noise — the loud hum from the plant's enormous fans — the vibration, and potentially even smell, in the vicinity would impact upon sightseeing tours on the East side of the Isle, particularly those focusing on Chequers Fort and the Hood. And before that, of course, we would be subjected to a noisy two to three year build of this massive structure (the site area is 2.3 hectares), with all the construction traffic associated with it.

As 2020 draws to a close, the tourism and hospitality sectors are reeling from Covid-19 regulations and constraints. From retail to restaurants, hotels to market stalls, it's been tough for everyone. According to a recent Parliamentary report: "Coastal communities in particular will be hard hit by the decline of the tourism industry". And it doesn't look like a swift recovery is on the cards. In its 2020 Tourism forecast, VisitBritain predicts that "by early 2021 we are unlikely to be back to baseline (pre-COVID) levels" in any sector of tourism.

And the National Coastal Tourism Academy recently found that at least 7% of coastal businesses have already permanently closed their doors, with 33.8% unsure about their survival until March 2021. The economic impact for 2020 is forecast to be a cut in tourism spend of £7.96 billion in England alone, with approximately 62.5% of coastal tourism businesses stating it will take more than a year until they can return to profit.

But there is hope! Many businesses on Portland noticed a difference this summer in the type of tourist coming to Portland — the more affluent urban 'staycationer' - and visitor numbers increased hugely, which was a great boon, coming as it did after the first lockdown. Usually people are attracted to the Isle to take part in specific activities such as birdwatching, walking or adventure sports. This year people were just enjoying the landscape, and spending money on food and drink. I recently spoke with Dorset Shellfish (a Coalition member) and they said they noticed spending from this new demographic, a different kind of customer.

In fact, Dorset Tourism and Dorset Food and Drink are currently working on a post-Covid recovery plan for tourism in Dorset that focuses to a large extent on artisan food and drink producers and outlets. So we now have a real opportunity to market Portland as a foodie destination similarly to Weymouth, due to our amazing fresh shellfish —



however, many of these oysters and crustaceans are either farmed or stored in the very body of water that would be adjacent to a large waste incinerator with not only an often visible emission plume pumping out day and night, but also the potential to leach toxic fly ash rich in heavy metals into the nearby harbour, particularly if, as Steve McNab told Weymouth council in a recent planning meeting, the Untreated Incinerator Bottom Ash is planned to be stored in barges on the harbour itself! In April spider crabs have their mating season and swarm in the harbour and come right up to the shoreline in Balaclava Bay — they would be coming right up to the incinerator walls! Sea Bass also have their mating grounds in waters very nearby, and visitors delight in fishing their very own mackerel for dinner on the shore of Chesil Beach.

Much investment has recently been put into Castletown to create a tourist centre - not least the Crabbers Wharf development with its own tourism office, the D-Day museum, local shore dive attraction and the Portland -Weymouth ferry. It would be extremely counter-productive if these initiatives end up being located under the 85 metre stack of a waste incinerator, which is operating day and night with all the increased HGV traffic, light pollution, noise and vibrations that such a plant is associated with during the entire 20-30 year lifetime of the plant. Visitors to, and further investment in Castletown would surely plummet.

As for emissions, this would be a matter of concern for farmers, fishing companies, artisan food producers — landing as they do over both land and sea. The prevailing winds would mean that for much of the time the incinerator plume would be aiming its toxins up towards Weymouth, Lulworth and the Jurassic Coast, pumping out its fumes literally for decades. The rubbish burner would be bad news for local farms & growers, as many of the toxins and heavy metals that will be dumped across the area are bioaccumulative. There are separate concerns about additional nitrogen, ammonia and CO<sub>2</sub> in the fumes affecting nearby seawater and crustaceans (it makes it more acid which in turn can mean the shells of crustaceans become thinner and cannot grow normally). However, the point I would like to make is that the nearby presence of the plant and its emissions would impact on the reputation of the area and the standard of the food produced here, which would inevitably have a knock-on economic effect. [SEP]

One common tourist to the area is the birdwatcher. However, increased nitrogen is also highly likely to impact on the growth of seagrass in the Fleet lagoon (which is fed from Portland harbour), a critically endangered site of European significance, which plays a crucial part in the diet of mute Swans and other marine creatures. This is due to the fact that the nitrogen feeds algal blooms which then grow rapidly, crowding out the seagrass. Currently the Fleet is home to rare birds such as the Schedule 8 protected Little Terns. If the habitat is destroyed due to excess nitrogen from the stack and increased traffic to the plant, then the birds inhabiting it will change. Obviously, this would be an ecological disaster, but ultimately it would also make the area less attractive to birdwatchers and nature lovers.

The reputation of Weymouth, Portland and the surrounding area is at stake — their reputation for pure clean air, water, unique ecological habitats and wonderful views — all of these will be under real threat should this development go ahead which could

result in a further depression of our local tourism and hospitality industry which needs the help, support and understanding of Dorset Council at this critical time.

We now stand at a crossroads. For Weymouth and Portland this could prove an incredible opportunity to reframe our tourist industry, but should this massive industrial development be passed, we would sadly see the area take an irrevocable retrograde step.

With very best wishes,

Hannah Borno

[www.coalitionagainsttheburner.org](http://www.coalitionagainsttheburner.org)

## COALITION AGAINST THE BURNER — SIGNATORIES

### WEYMOUTH

Weymouth Civic Society  
Rossi's Ice Cream  
Old Harbour Dive Centre  
Weyfish  
Belvedere Inn  
The Chatsworth  
Offshore Rebel Charters  
Stone Pier Cafe  
Cove Gallery  
Weymouth Rubbish Removals  
Amarisa Deep Sea Fishing  
Weymouth Bike Hire  
South West Coast Refills  
The Bay Guest House  
Statue Insurance  
Gladstones Family Jewellers  
Weymouth Vintage  
Skelly Construction  
Weymouth & Portland Scaffolding  
Weymouth Bouncy Castles  
The Library House Cafe  
A Spoonful of Honey  
Aunty Vi's Café  
The Eastney  
Signet Aerials  
Titan Manufacturing,  
S&W Shellfish  
Sally Ann Charters  
Acorns Childminding Service  
Dorset Entertainments

The Harbour Terrace  
Townsend's Amusements  
Seashells Soft Play  
Marden Guest House  
Remarkable Carpets  
Graham's Motor Services  
Supanova Charters  
Bob Summerhayes Fisheries  
Ryan Casey Marine Services  
Weymouth Angling Centre  
Dorset Seaweeds  
Les Enfants Terribles  
Snapper Charters  
Netherfield Cattery  
Garreg Lwyd  
Al's Spirit Charters  
Fins-up Fishing Charters  
Flamer IV Charters  
Olivers Guesthouse  
Helen's Famous Wholefoods Store  
PlayYard  
C Me Care  
The Monarch Guest House  
Whitesands Properties  
The Ocean Guest House  
Wadham Guest House  
Weymouth<sup>1</sup> Bridge Fairtrade Shop  
Nanna Moon's Café Bar  
Wessex Aerials  
The Cavendale Guest House  
The Warwick Guest House  
Weymouth Sands Guest House  
Beach View Guest House  
The Seacrest Guest House  
Aaron Guest House  
Real World Services  
Good as Gold  
The Window Doctor  
Hand Picked Shellfish Company  
C.A. Aerials  
Bosworth Glass  
Direct Removals of Weymouth  
Mason Gas Services  
South Coast Alarms  
Cavendish House  
The Bedford Guest House  
King of the Castles  
The Dorset Grill

Attic Designs

PORTLAND 

Dorset Shellfish  
Chesil Chippie  
Dive Beyond  
O'Three  
Dorset Sea Salt Co.  
Portland Joinery  
Scimitar Diving  
Paracademy Extreme  
Quiddles Cafe  
Taylor's Messdeck Cafe  
Portland Alpacas  
ArtSpace82  
LJK Resources  
Mike Young Personal Training  
Portland Magic  
Balti Island  
Perceptive Protection  
Mark White Roofing  
White Stones Art Cafe  
David Nicholls Art  
Adventure4All  
Martyn Davies Decorating  
Fancy's Farm  
Postal Logistics International  
JAIC  
Mocean  
Rob McIlroy Soft Tissue Therapy  
Fish-On! Angling Charters  
Portland Cottage

WYKE REGIS 

Pebble Bank Caravan Park  
The Fat Badger  
Sirius Business Services  
Dorset Phone Repair Service  
Swallows Rest  
Lee Electrical Installations

BRIDPORT 

Little Toller Books  
Soulshine Cafe  
Common Ground

DORCHESTER 

Down to Earth

Bright Button Productions  
Annie's Gardening  
Dorset's Kiwi Butcher

WAREHAM 

Longthorns Farm  
Terra Organics Cafe  
Huff and Puff Construction  
The Salt Pig

AND BEYOND 

Marren B&B, Holworth  
GB Roofing, Ilminster  
The Open Air Dairy, Littlebredy  
Heritage Seeds, Osmington  
Daniel Wretham Photography, Poole  
Donkey Down Camping, Sutton Poyntz

## PortWind Offshore Wind Farm

is a proposed renewable energy development located in the English Channel, off the Devon and Dorset coast in the south of England.



### About the project

SE PortWind Ltd (SEPL), a Source Galileo company, is seeking to develop a circa 2 GW offshore wind farm off the south coast of England. The project is at an early stage of development and any project development area will be subject to a future leasing round by The Crown Estate.

The project has the potential to deliver enough renewable energy to help power over 3 million households annually, helping the United Kingdom to meet its binding target to reduce greenhouse gas emissions by 78% by 2035.

A grid connection for the project has been secured from National Grid at the Chickereil 400 kV substation, contributing to energy security in the south west of England.

[Learn more](#)

### Project Timeline to 2033\*

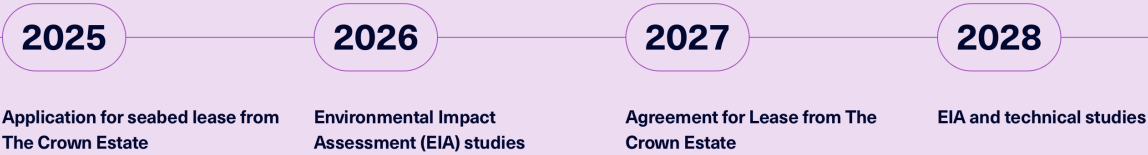
**2021****Site selection phase****Stakeholder engagement**

Begins with the project and continues throughout each phase of the development process

\*This timeline is for indicative purposes only. The sequence of events will be shaped by the timing of future TCE leasing rounds and may be subject to change.

**2022****Site refinement****2.5 GW grid connection secured****2023****Feasibility studies and site refinement****Fisheries Liaison Officer (FLO) appointed****2024****Technical studies to support site refinement and development**

### Project Timeline to 2033\*



### Project Timeline to 2033\*



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## Harnessing clean energy to power the UK's sustainable future

In support of the UK Government's Net Zero Strategy, Net Zero Growth Plan, Energy Security Strategy, and the ambition to deliver up to 50 GW of offshore wind by 2030, SE Portwind Ltd are progressing the PortWind Offshore Wind Farm project.



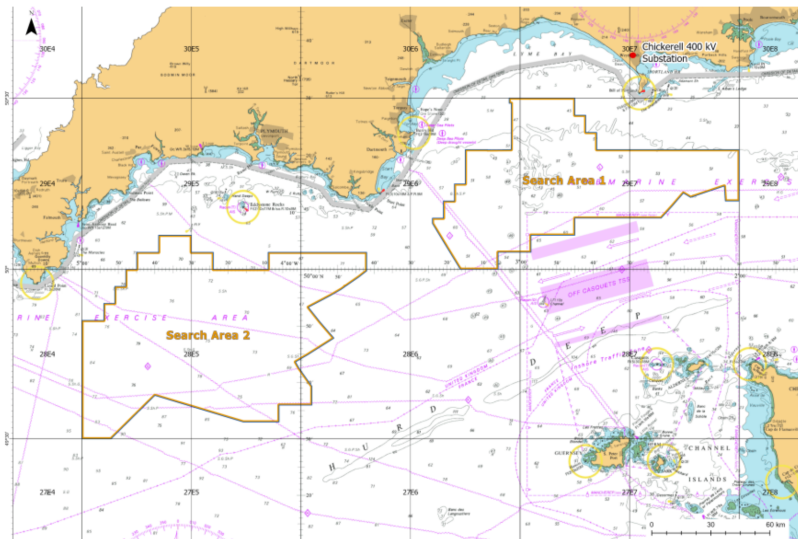


Underpinning the Net Zero Strategy is the UK's Climate Change Act 2008 that includes binding commitments to reach net-zero greenhouse gas emissions no later than 2050.

Large-scale offshore energy projects like PortWind will help the UK work toward a more sustainable energy system for future generations, leading to lower carbon levels and cleaner air. And it is another important step in reducing the UK's ongoing, unsustainable reliance on imported fossil fuels.

## Location

At its nearest point, PortWind's proposed turbine-array-area search areas are circa 22 km off the south coast. These areas have been strategically selected to reduce visibility from the coast, limit environmental impacts, and harness stronger wind speeds that are found further offshore. Charted water depths across the site make the project suitable for fixed-bottom turbine foundation technology and floating foundation technology in deeper waters further offshore.



Search Areas for the PortWind project



## Capacity

Our project team is actively assessing the suitability of potential array-areas off the south coast to support a c. 2 GW offshore wind farm. Through the development process, broad search areas will undergo ongoing assessment and refinement to limit environmental impacts and optimise design.

When the wind farm design has been optimised and all environmental constraints fully considered and accommodated, it is expected the project will have a capacity of c. 2 GW. This will deliver enough electricity to meet the needs of over 3 million\* households and will offset over four million tonnes\*\* of harmful carbon emissions each year. Based on offshore wind turbines that are available in the market today, 2 GW equates to approximately 132 turbines.



## Benefits:

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**Reduce CO2**



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**Community**



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**Economy**



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**Energy Security**



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**Sustainable Energy**



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**Increased Knowledge**

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\*Based on projected installed capacity of 2 GW, capacity factor of 50% and OFGEM UK consumption 2,900kWh/household

\*\*Based on projected annual output of wind farm and Department for Energy Security and Net Zero, 2022 UK greenhouse gas emissions, provisional figures, 532 tonnes of carbon / GWh from fossil fuels



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