



Stop Portland Waste Incinerator APPLICATION ORIENTATION SHEET 3

*Please note that objections which are factually incorrect will be discounted.
This sheet, and those that follow, aims to help you locate some of the arguments,
statements, and data in the application documents.*

Abbreviations

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| | NTS | Environmental Statement Non-technical Summary |
| ES + chapter | | Environmental Statement + chapter number |
| ES Appx | | Environmental Statement Appendix + subject |
| SST | | Support Statement |
| DAC | | Design and Access Statement |
| Plan | | with number and description |
| DC | | Dorset Council |
| BCP | | Bournemouth, Christchurch and Poole Council |
| CM | | Canford Magna |
| PfP | | Powerfuel Portland |

A. Landscapes/seascapes/views

1. See: ES Cpt 9 pt 1; Cpt 9 pt 2; ES Appx J Landscape, seascape etc; DAC Part 5
2. Visibility of plume: ES Appx J Part 4. Despite the claims and calculations set forth here, which we have yet to study in detail, there are innumerable images and videos of plumes from operating waste incinerators, which are highly visible, both day and night. In our 'Every second' video (on right-hand side of page) you can see video of the emissions coming out of a waste incinerator.
3. In our view, all views presented of the proposed incinerator should include the plume of emissions to give an honest representation of the true impact.
4. Viewpoint locations are given in ES Cpt 9 Parts 1 and 2: VP1 on Portland from footpath S3/68 =SW Coast Path?; VP2 on Portland from same path S3/81, further North (by Fancys Farm?); VP3 from Inner Breakwater Road within Portland Port; VP4 Weymouth Hazeldown Ave/Eastdown Ave; VP5 Furzy Cliff, Overcombe; VP6 Overcombe Beach; VP7 Osmington Mills, Car Park; VP8 from Ferrybridge Inn; VP9 from Sandsfoot Castle; VP10 from Nothe Fort; VP11 from Osmington White Horse; VP12 from Ringstead Bay, CP; VP13 from Bridleway S1/21 ?; VP14 from Durdle Door – high up, by information board.
5. The site and the plant would not be visible from VPs 1 and 2. However, the plume of emissions would be in certain conditions, we believe.
6. High impact viewpoints from the causeway across to Portland are not included. Nor is the viewpoint from the WPNSA or Portland Marina included, nor possible views from Castletown.
7. There are also no views from the West, for example from the Jurassic Coast Road, B3157, from where the plume, and from some locations the top of the stack, would be fully visible.
8. See our campaign's own images of the views of the plant from Portland Marina (available on our Planning Links and Documents page) and from the Rodwell Trail, which have been scaled using OS map contours and the Isle of Portland Interactive Topographical map.
9. VP 8 (DAC Part 4) from Ferrybridge, according to our own measurements, seriously under-represents the scale of the building against the landscape, which according to readings from OS map contours and the Isle of Portland Interactive Topographic Map, would be about 50% larger and higher. See, for comparison, our campaign's revised image of the view from the Rodwell Trail.

10. VP 11 (DAC Part 4) from Osmington White Horse also appears, in our view, to understate the height and scale of the building. The height of the Verne Citadel at this point averages about 142 metres. The top ridge of the highest building block is 54.2m and the stack 87.2m. In this montage they appear lower than that.
11. It is questionable whether the actual 3-dimensional plant with its visible plume would 'blend' into the landscape in views from the East as the PfP images attempt to show.
12. We have so far only located images of the proposed plant for VPs 8, 10 and 11: DAC Part 4.
13. Among the policies and plans which highlight the overarching need to protect the local landscapes and seascapes is the new Jurassic Coast Partnership Plan which repeatedly refers to the need to protect the World Heritage Site **and its setting**. E.g. p.22: the "tranquillity and undeveloped character of coast and seascapes, are important for helping to determine how people experience and enjoy **the setting of the WHS**" and p.20: "must be protected **from all threats or inconsistent uses**. These developments can often take place **beyond the boundaries of a [WHS]**."

B. Waste Plan 2019 Allocated Sites

1. See NTS 31-33; SST 4.33 – 4.35; Comparative assessment against waste local plan allocated sites
2. Context: The DC and BCP Waste Plan 2019 allocates 4 sites for this kind of development. It states (9.32): "Where there are appropriate Allocated Sites within the Waste Plan, proposals will be expected to come forward on these sites ... Proposals for unallocated sites **will need to demonstrate that Allocated Sites are not available**" and at 9.21: "Proposals for standalone facilities to manage refuse derived fuel (RDF) ...should be sited in appropriate locations... near to the RDF... production facility, with good transport links and where the utilisation of electricity and heat can be maximised" (for heat, see Sheet 2).
3. Portland Port is not one of these 4 allocated sites. It does not meet the criteria set out in the Waste Plan 2019, including those quoted above. PfP argue at length to justify their non-compliance with the WP 2019 in this regard.
4. SST 4.35: PfP state "no planning applications have yet been made in respect of the allocated sites" and "there appears to be little prospect of emerging proposals coming forward in the near future". In fact, Eco Sustainable Solutions have announced their intention to submit, later in 2020, a planning application for a waste incinerator at Parley, one of the allocated sites, where waste treatment facilities already exist and which is much nearer to CM: <https://www.letsrecycle.com/news/latest-news/eco-sustainable-solutions-to-build-dorset-efw-plant/>

C. Economy and Jobs

1. 30 direct jobs, working 3 shifts, maximum 15 members of staff on site at any time. DAC 6.5.10
2. 'Up to' 300 jobs during construction but number will vary. Working hours: 7.00am – 19.00 Mon to Fri; 8.00am to 13.00 Sat. NTS 27-28.
3. Tourism on the Jurassic Coast delivers 2,000 jobs and is worth about £111 million p.a. The aim is to grow this sector. There are about 15 million tourist visits to the area every year (Jurassic Coast Partnership Plan, Appx 1, p13).
4. The Eden Portland project would deliver over 3 times the number of direct jobs: <https://www.edenportland.org/partners>
5. NTS 59-63: in fact, the conclusion is that the claimed economic benefits would be "**not significant**", even at a local level.
6. The only claim of a significant economic benefit is from the claimed reduction in carbon emissions. We review these claims on Sheet 2 and conclude that they are invalid.