

Proposed Portland Energy Recovery Facility

Landscape Review of
ES and Technical Appendices on
Landscape, Seascape and Visual Effects

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Stop Portland Waste Incinerator

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1.0 Introduction

- 1.1 This statement has been prepared by Coe Design Landscape Architecture on behalf of Stop Portland Waste Incinerator to provide a review of the Landscape, Seascape and Visual Effects aspects of the Planning Application for the Proposed Portland Energy Recovery Facility (Application Number: WP/20/00692/DCC).
- 1.2 The following application documents have been reviewed in the preparation of this statement:
- Portland ERF ES Chapter 09 Landscape, Seascape and Visual Effects Parts 1-3
 - Portland ERF ES Technical Appendix J: Landscape, Seascape and Visual Effects
 - Portland ERF ES Chapter 13 World Heritage Site
 - Portland ERF ES Technical Appendix M: World heritage Site
 - Design and Access Statement Parts 1-6
- 1.3 The client, Stop Portland Waste Incinerator, has had prepared a report 'Representations on behalf of Stop Portland Waste Incinerator' by Adams Hendry Consulting Limited. This report contains an assessment of the ES in its entirety, including the ES chapters and D&A Statement which have been studied as part of this separate review. The findings of the Adams Hendry report have been considered in review of the above application documents. We would concur with the conclusions of the Adams Hendry Representation relating to landscape, seascape and visual effects.
- 1.4 We note that study has been developed in consultation with the LPA to define the scope, study area and selected viewpoints at which to record baseline imagery and undertake photo-wire and photomontage visualisations. In this review we are highlighting where we consider that additional evidence is necessary for appropriate consideration of the proposals and their likely effects.

2.0 Review of Scope Relating to the Zone of Theoretical Visibility and Viewpoint Selection

- 2.1 The Zone of Theoretical Visibility (ZTV) is an invaluable tool in identifying locations from which the main building and stack could be visible and forms the basis of the selection of the baseline photography locations.
- 2.2 The size and resolution of the images as presented in Figures 9.16 & 9.17, although suited to the 10km study area as a whole, is unsuitable for relating the ZTV to identifiable features on the OS plan.
- 2.3 The difficulty in relating the ZTV to identifiable features on the OS base plan is particularly problematic when considering potential visibility at closer distances, say within say a 1.5km radius of the main building and stack. We consider that the presentation makes it difficult to identify where the proposal may or may not be visible from, particularly at closer distances. It would have been invaluable to the public reviewing the application to have both features

on the OS base plan more clearly identifiable as well as to having the Public Rights of Way (PRoW) from where it is suggested that significant effects may be experienced shown.

- 2.4 There are a number of key locations at short-medium distance where we consider it critical, to enable consideration of the proposals, to be certain whether visibility is likely or not. And, should visibility of the proposals be considered to be likely at any of these locations, that baseline photography from a selection of these, would be necessary to include within the study, as follows.
- Views from Portland Castle or the immediate surrounding area including the mounded viewpoint adjacent to the public footpath.
 - Views from along the publicly accessible foot and cycle paths on the harbour edge at Osprey Quay
 - Views from the Royal Naval Cemetery, considering public users and the sensitive nature of this location.
 - Views from Public Rights of Way including S3/72, S3/86 & S3/18
- 2.5 There are a number of key locations at short-medium distance where visibility is indicated to be likely, based on the ZTV diagrams in Figures 9.16 & 9.17, but there is no inclusion of baseline photography either at the location or representative of the location or associated receptors. We would consider that the inclusion of representative baseline photography from at least a selection of these locations would be indispensable for considering the application, as follows:
- Portland Marina, considering the recreational and leisure user groups and local marine transport links.
 - Views from the sea particularly to the E and SE beyond the breakwater, considering high level use of the area for leisure and fishing vessels with views of the largely undeveloped and naturally reclaimed coastline within and immediately adjacent to the World Heritage Site.
 - Possible additional views from the Rodwell Trail, although there is some representation of these through the views from Ferrybridge (View 8) and Sandsfoot Castle (View 9).
- 2.6 The report concludes that a significant effect is considered likely from Portland Marina and a number of PRoW, including those listed above. It is difficult to understand why some of these were not included in the scope of the baseline photography enabling them to be considered for photo-wire / photomontage analysis.
- 2.7 In our opinion the omission of a selection of baseline views at closer distances hinders the visual envelope being fully comprehended. We are concerned that without both additional baseline views from short-medium distances, and the subsequent selection of some of these viewpoints for photomontage or photo-wire analysis, the overall assessment of visual effects across the study area could potentially be skewed towards judgements of lower adversity in their absence.

- 2.8 We regard that inclusion of these baseline views and visualisation studies to be both reasonable and proportional to the study, given the mass of the proposals, the prominence of the site and considering the value and sensitivity of the surrounding landscape.
- 2.9 We also believe that the inclusion of a selection of these additional viewpoints as photomontage visuals would have enabled invaluable further considerations to be given to the potential effects of the proposed primary visual mitigation measures, as seen at different distances and angles of view.

3.0 Considerations Relating to the Visible Plume

- 3.1 It is noted that the operation of the plant will at certain times produce a visible plume and that a study of the likely plume length and frequency of occurrences has been modelled as part of the application.
- 3.2 It is recorded in correspondence that the visibility of the visible emission plume was requested to be represented in photomontages during pre-application consultation with the LPA Landscape Officer and that this has not been included in the photomontages submitted as part of the application documents.
- 3.3 Although it is predicted that a visible plume may be present for a limited time, it is agreed that the potential significant adverse visual effects associated with the plume warrants its inclusion in the selected photomontage studies. We would think it reasonable that the study would provide photomontages with and without the plume, to enable both scenarios to be considered separately. We are concerned that the assumption that that the visible plume will result in only minor landscape and visual effects, when visible, is under-estimated and that evidence should be provided within the study to allow more detailed judgements to be reached, with the opportunity for these to be scrutinised through the application process.
- 3.4 The question of plume visibility raises the concern over where the plume may be visible from. We would consider it would have been highly informative for the study to have included a ZTV exercise to forecast this, using what could be projected as reasonable typical circumstances, and qualified with the forecasting data related to the frequency and patterns of visible plume occurrences.
- 3.5 It is noted that the Air Quality Review undertaken as part of the Adam Hendry Representation states that 'the plumes from the generators will be subject to less effective dispersion than has been modelled' and it would be in very informative to also reconsider whether this would also increase the predicted frequency of plume visibility.
- 3.6 The predictions relating to potential plume length suggest that, subject to weather conditions, the visible plume could be higher than the maximum ground levels found on Portland. This would therefore create an increased, much larger affected zone that would be subject to plume-only visibility including across the Tophill area of Portland and to the West.

It would also increase the extent of visible areas to the north of Portland to Weymouth and beyond.

- 3.7 A ZTV projection of areas subject to views of the visible plume would have provided a clear guide, as it has for considering the visibility of the building and stack. It would be possible from this to consider whether additional baseline photography and photomontage studies would be necessary for assessing the visual effects of the proposals on other potentially affected locations and receptors.
- 3.8 Without the inclusion of the visible plume as part of the study the area likely to be subject to plume-only visual effects cannot be sufficiently predicted. The role of the plume in views containing a combination of the plume and building and/or stack also cannot be taken into consideration but it is considered likely that the plume would increase both the scale of effect and the prominence of proposals within views, when visible. The plume may draw attention to the building and stack and therefore increasing the significance of the visual impact considerably.
- 3.9 In addition to the concerns raised above, regarding the visual effects associated with the visible plume during daylight hours, we are also concerned about whether it is possible for the visible plume to reflect ambient and proposed lighting and be visible during night time hours. We believe it would be informative to have this clarified as significant adverse visual effects would be considered likely if this occurs.

4.0 Review of the Assessed Viewpoints and Photomontage / Photo-wire Visualisation Studies

- 4.1 We would have considered it reasonable and proportional for additional baseline photographs to have been taken forward as photomontage and photo-wire studies. A more full and accurate assessment of the potential landscape and visual impacts of the proposed development would then be possible.
- 4.2 We consider it would have been highly informative to have included a photomontage view of the building from the south, to see the proposed building finishes where the proposed PVC mesh, as primary mitigation, is not proposed to be applied.
- 4.3 As raised above regarding the visible plume we have strong concerns over the omission of the plume in photomontage studies which would have been highly informative to have been modelled across short to long distance viewpoint locations.
- 4.4 We consider that the plume could be highly prominent in views in front of the silhouette of Portland above the building, as seen in the views from the AONB to the NE.
- 4.5 At close distance we are concerned that the plume would be highly visible including against a blue sky backdrop when seen from a more easterly or westerly location.

- 4.6 We do not consider that the weather conditions present in the recorded photography enable a worst-case scenario to be assessed, either of the proposed building when seen against a backdrop of sky or of the plume, should it have been modelled.
- 4.7 Overall we consider that the assessment does not sufficiently illustrate the extent of the significant landscape and visual effects where they occur. As suggested in section 2, we consider that there are viewpoints at closer ranges that could illustrate a greater magnitude of and type of effect than those presented, which would offer further insight into the potential worst-case scenarios. We would consider that modelling of the plume in viewpoint studies would further increase the magnitude of the landscape and visual effects.

5.0 Review of Primary Mitigation Measures

- 5.1 The primary mitigation measures include the proposal of a photo printed PVC mesh covering as a simulation of the view of the landscape behind. As seen in LVIA photomontage studies this has the provided mitigation of the visual effects of the proposed development, reducing the perceived mass of the building in longer distance views from the direction of the AONB.
- 5.2 The success of the architectural finishes to break-up the mass of the building with a visually recessive treatment appears significantly reliant on the efficacy of the primary mitigation measures proposed.
- 5.3 It is considered that further assurances are needed in order to be convinced of the efficacy of the proposed visual mitigation measures applied to areas of the building as a photo printed PVC mesh. There a number of questions and concerns based on the following:
- Durability of the mesh including to the weather conditions - we would consider it critical that more evidence of this is provided
 - Likelihood of degradation of appearance over time through weathering and the visual effects of this over time, whether the change envisioned at year 0 is equivalent to change that might be experienced at reasonable intervals that follow.
 - Examples in comparable locations with views at a range of distances and demonstrating durability
 - The potential for the capture of one moment in time to provide effective recession of the building into the backdrop considering the natural variation in the visual appearance of the backdrop as a result of varied effects of seasonality, time of day, sun direction and light conditions, shadow strength and direction, the effects of dry or wet weather conditions and the seasonal effects on vegetation and the likelihood of changes in the appearance of the backdrop over the longer term.
 - Consideration of the scale of the photo-print and the impacts of that as seen in closer views and at different angles.
 - Does the mesh create more adverse visual effects at closer distances and more acute angles, what is the comparative impact considered against the predicted benefits as seen from the AONB?

- The proposed methodology for ensuring the effectiveness of the proposed mitigation measures, against the proposed backdrop across a multitude of its typical conditions and appearances and testing of the proposals on site such as large scale mock-ups that could be viewed from agreed locations.

5.4 It is understood that as a primary mitigation measure the PVC mesh is considered integral to the building design but it would have been informative to have seen what the visual effects were with and without the mesh to ascertain its potential value as a mitigation measure and also to consider the pros and cons of its application at different angles and distances.

5.5 Considering the conceptual level of this proposal for primary mitigation for the building's visual impact, and the large range of additional considerations that are apparent, we would consider it critical to understand, in the worst case scenario, what the potential visual effects would be without mitigation, through assessment as part of the study at this stage in the development of the scheme.

6.0 Summary of Conclusions

6.1 There are some general legibility issues to do with ZTV mapping of views for a general readership. There are some important locations and viewpoints where it is not clear from the ZTV whether the proposed development is visible from, such as the Scheduled Monument Portland Castle and surrounding Conservation Area, which could be considered as at least comparable to Sandsfoot Castle.

6.2 We also think that it would be of benefit if there was a summary of the judgements and effects that included all those judged to be non-significant together with those judged to be significant and for this to be able to be referenced back to viewpoint studies. We would also comment that there are views receptors where effects are considered significantly adverse that should be included in the study and that each receptor assessed more individually. This would aid the general readership, and enable the reader to take a comparative view more easily relating to the whole range of landscape and visual receptors and refer these back to the numbered views.

6.3 We note that the methodology followed, was undertaken in consultation with the local authority landscape officer and views were agreed. It would be helpful if closer views were examined and assessed for any impacts and effects on the immediate locality, scheduled ancient monument and other receptors, as well as views from the sea, marina and seaward listed structures which we think are needed to assist the review of the effects and judgements provided which we are concerned are underestimated and/or under presented.

6.4 The impact of the plume, when visible should be assessed, as it is likely to affect a much larger area on Portland and beyond than the building and stack alone, the extent of which cannot be understood through the information provided. A ZTV with baseline photography and visualisations would reveal the extent of visibility and therefore any effects could be modelled and evaluated. The omission of this information means the worst case scenario

required to be modelled for consideration of the proposed development is not provided. We think clarity over potential visibility of the plume at night should be provided.

- 6.5 We would consider that significant assurances are needed with regards to the proposed PVC mesh as a primary mitigation measure. There are many concerns regarding its effectiveness and potential visual impact should it not be as effective as illustrated either due to natural changes in visual conditions, due to the limitations of achieving a photo like simulation or on issues related to durability. We would consider it necessary for views to be assessed with and without the mesh, including from a greater variety of different angles and distances, and with consideration to different natural visual conditions to fully understand the potential beneficial or adverse effects of a particular finish or landscape view simulation.
- 6.6 The effects and impacts of the proposed industrial building and plume, located on a site within the port has a significant effect on the settings of designations that have been awarded to the local landscapes, coastline and seascape including the World Heritage Site, AONB, and also to a Scheduled Ancient Monument, listed structures at sea, and architectural listings and conservation areas. This area of coastline with its eastern cliffs, seascape and silhouette of Portland set against the sea and sky, has a special landscape character and there is potential to significantly erode the highly valued landscape and scenic qualities.