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cc Plymouth City Council, English Heritage

**SWDRP 93 16 August 2011  
Construction and Operation of Energy from Waste Combined Heat and Power  
Facility (EfW / CHP)  
Devonport North Dockyard, Plymouth, PL22 2BG**

Thank you for bringing this scheme to the Panel. We were pleased that Plymouth City Council took part.

We were grateful to have the model and sample panels (and it was helpful of you to bring your own equipment) but we were handicapped by not having plans on display or to hand - digital presentations are useful, but, as we say in our issued notes, not enough by themselves.

SWDRP was seeing this scheme for third time, having carried out reviews in June and October 2010. As the scheme is now at planning application stage, and therefore this letter will go on the public record (unlike the two at pre-app stage), we will repeat some of our earlier points to give a full account of our guidance. Some of our previous points, it has to be said, have still to be fully accepted.

The Panel commended you for bringing your scheme to us at a fairly early stage last year and we are glad that some of our guidance has been beneficial to the scheme. We also recognise both the huge challenge this scheme on this site poses and the range of viewpoints that have to be taken into account.

This is a major and controversial project, involving a range of issues. The Panel would like to make clear the limited role it is taking in response to the request for design review. We make no comment on emissions, noise, transport and access. On location, we'd just say that the large

structure required and the nature of the process do not make this location close to residential areas impossible and it is a plus to reuse disturbed land rather than a greenfield site.

We applaud the fact that the waste heat will be used to replace conventional gas and oil fired boilers for the Dockyard and will use the existing district heating system. We asked that you engage as constructively as possible with the ambitious plans the Council has for CHP and we support your efforts for the adjacent residential areas also to gain heat from the plant. We also welcome the inclusion of photovoltaics, as we had suggested. Overall, you have raised the efficiency of the plant well above usual EfW values and the scheme will be hugely carbon-saving.

The scale of the plant and the wooded, valley-like nature of the site have led the Panel to see landscape as the starting point through our three reviews. We urged you to allow the landscape to inform decisions about the siting, form and massing of the plant – a landscape-led scheme in other words.

We welcome the opening of the woodland for the public. There is little access to the site now and it is a barrier between neighbourhoods so this a notable community benefit. Another benefit is the kickabout pitch. We welcome too the strong planting planned away from the plant, especially the avenue on the approach road.

There is one principle that need to put to you again, however, and that is that the landscaping should pull back from the buildings. The buildings cannot be hidden; any attempt to screen or soften is futile. On the contrary, we think the huge scale of the plant should be openly visible close to. Grandeur needs unencumbered space. There are no trees at the feet of say Tate Modern or Ely Cathedral: one can stand back and see them rise from the ground. Don't play down the size of the structures; just be proud! Applying this principle, we'd encourage you to think of a hard public space at the arrival point. The entrance should not be obscured but should be both legible and humanising (Tate Modern, again, is an example of an entrance that feels comfortable for people despite the scale of the whole). The section *Creating Good Spaces* in the DEFRA/CABE *Designing Waste Facilities* may be helpful:

<http://archive.defra.gov.uk/environment/waste/localauth/documents/designing-waste-facilities-guide.pdf>

It was useful for us to see photomontages of the plant from distance and in particular to have portrayed the view from the group of listed buildings of HMS Drake, as English Heritage had understandably sought. We found nothing alarming in what we saw. People in Devonport are used to large structures. The scheme may be seen as an addition to the large structures already in the area. In that respect, it responds to its context; but we really conceive it as setting its own context.

Turning to the design of the buildings themselves, we support you in letting the scheme express its function, as we have advocated. The more the plant makes its function in converting everyone's residual waste into heat explicit the better. You have made those parts that can be transparent. We also support your approach of a series boxes as flexible and logical. The scheme needs to allow for changes in technology and in policy and regulation: a structure tied to one specific process might be unusable even within its planned lifespan of 25 years.

We still call for a simpler approach, however. We'd encourage you to enjoy the geometric purity and exhilarating scale of objects in the landscape without the inappropriate articulation of curved edges and bumps, occasional angled elements that aren't boxes, and odd applications of colour. And the introduction of external columns is to us a step in the wrong direction. They complicate when simplicity should be the watchword. And they do not work with rounded edges. We didn't find the nautical analogy convincing and we'd much prefer a robust and authentic architectural language. Efficiency is wanted in the architecture as well as the operations; anything not efficient is probably a visual detraction.

We have a suggestion that could reinforce the logic of the boxes and develop your concept of graded tones in the cladding. An artist to help you use colour thoroughly and imaginatively could be very positive. It could help express the different boxes and perhaps moderate those elevations which are most dominant (we mentioned in discussion how warships were patterned in the two world wars: the painting, interestingly, did not *conceal* the ships but made it harder to assess their dimensions). The artist could also help you on a lighting scheme.

Visitors' access to and enjoyment of visiting the plant is important as you recognise and we back the idea of explaining the scheme's environmental advantages. The sequence from entrance to visitors' accommodation to roof should be properly thought through - including the need for publicly accessible spaces in the building - and should have a vividness corresponding to the

power of the wider site. On the roof terrace in particular you need to be sure how it will function as exhibition and event space, what views there will be (from back as well as front), how the huge scale of the terrace will be handled, how it will work in inclement weather and so on.

Although we have made these further comments and suggestions, at heart we see potential in your scheme to be a wonderful object of strength and functional integrity in the landscape. The changes we seek are not fundamental; if you take them up and with a good artist in the team you could create a positive landmark that deserved support. It could even be revered (after the initial shock that goes with any substantial addition to the familiar scene).