

Portland  
energy recovery  
facility

Environmental statement  
Addendum  
Appendices

Mr Rogers  
Terence O'Rourke  
by email...

**Date:** 30 April 2021  
**Ref:** WP/20/00692/DCC  
📄  
✉

Dear Mr Rogers,

**Planning application WP/20/00692/DCC for the construction of an energy recovery facility with ancillary buildings and works including administrative facilities, gatehouse and weighbridge, parking and circulation areas, cable routes to ship berths and existing off-site electrical sub-station, with site access through Portland Port from Castletown.**

I refer to the above planning application that was received on 7th September 2020, and which required an Environmental Impact Assessment. I am now writing with a request for additional information and clarification in relation to your client's proposal.

The Council considers some of the information requested below constitutes further environmental information, and where this is applicable it is requested in accordance with Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and Section 62(3) of the Town and Country Planning Act 1990.

The points below have been numbered to assist with referencing of your response.

#### Landscape

1. Additional detail and assessment in relation to the vapour plume from the stack and its visibility. This should include additional photomontages and/or visualisations which show the likely plume in different meteorological conditions.
2. Further interpretive background detail in relation to the scale of the development, and its context in relation to the existing Port.
3. More detail of the proposed PVC coating, its durability, and potential issues in respect of degradation during the design life of the facility.
4. Further consideration and information in respect of relevant landscape issues raised through representations on the first consultation as appropriate.

#### Health

5. Additional detail responding to issues in respect of potential benefits or impacts upon public health as a result of changes in air quality. In particular, this should address outstanding issues raised by PHD.
6. Further consideration and information in respect of relevant health related issues raised through representations on the first consultation as appropriate.

## Historic Environment

7. Further detail and assessment in respect of specific mitigation measures proposed to mitigate potential harm caused to the historic environment from the proposal, which should have regard to impacts on the setting of designated heritage assets. Proposals for mitigation should include the consideration of a footpath link on Port land immediately beneath the prison.
8. Assessment of potential impacts upon footpath S3/72 which runs past the Royal Naval Cemetery, in relation to the potential impacts on the historic environment.
9. Further consideration and information in respect of relevant historic environment related issues raised through representations on the first consultation as appropriate.

## Ecology

10. Additional information as required by Natural England and other ecological stakeholders to address the outstanding issues raised in respect of nationally/internationally designated sites raised through the initial consultation. This should include consideration of legal points which have been raised in respect of the robustness of the Shadow HRA.
11. Further consideration and information in respect of general ecology related issues raised through representations on the first consultation as appropriate, including the potential for management or improvement of habitat within the Port below the prison site.

## District Heating

12. Further detail in respect of how the prison and young offender institution could be connected to a district heating system supplied from the development. This should include the required infrastructure, technical supporting information, and description of the environmental (including climate change) and economic (for both for the supplier and purchaser) impacts.
13. Further consideration and information in respect of relevant district heating related issues raised through representations on the first consultation as appropriate.

## Electricity Generation

14. Further clarification on how the development will be connected to the grid, and secure benefits in relation to the generation of electricity. This should include detail of how the grid connection will be constructed and the proposed cabling.
15. Further consideration and information in respect of relevant issues related to the generation of electricity raised through representations on the first consultation as appropriate.

## Shore Power

16. Further clarification and additional detail in respect of how the shore power element of the proposal would work. This should include a response to issues raised in representations, and justification of any assumptions made in respect of modelling of carbon savings which might result.

17. Further consideration and information in respect of relevant issues related to the provision of shore-based power raised through representations on the first consultation as appropriate.

### Air Quality

18. Further information and modelling in respect of the impacts on air quality, and particularly as a result of the provision of shore-based power to Navy and cruise ships. The modelling should be accompanied by a separate document setting out the basis for any assumptions in respect of substitution for diesel fuel.

19. Additional air quality modelling in respect of the emissions from traffic on the section of the A354 leading to the site.

20. Inclusion of the use of the diesel back-up generator in the cumulative (in-combination) assessment.

21. Further consideration and information in respect of relevant air quality related issues raised through representations on the first consultation as appropriate.

### Carbon Balance/Climate Change

22. Additional information on the baseline scenarios requested by the council. These should have particular reference to points raised through the consultation on the robustness of the carbon balance scenarios set out in the current version of the ES. Additional clarification should also be provided in respect of the approach to carbon capture for the facility itself, and the circumstances under which it might be installed and operated.

23. A report has been submitted by UKWIN which makes a variety of technical points in relation to the suitability of the proposed technology and the robustness of some the claims made in respect of its effectiveness and environmental benefits. An assessment should be made of the technical points made in this report, and an appropriate response should be provided in respect of the issues raised.

### Traffic

24. Further clarification in respect of opportunities to export of IBA by sea, including the identification of specific sites that could accept the material when transported using this method.

25. Additional information in respect of the expected impacts (if any) of users of the Coast Path needing to cross the road in Castletown on the route used by HGVs to access the proposed plant.

26. Further consideration and information in respect of relevant transport related issues (including in respect of traffic modelling and baseline and future baseline conditions) raised through representations on the first consultation as appropriate.

### Surface Water Discharge

27. Further detail in respect of the acceptability of the sea outfall, addressing the comments of Dorset Council Flood Risk Management Team explaining how the issues raised will be addressed and overcome.

28. Further consideration and information in respect of relevant surface water management issues raised through representations on the first consultation as appropriate.

### Contaminated Land/Geology

29. Further information in respect of suitability of the site to accommodate the proposed development in terms of historic contamination, geology and ground stability.

### Need

30. Further clarification and explanation in respect of potential alternative treatment facilities within three hours drive by road, in respect of the need for the capacity the facility provides. Further detail in respect of likely sources of the RDF proposed to be managed should be provided, which should have regard to existing contracts for the management of RDF which are in place with competing facilities.

31. Further detail in respect of the potential impacts (or lack of) of your proposal upon the potential delivery of an RDF operation at Eco Sustainable Solutions, should the planning authority be minded to grant planning permission for it.

32. Further detail in respect of the impact of the development on the future process of RDF in mainland Europe, and future issues surrounding exporting UK waste to these facilities. The information provided should include discussion of the likely differences in respect of overall efficiency between the proposed plant and those plants in mainland Europe for which it may compete in relation to future feedstock.

### Jobs

33. Additional detail to support the assumptions which lie behind the stated number of additional jobs created.

### Planning Policy

34. It would be useful if you could provide your comment and perspective in respect of representations received on way in which you have interpreted planning policies as set out in your Supporting Statement.

### Environmental Permit

35. We note that you are making some updates to your Environmental Permit application, and request that the additional detail and assessment you are undertaking in respect of air quality, noise and fire prevention is incorporated into your planning application and EIA, so the assessment of the project is consistent across both regulatory regimes.

As you are already aware, the further information you provide will be advertised, and will then be subject to a further statutory consultation process, during which stakeholders and interested parties will be invited to comment, should they so wish.

Yours sincerely,

Adrian Lynham  
On behalf of Dorset Council