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**Email**  
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**By Email**

4 November 2020

Dear Sir

**MINISTRY OF JUSTICE  
PLANNING APPLICATION WP/20/00692/DCC – PORTLAND PORT, CASTLETOWN, DT51PP  
PROPOSED ENERGY RECOVER FACILITY AND ASSOCIATED DEVELOPMENT**

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The Ministry of Justice (MoJ) has been invited to comment on the above application, concerning major development close to HMP The Verne, a Category C male training prison situated at The Verne Citadel, Verne Common Road, DT5 1EQ.

HMP The Verne accommodates 580 men across 6 units, each with a common room and dining facilities. There is a range of supporting communal facilities for welfare, education, sport and recreation at the prison. Many of the prisoners have serious health conditions due to age or infirmity. HMP The Verne has just short of 300 directly employed staff and around 60 additional staff.

The site for the proposed Energy Recovery Facility is approximately 600m northeast of HMP The Verne. Given the nature and proximity of the planned energy facility, the MoJ is naturally concerned about the potential effects on its staff and inmates. Specifically, the concerns relate to reduced air quality from the facility's emissions and increased traffic.

Having reviewed the application submission and supporting Environmental Statement (ES), the MoJ questions the robustness of the assessment of likely air quality effects, including cumulative effects.

It is apparent that the ES does not consider all the likely air quality effects of the development in combination and against a reliable baseline of existing air quality.

As such, the current analysis may have significantly underestimated the likely impacts on air quality in the local area and in turn the potential effects on the human health of nearby residents and occupiers, including those residing and working at HMP The Verne.

In the absence of a robust assessment of air quality effects and associated need for mitigation, the MoJ objects to this application.

We trust the above comments will be taken into consideration and that the Council will direct the applicant to undertake a comprehensive and robust assessment of the likely air quality effects of the proposed development prior to determination of the application.

The MoJ will be pleased to review its position if further evidence on this matter is forthcoming and we shall be grateful if the Council can keep us informed on progress with the application.

Yours faithfully

A black rectangular redaction box covers the signature of Chris Hays. There are some faint, illegible marks around the box, possibly from the original document or scanning artifacts.

**Chris Hays**  
Partner  
UK Development, Planning