



Public Health
England

Centre for Radiation,
Chemicals and
Environmental Hazards www.gov.uk/phe
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Planning and Regulation Team,
Dorset Council,
County Hall,
Colliton Park,
Dorchester,
Dorset DT1

21st December 2020

Dear Sir/madam,

Consultation on Planning Application No: WP/20/00692/DCC (our ref: 55568)

Location: Portland Port, Castletown, Portland

Proposal: Planning application for the construction of an energy recovery facility with ancillary infrastructure.

Thank you for informing Public Health England (PHE) of the above planning application. Our comments are based on information provided within the Environmental Statement (ES).

Proposal

This application is for the development of an advanced energy recovery facility (ERF) with ancillary buildings and works, including cable routes to ship berths and an existing off-site electrical sub-station. The facility will treat a maximum of 202,000 tonnes of refuse derived fuel (RDF) per annum.

Site Location

The site is located on the north eastern coast of the Isle of Portland, within Portland Port, approximately 600 m to the east of the villages of Fortuneswell and Castletown. The closest residential property is located approximately 600 m from the proposed stack.

Air Quality

The proposed development is not located within an Air Quality Management Area (AQMA) (the nearest AQMA is 16 km north of the site) and, therefore, there is unlikely to be any significant impact on AQMAs. The applicant has modelled likely emissions from the site and considered the impact on local air quality against national air quality emission limit values. There are residential areas within 1km of the site and potentially vulnerable populations, such as, HMP Verne and HMP Portland. The submitted assessments does not specify specific human sensitive receptors but identifies the maximum predicted process contribution for residential areas. No significant impacts have been identified in the documentation, and PHE is satisfied that the applicant is using a model and assessment criteria that are in line with UK guidance and good practice. The ES includes a Health Risk and Health Impact Assessment (Appendix G). PHE is satisfied that the approach taken in the assessment and the operator has adopted conservative but not over-precautionary approaches to assessing the potential risks.

The Transport and Traffic Assessment (Chapter 11) indicates that during the construction the increase in traffic flows will be just over 2%. During the operational phase, the modelling report states that additional vehicle movements are below the threshold for a detailed assessment of vehicle movements, based on 100% of deliveries by road. It is, therefore, expected that any increased vehicle movements will not have a significant impact on local air quality, including at locations identified as being sensitive to traffic emissions.

Fugitive emissions to air

Impact of fugitive emissions of dust during the construction phase and emissions of dust and odours during operation have also been assessed. The emission of dust has the potential to cause nuisance and present a health risk from the inhalation of particulate matter. Whilst nuisance can be a source of complaint and distress, the assessment of dust as a potential statutory nuisance is a matter for the local authority and, consequently, PHE will restrict its comments to respirable dusts (PM10 and smaller). PHE is satisfied that the human health impact from dust and odour has been assessed in accordance with IAQM guidance. Based on this assessment, the impacts from fugitive emissions of dust and odour are low. We would expect that the use of a construction environmental management plan (CEMP) employing appropriate mitigation measures would ensure that dust does not have a significant impact on health during the construction phase. PHE note that the operation of the ERF will be subject to an Environmental Permit, the conditions of which would ensure that fugitive emissions beyond the site boundary are kept to a minimum.

Contaminated Land

The site has a history of industrial and commercial use and, therefore, there is the potential for soil contamination. The nature of the development means that it is a low risk of future users of the site coming into contact with contaminated soil. The CEMP should include a section on the management of contaminated soils if they are encountered during the development and, consequently, PHE is satisfied that historic contamination does not pose a risk to public health.

Noise

PHE does not provide comments on noise at the present time.

Conclusion

PHE has published a position statement on the impacts on health of emissions to air from municipal waste incinerators. This concluded that 'modern, well managed incinerators make only a small contribution to local concentrations of air pollutants. It is possible that such small additions could have an impact on health but such effects, if they exist, are likely to be very small and not detectable'.

PHE is satisfied that the applicant has approached the Environmental Impact Assessment (EIA) in a manner consistent with the UK requirements. They have utilised a satisfactory approach and methodology to predict the likely emissions, distribution of a range of key pollutants, and the impact on the local environment and receptors.

The proposed facility will be regulated through the pollution prevention and control regime and we would recommend that the regulatory authority ensures that it will operate to Best Available Techniques (BAT). PHE will be consulted as part of the Environmental Permitting

process and will further consider emissions and control measures and make additional comments at that time.

If you have any questions, or require any clarification, please do not hesitate to contact us.

Yours faithfully,

Dr James Isaac
Environmental Public Health Scientist

