

Consultee response for application **WP/20/00692/DCC** from **Rodwell & Wyke Ward**
- Cllr Brian Heatley
15/10/2020

I am Councillor Brian Heatley, a Dorset Councillor for Rodwell and Wyke Ward in Weymouth, which is just to the north of the site of this application across Portland Harbour.

Procedure

This is an application for a major industrial facility of a type new to the area. It has attracted substantial local controversy and opposition as evidenced by the petition submitted by the Stop Portland Waste Incinerator campaign. It therefore almost goes without saying that this application should be considered by Committee rather than delegated to officers.

Objection Summary

On balance I am opposing this application. I accept that there are some points in its favour

- the 350 or so jobs that the proposal will create during the construction phase
- the estimated 35 long term jobs that the plant should create
- the short-term opportunity to generate electric power from waste that would otherwise go to landfill, with possibly some climate change mitigation benefits (but see below).

However, I think these points are significantly outweighed by other considerations, including the damage done to the World Heritage Site along the Dorset Coast, the transport and associated road safety, nuisance and health aspects for my ward, public health concerns, and the long-term unsustainability of this way of dealing with waste.

The World Heritage Coast

Our Coast (apart from Weymouth and a little bit of Portland around this site) is recognised as a World Heritage Site - it contains internationally important historic geological features dating back around 185 million years. This is not a local designation nor just a national or European one but a world designation. It must exemplify "cultural and natural heritage around the world ... that is ...considered to be of outstanding value to humanity. "

Weymouth and Portland depend hugely upon the tourist industry, and our single most important tourist attracting asset is that we are at the centre of the beautiful Jurassic Coast. This site is of course not strictly within the designated area of the heritage coast, but it is prominently right in the middle of it, and a large industrial

plant, with a plume producing chimney will significantly detract from the beauty of the Jurassic Coast landscape around it.

If the site were to be returned to its natural condition, it would form with the North East face of the Verne behind it a significant enhancement of to the World Heritage Site, and in time a significant place for wildlife. If development does not go ahead there will be the opportunity in the forthcoming Dorset Local Plan to remove the current industrial designation of this piece of land, and prevent development upon it. We should no forego that opportunity.

The landscape of the Jurassic Coast is of immediate importance to the residents of Rodwell and Wyke. Many can see it from where they live, most value the time they spend on or by the sea next to that coast. We should make it more beautiful not diminish it with a huge industrial plant.

Transport implications

If all the feedstock and by-products come and go by road - and while use of the port is mentioned in the application there is no commitment to that - the application anticipates some 80 HGV movements a day along Portland Road and then through Weymouth.

Although the Environmental Statement suggests that this will be mitigated by a one way system for HGVs in Weymouth, that plan (which I support) is not yet in operation, and at present I would expect most of the 80 HGV movements a day to be along the A354 (Portland Road, Buxton road, Rodwell Road and Boot Hill) through residential parts of the Rodwell and Wyke Ward. This route passes 4 schools, and goes through the Wyke Regis shopping centre.

The Environmental statement says that this represents no more than a 2% increase in traffic flows. However, in terms of impact on residents, shoppers and children going to and from school, the impact will be far greater than that in that the increase is an increase in HGVs, not smaller vehicles. I can't find a figure for the current number of HGVs using the road, but I'd suggest that the impact is better measured in terms of the increase in HGV traffic rather than all traffic.

There are already a considerable number of accidents along this route (1 fatal, 6 serious and 27 slight collisions reported to the Police in the last five years, see the online Dorset Road Traffic Collision map), and this increase in HGV traffic is likely to make the situation worse.

The route also goes along Boot Hill, which while not yet an Air Pollution Action Area, suffers extremely poor air quality, mostly caused by HGVs. The addition of a further 80 vehicles a day will surely make this situation worse.

Public Health

I have read the Environmental statement submitted by the applicants and their consultants in so far as it concerns air pollution from the plant and associated health effects. The broad conclusion is that all emissions will be below regulated limits and that effects on public health will be negligible.

I think this assessment is complacent taking account both of the nature of the feedstock for this plant and because inevitably accidents will happen.

The feedstock is not a homogenous product of known and generally unvarying characteristics, such as diesel fuel. It is what is left over from the waste stream once some portion of the recyclables have been removed. It will inevitably sometimes contain noxious materials that have (probably illegally) been put into the waste stream when they should not have been, which will then be tipped into the furnace. There may well be unanticipated chemical reactions with other things in the waste. I think it is simply impossible to be so sure that the emissions from this plant will always be harmless.

Waste Policy and renewable generation

The builders of a plant like this are assuming that there will continue to be a supply of waste derived fuel to burn in it for the life of the plant. But Dorset Council's Corporate Plan says that we should

Promote behavioural change to reduce waste and increase reuse and recycling

in which case the quantity of residual waste will diminish. We should not approve a plant whose very raison d'etre depends upon the County failing to achieve one of its policies.

Moreover, there have been suggestions in some of the material promoting this plant that the energy produced is in some sense renewable. This is only partly so. Much of the content of Refuse Derived Fuel is organic in origin - food, wood, paper, many textiles etc - and energy generated by burning these materials can reasonably be called renewable in just the same way as burning say wood pellets, though account has to be taken of energy used in the manufacture and transport of the fuel. However Refuse Derived Fuel will also contain some combustible material whose origins lie in fossil fuels, primarily plastics that cannot be re-cycled or which have escaped re-cycling. Burning this material is effectively like burning fossil fuels. How far the energy generated by the plant can properly be called renewable depends upon the nature of the feedstock; I cannot find in the papers any estimate of the proportion of combustible non-organic there will be.

Brian Heatley
15 October 2020

I wish to supplement my original objection submitted on 15 October. I want to challenge the assertion by the applicant referred to in that objection that the increase in HGV traffic on the A354 in my ward would be no more than 2% by offering an alternative calculation of the increase in HGV traffic.

The applicants say the plant will generate 80 lorry movements a day (11.19 ES). They say this will have a negligible effect on overall HGV traffic along the A354 through Rodwell and Wyke; they calculate an increase of the order of 1% in 2023 when the plant opens (ES Table 11.11).

This calculation is badly flawed. First it assumes a huge increase in HGVs between now and 2023 because of other hypothetical developments. But for the residents and schools and shops on the A354 the comparison that makes sense to them is a comparison with what they know, that is what is going on now.

Second, it compares these 80 mainly very large lorries, 40-44 tonners, with all HGVs. The definition of an HGV is over 3.5tonnes, something like a typical larger campervan. If the comparison is with really big vehicles, say those over 12.5m, then the typical daily flow of those larger lorries on Boot Hill is about 150 (ES, App L1 pt 2, DC survey pg 60 onwards). So 80 new large lorries a day needs to be compared to the current 150 big lorries. That's an increase of more than 50%. That is not negligible, that is substantial, and unacceptable.

This is a material planning consideration by reference to the following paragraphs of the NPPF:

102. Transport issues should be considered from the earliest stages of ... development proposals, so that: ...

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account - including appropriate opportunities for avoiding and mitigating any adverse effects, ...

An increase of more than 50% in HGV traffic has a substantial environmental impact, and no opportunities for mitigating that effect have been identified

108. In assessing ... specific applications for development, it should be ensured that: ...

c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

and nothing has been done to mitigate the effects in any of these terms in the application.

Cllr Brian Heatley 14.11.20