

Dear Planning team A,

Thank you for your request to comment on the proposed development WP/20/00692/DCC for a Portland energy recovery facility involving the combustion of refuse derived fuel. These comments are restricted to the matter of land contamination and relate to a review of the Environmental Statement prepared for Powerful Portland Ltd by Terence O'Rourke Ltd dated Sept 2020, various associated documents and later submissions concerning a regulation 25 request.

- Within the Environmental Statement land contamination is identified as a key issue (Table 3.2).
- A document of review concerning land contamination is referred to and detailed (Arup), Arup refers to prior investigation conducted by RPS in 2009. The Arup submission constitutes a desktop study that characterises the site and environs so as to enable the targeting of further invasive site investigation.
- Prior historic contaminative land issues stem from port construction (made ground), prior gasworks and coal depot in the vicinity, industrial infrastructure associated with military land use and other uses, land status following prior demolition, and the likely risk from unexploded ordnance.
- WPA advises that any development must be subject to adequate development control and regulation. Currently the submissions indicate that land contamination issues could be dealt with by conditions but additional invasive site investigation and risk assessment is required to be completed before construction commences. This requirement should form part of any preparatory works. Given the extent of the site curtilage if conditions are prepared they may need to be tailored to various stages and zoning criteria.
- WPA notes that the Environment Agency also require the completion of further investigation and risk assessment concerning controlled waters.
- WPA is aware that the extent of the site curtilage indicates proximity to other significant areas of development that have occurred in this part of Portland where contaminated land issues have been investigated. This proposal would benefit from the sharing of information from other neighbouring development activities in recent years to ensure a robust risk assessment across the site.
- WPA notes that there would be significant potential contamination exposure scenarios to be managed during site preparation and construction. Documentation such as the ERF Framework SWMP requires further updating to indicate that environmental site management and site induction adequately consider contaminant linkages that have yet to be fully characterised by further investigation and research. It is likely that the matter of land contamination will require further submissions and further review before the Authority's decision can be finalised.

Best regards

Michael Way  
Principal Consultant

