



Ref: Planning application: WP/20/00692/DCC

Powerfuel Portland Ltd - REGULATION 25 NOTICE REVISIONS

RESPONSE FROM PORTLAND TOWN COUNCIL

Having duly considered the additional documentation submitted by Powerfuel, Portland Town Council wishes to object in the strongest terms to this planning application. A wide range of documentation and specialist feedback has repeatedly demonstrated that the harm of building this facility clearly outweighs the benefits. PTC therefore states there can be no justification for the building of an Energy Recovery Facility at this location.

Climate and Ecological Emergency:

- ***PTC's concerns and objections:*** On 26th June 2019, Portland Town Council (PTC) declared a climate and ecological emergency and therefore this proposal does not align with the objectives set out within this declaration. The overriding objective being “*to do all that we reasonably can to reduce our impact on climate change and ecological degradation both here on Portland, but also nationally and globally,*” which includes ensuring that PTC's responses to Planning Consultations reflect protection of the unique natural habitat found on Portland.
- Powerfuel has not addressed any of PTC's objections separately within the **Consultation response summary document** of August 21, requiring PTC to search through 112 pages of responses and 33 new documents to find the answers that might address their concerns.
- Powerfuel addresses climate and ecological emergency concerns by repeating that they will be carbon neutral / 'net-zero carbon' using off-setting and various carbon credit schemes - this will not address the 183,000 - 202,000 tonnes of carbon that will be emitted from the Portland stack annually into Dorset's air, adding to the climate emergency.
- Oxides of nitrogen are also a powerful Greenhouse Gas (GHG), which will have a deleterious impact on the calcareous grasslands of the SAC abutting the site. Weekly, the incinerator will create 2.69 tonnes of NOx, along with 3842 tonnes of CO2 as the **Supporting Information** p37 (EA-EP) states NOx released after abatement will be 140 tpa; this does not align with PTC's declared climate & ecological emergency.
- Powerfuel acknowledge an incinerator is not a 'no carbon' energy source, stating that...
It should be recognised that Energy Recovery Facilities (ERF) are for planning policy purposes,

a 'low carbon' energy source, even if they are not a 'no carbon' energy source and therefore are encouraged by existing policy as part of the move to address the climate change emergency.

- Powerfuel emphasise incinerators are supported by the Government, but do not mention that Wales has placed a moratorium on incinerators, and the Scottish Conservatives, Greens and Labour all support a call for a moratorium on new incinerators in Scotland.
- The Government has concerns that the landfill tax has backfired, as it was imposed to encourage waste authorities to recycle. However, instead of encouraging recycling, it has caused waste authorities to incinerate their landfill waste. Powerfuel still cites old strategies and states *"the proposed ERF is deemed a low carbon source of energy and is supported by government as part of a range of measures intended to reduce national carbon emissions to meet national and international carbon reduction commitments."*
- According to the 2020 report '**Reducing UK emissions: Progress Report to Parliament**,' by the Committee on Climate Change, *'Achieving significant emission reductions in the waste sector requires a step-change towards a circular economy, moving away from landfill and incineration (and the associated methane and fossil CO2 emissions)...'*
- A report by ZeroWasteEurope in 2019 stated that *"Waste-to-energy incineration is sometimes promoted as a low-carbon source of energy, justifying increasing quantities of waste for use in electricity generation. The evidence, however, suggests that the carbon intensity of energy produced through incineration is around 2 times greater than the carbon intensity of the current EU average electricity grid intensity and has significantly more adverse climate impacts than conventional electricity generation from fossil fuels such as gas"*.
- According to carbonintensity.org.uk, the carbon intensity of the national grid is around 200-280 - according to UKWIN the average carbon intensity of a waste incinerator is 800. In Powerfuel's documents the only reference to carbon intensity is in the **Greenhouse Gas Assessment (EA-EP)**, where they state that the carbon intensity of Coal is 920 and for Natural Gas it is 349. Powerfuel does not appear to provide a gross carbon intensity figure for their incinerator. Powerfuel should provide a gross carbon intensity figure vs their net carbon intensity figure to enable proper analysis of the waste incinerator's carbon impact on the climate emergency.
- **DISTRICT HEAT NETWORK (DHN):** Implementing a DHN is an important Government tactic for decarbonisation, but Powerfuel have not included a district heat network as part of their application, despite the Government's support of heat network deployment requiring that heat that otherwise goes to waste be harnessed and used.
- Powerfuel do cover DHN at great length in their revised documents, however, in a document they submitted to the Environment Agency the '**Combined Heat & Power ready report**' a Cost-Benefit Assessment showed that *"The proposed heat network will not yield an economically viable scheme in its current configuration. The economic feasibility of the scheme will be reassessed in the future when there is a better understanding of heat demands and considering any subsidies that support the export of heat."*
- Powerfuel will only commit to implementing a DHN if a commercial agreement showing it would be commercially viable is put in place, however according to their Environmental Permitting application, they have already established that this is unlikely to be the case, unless the Government provides subsidies. Powerfuel predict that in the future they may be able to benefit from Government subsidies, along with Dorset Council and Portland Town Council grants to implement a DHN, although there is not enough certainty. This uncertainty is reflected in the

fact that implementing a DHN does not form part of Powerfuel's planning application.

- It should also be noted that a DHN has some negative impacts that have not been addressed by Powerfuel in their new reports...
 - Powerfuel has stated the waste incinerator will run for 8,000 hours per annum, this report does not state where the heat for their customers will come from for the other 760 hours of the year.
 - DHN systems that are operating from a waste incinerator have reported there are frequent breakdowns in the system, often during winter months, leaving households without heat just when they need it - it appears there is no back-up plan for a faulty DHN.
 - Those that connect to the system are locked in, with no choice on pricing or switching to a cheaper more reliable provider, or even a provider that supplies 100% renewable energy.
 - An important part of a DHN, particularly in the planned location which rises from 7m above sea level to 141m to Her Majesty's Prison (HMP) The Verne, is the use of distribution pumps, which are the most important plant item for distributing the heat through the heat network carried by the hot water from the heat source to the customers. Powerfuel's report has not considered these noise impacts in addition to the incinerator noise impacts, which could add considerably to the suffering of those across the water along the Portland Harbour shoreline, as well as the prison itself.
- Regulation 25 notices requests have provided no more information to allay PTC's concerns that this proposal does not align with PTC's climate and ecological emergency declaration. Powerfuel therefore are unable to show that their proposal will fulfil the PTC objective "*to do all that we reasonably can to reduce our impact on climate change and ecological degradation both here on Portland, but also nationally and globally.*"

PUBLIC HEALTH:

- ***PTC's concerns and objections:*** PTC agreed with the Ministry of Justice (MoJ) that there was a lack of robust testing on the impacts on human health and had concerns with respect to wider public health. There are concerns over the impact of emissions due to Portland's terraced landscape. PTC notes that there are many homes, nurseries, a care home, a hospital, and a youth club in very close proximity to the site of this proposal. Public Health England states that emissions from energy recovery facilities could have an impact on health.

Topography and Meteorology

- The changeable wind is a well-known factor on Portland, which may well have an adverse effect on the stack emissions, potentially causing backdrafts, which would have an adverse impact on how emissions disperse locally. There is no evidence that the variable winds due to effects of the topography on wind directions have been taken into account.
- Local resident Mr BW, a Fellow of the Royal Meteorological Society, a lifelong professional meteorological specialist, had this to say about the unique Portland weather conditions:
 - Settled, high pressure conditions will 'trap' and concentrate pollutants which combined with sea breezes, will make surface pollution levels high to extremely high. The resultant air quality will become extremely poor, sometimes becoming a serious health hazard to those in the local area.
 - Each drop of rain or drizzle has at its centre a microscopic grain of grit. Indeed, it is the

condensation of water in the atmosphere onto these pieces of grit that gives rise to raindrops. Increased pollution will provide more molecular sources for raindrop formation. Additionally, during times of precipitation, any pollution will be washed down to the surface and into Portland harbour.

- Weather inver
- Portland Town Council considers that wholly insufficient attention has been given to the topography of the site where slopes, cliffs and rises surround the proposed location. Homes, HMP The Verne and the Port Industries are nearby, and therefore a large number of people live or have business in the immediate neighbourhood.
- Portland Town Council is advised that Public Health England has referred to the failure of adequate modelling on both topographical and meteorological grounds. As a direct result, the risks to human health can not have been adequately assessed. If the modelling is inaccurate, how can the Incinerator meet the standard required within the assessment criteria? It is the assertion of PTC that the risks to human health have therefore been significantly underestimated.
- Portland is known to frequently experience a weather inversion whereby warm air traps cooler air below, resulting in stagnation of air and the trapping of pollutants closer to the ground. This will result in a higher concentration of harmful emissions and risk human health and wildlife. The air quality modelling in the application has not treated this specific element of the local micro-climate.
- PTC commissioned the law firm Freeths to review Powerfuel's Environmental Permitting application, and there are cross-overs with the Regulation 25 notice request in some areas. Freeths reviewed Powerfuel's 'Human Health Assessment' and have identified a number of shortcomings, and concluded that:
 - (i) the potential human health impacts of the proposed scheme need to be reassessed; and
 - (ii) this will have implications on other assessments.
- The shortcomings in the Human Health Assessment were summarised as follows:
 - Several key compounds of potential concern are not included in the assessment. As a result, the carcinogenic risk is underestimated;
 - The assessment ignores intake by consuming locally sourced fish and possibly other marine life. The associated risk is therefore underestimated;
 - There are a number of farms within 2 km of the proposed development site which have not been considered;
 - The additional daily dose (particularly for breast-fed infants) is not reported in the assessment.
- The legal review went on to say that the overall burden of pollution is critical to health. The shortcomings in the air quality and human health risk assessments indicate that impacts have been underestimated. With the nature and level of pollution that will be generated by this proposal, the consequences of miscalculating the impact on human health are very serious indeed.
- Within the review, specialist consultants RSK observed that in relation to both BAT (best available techniques) and the air quality assessment that Powerfuel failed to take available opportunities to mitigate pollution, rejecting techniques that could have reduced emissions and being prepared, instead, to expose local residents to unnecessary risk.

- Portland Town Council remains gravely concerned about the high level of pollutants that are envisaged by this application.
- This legal review does not provide PTC with any reassurances that this proposal would not impact on human health, and we confirm that PTC stills objects to this proposal on the grounds of unacceptable risk to our residents.

TRAFFIC IMPACTS:

- **Portland Town Council's concerns and objections in respect of traffic impacts:**
 - PTC would like to see a more robust study on the impact of HGV movements.
 - PTC has raised concerns with the local authority over frequent congestion on Portland Beach Road, through Wyke and Weymouth, affecting the ability to travel smoothly to and from Portland.
 - Traffic congestion has recently been exacerbated by the increase in visitor numbers to Portland.
 - PTC is concerned about the ability of the road network to cope with the additional HGV movements.
 - PTC cannot see any contingency plans should Portland Beach Road be closed.
- The Powerfuel Portland planning documents states “the traffic and transport assessment in ES chapter 11 concludes that there will be a negligible increase in local traffic, so no significant health effects are predicted.” However there will be an extra 80 lorry movements a day, trundling past many sensitive locations, that do not appear to have been given any consideration in the planning documents. An extra 80 lorry movements during the day and through the night, might be considered by Powerfuel as a negligible increase, but for properties they could be passing 2 metres from, 24 hours a day, 7 days a week, that could have a significant effect on people's health.
- In the new **ES 5.2 Health impact assessment addendum**, Powerfuel acknowledge there will be traffic impacts and that “*Vulnerable groups in society will be affected most by the increase in traffic levels. Those such as young children and the elderly may experience negative health impacts. The elderly may experience annoyance from increased noise, whereas young children are at higher risk of road accidents and health impacts associated with potential air pollution.*” although they conclude that “*The low percentage increases in traffic associated with the construction and operation of the Proposed Project means that the potential for increased collisions is assessed to be negligible, and therefore the risk to health is low, and not expected to be significant.*”
- According to Powerfuel’s **ES Ch4 Air quality** document “*it is expected that the proposed development would generate an additional 72 two-way HGV movements and 38 two-way car movements (staff) per day, if all the Refuse Derived Fuel is delivered by road.*” Whilst these traffic impacts fall below individual screening criteria for requiring detailed assessment (100 Light Duty Vehicles and 500 cars), these impacts would combine on Castletown, which is very narrow, with receptors close to the kerb which could mean that annual mean nitrogen dioxide concentrations may be elevated.
- There are concerns regarding HGV movements and their impact on residents of Castletown in particular, especially with regards to vibration and noise and the impact on the wellbeing of

residents.

- The manager of Portland Bunkering has written in an objection which includes traffic, which states: “We would also like to raise the problem of the road through Castletown leading to the port main gate. This narrow road regularly gets blocked / heavily congested with the current HGV use from the other tenants that move products in and out of the port by road. Adding another 50 HGV movements a day to this would be ridiculous and massively hinder emergency service response time in the event of an emergency within the port estate.”
- This objection indicates that current Portland Port users are already finding it gets blocked and congested and this is before the Glencore 80 grain lorry movements have commenced, therefore another 80 waste-associated lorries a day is likely to exacerbate the problem.
- As PTC points out, congestion has recently been exacerbated by the increase in visitor numbers to Portland. There have been big increases in tourist traffic in the last 18 months, as Portland appears to have been ‘discovered’ by tourists during the Covid-19 pandemic. The traffic has increased to such an extent that leaving the island from 4pm onwards backs all the way up to Fortuneswell, during the summer months and at weekends.
- Powerfuel has dismissed objections concerns regarding traffic congestion, by responding in the **Consultation response summary document** that “*This has concluded that a safe access can be achieved and that the HGV movements associated with the facility when considered in the context of the overall highway network and traffic levels would not give rise to any significant highway impact. As such the concerns cited regarding the potential impact of the development on highway congestion and adverse impact tourism are without foundation.*”
- PTC’s concern about closures of the A354, Portland Beach Road, during severe weather conditions, or due to an accident, has not been considered. The major winter storms between December 2013 and March 2014 were the worst seen for at least 30 years, causing the closure of Portland Beach Road for a number of days. As the climate continues to change, many experts predict that storms such as those experienced over the winter of 2013/14 will become more frequent and so the eastward movement of Chesil Beach toward the land will speed up.
- Therefore, the additional revised documents provided by Powerfuel do not address the concerns in their responses and therefore PTC objections and concerns regarding traffic still remain.

TOURISM AND ECONOMY IMPACTS

- ***PTC’s concerns and objections:***
 - PTC is concerned that as Portland sits in the middle of AONB, and World Heritage Site that this proposal would affect the experience of visitors to Portland.
 - Portland has a world class sailing facility which is used by visitors from far and wide and is an important part of our tourist offering.
 - Part of Portland’s tourism strategy involves promoting a Portland-clean environment.
 - PTC is concerned that this proposal would have a significant negative impact on the experience of users of Portland Harbour and Portland as a whole, and that there may be more jobs lost from within our tourism industry than will be created by this proposal.
- Within the revised documents Powerfuel does not acknowledge that a waste incinerator in a

tourist location will be detrimental to the local economy. In their **Consultation response summary document** they state... *“There is no evidence that the proposed ERF will have an adverse economic effect on Weymouth and Portland as destinations. There are examples of ERFs being located in tourist locations, including the Spittelau facility in Austria and Amager Bakke facility in Denmark, which through their designs have become local tourism attractions in their own right. The Portland facility has been carefully designed to be recessive in its setting, and whilst it is clearly not a tourist destination in its own right, it will as a consequence of its unique architectural design be a feature of some interest.”* and that *“There is no evidence that the provision of Energy Recovery Facilities (ERF) causes any reputational damage”*

- Powerfuel also state that *“The submitted Economic Impact Assessment demonstrates that the ERF will deliver substantial economic benefits for Portland, Weymouth and Dorset and the provision of shore power at Portland Port will safeguard existing jobs and support future local economic growth in tourism and other related activities associated with the cruise liner visit business”*.
- In the Supplemental planning supporting statement Powerfuel make a point which is obviously felt important by them, as they mention it 4 times in the same document under different sections *“In addition to enabling public access to view and interpret all of the heritage features present within the East Weare area, the creation of an ‘around the island’ enhanced coastal path connection across the port estate will deliver wider public benefits in relation to recreation and local tourism, specifically contributing to the sustainable tourism objectives of Policy Port/ST1 of the adopted Portland Neighbourhood Plan.”*
- Post-construction, Powerfuel deny that any jobs will be lost to tourism as a result of an incinerator being built adjacent to a hotspot for tourism and deny that business will be lost through visitors choosing less polluted areas of Dorset to visit, and not wanting to stay in holiday accommodation in the shadow of a waste incinerator and its plume. Visitors come to the area because of its beauty, and bracing clean air, which is highly valued both by residents and visitors alike, whether coming for the peace and tranquillity of the area, or for active sports. The Jurassic Coast visitor economy employs 2,000 people, jobs which are threatened by the prominence of a large industrial incinerator, its constant noise, smells and emissions, such an operation is not conducive to the peace and tranquillity sought by visitors and holiday makers, or even residents.
- As Powerfuel do not recognise that a waste incinerator in a tourist hotspot could have an impact on either tourism or leisure, none of the issues raised by PTC have been addressed

IMPACT ON ECOLOGY

- PTC felt, that as a shadow Habitat Regulations Assessment screening report had yet to be received, no comment would be made in the first public consultation. However, as the Freeth’s legal review covered some aspects, it seems appropriate to include a brief quote at this point...
- Consultee responses to the planning application identified that the shadow Habitats Regulations Assessment (sHRA) is fundamentally flawed. The planning authority, Dorset Council, subsequently issued a request for further information pursuant to regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 on 30 April 2021. On 17 August 2021, the applicant submitted (i) a detailed response to the regulation 25 request; and (ii) a number of new/updated documents, including a substantial addendum to its Environmental Statement and an updated shadow Habitats Regulations Assessment.

- The conclusions of the sHRA dated September 2020 cannot, therefore, remove all reasonable scientific doubt as to the effects of the permitted facility. It logically follows that It cannot be stated, with the degree of certainty that the law requires, that the proposed permitted facility will have “no adverse effect on the integrity of any European site either alone or in combination with any other plans or projects”.

SHORESIDE POWER ALTERNATIVES

- ***PTC’s concerns and objections:***

- PTC is sympathetic to Portland Port’s need for shoreside power but do not see any investigation into clean energy alternatives that would align with Portland’s tourism strategy
- More information is required to ensure that power provided by a waste incinerator, located in a port, can provide an onshore power supply that fulfils the Government requirement as outlined in the **UK Clean Maritime Plan**. This sees zero emission shipping as a future, whereby no Greenhouse Gases or air quality pollutants are emitted by vessels (of all types) operating in UK waters or in the ship-to-shore activities required to facilitate those operations. **Directive 2014/94/ EU of the European Parliament and of the Council of 22 October 2014 on the deployment of alternative fuels infrastructure** seeks to ensure shoreside electricity is provided by clean power supply and can contribute to reducing the environmental impact of sea-going ships. The Local Planning Authority (LPA) should issue a further Regulation 25 notice to request Powerfuel provide evidence that a waste incinerator onshore power supply source will comply with national and international requirements for zero emission shipping.
- Powerfuel should clarify how the assessment of the air quality impacts from cruise ships switching off their engines, compared against the air quality impacts from a waste incinerator, was modelled. Powerfuel have estimated the onshore power requirement for the cruise ships will be 396 hours, and have stated that the waste incinerator will operate for a minimum of 8,000 hours. Powerfuel need to confirm whether the 396 hours of cruise ships emissions whilst at berth have been modelled against 396 hours of waste incinerator emissions, or whether the full 8000 hours of emissions from the waste incinerator have been taken into account.
- Powerfuel need to justify increasing operational noise from cruise ships at berth from 396 hours a year, to the operational noise from a waste incinerator of 8000 hours per annum, as **Directive 2014/94/EU para.34**, that states that shore-side electricity facilities can serve maritime transport as clean power supply; in particular in maritime ports where air quality or noise levels are poor. The LPA should issue a further Regulation 25 notice to request a further comparison between noise levels from a waste incinerator operating for 24/7 and a cruise ship operating for a maximum of 11 daytime hours for 36 days a year (figure provided by Powerfuel’s for expected 2024 cruise ships able to hook-up to onshore power) and the impact on HMP The Verne, residents of East Weare and residents along the shoreline of Portland Harbour and beyond.
- **ALTERNATIVES TO SHOREPOWER:** It appears Portland Port Ltd itself has not explored any alternatives to waste incineration, in order to implement onshore power, that would meet the criteria of the maritime ambitions for zero emissions for shipping in port. It is astounding that a Port is not concerned that it’s potential to achieve zero emissions could be written off for the next 25 to 30 years, potentially making it an unattractive place for cruise ships to berth. Portland Port Ltd need to take care that they don’t become the only Port in the world to be

unable to provide zero emissions port facilities. The obvious alternative to such an unsuitable power source, would be to investigate funding a National Grid hook-up.

- Powerfuel have been quick to state that without the Energy from Waste plant, there is no alternative way of funding onshore power. However, at the end of 2020 Associated British Ports (ABP) announced a 5th cruise terminal at Southampton docks, the first UK onshore power supply cruise liner berth, having secured a grant of £8m from the Government's 'Getting Building Fund'. The new terminal was built in partnership with MSC Cruises and Norwegian Cruise Line Holdings Ltd. This first UK cruise liner onshore power supply berth was opened in July 2021.
- In 2019, The Royal Navy who have used shore power for many years, installed a 13.5MW off-grid power plant to provide shore power in Portsmouth and there is no reason to assume they will not support a similar onshore power supply for the RFA vessels berthed at Portland Port.
- According to the British Ports Association: *"New research finds that no ports in the world have installed cold ironing (shore to ship electricity) without public funding or subsidy"*
- There is no evidence to support Powerfuel's claim that funding could not be secured to upgrade the outdated Chickerell substation which, apart from Portland, feeds nine other primary substations: Cerne Abbas, Charminster, Chickerell, Dorchester, Maiden Newton, Piddletrenthide, Puddletown, Redlands and Weymouth, and is long overdue. Upgrading the outdated Chickerell substation would enable not only Portland Port to benefit from onshore power, but also benefit the wider area.
- In May 2021, PortTechnology.org reported that: *"The ports of the United Kingdom could soon be receiving investment funding on zero-emission bunkering and onshore power in the UK Government's newly-launched funding competition. The UK Government announced a £20 million (\$27.75 million) Clean Maritime Demonstration Competition (CMDC) in March 2021 to develop zero-emission vessels and clean port infrastructure."* and that...
"The Department for Transport (DfT) continued that the CMDC will support projects focusing on shoreside low and zero-carbon bunkering of renewable fuels, vehicle charging infrastructure, shoreside power, and port-side renewable energy generation to supply vessels."
- Although the CMDC is now closed, the document DfT Decarbonising Transport - A Better, Greener Britain published in 2021 states the Government intends to build on its success: *"We will explore the establishment of a UK Shipping Office for Reducing Emissions (UK-SHORE). This is a dedicated unit within the Department for Transport focused on decarbonising the maritime sector. UKSHORE will build on the success of the CMDC, delivering a suite of interventions inspired by our experience with decarbonising other transport modes, looking at programmes such as the Office for Zero Emission Vehicles and the Future Fuels for Flight and Freight Competition."*
- Apart from any potential Government schemes to support onshore power supply, there are other funding schemes that could be investigated. In the case of Southampton's first onshore power supply from the national grid, it received support from HM Government's Local Growth Deal that provides funds to Local Enterprise Partnerships (LEPs) for projects that benefit the local area and economy, which together with working in partnership with Carnival UK enabled onshore power to be installed. This has been so successful that port operator, ABP have announced a second onshore power supply terminal will be installed, with continued support from Carnival UK.

- In respect of the Portland Port onshore supply provision, the Dorset LEP, cruise ship operators, the MoD, other port users, and Portland Port Ltd, could, with the support from Richard Drax MP, potentially work in partnership to ensure clean power can be installed at Portland Port. Southampton has already proved it is feasible to get the required backing and are now planning a second onshore power installation.
- There is another alternative that Powerfuel and Portland Port have completely overlooked and that is a method used in other ports already, such as the Port of Hamburg. According to Green Cruise Port: *“the use of a Liquefied Natural Gas (LNG)-power-barge, can be an alternative in cases where high investment costs for grid connection is the main barrier. A LNG barge is also possible to move and increased utilization of the investment can be obtained through alternative use.”*
- Although a LNG barge is not zero emissions, the emissions are greatly reduced and this technology is accepted by the International Marine Organisation and could be a temporary measure, whilst all ships work towards being powered by zero emissions technology.
- Powerfuel’s proposal for a waste incinerator at Portland Port with the **“key element of the proposal being the provision by the plant of shore power for shipping in Portland Harbour”** is misguided, as a waste incinerator is unable to supply zero emission onshore power it is **the wrong technology in the wrong location.**

Construction and Design

The nature of the construction – design and fabric is wholly incongruous with the visual aspect of the proposed site. PTC strongly objects to the design and visual appearance of the Incinerator. PTC has a made and adopted Neighbourhood Plan which specifically refers to the design aspect of planning applications, and was created following a special Heritage and Character study, approved through public consultation.

The policy states:-

Portland Neighbourhood Plan policy EN7 Design and Character

Development proposals will be expected to be of a design which:

- i. complements the prevailing size, height, scale and mass, materials, layout, density and access of the existing surrounding development;
- ii. be of high quality design and use locally appropriate materials and colours;
- iii. demonstrates that the development reflects and reinforces, as far as is possible, the existing character of the locality as identified in the Portland Heritage and Character Assessment and applies the principles set out in the conservation area appraisals where appropriate; and iv.
- iv. wherever possible, incorporates and enhances existing landscape features as part of an appropriate level of landscaping.

Height of Stack

Documentation and feedback constantly refers to the stack being of insufficient height to effectively prevent risk to human health. The chimney nestles into the cliff behind and means emissions are at residential level in local apartment blocks. PTC objects to the planning application on grounds that the stack in this location, when taken in conjunction with the topography immediately surrounding, places unacceptable risk to human health. PTC reminds of the risk to the significant number of nearby residences, the HMP The Verne Prison, and those working in the vicinity of the Port. In relation to the unique local climate, the stack is not modelled

to be high enough to guarantee safe clearance of the toxic particulate emissions, and on rainy or foggy days, the droplets will bring the pollution straight back down to ground, thereby risking human health.

Landslip

PTC is aware of landslips on a regular basis at the proposed construction site, and registers strong concern about the stability of land. It is understood that a landslip occurred only recently at Portland Port. PTC is not confident that sufficient attention has been given to this issue, and is concerned about serious risks of future landslips compromising the safety of the building and its safe operation. Whilst the matter of potential fire has been (inadequately) addressed through a Fire Plan, there is no reference to managing a critical incident brought about by landslip. With the proneness to landslip of this particular location, PTC asserts that the management of this risk should be technically assessed as part of the Planning determination.

End of Life Operation

PTC is concerned that with rapidly advancing technology, this proposed plant, which operates at a less effective level than other technologies, and which emits comparatively high levels of toxic particulates, will become obsolete within a matter of years. PTC therefore requests that a full dismantling strategy should be required as part of the planning determination. Failure to do so would leave the location, residents and wildlife at risk of contamination.

Planning Process

PTC would like to point out that it has received a number of complaints that numerous queries to Dorset Council in respect of this planning application have not been addressed. Additionally request from the Clerk to Dorset Council's Environment Team to engage with the Permit Application did not receive any response whatsoever.