



Public Health
England

Environmental Hazards and
Emergencies Department
Centre for Radiation, Chemical and
Environmental Hazards (CRCE)
Seaton House
City Link
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Nottingham
NG2 4LA

www.gov.uk/phe

Our Ref: CIRIS 57942

Your Ref: WP/20/00692/DCC

Adrian Lynham
Planning and Community Services
Dorset Council
County Hall
Colliton Park
Dorchester
DT1 1XJ

[by email]

Date: 24th August 2021

Dear Adrian,

Planning Application for: Portland Port, Castletown, Portland, DT5 1PP

Thank you for forwarding a copy of this application to the Centre for Radiation, Chemical and Environmental Hazards (CRCE) at Public Health England (PHE) on 19th August 2021.

PHE exists to protect and improve the nation's health and wellbeing and reduce health inequalities; these two organisational aims are reflected in the way we review and respond to consultations, although we note that we are not a statutory consultee for local planning applications.

We have previously provided comments (21st December 2020) to the planning application for this installation, in relation to activities for the development of an advanced energy recovery facility (ERF) with ancillary buildings and works. We have also provided a response to the environmental permit application in relation to this installation (13th August 2021) where we made some specific recommendations which are also applicable to this planning application and you can find this response attached.

We request that Dorset Council takes account of the following additional recommendations when considering permitting the application:

- The application does not evaluate potential impacts on air quality from the backup generators. Further information on the quantity, testing regime and usage of the backup generators should be provided to demonstrate that emissions will not be a significant risk to public health.

Reducing public exposures to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards has potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure), and maximise co-benefits (such as physical exercise) and encourage their consideration

during the design, environmental and health impact assessment, implementation, and post-implementation monitoring stages.

The planning authority may wish to contact the local authority public health team for matters relating to wider determinants of health associated with this development/proposal.

Yours sincerely,

Emily Cheek
Environmental Public Health Scientist

cc
Public Health England South West, Health Protection Team
Dorset Council, Public Health Team



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Permitting Support Officer
Environment Agency
Permitting Support Centre
Quadrant 2
99 Parkway Avenue
Sheffield
S9 4WF

Date: 13th August 2021

Dear Permitting Support,

Environmental Permit application for Portland Energy Recovery Facility, Incline Road, DT5 1DB
Application Reference: EPR/AP3304SZ/A001 (CIRIS 57565)

Thank you for forwarding a copy of this application to the Centre for Radiation, Chemical and Environmental Hazards (CRCE) at Public Health England on 11/06/2021.

We have provided comments (21st December 2020) to the planning application for this installation, in relation to activities for the development of an advanced energy recovery facility (ERF) with ancillary buildings and works.

The main emissions of potential concern are point source emissions to air from the energy recovery facility.

Public Health England (PHE) has reviewed research undertaken to examine the suggested links between emissions from municipal waste incinerators and effects on health (<https://www.gov.uk/government/publications/municipal-waste-incinerators-emissions-impact-on-health>). PHE's risk assessment is that modern, well run and regulated municipal waste incinerators are not a significant risk to public health. While it is not possible to rule out adverse health effects from these incinerators completely, any potential effect for people living close by is likely to be very small. This view is based on detailed assessments of the effects of air pollutants on health and on the fact that these incinerators make only a very small contribution to local concentrations of air pollutants.

Recommendations:

We request that the Environment Agency takes account of the following concerns when considering appropriate permit conditions:

- that the air quality modelling used is suitable and accurately reflects the local topography and provides reliable estimates of reasonable worst-case ground level pollutants
- that an assessment against the tolerable daily intake (TDI) of dioxins, furans and other considered metals for the oral pathway at the worst-case receptors is conducted

- a full Construction Environmental Management Plan (CEMP) is submitted prior to development detailing environmental management measures ensuring these are appropriate and address potential risk to human health
- that a Pre-Operational Condition is included within the EP which requires the details of the proposed NOx abatement system to be confirmed during detailed design
- that additional gas monitoring is required as the proposal to redevelop the site progresses
- when transport and commercial activity return to more business as usual a noise survey is conducted, with the results being used as a basis for confirming noise emission limits and designing the ERF accordingly
- further ground investigation across the site, adhering to appropriate standards, to fully assess the potential for contamination which could impact the proposed redevelopment of the site and the potential associated health impacts

The applicant has used the COMEAP methodology which is not generally recommended for modelling the human health impacts of individual installations. However, it may have limited applicability where emissions of NOx, SO2 and particulates cannot be screened out as insignificant in the Environmental Impact Assessment, there are high ambient background levels of these pollutants, and that its use was appropriate.

The recommended approach is therefore the use of the methodology set out in the guidance for comparison for most pollutants (including metals) and dioxin intake model using the HHRAP model for dioxins, furans and dioxin like PCBs. PHE would recommend that this model is used in this instance.

Any information arising from these recommendations should be sent to Public Health England for consideration when it becomes available. Such information could affect the comments made in this response.

This consultation response is based on the assumption that the permit holder shall take all appropriate measures to prevent or control pollution, in accordance with the relevant sector guidance and industry best practice.

Yours sincerely,

Emily Cheek

Environmental Public Health Scientist