



Powerfuel Energy Recovery Facility (Portland ERF)

Proposal Summary

February 2023

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1. Introduction

1. Powerfuel Portland Limited (**Powerfuel**) submitted its application (reference number WP/20/00692/DCC) for a nominal 183,000 tonne per annum (maximum 202,000 tonnes per annum) ~15MWe Energy Recovery Facility (**ERF**) in September 2020.
2. The application is expected to be considered by the Dorset Council Strategic and Technical Planning Committee at its scheduled meeting on 6th March 2023.
3. Given the 2.5 years since the original submission and the multiple planning officers, internal specialists and independent consultants Dorset Council has engaged to review the application Powerfuel believe it would be helpful to clearly set out the benefits of the proposal, the identified negative impacts and its conclusion in respect of the planning balance with reference to objective supporting evidence to justify this position.
4. We have included references for the information provided and the statements made in this report, much of which refers to documents submitted to Dorset Council that have been subject to intensive interrogation by Dorset Council and its independent technical adviser (Tetra Tech).
5. The Portland ERF is fully consistent with national and local waste policy. Extant national policy supports efficient energy recovery from residual waste as *“the best management option for waste that cannot be reused or recycled in terms of environmental impact and getting value from the waste as a resource. It plays an important role in diverting waste from landfill”* (DEFRA 2021 ⁱ). Within Dorset, the current waste plan clearly states *“Dorset should as far as practicable aim to ensure that there is sufficient capacity available within the Plan area to deal with its waste arising”* (Dorset Waste Plan 2019 ⁱⁱ). Currently Dorset has no final treatment plant for its residual (post-recycling) waste and all volumes are exported and processed out of county.
6. Dorset Council has advised Powerfuel that it wants to ensure the determination process for this application is comprehensive, objective, robust and transparent, and to ensure the decision is made in line with UK law, national and local planning policy and planning guidance.
7. To ensure this transparency in the event that the Dorset Council Planning Officer’s Committee Report significantly disagrees with any of the conclusions presented in this paper then Powerfuel recommends that the Planning Officer’s Committee Report clearly identifies the basis for this disagreement and provides justification for the position. This will allow any differences to be scrutinised at Committee and avoid the risk that Committee Members reach a decision that may not be justified by the technical evidence and therefore liable to challenge.

2. The Planning Balance

The paragraphs below build on the Planning Supporting Statement and comprehensive documentation submitted as part of the application. They set out in summary Powerfuel's assessment of the merits of the proposal and planning balance by considering the multiple identified positive benefits of the Portland ERF and the limited potential negative impacts.

The analysis references key clauses in the National Policy Planning Framework (NPPF) where applicable to provide justification for the position stated.

Powerfuel's planning advisor, Terence O'Rourke, has reviewed the weightings below to ensure that these are appropriately balanced and broadly consistent with other Local Authority Officer reports in respect to decision making on other ERF planning applications.

Benefits of the Portland ERF:

1. The Portland ERF will provide the only potential near-term (pre-2036) viable source of electricity to enable Portland Port to provide shore power to visiting cruise ships, to guarantee and ensure the continued growth of the cruise business that generated £8m for the Dorset economy in 2022. The benefit of shore power also extends to stationed Royal Fleet Auxiliary vessels and any other equipped commercial vessels, leading to substantial environmental and economic benefits for the Ministry of Defence and other marine businesses. The ERF shore power will protect the future of the port and help to create the conditions in which Portland Port can expand and adapt by removing a major barrier to investment (lack of suitable and secure power supply). Without shore power the Port risks losing the cruise business it has worked hard to attract to competitor ports who can provide it. According to the British Ports Association this would be the first shore power facility provided without public subsidy in Europe ⁱⁱⁱ, deliverable as it is a positive co-benefit of a high quality waste solution for Dorset. In line with NPPF 81 given the support provided by this application for economic growth this benefit should be afforded **very substantial positive weight**.
2. Use of residual waste as fuel to generate energy and assist in the diversion of waste from landfill to deliver more sustainable waste management at a higher level in the waste hierarchy is a further significant benefit and is fully in accordance with national policy. This benefit should be afforded **significant positive weight**.
3. The Portland ERF provides new waste management capacity that will contribute to Dorset meeting its identified residual waste management need in line with the principles of self-sufficiency and the proximity principle (enshrined within the Dorset Waste Plan) and reduce the existing reliance upon the export

of residual waste to waste management facilities outside of Dorset, without prejudicing other Dorset Waste Plan sites from coming forward. This benefit should be afforded **significant positive weight**.

4. Reduction in the cost of managing Dorset's residual waste, as a result of reduced costs associated with transporting waste to other facilities outside of Dorset, and the avoidance of landfill related charges. **This benefit should be afforded moderate positive weight.**
5. The site's location within a commercial port provides potential opportunities for residual materials arising from the process to be transported sustainably by sea to appropriate existing recycling plants (for the production of recycled aggregate building products), reducing local traffic impacts, an advantage that no other allocated site in Dorset could achieve. This should be afforded **moderate positive weight**.
6. Provision of a new significant source of non-intermittent, dependable baseload energy generation that increases energy security for Dorset and provides energy generation on Portland that will facilitate the growth of local business and industry. This benefit should be afforded **moderate positive weight**.
7. Reduction in climate change impacts associated with the management of Dorset's waste as a result of lower landfill volumes (direct and/or indirect) and lower transport carbon costs. This benefit should be afforded **moderate positive weight**.
8. The Portland ERF, applying conservative shore power usage assumptions, will result in an improvement in air quality across the majority of the local area as a result of the shore power provision (due to the removal of existing unabated diesel emissions from vessels in port) ¹. This benefit should be afforded **moderate positive weight**.
9. Provision of a heritage mitigation programme that will ensure managed public access to currently inaccessible heritage assets and funding to restore these assets, which will result in the removal of a Scheduled Monument from Historic England's "at risk" register. This mitigation outweighs the "*less than substantial harm*" to the nearby asset settings creating a net heritage benefit that should be afforded **moderate positive weight**.
10. Provision of a permissive path that will provide public access through currently inaccessible parts of the Portland Port estate that will complete the "round the island" footpath. This will benefit local leisure activities and can enhance the experience of users of this part of the South West Coast Path and the England Coast Path. This benefit should be afforded **moderate positive weight**.

¹ We note the improvement in air quality will be even greater if District Heating is provided (as expected) but this is not considered as part of the weight applied here

11. Socioeconomic benefits including a £150m private sector investment that will provide 300 construction jobs, 35 full time permanent jobs and 60 indirect jobs in a key employment zone. This benefit should be afforded **moderate positive weight**.
12. The Portland ERF provides an identified and credible opportunity to provide district heating to two local prison facilities that will result in further improvements in air quality, reductions in carbon emissions and cost savings for the Ministry of Justice. The form of legal agreement, a Memorandum of Understanding with the Ministry of Justice has been agreed, a viable commercial case has been presented and the route from the Portland ERF to the offtakers has been analysed to demonstrate there is limited/no planning risk associated with this proposal. The benefits of supplying the prisons (effectively UK Government credit risk) provides investor confidence to fund the upfront cost of the district heating network. This will then create an opportunity to extend this cornerstone heat network to other parts of Portland where heat produced by the ERF (that otherwise will not be used) could be priced to target fuel poverty alleviation. Given the analysis provided this benefit must reasonably be seen as being deliverable and should be afforded **moderate positive weight**.

Negative Impacts:

13. The ERF has been carefully designed in consultation with Dorset Council landscape and planning officers and Dorset AONB landscape officers to minimise its effect on the surrounding environment as far as practical. The proposed development will have some negative visual impacts but, with the exception of some very localised impacts, these will not be significant. No significant effects are predicted on the character of the landscape or seascape. Visual effects from the Dorset AONB, West Dorset Heritage Coastline and the Dorset and East Devon Coast UNESCO World Heritage Site will be slight and not significant. Significant visual effects will be felt only within the area of Portland Port and the breakwaters, including the Sailing Academy, Portland Marina and Portland Harbour, public rights of way immediately adjacent to the site, Sandsfoot Castle and Nothe Fort. In the majority of these areas receptors are transitory. The highest degree of effect predicted is moderate or moderate to slight. In the planning balance the visual impact should be given **moderate negative weight**.
14. The ERF would result in some minor environmental impacts which have the potential to influence local levels of traffic, noise, and dust but the magnitude of the effects will be within established limits and are capable of being mitigated through planning or environmental permit conditions. It is therefore appropriate to give these impacts neutral to **very minor negative weight**.
15. For completeness it is noted that limited negative impacts were initially identified to the setting of heritage assets. However, a programme of

mitigation has been agreed and the Dorset Council Senior Conservation Officer has confirmed that this more than outweighs these impacts such that a net heritage benefit is created by the proposals^{iv}. As a result, any setting impacts should be given **no negative weight** (as overall the proposals result in a net heritage benefit).

Overall Planning Balance:

16. The ERF is a proven and best available technology that meets the R1 efficiency criteria and is recognised as a recovery facility within the waste hierarchy. It is essential to enable Dorset to manage its waste in accordance with national and local policy, reduce costs, generate in-county baseload low carbon electricity and deliver significant savings in carbon emissions, when compared to its current waste management practices.
17. It also provides the only near-term opportunity to provide shore power at Portland Port, to guarantee and ensure the continued growth of the cruise business which generated over £8m for the Dorset economy in 2022. Failure to secure shore power will place Portland Port at a significant competitive disadvantage and put its future prospects at risk, with clear impacts for the local economy.
18. The ERF will generate low carbon electricity and reduce the carbon impacts of the management of local waste volumes. It clearly represents sustainable development.
19. Paragraph 8 of the NPPF confirms that decisions should apply a presumption in favour of sustainable development except where *“any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”*.
20. Paragraph 158 of the NPPF states that when determining planning applications for renewable and low carbon development, local planning authorities should (a) not require applicants to demonstrate the overall need for renewable or low carbon energy and (b) approve the application if its impacts are (or can be made) acceptable.
21. In relation to waste policy paragraph 7 of the National Planning Policy for Waste (**NPPW**) confirms that when determining planning applications, decision makers should *“only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where proposals are not consistent with an up-to-date Local Plan.”* Noting the recency of the Dorset Waste Plan, and the clear demonstration of this proposal’s compliance with Policy 4 and in particular paragraph 6.11 of the Plan (given the advantage that the Portland site provides over other allocation sites), no demonstration of need is required. If Dorset Council disagrees with this position then we further note that paragraph 7 of the NPPW continues *“In*

such cases, waste planning authorities should consider the extent to which the capacity of existing operational facilities would satisfy any identified need". This clearly states that only existing operational facilities can be taken into account (not allocated sites or even permitted sites that have not been built). Dorset does not have any existing operational facilities and therefore the need for the Portland ERF is clearly demonstrated.

22. The extant consent granted for an energy generation plant using a waste fuel demonstrates that this site has previously been accepted as a suitable location for an industrial facility generating electricity. Furthermore we note that the former Dorset Waste Partnership (**DWP**), the former Dorset County Council Economic Development team and their consultants (Eunomia) held multiple meetings with Portland Port across 2017-2018 to establish the potential for a residual waste management facility at Portland Port. We understand Dorset did not progress due to financial and timing constraints but assured Portland Port that they would continue dialogue with them and that the Port would be considered as a potential location for waste management as DWP developed their long term strategy for managing local waste arising.
23. The existing context of Portland Port as a working commercial port assists with reducing the visual impact of the ERF, noting that there is no significant impact identified from the Dorset AONB. The Port includes a number of large industrial buildings and infrastructure of a similar height, and frequently hosts vessels that are larger than the Portland ERF.
24. The ERF has been carefully designed in consultation with Dorset Council landscape and planning officers and Dorset AONB landscape officers to minimise its effect on the surrounding environment as far as practical. However, it is acknowledged that a development of this scale cannot be undertaken without some adverse visual impacts, noting that due to the design these will be highly localised to the site location. The Overarching National Policy Statement for Energy (**EN-1**) acknowledges that it is almost impossible to carry out a large infrastructure development without some level of visual impact and therefore it is appropriate for the planning decision to balance any level of visual harm against the benefits of the project in the wider planning decision.
25. The assessment of the planning balance here should be clear to Dorset Council.
26. The multiple public benefits of the proposal should be allocated very substantial, significant or moderate positive weight as outlined above.
27. The moderate negative effects identified relate to highly localised visual impact effects that do not include any landscape designated areas (e.g. AONB). These residual effects (post design/embedded mitigation) should be

considered against the multiple project benefits in accordance with the guidance in EN-1.

28. There are no material considerations that in isolation or together would warrant the refusal of the application.
29. Given these considerations the Dorset Council Planning Officer should confirm their strong support for this application on the basis of the correct application of planning policy and, consequently, the Strategic and Technical Planning Committee should find in favour of the grant of planning permission for the development.

3. Proposal Benefits

The Portland ERF will deliver the following positive benefits to the local area and Dorset.

1. **Shore Power: the Portland ERF is the only potential near term (pre-2036) source of electricity to enable Portland Port to provide electric shore power to visiting cruise ships, to guarantee and ensure the continued growth of a business which generated £8m for the Dorset economy in 2022. Failing to provide shore power is likely to result in a decline in direct and indirect cruise related employment and a decline in local wealth creation.**

- Over 100,000 tourist visitors arrived at Portland Port by cruise ship in 2022, generating in excess of £8m for the local economy. This is expected to continue to grow with more than 130,000 visitors expected in 2023.
- Whilst in port the cruise ships generate power by burning diesel. This results in emissions of unabated particulate matter, nitrogen dioxide and sulphur dioxide that reduce air quality as the ships do not have the sophisticated emission reduction technology that will be part of the ERF. This process also results in carbon dioxide emissions that contribute to climate change.
- The alternative is shore power where cruise ships are powered by an on-shore electricity source. Southampton installed shore power in 2022 ^{vi}; Dover has announced it will do this by 2030 ^{vii}; and Portsmouth plans to do so by 2025 ^{viii}. To provide shore power requires either local grid capacity or local on-shore generation.
- Over 60% of the cruise ships calling at Portland Port in 2023 are already capable of taking shore power. In addition, Royal Fleet Auxiliary (RFA) vessels were docked at Portland Port for over 400 berthing days in 2022 and all its ships are shore power enabled but currently are forced to burn diesel while berthed as there is no shore power option available ^{ix}.
- The industry trade body (CLIA) has announced that by 2035 all cruise ships will be equipped to use shore power, with an expectation that this might be achieved by 2030.
- Carnival Corporation, the world's largest cruise operator, has written to Dorset Council to confirm its aim to transition to shore power and confirmed that the provision of shore power at Portland would "*ensure that it remains an attractive destination for inclusion for Carnival Group cruise calls*" ^x.
- Portland Port has advised Powerfuel that a number of its other large cruise customers, including some in the top five globally, already own shore-power enabled vessels that call at Portland Port. Feedback from these customers is that there is an increasing focus on sustainability within the

industry, that there is strong appetite to use shore power whenever available and, conversely, going forward if shore power is not available then this could impact on future itineraries.

- Local electrical grid constraints mean that the Portland ERF is the only way that power can be generated and supplied to vessels at Portland Port. The original application noted that a shore power grid connection was not commercially viable due to these constraints as the cost of reinforcement works would be prohibitive. This remains the case.
- However, since the submission date the wider National Grid network position has deteriorated. SSE (the local grid operator) has indicated that any significant connection in the Chickerell GSP network area (the same area as the Portland ERF) is likely to result in National Grid network upgrades with an expected completion date in 2037. This is because a grid offer for 2,500MW was accepted at Chickerell in late 2022 with a connection date in December 2036 ^{xi}. As a result any other significant connection in the area is delayed until after this time. As such, even if connection to the grid was commercially feasible (which is not the case), it will not be possible to deliver shore power at Portland from the National Grid for over ten years.
- The ability for the Portland ERF to provide a shore power solution was a key reason for selecting this site location. The benefit provided by shore power in terms of ensuring continued economic prosperity for the local economy and improving air quality in the local area (see below) is a key advantage that this location provides over any other allocated site in the Dorset Waste Plan.
- If Portland Port is unable to offer shore power then it will be at a competitive disadvantage to other UK and European ports. This is likely to result in a lower number of cruise ship calls and a reduction in visitor numbers and tourist spend in Dorset. This will inevitably have an adverse impact on Portland Port and those local travel and tourism businesses connected to these activities.

2. Waste Need: the Portland ERF will enable Dorset to take responsibility for its waste, in line with national requirements and the Dorset Waste Plan. Dorset currently is unable to do this as it does not have the required facility and instead it exports its post-recycling waste out of county for others to manage, contrary to national policy. The ERF provides a more responsible, self-sufficient opportunity for Dorset.

- Dorset Council's latest published waste figures confirm that 840,000 tonnes of household and commercial/industrial waste is generated within Dorset each year and this is forecast to grow by 20% to over 1,000,000 tonnes in 2033 ^{xii}.

- Dorset has increased its recycling rates from 29% (2003/4) to 59.6% (2019), putting Dorset in the top three comparable authorities in the UK ^{xiii}.
- However, unlike the majority of other UK local authorities, Dorset has no final treatment plant for its residual (post-recycling) waste. Currently all volumes are exported and processed out of county.
- The Portland ERF has a nominal capacity of 183,000 tonnes per annum and maximum design capability of 202,000 tonnes per annum – as such given the waste volumes there is clearly a need for this project, and others like it, in the county to ensure Dorset can appropriately manage its waste volumes going forward.
- Dorset Council has not been able to confirm how or where its residual (post-recycling) waste is processed. It is understood that historically some volumes have been landfilled with the remaining residual (post-recycling) waste exported to other parts of the UK/Europe to be processed in a similar facility to the Portland ERF. Dorset has historically entered into short term contracts with a number of out-of-county destinations, some of which (e.g. Hampshire) have confirmed they will look to prioritise the processing of their in-county waste going forward which could mean this option may no longer be available to Dorset. Some of Dorset’s residual waste may be sent to the Bridgewater ERF in Somerset (a plant with 100,000 tonne processing capacity) but there would remain sufficient residual waste for the Portland ERF and other allocated sites that may come forward in the future. As summarised below waste volumes sent out of county effectively displace other waste and ultimately indirectly lead to a higher level of UK landfill and/or an increase in exports to Europe, both of which result in higher costs and carbon impacts.
- The Portland ERF will enable Dorset to take responsibility for managing its own waste in a more sustainable way.
- Letters of support for the Portland ERF proposal have been sent to Dorset Council from Beuparc Group, the operator of the established recycling facility at Canford Magna, confirming its intention to supply post-recycling waste arisings from Dorset to the Portland ERF. Powerfuel has also agreed with Dorset Council that it will look to source waste volumes from the Dorset (including BCP) areas provided these can be secured on acceptable commercial terms and that it will also compete in any material procurement rounds for these areas.
- This should allow residual (post-recycling) Dorset waste to be managed within the county close to where it is produced, allowing Dorset Council to comply with national and local planning policy regarding the proximity and self-sufficiency principles.
- Dorset’s Waste Plan^{xiv} is founded upon these fundamental principles, noting that the county should “*ensure that there is sufficient capacity to deal with*

its waste arisings". This is currently not the case as there is no final treatment capacity. Dorset has adopted successive waste plans (2006 and 2019) that included policies and identified allocated sites that could have been brought forward but were not, at least not successfully. We note in this context for example, the failed New Earth project at Canford that looked to use advanced combustion technology that has proven to be technically difficult.

- The Planning Inspectorate report ^{xv}on the Waste Plan noted the requirement to "*...facilitate the treatment of an increased tonnage of waste to enable increased recovery within the County, instead of transporting waste to landfill or recovery facilities outside of Dorset, as happens at present.*" The Portland ERF provides the opportunity for Dorset to begin to meet this requirement.
- It is noted that the last Dorset Council decision relevant to residual waste appears to be the approval in October 2021 to extend of the life of one of the closed / non-operating landfills in Dorset, granting a ten year extension to reopen and fill the Beacon Hill landfill north of Poole. This appears contrary to national policy, the general direction of travel and Dorset's declaration of a Climate Emergency.
- The ERF should also reduce the cost of managing Dorset's waste given the reduction in transport costs and the avoidance of landfill costs. In common with many local authorities, post pandemic, Dorset Council budgets are under pressure and it is appropriate for authorities to seek a more cost effective waste management solution.
- Failure to approve the Portland ERF would be contrary to Dorset Council's responsibilities to manage its own waste, mean continued non-compliance with national and local policy, and result in additional financial and carbon costs for Dorset taxpayers.

3. Energy Security: the Portland ERF will make a significant improvement to Dorset's energy security and provide additional generation on Portland which is currently constrained

- Relative to the national position Dorset has a very low level of baseload (i.e. 24/7) generation capacity. There is a single 45MW gas plant at Chickerell but there is no other significant baseload generation in Dorset ^{xvi}.
- The Portland ERF has a baseload generation capability of ~18MW, of which ~15MW will be available for export. It will therefore be the second largest baseload generator in Dorset and provide a significant addition to Dorset's overall energy security in line with national policy. Unlike other forms of renewables (i.e. wind/solar) this power is non-intermittent (i.e. dispatchable power) and can provide electricity on demand, which will be

increasingly important as the UK transitions away from fossil fuel generation.

- There is limited capacity on the existing grid connection between Portland and Weymouth. The Portland ERF will provide generation capability on Portland and help facilitate the growth of local business and industry.
- We note the recent establishment of the Department for Energy Security and Net Zero. The Portland ERF provides significant new domestic baseload generation (i.e. energy security) that is low carbon (i.e. contributing to net zero).
- As such the Portland ERF is fully in-line with current government policy regarding energy generation. The Government has stated a clear focus (reference the British Energy Security Strategy ^{xvii}) to deliver new domestic (ideally low carbon) generation sources to ensure the UK improves its energy security going forward following the economic effects of the Ukraine conflict and the Portland ERF will help meet this requirement.

4. Climate Change: the Portland ERF is an energy recovery technology and is nationally recognised as low carbon generation. As such it is fully aligned with Dorset’s declaration of a Climate Emergency.

If Dorset continues to landfill or export its waste, as opposed to processing it locally to generate renewable energy, this will increase its climate impact in direct contravention of its Climate Emergency declaration.

- Dorset Council’s latest published waste figures confirm that 840,000 tonnes of household and commercial/industrial waste is generated within Dorset each year and this is forecast to grow by 20% to over 1,000,000 tonnes in 2033 ^{xviii}.
- Post recycling the residual waste can only be disposed of in two ways:
 1. *Landfill* – this was the historic approach of Dorset Council and other UK authorities as it was a low cost option. In 1996 the Conservative government, recognising the environmental impact of landfill, introduced a significant landfill tax to discourage the activity but due to a lack of UK incineration capacity this still remains the lowest cost option for some authorities.
 2. *Incineration* – the only alternative to landfill is to incinerate the waste. This reduces the climate impact and allows the recovery of energy. The vast majority of UK facilities only recover electrical energy and therefore are less efficient. The Portland ERF will be able to recover heat and Powerfuel has advanced discussions with the nearby Ministry of Justice prisons to supply this heat directly, resulting in further carbon emission reductions. This would make the Portland ERF a relatively high efficiency project across the UK fleet.

- Objectors to the Portland ERF claim the project is not required, because Dorset Council and businesses can just continue to export their waste volumes out of county for management by another authority (or country). However, this approach evidences a degree of irresponsibility in terms of waste management but also a misunderstanding in terms of the associated benefits of an ERF. Whilst this approach means that the waste management responsibility is passed to neighbouring areas/countries it also means that the benefit of energy produced is received elsewhere. This approach also leads to negative climate impacts and is contrary to the self-sufficiency and proximity principles enshrined in national policy and reflected within the Dorset Waste Local Plan.
- In 2021 approximately 26.5 million tonnes of post-recycling (residual) waste was generated in the UK. Approximately 35% of this waste (9.28 million tonnes) was sent to landfill and approximately 8% of this waste (2.12 million tonnes) exported outside the UK ^{xix}. This clearly demonstrates that there is no national ERF capacity oversupply issue and, given there is no capacity in Dorset, there is clearly no local oversupply concern.
- Dorset Council, by not managing its own waste in Dorset, is effectively exporting its waste responsibilities to other parts of the UK and adding pressure to those areas.
- As the UK currently landfills waste the logical conclusion can only be that either (a) Dorset's waste is directly adding to landfill volumes by other authorities (i.e. another authority takes Dorset's waste and landfills it) or (b) Dorset's waste is incinerated in other parts of the UK but this displaces other areas' waste that would otherwise have been incinerated such that this waste then has to be landfilled, i.e. Dorset is indirectly adding to landfill volumes by other authorities. Dorset Council has repeatedly stated that it cannot confirm what the end treatment of waste exported out of county is, or even exactly where this waste is exported to.
- When waste is landfilled methane is produced. Whilst some of this can be captured and combusted to produce electricity some is lost to the atmosphere. The United Nations Framework for Climate Change estimates that the global warming potential of methane is 25 times that of CO₂.
- Technical analysis was submitted and reviewed by Dorset Council's independent technical adviser (Tetra Tech). This confirmed that the Portland ERF (excluding district heating) would reduce Dorset's effective CO₂ equivalent emissions by around 27,000 tonnes per annum relative to the existing position where Dorset's waste effectively increases landfill volumes in the UK leading to significant climate change impacts ^{xx}.
- Objectors to the project have argued that as the UK may not landfill waste in the future then landfill is not a fair comparator.

- Objectors also argue the Portland ERF generates CO₂. This is correct, although we disagree with the volumes stated. However, it needs to be recognised that the waste already exists and already has a carbon footprint – it is not extracted solely to provide power and therefore comparisons with generation-only projects (e.g. solar, wind, gas, etc) are not appropriate.
- As noted above, the only options available are landfill and incineration, with the latter having significantly lower climate change impacts.
- It should be obvious that the direct CO₂ equivalent emission impact from combusting waste is the same whether the waste is combusted at Portland or elsewhere. The only differences in project total emissions are related to (a) transport costs and (b) differences in carbon displaced by generating power or heat.
- Dorset Council requested analysis comparing the carbon emissions for the Portland ERF to be compared against sending its residual waste to (a) other Dorset facilities, (b) other UK facilities and (c) other European facilities.
- The submitted analysis, reviewed by Dorset Council's independent technical adviser (Tetra Tech), demonstrates that other UK facilities perform worse than Dorset facilities if used to manage Dorset's waste, because transport carbon costs are higher with no identified carbon displacement benefits to offset these higher carbon costs.
- The analysis further confirms that any similar sized facility in Dorset (i.e. other options identified in the Dorset Waste Plan that may be available in the future) would result in net emissions of approximately 48,000 tCO₂e per annum. This figure is significantly lower than figures claimed by objector groups (which typically claim a tonne of CO₂e for each tonne of waste) due to a failure to understand the technical detail of the carbon calculation.
- The net emissions from the Portland ERF (excluding district heating benefits) are 43,182 tCO₂e per annum. This results in a carbon saving of approximately 5,000 tCO₂ per annum relative to other Dorset Waste Plan facilities as a result of the carbon displacement savings delivered by shore power.
- If the district heating network is also delivered (as expected) at Portland the saving against Dorset Waste Plan projects increases to approximately 8,200 tCO₂e per annum. In this scenario the project is comparable with highly efficient European facilities which benefit from developed municipal district heating networks.
- In summary the technical analysis, reviewed by Dorset Council's independent technical adviser (Tetra Tech), has shown that in all scenarios the use of the Portland ERF to manage Dorset's post-recycling waste results in a lower carbon impact than any other option available to Dorset Council and is significantly lower than the current practice of exporting

waste to other areas which, directly or indirectly, increases the volume of waste that is landfilled in the UK.

- The Portland ERF is therefore fully consistent with Dorset Council's Climate Emergency declaration.

5. **Air Quality: facilities such as the Portland ERF are now highly regulated at a national level to ensure that any air quality or health impacts are not significant.**

The Portland ERF will improve air quality across the majority of the area as the provision of shore power will mean that diesel generators currently used to power vessels at Portland Port will not be required. These diesel generators currently produce unabated particulate matter, nitrogen dioxide and sulphur dioxide.

- Older UK energy from waste plants were focused on disposal of waste as opposed to energy recovery and had only minimal environmental control measures resulting in significant air quality impacts.
- Environmental controls have significantly tightened. The Portland ERF will be built using the latest best available technology and will need to satisfy requirements set out and monitored by the Environment Agency or it will not be granted an environmental permit to operate. The Portland ERF will include significant environmental control measures to ensure any emissions are within the permitted levels.
- Technical analysis submitted as part of the environmental permit application demonstrates the air quality and health effects of the Portland ERF.
- The Environment Agency confirmed to Dorset Council at an early stage that air quality is covered by the environment permitting process and it is the Environment Agency's responsibility to regulate this. The Environment Agency confirmed that regulation of these matters is not a planning matter that falls under the Local Authority's remit ^{xxi}.
- Notwithstanding this, Dorset Council decided to engage an independent technical adviser (Tetra Tech) to review the analysis and requested further information. Having reviewed all analysis Tetra Tech confirmed to Dorset Council that the analysis was "*considered to be robust, competent and sufficient to determine that there is not expected to be a significant adverse impact as a result of the application site, therefore it is considered that the planning application should not be refused on the grounds of potential impact upon air quality*" ^{xxii}.
- At Dorset Council's request the Environment Agency has also confirmed directly to Dorset Council that the air quality assessment provided is acceptable for permit determination.

- The UK Health and Security Agency (previously Public Health England) confirmed to Dorset Council that it “*has no significant concerns regarding the risk to the health of the local population from the proposed development*”^{xxiii}.
- Further analysis was requested by Dorset Council to establish the air quality benefits of shore power. This analysis was based on the highly conservative assumption that 36 cruise ship vessels connecting to shore power for an average of 11 hours each, between the months of April and October (inclusive) and 260 days in which an RFA ship is in port. We note that there were over 400 berthing days in which an RFA ship was in port in 2022 (a c. 50% increase on the modelled levels) and that 58 cruise ship visits are scheduled for 2023 (a c. 60% increase on the modelled levels). The analysis also assumed that all on-board diesel generators for the cruise ships are modern with limited emissions, which is unlikely to be the case.
- The additional analysis^{xxiv}, based on the conservative assumptions described above, confirms the air quality improvements that the Portland ERF will deliver to the local area:
 1. For particulate matter there is a net benefit associated with the Portland ERF, because the emissions from on-vessel generators which will not be released are higher than the controlled level of emissions from the project.
 2. For nitrogen dioxide there is a net benefit for the majority of the area. Where there is an increase, this is very low representing an increase of 0.22% against the current levels on land.
 3. For sulphur dioxide there is a net benefit for the majority of the area. Where there is an increase, this is again very low representing an increase of 2.5% against the current levels on land.

6. Heritage / Public Amenity: whilst some harm has been identified in relation to the setting of nearby heritage assets a programme of restoration and provision of public access has been agreed to mitigate this. The Dorset Council Senior Conservation Officer has confirmed that the benefit of this mitigation outweighs any harm to these assets and results in a net heritage benefit.

- In their initial responses to this proposal Historic England and the Dorset Council Senior Conservation Officer (**Conservation Officer**) noted potential impacts on the setting of heritage assets.
- This was quantified by the Conservation Officer as “*less than substantial harm*” and capable of mitigation in line with planning policy.

- A Framework Heritage Mitigation Strategy was agreed through constructive consultation in August 2021. The strategy was produced with ecological, landscape and access issues fully considered and was deemed acceptable by all parties.
- It was identified that the East Weare Battery (**E Battery**), a Scheduled Monument, is currently on the Historic England “at-Risk” register. Powerfuel agreed to undertake a package of works to restore this asset including scrub clearance, a comprehensive survey and repairs to the asset, together with an agreed programme of “*annual maintenance and quinquennial survey*” to secure its longer term future.
- A number of the heritage assets, including the East Weare Battery, are currently not accessible to the public. As part of the proposals Powerfuel (with the agreement of Portland Port) will provide public access to, and interpretation of the East Weare Battery and the nearby A-D Batteries via a new access route. This will join two existing public rights of way and result in an “around the island” route. Interpretation will be provided for the A-E batteries, the former detention camp and the non-designated Second World War features.
- Notwithstanding the “*less than substantial*” harm identified to the setting of the heritage assets the Conservation Officer confirmed, subject to the mitigation being provided, there was an overall net heritage benefit which allowed him to confirm his support for scheme.

7. Socioeconomic Benefit: the Portland ERF site will result in a number of socioeconomic benefits including a £150m private sector investment that will provide around 300 direct jobs and 250 indirect jobs during construction and around 35 full time permanent direct and 60 indirect jobs during operations.

- There is an identified need for new economic investment at Portland to help address existing socio-economic concerns and generate sustainable growth. The Portland ERF will deliver a £150m private sector investment (of which around £50m is anticipated to be spent locally) that will result in the development of a site at Portland Port that has been vacant for over ten years.
- There is a need to create more high quality jobs to retain and attract younger people to the Portland area. The location is within a key employment site identified in the local plan and is identified in the neighbourhood plan as a vital employment zone. Powerfuel has agreed to provide two apprenticeship starts each year for Dorset residents and also provide traineeships to young people resident on Portland or students at Weymouth College.

- Portland Port and its tenants have expressed an interest in receiving direct supply of low carbon power (and potentially heat) from the Portland ERF which would result in a lower cost of energy for these businesses due to the avoidance of electricity grid costs.
- A community benefit fund of £100,000 per annum will be established to be used, as directed by a committee of local representatives to improve local climate and energy outcomes.
- Powerfuel will co-ordinate with Dorset Council to facilitate educational visits to enable students to understand the benefits of the ERF in relation to waste management for Dorset and also provide access to the (currently inaccessible) local heritage assets.
- Finally, the Portland ERF will result in significant annual fiscal benefits to Dorset Council through the payment of business rates expected to be around £600,000 per annum.

8. **District Heating: the Portland ERF is located close to two significant prisons, HMP The Verne (~500m) and HMP YOI Portland (~1.6km). Powerfuel and the Ministry of Justice have advanced commercial and technical discussions regarding the provision of heat from the Portland ERF.**

- All modern ERF projects are designed as “CHP-ready”. However, the majority (c. 80%) of operational UK energy recovery facilities are unable to export heat as there are no nearby demand users.
- Heat generated from these projects is not utilised, reducing efficiency and leading to lower energy recovery and higher carbon impacts.
- The Portland ERF will also be designed as “CHP-ready” but, importantly, Powerfuel has already identified a local demand for the heat at the two existing prisons. Supply of heat to the Ministry of Justice facilities is wholly consistent with the Government’s decarbonisation targets for public infrastructure to assist in the transition to net-zero.
- Powerfuel and the Ministry of Justice advanced discussions over a two year period which led to the agreement of a Memorandum of Understanding that will be signed shortly after planning permission is granted.
- The parties respective technical advisors (Arup and AECOM) progressed technical discussions in parallel that concluded that the supply of heat from the Portland ERF to the prisons is technically feasible. An environmental and planning review has been completed that did not identify any gating items that would frustrate the installation of the required infrastructure. As such there is no reason that this opportunity cannot be progressed should the Portland ERF be granted planning consent.

- Once the cornerstone network is in place with the prisons then it is anticipated that an extension of this network to supply other business and residential properties should be possible. This is a standard approach in Europe but less common in the UK due to under investment in heat networks.
- Objectors have suggested that implementation of a district heating network to serve the prisons is not commercially viable. This is incorrect. The commercial analysis indicates an internal rate of return over 30 years of 11.7% which, in cash terms, means that the proposed c. £9m investment would realise total cashflow receipts over time of c. £44m. Given the credit payment risk is against Government owned facilities this represents a strong return on invested capital.
- The Portland location provides a unique opportunity within Dorset to deliver an ERF facility with a credible plan to use the heat produced as part of the process and maximise the efficiency and energy recovery generated from Dorset's residual (post-recycling) waste. Other waste sites in Dorset do not enjoy these benefits.

4. Key Consultee Responses

Dorset Council consulted a number of key consultees to ensure that any potential negative impacts of the Portland ERF were identified, and appropriate mitigation agreed, to minimise any residual harm. Technical submissions from key consultees in relation to these potential impacts are noted below.

Aside from the recent Dorset Landscape response (which contradicts the two previous landscape responses that Dorset Council had already received) none of the key consultees has raised an objection in relation to the impact of the Portland ERF project.

Area	Key Consultee(s)	Response	Summary of Comments
Air Quality	Environment Agency Tetra Tech (TT) on behalf of Dorset Council (DC) DC Environmental Health	No objection	<ul style="list-style-type: none"> The EA has confirmed it is satisfied that the air quality assessment conclusions can be used for permitting purposes and that contributions from the ERF are unlikely to exceed any environmental standard TT (on behalf of DC) found the submitted documents to be robust, competent and sufficient to determine that no expected adverse impact is expected, and the application should not be refused on air quality grounds DC Environmental Health confirmed it supported the TT air quality review and has no objection
Human Health	UK Health Security Agency (UKHSA), previously Public Health England	No objection	<ul style="list-style-type: none"> UKHSA has confirmed it has no significant concerns regarding the risk to the health of the location population... and that any effects as a result of air quality, if they exist, are likely to be very small and not detectable
Ecology (Terrestrial and Marine)	Natural England (NE) Marine Management Organisation (MMO) Dorset Council / DTA Ecology	No objection to the ERF Holding objection pending further information from Dorset Council regarding future	<ul style="list-style-type: none"> NE have confirmed they have no objection in terms of potential effects from the Portland ERF alone. NE have requested further information regarding how Dorset Council will manage in-combination effects with other large scale projects should they come forward and submitted a holding objection until Dorset Council provide this information. We understand that Dorset Council has engaged

Area	Key Consultee(s)	Response	Summary of Comments
		planning decisions	<p>with NE and expect this holding objection to be removed.</p> <ul style="list-style-type: none"> Dorset Council (as the Competent Authority under the Habitats Regulations) is preparing an Appropriate Assessment with assistance from DTA Ecology that is expected to conclude that the proposal will not have an adverse impact The MMO has raised no significant concerns in respect to the marine environment
Landscape and Visual	<p>DC Landscape Officer (two different individuals)</p> <p>Tetra Tech (TT) on behalf of Dorset Council (DC)</p> <p>Dorset AONB Landscape</p> <p>Jurassic Coast Trust</p>	<p>No Dorset AONB or Jurassic Coast objection</p> <p>Two landscape responses (2020 and 2021) confirming broad agreement with the submitted LVIA and confirming no objection</p> <p>One recent landscape response (Dec 2022) suggesting an objection but with no details to justify this position</p>	<ul style="list-style-type: none"> There is no Dorset AONB Landscape or Jurassic Coast Trust objection Dorset Council had received two landscape responses, both of which confirmed there was no basis for an objection to the ERF: <ul style="list-style-type: none"> The original DC Landscape response submitted in October 2020 confirmed “no serious objections to the application” The independent Tetra Tech Landscape response submitted in December 2021 confirmed “there are no serious landscape objections to this application”. In December 2022 Dorset Council requested a further landscape response from a new DC Landscape Officer. The new landscape officer raised an objection to the proposals on the basis of highly localised impacts on non-landscape designated areas. However, there are multiple issues with his submission and he does not demonstrate how he applies the agreed LVIA methodology to reach a contrary position. Powerfuel has submitted a response to this late submission, highlighting the failure of the Landscape Officer, to the extent he disagrees with the detailed position set out in the submitted LVIA, to clearly show how he has followed the methodology to reach a different conclusion and requesting that he do so. If this is not provided, then these views can only represent an unsubstantiated opinion and should not be relied upon by Dorset

Area	Key Consultee(s)	Response	Summary of Comments
Cultural Heritage	Historic England DC Senior Conservation Officer	No objection	<p>Council.</p> <ul style="list-style-type: none"> • In their initial responses to this proposal both Historic England and the DC Senior Conservation Officer noted potential impacts on the setting of local heritage assets. • This harm was quantified by the DC Senior Conservation Officer as “less than substantial harm” and capable of mitigation in line with planning policy. • Historic England confirmed in August 2021 and February 2022 that it no longer needed to be consulted on this application. • A heritage framework mitigation strategy was agreed with the DC Senior Conservation Officer. • The Conservation Officer confirmed in October 2021 that, subject to the mitigation being provided, the mitigation resulted in an overall net heritage benefit and allowed him to confirm his support for scheme.
Traffic and Highways	DC Highways Highways England	No objection	<ul style="list-style-type: none"> • DC Highways confirmed that the submitted transport documents are satisfactory and robust. If confirmed that the residual cumulative impact of the proposal cannot be thought to be “severe” and consequently had no objection subject to an appropriate traffic management plan being agreed • Highways England also concluded that the transport assessment presents a suitably robust worst case scenario with regards to the traffic impact on the Strategic Road network and confirmed no objection.
Noise	DC Environmental Health (DC EHO)	No objection	<ul style="list-style-type: none"> • The DC EHO notes that the modelled predicted rating sound emissions do not exceed measured background levels at receptors • The noise assessment was accepted, subject to standard planning conditions

Area	Key Consultee(s)	Response	Summary of Comments
Land Contamination	DC Environmental Health (DC EHO)	No objection	<ul style="list-style-type: none"> The DC EHO raised no objection subject to planning conditions requiring any contamination to be mitigated appropriately
Light	DC Environmental Health (DC EHO)	No objection	<ul style="list-style-type: none"> The DC EHO confirmed that through good design and mitigation where required light spill beyond the boundary of the site will be minimised
Flood Risk and Drainage	DC Lead Local Flood Authority (DC LLFA)	No objection	<ul style="list-style-type: none"> The DC LLFA confirmed the site is largely within flood zone 1 (low risk of flooding) and is subject to an acceptable surface water strategy
Fire Safety	Dorset and Wiltshire Fire and Rescue (DWFR) Environment Agency	No objection	<ul style="list-style-type: none"> DWFR made some minor recommendations in respect to assisting firefighting which will be incorporated The Environment Agency has not raised any concerns. It will review and confirm the fire safety plan is acceptable as part of the Environmental Permit process

5. Analysis of Identified Impacts

The following areas have been identified as potential impacts of the Portland ERF.

1. Landscape and Visual Impact Assessment (LVIA):

- The Portland ERF is located outside the Dorset AONB and outside the World Heritage Site. The Dorset AONB Landscape Officer has confirmed there is no justification to refuse the application on the basis of any AONB impact.
- The Dorset Landscape Officer provided a response on 30th October 2020 confirming he did not have “*any serious objections*” to the application ^{xxv}.
- Dorset Council engaged an independent technical adviser (Tetra Tech) to provide a comprehensive landscape and visual impact review to ensure the final position was robust. The Tetra Tech landscape specialist provided a report on 9 December 2021 confirming that “*there are no serious landscape objections to this application*” ^{xxvi}.
- In November 2022 (11 months following the second opinion received from Tetra Tech) Dorset Council informed Powerfuel that it considered a third landscape assessment was required.
- It is not clear why this approach was taken given landscape proposals have not changed since submission of the application and the original Dorset Landscape Officer, the Dorset AONB Landscape Officer, the Jurassic Coast Trust officer and the independent technical specialist (Tetra Tech) had not identified any landscape reason to refuse the application.
- In order to ensure a robust and transparent process the Officer Report should explain the justification for a third landscape opinion. We note the Dorset Council Planning Team has no technical expertise in this area and was already in receipt of two landscape assessor responses, both of which raised no objection to the proposals. This should have allowed the Planning Officer to summarise the position in the Officer’s Report without a requirement for a third landscape opinion. We further note there is no precedent for a similar approach for any historic application considered by the Strategic Technical and Planning Committee.
- Dorset Council selected Mr Peacock to complete the assessment. Mr Peacock had no prior involvement in the Portland ERF proposal or any historic involvement with the landscape sensitivities at Portland Port. It is not clear why Ms Barber, a senior landscape architect within Dorset Council, was not allocated this role, given her previous understanding of the Portland ERF proposal (as part of her secondment to Dorset AONB) and given she was already working on the review of an unrelated proposal at Portland Port and therefore would have an intimate knowledge of the environment and potential impacts.

- Mr Peacock submitted his report on 21 November 2022 ^{xxvii}. Prior to this he did not engage with Powerfuel to help him understand the proposal and background and we do not believe any discussion was held with the previous Dorset Landscape Officer. Mr Peacock has since confirmed he did not visit the Portland Port as part of his review and that he was not aware of the existence of the independent analysis by TetraTech that Dorset Council had commissioned and that confirmed no landscape objection, because Dorset Council had neglected to upload this to the planning portal or make it otherwise available to him.
- Mr Peacock's position appears to be that the visual impacts on highly localised areas, that are not subject to a landscape designation, is sufficient basis for him to register an objection to the proposals.
- We accept it is possible for landscape assessors to reach different conclusions. However, Mr Peacock, as an experienced landscape professional, will be aware that Landscape Institute guidance requires that he explains, to the extent he does not agree with the detailed position set out in the submitted LVIA, how he has followed the methodology to reach a different conclusion. He fails to do so. Put simply, any view expressed in the absence of this can only be described as unsubstantiated opinion.
- Dorset Council is now in possession of a number of landscape responses on this proposal. All responses, except Mr Peacock's submission, confirm there is no basis to refuse the application on landscape or visual impact grounds.
- If Mr Peacock is unable to justify how he reached his position the Dorset Council Planning Officer should rationally apply little weight to this in the planning balance. In the event that weight is placed upon an unsubstantiated opinion, officers and Committee Members risk reaching a conclusion that is not based on robust evidence and are liable to challenge.
- The Dorset Council Planning Officer should rationally apply much greater weight to the two other landscape responses received, including the independent response from Tetra Tech. These responses broadly agreed with the detailed assessment provided in the LVIA in reaching a no objection view, a position that was therefore justified and evidenced by the detailed application of the methodology as clearly and professionally set out in the LVIA.

2. **Traffic** ^{xxviii}:

- As is required the environmental statement considered worst case scenarios to assess traffic impact. It assumed that all deliveries and removals would be solely by HGV. In practice some of these could be facilitated by ship/sea which would reduce local traffic impacts and provide

a further benefit of the Portland ERF location compared to other Dorset Waste Plan sites.

- In order to service the project, it was assumed that 25 deliveries of RDF would need to occur per day, with a further 10 HGVs removing ash and one HGV providing consumables. To provide headroom for scenarios such as more consumables being delivered on a single day the assessment assumed that the Portland ERF would not generate more than 80 two-way HGV trips per day (40 in each direction).
- The traffic analysis confirmed that both total vehicle flows and HGV flows are predicted to increase by less than 5% on all road links except Castletown (i.e. at the Port access) as a result of the Portland ERF.
- Excluding the impact at Castletown the increase in total vehicle flows is 0.43% at all other measured points. The increase in HGV only flows is a maximum increase of 4.7% for HGV traffic, and in many cases less than a 2% increase.
- The higher percentage increases at Castletown are mainly due to the current low levels of traffic following cessation of historical operations at the Port. The two-way worst case daily increase equates to approximately three additional HGVs an hour which is a normal level of interaction with traffic for pedestrians.
- The Dorset Council Highways response noted that the volume of traffic to the Port is within that allowed for as part of the permitted growth within the Harbour Revision Order previously agreed with Dorset County Council.

3. Cultural Heritage:

- For completeness we note that in their initial responses Historic England and the Dorset Council Senior Conservation Officer (**Conservation Officer**) noted potential impacts on the setting of local heritage assets. This harm was quantified by the Conservation Officer as “*less than substantial harm*” and capable of mitigation in line with planning policy.
- However a mitigation strategy was agreed to address the identified harm to the setting.
- Historic England indicated in August 2021 and confirmed in February 2022 that it no longer needed to be consulted on this proposal, unless there was a material change.
- In October 2021 the Conservation Officer provided a full response to Dorset Council, confirming that he was satisfied with the proposed mitigation and that he supported the application on the basis that a net heritage benefit would be delivered such there is no harm to cultural heritage as a result of the proposals.

6. References

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