

AQ:

Air Quality

Firstly, it is expected that the stack height and its associated calculation would be formally considered by the Environment Agency, as part of their determination for the suitability of an Environmental Permit.

Q1: Further evidence would be required to demonstrate that all residential receptors to, as well as the Verne Prison occupants have been fully considered. Could the applicant please clarify if this has been completed?

2017 data has been used. The report makes the correct assumption that the NO₂ monitoring concentrations during 2017 were lower than in previous years, but they rose again in 2018 – likely due to weather conditions. However, it would be more appropriate to use the 2018, or even 2019 data.

Q2: Would the applicant use the attached 2019 data from Dorset Council to review their submitted evidence?

Q3: Please would the applicant advise if they would be willing to undertake any of their own air quality monitoring, both at the likely source of emissions, but also at relevant exposure locations, where Dorset Council have not monitored – to subsequently provide a more accurate baseline for their calculations, especially, as this facility may not be built for a number of years.

Q4: Would the applicant be willing to carry out additional Air Quality monitoring once / should the facility be granted planning permission. This could be later agreed with the local authority and applied by way of a condition to any permission which may be granted.

It is unclear as to where the source of the RDF will arrive from, if it is to be transported by Road - The application advises that this facility would likely be taking waste from outside of the Dorset Area. If waste were to be brought in along the A30 / A35 (Exeter to Bere Regis) consideration must be given to the impact to the AQMA based at Chideock, where the annual mean and hourly mean for NO₂ are substantially exceeded.

Q5: please would the applicant undertake a 'Worst case scenario' consideration of their facility's impact to the AQMA at Chideock

Q6: Provisionally, the methodology within D3 Roads emission modelling is accepted, however, there are a few matters which would need to be addressed:

- a. It would be best practice if actual data from 2019 was used within the report.
- b. Boot Hill is considered to be a Street Canyon by Dorset Council and Defra for the purposes of the Annual Status Reporting process
- c. There has been omission of some existing residential dwellings (to The Verne)
- d. There is no consideration given to the extensive proposed development to Ocean Views
- e. The Report identifies the route where the vehicles associated with the facility will be moving (namely the Rodwell Road, and Castletown areas) and relevant residential receptors have been identified.

In the Tables 5, 6 and 7 within "B Detailed Results Tables" Receptors are referred to as 'RT 1-34'. The maps within "A Figures" do not directly correspond, in that some receptors are missing from the map depicting Boot Hill; and, there are no tables identifying the receptors shown on the map depicting Castletown ('R3-R4, R8 through 11, R13 - 18')

The applicant has already acknowledged poor air quality within the Boot Hill area. Because of that Dorset Council suggested in their response to the applicant's Scoping Report, that a Traffic Management Plan would be worth considering, to demonstrate how the operations associated with the facility could be negated off site also.

Q7: Would the applicant please advise if this would be something they will go forward with. Because of the sensitivity of the application and poor air quality due to the limited road infrastructure nearby and the 2 AQMAs within Dorset Council's area, it would be appropriate that this was carried out as part of the application process.

The Plan would need to include, but not be limited to:

Hours of transporting the RDF

Use of an appropriate route that would fit with how vehicles are laden

Operating out of the area's known peak rush hours

Use of nearby waste transfer sites to hold RDF

Making note of the councils VMS to consider the congestion within the area prior to entering

Construction Environmental Management Plan (CEMP) is proposed. Environmental Protection would agree for an appropriate condition to be applied to any permission granted. We would make particular comments as to the minimum requirements for this in our formal response.

Noise:

I have had a look at the noise report for this and would comment as below:

- There is no baseline survey due to the pandemic. The reasoning is that the noise levels would not be representative of the usual noise. They have suggested that this can be conditioned and reviewed after the restrictions are lifted. This was agreed with Ben Jones on the phone. I agree that this is a sensible approach. The higher background level in the future will provide a masking effect and will reduce any nuisance impact of the plant noise. However the return to normal working may take a long time, so the date of the future assessment should be agreed with the council beforehand. This could also be part of the condition.
- However, in the interim if the plant is operating there will be no planning mechanism for noise and we would have to use our usual legislation and powers.
- They have taken into account the effect of nearby properties, but also residential properties across Portland Harbour, at Wyke. This is wise as the noise will be propagating over water and therefore the distance attenuation will be reduced.
- Piling will be by auger, to reduce the noise. Should this be conditioned?
- They have considered vibration and do not consider it would be an issue for dwellings as the nearest is over 200 m away. However, there is no consideration for commercial. I am not sure if there are businesses nearby that would be sensitive to vibration. Should we be asking for an assessment of this?
- The construction hours of M-F 07:00-19:00 and Sat 8:00-13:00 seem reasonable.
- The operating hours do not seem to be mentioned in the noise report. But the application form states it will be 24 hours a day minus 1 minute. So the final noise assessment is very important and good communications between us and them would be helpful until this has been completed. Also it refers to two 15 MW transformers and containerised converters to provide power for ships. It states that they will comply with environmental noise emission requirements. These must be included in any noise assessment. I recall issues in Weymouth Harbour with non-mains electric for a ship.
- The report says that noise will be monitored during commissioning to ensure noise limits are achieved. We need to be kept informed of this, any breaches and what measures they intend to take to rectify it.

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Community and Public Protection

Dorset Council