

# **INEOS ChlorVinyls**

**Halton Borough Council Development Control Committee**

**Runcorn Energy from Waste**

**Planning Application Reference 11/00186/COND**

**Additional Information Request**

## **1. INEOS transport report considers four transport scenarios. Are other delivery scenarios available to inform this application?**

When identifying potential delivery scenarios, it is important to consider the probability and the practicality of those scenarios coming to fruition in real life. The scenarios presented by INEOS are considered on the balance of probability to have reasonable prospects of being achieved.

The INEOS Transport Carbon Assessment assesses seven RDF transport scenarios. Of these seven scenarios, two relate to delivery of RDF by road and five relate to different rail delivery options. The seven identified and evaluated transport scenarios represent INEOS', and its consultants RPS', best view of the 'probable and practicable' transport options available for North West derived RDF.

The Planning Officer's report to Committee of 4<sup>th</sup> July, does not identify additional or alternative transport delivery scenarios beyond the seven scenarios identified and evaluated in RPS' Transport Carbon Assessment.

The Council has sought and obtained comments on the application and its supporting materials from the Merseyside Environmental Assessment Service (MEAS) which, by response dated 30<sup>th</sup> June, does not identify additional or alternative transport delivery scenarios beyond those referenced by INEOS but suggests clarifications and adjustments that INEOS should consider.

In its letter of 30<sup>th</sup> June MEAS suggests INEOS could consider contracting 200,000 tpa of commercial and industrial (C&I) derived RDF from Merseyside and Greater Manchester. INEOS is pleased to advise that it is seeking contracts for C&I RDF from within the region. However, and as detailed in the Urban Mines study: '*North West of England Commercial and Industrial Waste*', carried out on behalf of the Environment Agency, C&I waste volumes and locations (see Appendix I) are small and fragmented and require pragmatic (usually road) transport solutions:

*'The theoretically available C&I waste is mainly commercial waste generated by small businesses or sites with less than 50 employees. This means that potential waste material, whilst located mainly in the urban south of the region, is very widely distributed over a large number of producers....'*

*'Setting up viable systems for securing these dispersed commercial waste arisings will be vital if they are to be relied on for long term material supply. These will include devising contract arrangements with the commercial waste collection companies and the practical logistics of collection of waste material that is suitable for EfW feedstock, together with any pre-treatment that is necessary.'*

Remaining municipal contracts within the region are for relatively small volumes of RDF and the combination of modest loads, disparate locations and, in some instances, short distance to the EfW facility, do not support the practicable use of existing rail infrastructure. For small volume suppliers, a contractual requirement to transport RDF by rail (which will in practice necessitate transhipment by road) would unnecessarily add to costs. Accordingly, those suppliers concerned with contracting modest volumes of RDF currently plan to transport it by road.

The addendum to the Transport Carbon Assessment prepared by RPS demonstrates that CO<sub>2</sub> emissions for the proposed road transport of 395,000 tpa of RDF would achieve GHG emissions reductions of around 30% compared to transhipment to rail.

The restriction on road transport that currently applies to the Runcorn EfW severely restricts INEOS' ability to bid for regional fuel sources, which is contrary to sustainable waste management and the legal and policy requirements in respect of regional self-sufficiency and the proximity principle.

The planning consent permits a 90:10 ratio (765kt: 85kt RDF) of rail to road transport for RDF movements to the Runcorn facility. INEOS' application is a request for agreement to change the ratio to approximately 44:56 (370kt: 480kt), which is almost half each by rail and road.

## **2. What relevance (if any) has water transport to this application?**

The Runcorn EfW facility is close to the Manchester Ship Canal, which links Eastham Docks in the west to Salford Quays in the east. The project gave consideration to water transport in its original assessment as RDF could enter from the east if it were double handled and transferred from road to barge in the Manchester area, however environmental benefits would be limited as they would only affect the final 30 miles of the journey.

Peel reviewed the transportation of RDF from Greater Manchester by water in 2010, but they were unable to present an economically viable proposal compared to the rail benchmark. There are currently no known sources of RDF to the west of the country that could feasibly be imported via Eastham Docks.

The Company still expects RDF from GMWDA and Cheshire (if successful) to be delivered by rail and would still hope to source other RDF by rail if it proves to be economically feasible. To this extent, and in line with the conditions imposed in the existing consent, INEOS has provided an undertaking to exercise all reasonable endeavours to maximise the movement of materials, including RDF, into and out of its Runcorn site by sustainable transport arrangements.

## Appendix I

### What waste sources exist and why is this application being made now?

This application is being made now because some waste contracts have been confirmed and others are up or coming up for tender, which means that it is essential to act now to secure these contracts, which requires clarification on volumes permissible by road. INEOS' application is based on its requirement for flexibility to source commercially viable RDF from within the North West, to fill remaining capacity and sustain the future and economic viability of the Runcorn EfW facility. Information on Municipal and Commercial and Industrial waste sources is provided in the following;

#### **RDF derived from Municipal waste sources**

Although INEOS would prefer to utilise large parcels of RDF derived from local authority MSW contracts, recent changes in local authority procurement plans and the economy, mean that few sizeable MSW contracts for RDF are available in the North West region. Those that do remain, are either not available to INEOS (Merseyside); are too small; or are not easily served by rail transport (Warrington).

INEOS believes GMWDA and Cheshire represent the limit of North West RDF that is suitable for rail delivery at this time. This means that, a significant proportion of the remaining RDF required for the EfW plant will need to be sourced by road. To remain aligned with the proximity principle, the best way of achieving this is for INEOS to source RDF from small municipal waste contracts and from commercial and industrial waste arisings from within the North West region. To do this INEOS requires full utilisation of the quantity of RDF that can be transported to the EfW plant by road as outlined in the original S36 application. Again this aligns with RSS, which states that:

*'There will be a need to provide waste management capacity for commercial and industrial waste streams across the region in particular for new recycling, processing and treatment capacity which will be increasing driven by legislative requirements'*

*And that,*

*'For both the municipal, and the commercial and industrial waste streams, primary reception, treatment and transfer facilities should be located near to the sources of arisings. Secondary treatment and disposal facilities may be located on a sub-regional strategic basis, to serve a wider catchment area. Regionally significant facilities may be needed to serve the Mersey Belt, which includes the Manchester and Liverpool conurbations.'*

Figure 2 which accompanies this report and supports this Appendix provides more details of regional MSW contracts, however it is worth noting that the existing transport restriction for the EfW plant effectively limits choice for local authorities whose volumes and location do not lend themselves to using existing or new rail infrastructure. This consequence is contradictory with regional policy as expressed in the RSS.

INEOS believes that the application of the proximity principle in the North West would (and should) result in more regionally derived RDF being treated within the region although availability of municipal contracts has reduced, large volumes of Commercial & Industrial (C&I) waste remain available.

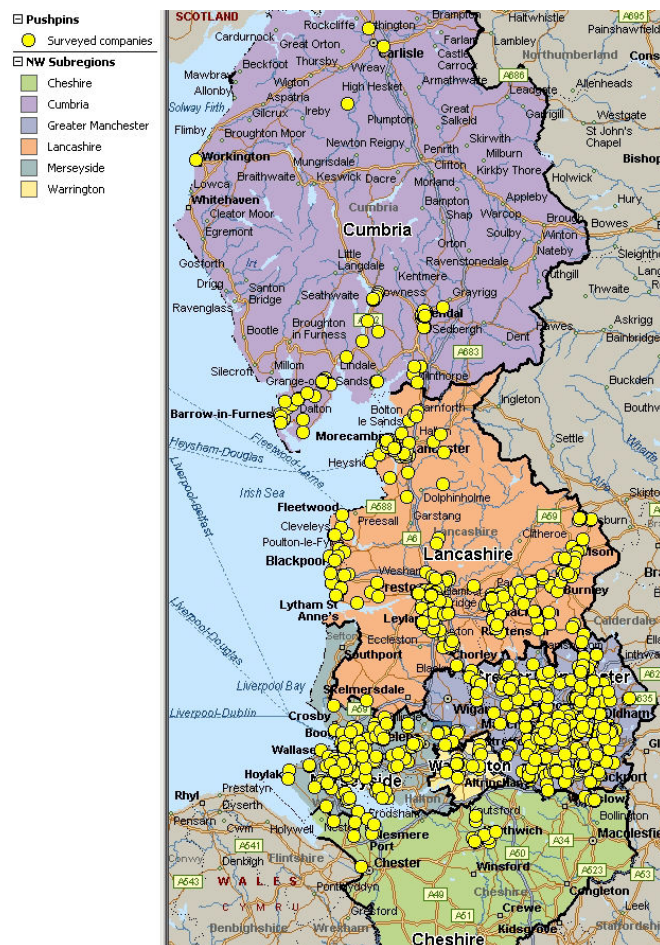
## RDF derived from North West Commercial and Industrial Waste sources

Although availability of municipal contracts has reduced, research published by Envirolink in conjunction with Urban Mines<sup>1</sup> (March 2010), shows that despite the recent economic downturn and in contrast to MSW, the North West region still produces approximately 7.6 million tonnes of Commercial & Industrial waste arisings each year.

The research assessed also the potential for these waste streams to be used as a fuel for energy and estimated that of the waste material not already 'energy' recovered, 4.95 million tonnes could be classed as either recoverable, or potentially recoverable. Even if looking only at land-filled waste, 1.22 million tonnes are deemed to be recoverable or potentially recoverable. Furthermore the study shows that the majority of available regional C&I waste is located within the most populous areas such Greater Manchester, Liverpool and Lancashire and the Runcorn EfW plant is well-positioned to provide a regional hub for treating RDF derived from this waste stream.

As the below map shows, unlike MSW contracts, North West C&I contracts are available from a large number of geographically fragmented sources. This means that derived RDF will be available in smaller and more geographically fragmented parcels, which emphasises the need for flexible consideration of transport options, as this RDF may be more sustainably transported by road than by rail.

Figure 1 A selection of Commercial and Industrial Waste sources (Urban Mines Survey)



<sup>1</sup> North West of England Commercial and Industrial Waste Survey 2009 For The Environment Agency Published March 2010