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MEMO

To: Andrew Plant
Organisation: Halton Borough Council

BY EMAIL ONLY

From: Paul Knott
Merseyside Environmental Advisory Service

Your Ref: 11/00186/COND
File Ref:
W/P Ref: 13/6/2
Date: 2 August 2011

Ineos ChlorVinyls – request to vary condition 57 in order to increase the quantity of refuse-derived fuel delivered by road

Thank you for consulting Merseyside Environmental Advisory Service (Merseyside EAS) on the additional information which the applicant and its consultant, RPS, have submitted to support this application.

To reiterate our previous response, Merseyside EAS's comments refer to the sourcing of suitable waste-derived fuelstock for the Ineos power facility. It is not within our technical remit to review the factors used in calculating greenhouse gas emissions (GHGs) generated by road and rail transport, or the logistical constraints involved in the latter. We therefore take the assumptions quoted by RPS to be representative and accurate, but you may wish to seek the opinions of your transport colleagues regarding these matters.

Our previous response proposed that further scenarios should be modelled in order to assess the emissions levels based on a different but potentially more realistic assumption about the potential sources of waste fuelstock for the site, much of which could originate within the Mersey Belt.

Accepting RPS's contention that the "*higher*" rail transport CO₂ emission factors should be used, we note that the revised scenarios 1 and 2 show a reduction in GHGs of between 27% and 33% for road transport compared to that for rail. **The modelling results therefore demonstrate this revised distribution supports the application to vary condition 57.**

We have also reviewed the supporting "Questions & Answers" document and concur with its principal statements where they relate to likely waste sources. Questions 1 and 24 refer specifically to the power facility's regional catchment. The response to Question 1 makes a key point with respect to self-sufficiency and the proximity principle (as stated previously or as re-cast in paragraph 3 of Planning Policy Statement 10) and the modelling outcome is consistent with these policy statements.

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The modelling assumptions imply that rail is likely to out-perform road both in terms of GHG emissions and transport costs if RDF has to be moved over longer distances. Therefore:

- If the fuelstocks needed to fully implement the permitted scheme can be sourced largely from within the Mersey Belt and/or the southern half of the North West, then the modelling results indicate increased use of road transport in line with this application should result in lower GHG emissions compared to rail transport; whereas
- If some fuelstocks have to be sourced from further away then it is likely that more waste would arrive by rail with lower GHG emissions compared to delivery by long-distance lorry movements.

This new evidence suggests that the application can provide flexibility while still delivering a better outcome in terms of GHG emissions even though it is not clear at present where the additional RDF will come from.

Merseyside EAS would be happy to provide further advice and detail to support these comments as required.

Encs.

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