

INEOSCHLOR TRAFFIC IMPACT

- 1 The screening opinion produced by Halton Borough Council considers the alterations that are being proposed to Condition 57 and whether any changes to the ES are required. The screening opinion states;

'The original application sought to deliver 480,000 tonnes per annum by road.....the submitted Environmental Statement was based upon this figure and the application assessed on this basis'

- 2 The screening report then goes onto say in the section titled '**Traffic**'

'... The access to the site and routing of traffic remains the same as that previously assessed in the approved document.'

- 3 What is clear from the various documents is that the original transport assessment considered the full 480,000 tonnes being delivered by road. It is not however the case that the distribution of that traffic and hence the impact, both in terms of traffic delay and congestion or the associated environmental impacts remains the same.

- 4 The transport assessment submitted with the original application assumed that 51.2% of the fuel would be delivered to the site via the north of the Expressway road and 48.8% from the south.

- 5 However within the TA submitted for the current application, the two alternative scenarios of 85% of the fuel from the north and 65% from the south have been used as the basis for the traffic analysis.

- 6 To further confuse matters, the Carbon Transport Assessment then considers a number of different fuel delivery scenarios that are in themselves also incompatible with the distribution of traffic assessed within the TA documents. For instance Scenario A is likely to result in 100% of the deliveries to be from the south.

- 7 The traffic impact on the strategic roads in the area, ie principally the Expressway, but also the M56 and other parts of the Trunk Road network, should also be considered against the effect of the second Mersey crossing. Both of the TA documents deal with this in a very superficial way, saying that the crossing will generally reduce traffic on the Expressway and therefore any impact from the delivery of waste to IneosChlor will be lower. However the forecast redistribution of traffic resulting from the second Mersey Crossing is clearly aspirational and therefore the true impact of the traffic resulting from IneosChlor must be viewed with care.

- 8 This confusion in forecasting, first the fuel movements and then the impact is actually already addressed within the committee report to the July 2007 planning committee, the report concluded the following (page 56) in relation to the delivery of the fuel and the impact of transport.

In reality this leaves a gap in information as to the precise method of fuel movement, its direction of travel and the impacts that may have on Halton's roads and rail infrastructure and the environmental impacts of such movement. This gap in information will no doubt in time evolve and as such can be re-assessed at a later date, as such, it may well be considered appropriate to control by condition should the DTI be mindful to authorise the proposal. A particular need to establish what rail capacity there is and during which hours of operation this capacity is available is important if for instance hours of delivery etc were to be controlled as part of the process. Notwithstanding, that the time multi-model nature of fuel delivery cannot be known at this stage, it is generally accepted by both the rail operator and highway authority that there is with appropriate improvement and conditions, overall capacity.

- 9 This seemed to place significant doubt on the ultimate strategy for the delivery of the fuel. From the range of scenarios put forward in the application for removing this condition, it is clear that the 'gap in information' referred to in the committee report still exists and that therefore there can be no certainty on the resulting traffic impact, the question of transport sustainability, or the robustness of the carbon impact.