

## 3 Assessment Chapters

### Assessment Methodology

- 3.1 Clarification is required on the assessment methodologies used in the technical chapters and the consideration of absolute or relative change thresholds. In a number of cases, the assessment relies upon professional judgement that is not supported by evidence. The subjective nature of many of the assessments undermines the credibility of the document.

### Traffic and Transport

- 3.2 As a general point, a number of the references are incorrect throughout the chapter which makes navigating the document more difficult than it needs to be. It is also noted that the reference to the DMRB Volume 11, Section 3, Part 9 (Vehicle Travellers) is out of date, having been replaced by 'LA112 Population and human health'.
- 3.3 The Non-Technical Summary does not include information on vehicle movements, which is a key concern to local residents and is a serious omission. Whilst paragraph 4.8 of the PEIR includes information on vehicle movements these are provided as a total rather than for each constituent element. It is important to know how many of the vehicle movements are associated with waste fuel delivery, Air Pollution Control Residues (ACPR), bottom ash and removal of other consumables in order to test the veracity of the figures. It is also necessary to understand the origin / destination of these vehicle movements. It is only with this information that it is possible to begin to assess the likely environmental effects of the various sites looked at by the Applicant, which as discussed previously, is a requirement of the EIA Regulations.
- 3.4 It is noted that the operational assessment is taken as 2025 as that is the year in which the proposed development is expected to be fully operational. Whilst the facility may be fully operational at this point, it is not clear whether it has been assumed that the amount of waste processed at the facility would peak in the first year of opening. If this is not the case, then it is questioned why 2025 has been chosen as the assessment year as it would not represent the worst case. It is assumed that background traffic levels will increase over time and therefore a more representative operational year may be more appropriate.
- 3.5 A number of assessment chapters include an assessment 15 years post opening. It is unclear why this scenario has not been assessed for traffic and transport.
- 3.6 The Scoping Opinion requires an estimate to be provided of material that is brought to the site but cannot be processed and how it would be removed from the site. Any significant effects associated with the storage and/or removal of such material should be assessed. This information is not included in the PEIR and would therefore potentially represent an increase in the number of movements assessed.
- 3.7 The lack of a transport assessment prevents consultees from considering the implications of the proposal in highways and transportation terms. This is a serious omission. As the traffic surveys to inform the assessment have yet to be completed, it is unclear on what basis the conclusions on likely impact have been reached.