Portland Port Energy Recovery Facility

Appeal Against The Refusal Of An Application For Construction Of An Energy Recovery Facility With Ancillary Buildings And Works At Portland Port, Castletown, Portland Dt5 1pp

Pins Ref: App/D1265/W/23/3327692

LPA Ref: 20/00692/DCC

Proof of Evidence

Traffic and Transportation

PPF16

Portland Port Energy Recovery Facility

Proof of Evidence

Traffic and Transportation Matters

Job Title	**Portland Port ERF**
Project Number	**0979**
Date	**06 November 2023**
Client	**Powerfuel Portland Ltd**
Prepared by	**I Awcock**
Checked by	**A Wozniczko**
Authorised by	**I Awcock**
File Reference	p:\0979 portland port erf\c documents\reports\2023 appeal\portland erf proof of evidence - traffic and transportation - i awcock awp f1 2023.11.06 - updated.docx

Contents

1 Introduction

1.1. This Proof of Evidence has been prepared by Ian David Awcock, a Chartered Civil Engineer and member of the Institution of Civil Engineers, the Chartered Institution of Highways and Transportation and the Chartered Institute of Water and Environmental Management. I have 39 years' experience in transportation planning and highway design and assessment, and over that time have advised on many significant developments in the southwest of England and further afield.

1.2. My team at Awcock Ward Partnership (AWP) has advised Powerfuel Portland and also Portland Port Ltd on traffic and transportation matters associated with the proposed ERF since 2019. We prepared the Transport Assessment and Environmental Statement Transport Chapter as well as the subsequent Addendum documentation.

1.3. Prior to that I advised Portland Port Limited on traffic and transportation matters associated with various port planning applications including the 1997 Harbour Revision Order and the subsequent 2010 Revision whilst employed by WSP.

1.4. The evidence which I have prepared and provide for this appeal / inquiry (reference: APP/D1265/W/23/3327692) is true and has been prepared and is given in accordance with the requirements of my professional body. I can confirm that the opinions expressed are my true and professional opinions.

2 Scope of Evidence

2.1. A planning application (ref: WP/20/00692/DCC) was submitted, and an appeal has now been lodged against the refusal of planning permission by Dorset Council (DC) for an Energy Recovery Facility (ERF) and associated infrastructure at Portland Port, Castletown, Dorset.

2.2. After detailed and lengthy consideration, the application was refused on various grounds covered by other evidence in this Appeal.

2.3. There are no highways reasons for refusal and DC Highways (the local highway authority) are satisfied that the scheme will cause no detrimental effects to the highway network and satisfies all their policy requirements and those in the National Planning Policy Framework as confirmed by Paragraph 8.14 of the Planning Officer's Committee Report:

> The highway authority considers that the submitted transport documents are satisfactory and the residual cumulative impacts of the development cannot be thought to be severe in highway terms. Consequently, Dorset Highways has no objection subject to conditions.

2.4. Paragraph 8.21 of the Planning Officer's Committee Report also confirms that National Highways are satisfied that the transport assessment presents a suitably robust worst-case scenario with regard to the traffic impact on the strategic road network, and raised no objection:

> No objection - Having reviewed the further information provided, we are satisfied that the transport assessment presents a suitably robust worst-case scenario with regard to the traffic impact on the strategic road network, noting that the applicant states that they are in active discussion to secure a contract to export incinerator ash by sea. Our recommendation of no objections provided previously remains appropriate.

2.5. This Proof of Evidence therefore sets out:

- the scope of traffic and transport work agreed with DC Highways;
- a summary of the submitted Transport Assessment outlining the methodology agreed with DC Highways and key findings;
- a summary of the additional transport submissions submitted to DC Highways for agreement in response to issues raised by the Council and objectors;
- commentary on relevant objectors comments;
- a summary of the traffic analysis undertaken to support the Air Quality Assessment;
- a comparison of the proposed development trip generation against potential alternative B2/B8 land uses;
- overall summary and conclusions.

3 Transport Assessment Scoping

Introduction

3.1. This section of the Appeal Statement sets out the scoping process undertaken with DC Highways which is summarised below.

3.2. A Pre-Application meeting was held on 13th December 2019 where traffic and transport matters were discussed between AWP and the DC Highways officer.

3.3. An EIA Scoping Report dated January 2020 was submitted to DC and included a dedicated chapter covering traffic and transport matters which was prepared by AWP.

3.4. DC Highways prepared an EIA Scoping Response dated 20th January 2020 which included specific feedback on the AWP proposed traffic and transport assessment.

3.5. AWP prepared a Transport Scoping Report in response to the DC EIA Scoping Response dated 20th January 2020, which was formally submitted to the DC Highways officer on 30th January 2020.

3.6. DC Highways responded to the AWP Transport Scoping Report in an email dated 19th March 2020, confirming that *"Subject to recognising our comments on routing to Portland through either of the two routes through Weymouth, we find your scoping report provides an acceptable basis for the Transport Assessment"*.

3.7. AWP confirmed to DC Highways via an email dated 19th March 2020 that the two routes through Weymouth would be assessed through the Transport Assessment.

Summary

3.8. In summary, the transport related documents prepared to support the planning application are in accordance with the extensive pre-application scoping consultation undertaken with DC Highways.

3.9. There has been no request for detailed network capacity analysis given the very low number of trips to be generated and DC Highways are content that the proposed methodology would robustly assess the traffic and transport impacts of the development.

4 Transport Assessment Summary

Introduction

4.1. This section of the Appeal Statement summarises the methodology and key findings of the following AWP prepared documents:

- Transport Assessment dated 17th August 2020 included as Environmental Statement Appendix L1
- Chapter 11 – Traffic - of Environmental Statement ref 262701 dated September 2020, with supporting Appendix L1 Transport Assessment and L2 Construction Traffic

AWP Transport Assessment (17th August 2020)

4.2. The content of the document reflects the scope that was agreed with DC Highways at the pre-application scoping stage.

4.3. The early chapters of the Transport Assessment cover a summary of relevant transport policy, a review of existing transport infrastructure and services, followed by an assessment of the site accessibility relative to surrounding local facilities and public transport opportunities.

4.4. Attention is particularly drawn to the historical approvals through Harbour Revision Orders of regeneration proposals at the Port and the permitted volumes of traffic envisaged to be generated by that regeneration as set out below.

4.5. Chapter 5 of the Transport Assessment explains the development proposals in full, including the site access strategy which involves a one-way system for HGV delivery traffic. It also states that deliveries could arrive at the site via both road and / or sea depending on the origin of the Refuse Derived Fuel (RDF).

4.6. Chapter 6 of the Transport Assessment considers the trip generation that might be expected to arise because of the proposed development, confirms in paragraph 6.4 that the traffic calculations are undertaken for a scheme with the capacity of 202,000tpa of RDF, and identifies the potential distribution of traffic on the surrounding road network.

4.7. Since every ERF facility uses specific geographical and operating parameters, the calculations for traffic flows were undertaken from first principles assuming all RDF being delivered by road. This is a highly robust assessment because with this particular site there is the potential for deliveries by sea rather than road.

4.8. Furthermore, the traffic generation assessment assumes that the plant will be operating at full capacity and will therefore require the maximum level of RDF for processing.

4.9. Table 6.1 of the Transport Assessment explains that 72 two-way daily HGV trips will be generated at an average of 4 trips per hour. However, for the purposes of the traffic impact assessment, a higher figure of 80 two-way HGV trips per day has been assumed. Additional analysis is presented to quantify the volume of staff development trips by car or sustainable modes.

4.10. The journeys to work of the 35 staff expected to be employed at the plant on a shift working basis is also considered in the Transport Assessment. A Travel Plan would be implemented, and the mode of transport anticipated has been considered as set out in Table 6.3 of the Transport Assessment.

4.11. Staff who travel to work by car would do so outside of the normal network peak hours due to shift change times. Table 6.12 of the Transport Assessment sets out the anticipated journeys to work by employees in a car as 19 vehicles each way per day bringing the total daily flows expected from the ERF to only 118 vehicles per day.

4.12. Both DC Highways and National Highways accept and concur that a 'worst case' assessment has been undertaken in traffic generation terms.

4.13. Future baseline traffic flows for the assessment years of 2023 and 2033 were generated using the combination of observed traffic survey flows, application of TEMPro growth factors and numerous committed development sites.

4.14. Tables 6.8 and 6.9 of the Transport Assessment confirm the vehicular traffic generation levels permitted in the 2010 Revised Harbour Revision Order as 469 vehicles two way in the morning peak hour and 407 vehicles two way in the evening peak hour.

4.15. Table 6.12 of the Transport Assessment presents a total development trip generation summary for the AM peak, PM peak and daily time periods. The figures demonstrate that the development trip generation with only 4 vehicles anticipated in the peak hours is significantly within the permitted levels of the 2010 Revised Harbour Revision Order. It is also far lower than the trips already consented from other developments in the area.

4.16. The distribution of all development generated road traffic has been forecast using first principles assumptions and 2011 Census Method of Travel to Work datasets which are relevant to where the site is located.

4.17. Chapter 7 of the Transport Assessment sets out the AM/PM peak hour traffic impact assessment for a total of nine road links based on 80 two-way HGV delivery trips per day being added to 2023 (Scenario 1) and 2033 (Scenario 2) future baseline traffic flows. The scope of assessment was agreed with DC Highways during pre-application scoping.

4.18. The traffic impact assessment demonstrates that all links included in the study area would experience negligible change with a maximum 3% increase in traffic flow across any scenario within the AM/PM peak hours. This change would be well within the natural day-to-day variation in traffic flow experienced on the local road network.

4.19. The Transport Assessment therefore concludes that the existing highway network would satisfactorily accommodate the additional traffic arising from the proposed ERF plant without resulting in any severe impacts, and therefore the traffic impact of the scheme is considered to be acceptable in light of the requirements of the NPPF.

4.20. Chapter 8 of the Transport Assessment contains a Framework Travel Plan setting out a package of measures to promote the use of sustainable modes of transport with the view to achieving a modal shift away from the private car. In turn this would be expected to reduce traffic flows from staff onto the local road network associated with the development, and therefore help to mitigate the impact of the scheme.

4.21. The volumes of traffic generated by the development (even under a worst-case assessment) are therefore insignificant in the

context of other committed development and the traffic levels permitted under the Approved Harbour Revision Order. Furthermore, the peak hour traffic flows generated by the development are insignificant and within the normal daily variation of traffic flows experienced on any highway network.

Transport Chapter of Environmental Statement dated September 2020

4.22. Chapter 11 of the submitted Environmental Statement (ES) has been prepared by AWP to consider the transport effects of developing the proposed development.

4.23. The assessment methodology considers relevant transport policy, the means and location of access for pedestrians, cyclists and vehicles, the proposed levels of vehicular traffic generated by the development, the ability of the road network to accommodate that traffic and any consequent highways and transport environmental issues.

4.24. A three-stage process is adopted for the assessment of the environmental impact of the development in transport terms, considering the sensitivity of receptors, the magnitude of the transport impacts and then based on the first two stages, the significance of the transport impacts.

4.25. Guidance on the identification of receptors, affected parties and key issues is derived from the "*Guidelines for the Environmental Assessment of Road Traffic*" prepared by the Institute of Environmental Management and Assessment (IEMA).

4.26. The key potential impacts are set out in Table 6.1 of ES Ch 11. The table indicates which impacts are dealt with where in the Assessment documentation.

4.27. The chapter assesses the transport effects of the development on the same nine road links as considered within the Transport Assessment, for future years 2023 and 2033 as agreed through the EIA Scoping process. Baseline traffic flows are based on existing traffic counts.

4.28. Section 11.3 of the ES report demonstrates the transport effects of the construction phase of development. Given that the development trip assignment shows that there would be an increase of a maximum of 2% from all traffic and 2.3% from HGV

traffic onto local road network - which is well below the IEMA threshold of a 10% increase for sensitive receptors – no further assessment is undertaken.

4.29. Section 11.4 of the ES report explains the mitigation measures that will be implemented during the construction and operation phases to limit the potential impact on receptors.

4.30. It is expected that the residual impact of the development during the construction phase on: Severance; Driver Delay; Pedestrian Delay; Pedestrian Amenity; Fear and Intimidation; and Accidents and Safety will be "*Not Permanent, Negligible and Not Significant*".

4.31. On all issues the assessment demonstrates that, following mitigation, the residual adverse impacts are, at worst, negligible with traffic flows from the proposed development being no greater than the day-to-day variation that would be experienced on the local road network.

4.32. It is therefore considered that the Proposed Development is acceptable in transport terms, and that there are no highways related reasons that should prevent Planning Permission from being granted.

Summary

4.33. In summary, it is evident that all relevant traffic and transport impacts anticipated to be generated by the proposed development have been appropriately considered and assessed in line with relevant guidance and as agreed with DC Highways during pre-application scoping.

4.34. Both DC Highways and National Highways accepts that the adopted approach regarding the development trip generation is robust and represents a 'worst case' assessment.

5 Additional Transport Submissions

5.1. This section of my Proof sets out the additional information submitted during the Application Consultation stage in response to issues raised by DC Highways and Planning officers.

5.2. Section 6 of this Statement considers objector issues in further detail.

5.3. DC formally requested further environmental information under Regulation 25 of the EIA Regulations in relation to the application for the proposed Portland ERF.

5.4. Points 5 & 6 of the DC Regulation 25 letter relates to the projects included within the cumulative effects assessment in the EIA, which were included within the Transport Assessment as committed developments.

5.5. A review by the Applicant determined that numerous projects within the 1997 and 2010 Portland Harbour Revision Orders, which were included in the original assessment, will need to be screened to determine whether they must be subject to an appropriate assessment under the Habitats Regulations before they can proceed.

5.6. This means that they should not be included in the EIA cumulative effects assessment or treated as committed development for the purposes of the Transport Assessment. Further details of the reasoning behind this review process can be found in Chapter 2 of the ES Addendum report.

5.7. In addition, given the passage of time since the original assessments were undertaken, the need to include new consented developments within the assessment was assessed. It is understood that a resolution to grant planning permission was made in November 2021 for a building for the servicing and maintenance of helicopters at the heliport on Coode Way in Portland.

5.8. As a result, the list of committed developments has been reviewed to exclude Port projects that have not yet been undertaken, but to include the Coode Way heliport building. The transport assessment has been updated to reflect this revised

scope. The result of this review is set out in the Transport Assessment Addendum and ES Addendum.

5.9. A Transport Assessment Addendum and ES Chapter 11 Transport Addendum were therefore prepared by AWP. These documents were prepared to provide an updated assessment of committed development traffic flows expected to be generated by Portland Port and to reflect the passage of time since the original documents were submitted.

5.10. The committed development traffic flows reported in the Transport Assessment Addendum are lower than those previously assessed, resulting in higher proportional traffic increases due to the proposed development than presented in the initial TA and ES.

5.11. To summarise, the traffic impact assessment demonstrates that all links in the wider study area, would experience negligible change in traffic flows with this lower level of committed development with a maximum 4.7% increase in HGV flow and maximum 1% increase in total traffic flow in the AM/PM peak hours. This change would be well within the natural day-to-day variation in traffic flow experienced on the local road network.

5.12. The proportional changes in the immediate vicinity of the Port on Link 1 at Castletown are higher due to the lower baseline flows but are still at worse an increase of only 80 vehicles per day. The assessment of the environmental impacts associated with this minor increase in traffic flow is set out in paragraphs 10.9-10.13 of the 2nd ES Addendum which concludes in para 10.13:

> …. an average increase in HGV movements of one every 18 to 20 minutes is therefore considered to be a negligible change that will not lead to any significant effects on severance, driver and pedestrian delay, pedestrian amenity, and accidents and safety on Castletown.

5.13. The Transport Assessment Addendum concludes that the existing highway network would satisfactorily accommodate the additional traffic arising from the proposed ERF plant without resulting in any severe impacts, and therefore the traffic impact of the scheme is considered to be acceptable in light of the requirements of the NPPF.

5.14. The volumes of traffic generated by the development (even under a worst-case assessment) remain insignificant and will not lead to any significant effects on severance, driver and pedestrian delay, pedestrian amenity, and accidents and safety on Castletown. Furthermore, the peak hour traffic flows generated by the development are insignificant and within the normal daily variation of traffic flows experienced on any highway network.

5.15. The Transport ES Chapter Addendum, also incorporating the updated assessment of committed development, still demonstrates that, following mitigation, the residual adverse impacts are at worst negligible with traffic flows from the proposed development being no greater than the day-to-day variation that would be experienced on the local road network.

5.16. It is therefore considered that the Proposed Development is acceptable in transport terms, and that there are no highways related reasons that should prevent Planning Permission from being granted.

Summary & Conclusions

5.17. In summary, it is evident from the information above that the only reason for preparing addendum reports during the determination period was to provide an updated assessment of committed development traffic flows agreed to be generated by Portland Port.

5.18. The addendum reports reached the same conclusions as the original documents without any new issues of significance.

6 Objector Comments

6.1. This section of my Proof sets out in summary responses to specific items raised by objectors, referring to previously submitted work in addressing those comments and also addressing new matters raised since the consultation period closed.

6.2. The main objector groups that have formed since the application was submitted are Stop Portland Waste Incinerator Group and The Portland Association. Section 9.5 of the Planning Officer's Committee Report summarises traffic and transport related comments raised by objectors.

6.3. The traffic and transport related objector comments can be grouped around the themes set out below.

Parts of the local road network being unable / suitable to accommodate the development trip generation, particularly by HGV.

6.4. The AWP transport documents supporting the planning application are comprehensive and demonstrate that all relevant traffic and transport impacts are appropriately considered and assessed in line with relevant guidance and as agreed with DC Highways during pre-application scoping.

6.5. Table 6.1 of the Transport Assessment explains that 72 two-way daily HGV trips will be generated at an average of 4 trips per hour. However, for the purposes of the traffic impact assessment, a higher figure of 80 two-way HGV trips per day is assumed.

6.6. Both DC Highways and National Highways accept this approach and concur that a 'worst case' assessment has been undertaken in traffic generation terms.

6.7. There were no requirements from DC Highways for detailed network capacity analysis given the very low number of trips to be generated.

6.8. DC Highways accept the forecast traffic impact of the scheme and that the development trip generation, with only 4 vehicles anticipated in the peak hours, is significantly within the permitted levels of the 2010 Revised Harbour Revision Order which are set at 469 vehicles two way in the morning peak hour and 407 vehicles two way in the evening peak hour.

6.9. The proposed routeing of development generated HGV traffic across the local road network is acceptable to DC Highways and utilises the one-way system through Weymouth that they have implemented to assist with reducing potential conflicts between HGV vehicles travelling in opposing directions.

The proposal is not in accordance with policies 3 and 4 of the Dorset Waste Plan.

6.10. The appraisal of how this ERF proposal fits with the Dorset Waste plan is covered in other evidence submitted for this Appeal. Policies 3 and 4 make no specific reference to traffic and transport matters.

6.11. It is, however, noted that the location at Portland offers the opportunity for transport of fuel and waste products by sea as set out in the Transport Assessment.

Traffic during the summer months increases due to tourism, this would be exacerbated by the additional vehicles associated with the development – and – traffic surveys were undertaken during winter months.

6.12. Following mitigation, the residual adverse impacts are at worst negligible with traffic flows from the proposed development being no greater than the day-to-day variation that would be experienced on the local road network. This conclusion has been reached whilst both DC Highways and National Highways accept and concur that a 'worst case' assessment has been undertaken in traffic generation terms.

6.13. Increasing the future baseline traffic flows to reflect increased seasonal tourism activity would only serve to dilute the resulting proportional traffic impacts of the development below the levels presented and assessed. The 80 hgv per day generated by the development would not be sufficient to cause any significant traffic impact effect even in the summer months, especially in the immediate vicinity of the Port at Castletown, as it would still be within the daily variation of traffic flows.

6.14. Traffic surveys are always undertaken in Neutral months to reflect a typical situation rather than seeking to understand the traffic impacts in high season when levels of traffic are artificially inflated compared to the norm. The scope of assessment and baseline

data collection was agreed with DC highways with no requirement for an assessment of seasonality effects.

Planning application WP/18/00812/SCOE has not been included as committed development.

6.15. DC Highways has reviewed and agreed to the cumulative assessment of traffic undertaken. This was after DC formally requested further environmental information under Regulation 25 of the EIA Regulations, which resulted in the committed development assumptions being revised and the transport effects of the development being re-assessed.

6.16. Whilst the application referred to is only for environmental scoping at present and no details are available the potential inclusion of additional traffic generated by other sites not included would only serve to increase the future baseline traffic flows on the local road network.

6.17. In this specific case it is understood that the scheme may include a park and ride Osprey Quay which would be expected to bring significant numbers of additional cars onto the local road network, especially in the summer holiday period. This would further dilute the resulting proportional traffic impacts of the development below the levels already assessed, and the cumulative impacts of the additional 80 hgv per day as well as an unquantified volume of car traffic to Osprey Quay would not cause significant traffic impacts and would be within the daily variation of traffic.

Cruise liner excursion coaches have not been included within the assessment as the baseline data pre-dates the use of the port as a cruise terminal from 2017.

6.18. We understand that there is anticipated to be 56 cruise ships in 2023 and potentially up to 65 in the future. Such visits are occasional and would be managed with their own travel planning including the use of occasional coach visits to the port to offload visitors to tour the wider Dorset area.

6.19. These incidental coach trips would be within the daily or hourly variation of traffic on the local road network and would be insignificant over the whole day or in the peak hours.

UNESCO World Heritage Centre IUCN (International Union for Conservation of Nature)

6.20. The UNESCO IUCN letter dated 04 April 2023 raised concerns about the traffic impact of the development on the world heritage site stating:

> …. To respond to the potential increase in industrialization of the wider setting of the property that would result from the Energy Reclamation Facility at Portland and the effect this may have on the naturalness of the property, it is recommended that potential measures to mitigate increased traffic impacts be considered in the assessment and decision-making process.

6.21. It is not clear to what extent the writer or reviewer of the Application had read the supporting documentation or understood the history of the location since the statement on traffic is very general and raises no specific concerns that have not already been considered ion the Transport Assessment and ES.

6.22. The traffic link within the world heritage site which would carry additional traffic from the ERF is the A354 Portland Beach Road (Link ref 2 in the ES). The traffic impacts of the additional 80hgv per day on the existing 12,470 outbound and 13,154 inbound or 25,624 2 way vehicles per day on Portland Beach Road are set out in table 10.6 of the 2nd Es Addendum and demonstrate a maximum percentage increase of only 0.33% for the outbound Annual Average Daily Traffic (AADT) period.

6.23. It is not possible to mitigate such insignificant effects and DC highways have not requested any such mitigation other than the usual Travel Planning Measures for journey to work traffic which would be part of the normal mitigation proposed with the scheme and of which UNESCO may not have been aware.

6.24. The potential for fuel delivery and waste product from the ERF to be transported by sea is also a significant mitigating factor in this specific location which again appears not to have been understood.

Summary & Conclusions

6.25. In summary, the traffic and transport assessment undertaken has been scoped extensively, agreed, and accepted by DC

Highways. The commentary provided demonstrates that objectors or UNESCO have not raised any new issues of material significance that have not already been considered and accepted by DC Highways.

7 Traffic and Air Quality Calculations

7.1. This section of my Proof sets out the methodology for the calculation of traffic flows to allow the assessment of air quality with reference to the impacts on sensitive habitats adjacent to Portland Beach Road.

7.2. Traffic flows in the form of 24-hour Average Annual Daily Traffic (AADT) were calculated by AWP to inform the Air Quality Assessment that forms part of the ES report.

7.3. AADT traffic flows were calculated for a total of six different road links located in proximity of the site and sensitive habitats adjacent to Portland Beach Road.

7.4. Baseline traffic data has been either provided by Portland Port or obtained from DC Highways surveys that were supplied to AWP.

7.5. Baseline traffic flows for the future years agreed at the time of scoping of 2023, 2028 and 2033 were calculated by uplifting the baseline traffic data for expected growth in background traffic and because of committed development being delivered.

7.6. A comprehensive review of permitted development in the vicinity of the site has been reviewed to quantify the additional traffic that can be reasonably expected to come forward through committed developments.

7.7. Background traffic growth has been derived using the TEMPro database and its projected growth in jobs and households for each assessment year. The default planning assumptions for households and jobs were manually adjusted to reflect the committed development findings and to prevent any double counting of traffic in the analysis.

7.8. This has allowed future baseline traffic flows to be generated without the development in place. Additional 'with development' future year traffic flows were calculated by adding the development traffic generation.

7.9. Chapter 4 of this document explains the methodology used by AWP to calculate the development traffic generation. It explains why both DC Highways and National Highways agree that the development traffic generation calculated, and carried through to the traffic impact assessment, is highly robust and a 'worst

case'. The resulting daily trip generation figures have been used for the purposes of this assessment.

7.10. The future year with and without development traffic flows are compared to demonstrate the change associated with the development coming forward.

Summary & Conclusions

7.11. In summary, it is evident that the Air Quality Assessment covered by the ES report has been based on AADT flows generated by AWP using the appropriate methodologies explained above.

7.12. Both DC Highways and National Highways accepts that the adopted approach in regard to the development trip generation is robust and represents a 'worst case' assessment.

8 Traffic and Comparative Land Uses

8.1. The Application Form confirms that the proposed development will lead to 8,564 sqm total new gross internal floorspace. In addition an application will be made to vary the environmental permit (if and when granted) to include a wider group of residual waste codes that would allow the use of fuel sources additional to RDF.

8.2. This section of my Proof compares the traffic generation for the proposed ERF scheme against other B2/B8 land uses of the same scale and any implications from the potential change in fuel source.

Other Uses

8.3. The TRICS trip rate database (Version 7.10.3) has been interrogated to generate approximate weekday peak hour and daily trip rates for the following B2/B8 land uses, which could hypothetically come forward on the site in place of the ERF scheme proposed:

- Industrial estate
- Storage warehousing
- Commercial warehousing

8.4. Trip rates have been calculated for the land uses above for 'total vehicles' (Table 8-1) and 'HGVs only' (Table 8-2).

Table 8-1: Total vehicles trip rates (per 100 sqm GFA)

Land Use	AM Peak			PM Peak			Daily		
	Arr	Dep	Tot	Arr	Dep	Tot	Arr	Dep	Tot
B2/B8 Use									
Industrial Estate	0.527	0.313	0.840	0.203	0.485	0.688	4.562	4.633	9.195
Storage Warehousing	0.109	0.078	0.187	0.057	0.135	0.192	1.510	1.504	3.014
Commercial Warehousing	0.268	0.204	0.472	0.174	0.396	0.570	3.217	3.144	6.361

Table 8-2: HGV only trip rates (per 100 sqm GFA)

Land Use	AM Peak			PM Peak			Daily		
	Arr	Dep	Tot	Arr	Dep	Tot	Arr	Dep	Tot
B2/B8 Use									
Industrial Estate	0.044	0.040	0.084	0.010	0.019	0.029	0.370	0.366	0.736
Storage Warehousing	0.005	0.005	0.010	0.000	0.000	0.000	0.056	0.056	0.112
Commercial Warehousing	0.052	0.113	0.165	0.105	0.081	0.186	0.996	1.057	2.053

8.5. The corresponding TRICS summary reports are included in Appendix IDA 1 of this report.

8.6. The resulting total vehicles and HGV only trip generations compared against the proposed ERF trip generation are shown in Tables 8-3 and 8-4 respectively.

Table 8-3: Total vehicles trip generation (8,564 sqm GFA)

Land Use	AM Peak			PM Peak			Daily		
	Arr	Dep	Tot	Arr	Dep	Tot	Arr	Dep	Tot
Proposed Use									
ERF	**2**	**2**	**4**	**2**	**2**	**4**	**59**	**59**	**118**
B2/B8 Use									
Industrial Estate	45	27	72	17	42	59	391	397	787
Storage Warehousing	9	7	16	5	12	16	129	129	258
Commercial Warehousing	23	17	40	15	34	49	276	269	545

Table 8-4: HGV only trip generation (8,564 sqm GFA)

Land Use	AM Peak			PM Peak			Daily		
	Arr	Dep	Tot	Arr	Dep	Tot	Arr	Dep	Tot
Proposed Use									
ERF	***2***	***2***	***4***	***2***	***2***	***4***	***40***	***40***	***80***
B2/B8 Use									
Industrial Estate	4	3	7	1	2	2	32	31	63
Storage Warehousing	0	0	1	0	0	0	5	5	10
Commercial Warehousing	4	10	14	9	7	16	85	91	176

8.7. Table 8-4 demonstrates that the proposed ERF would generate significantly fewer HGVs than a commercial warehousing use, but more than industrial estate and storage warehousing uses.

8.8. However, Table 8-3 demonstrates that all comparative uses tested would generate vastly more all vehicle trips than the proposed ERF across all three time periods considered.

Alternate Fuel Source

8.9. It is explained in the evidence of Mr Othen that the environmental permit application (which is in the determination process) will, if granted, be subject to an application for variation to allow the use of a wider group of residual waste codes as fuel sources in addition to RDF.

8.10. The volume of fuel to be used at the plant remains as 202,000tpa and the weight of vehicles also remains the same with the result that there would, be no change in vehicle numbers with the potential change in fuel source.

Summary & Conclusions

8.11. The application documents confirm that, following mitigation, the residual adverse impacts are, at worst, negligible with traffic flows from the proposed development being no greater than the day-to-day variation that would be experienced on the local road network.

8.12. As demonstrated within this chapter, the transport impacts would likely be much more significant if the site was being proposed for an alternative land use comprising commercial warehousing or industrial estate, for example.

8.13. The potential change in the fuel source has no impact on proposed traffic flows.

9 Summary & Conclusions

9.1. A planning application (ref: WP/20/00692/DCC) was submitted, and an appeal has now been lodged against the refusal of planning permission by DC for an ERF and associated infrastructure at Portland Port, Castletown, Dorset.

9.2. The transport related documents prepared to support the planning application are in accordance with relevant guidance and with the pre-application scoping process undertaken with DC Highways including a Transport Scoping Report, EIA Screening process and meetings.

9.3. Requests by DC Highways for additional information during the planning application determination period, under Regulation 25 of the EIA Regulations, were addressed through a revised assessment of committed development and cumulative transport effects.

9.4. The two main objector groups that have formed since the application was submitted are Stop Portland Waste Incinerator Group and The Portland Association. Objectors have not raised any new issues of material significance that have not already been considered and accepted by DC Highways or which cause me any new or additional concerns.

9.5. This section of my Proof sets out the methodology for the calculation of traffic flows to allow the assessment of air quality with particular reference to the impacts on sensitive habitats adjacent to Portland Beach Road.

9.6. Traffic flows in the form of 24-hour AADT were calculated by AWP to inform the Air Quality Assessment that forms part of the ES report. A total of six different road links located in proximity of the site and sensitive habitats adjacent to Portland Beach Road are assessed.

9.7. It was confirmed by DC Highways at the scoping stage that there are no requirements for detailed network capacity analysis given the very low number of trips to be generated and DC were content that the proposed methodology would robustly assess the traffic and transport impacts of the development.

9.8. Both DC Highways and National Highways accept and concur that a 'worst case' assessment has been undertaken in traffic generation terms within the Transport Assessment and ES. Under the worst-case scenario, 72 two-way daily HGV trips will be generated at an average of 4 trips per hour. However, for the purposes of the traffic impact assessment, a higher figure of 80 two-way HGV trips per day has been assumed.

9.9. As demonstrated within Chapter 8, the trip generation would likely be much more significant if the site was being proposed for an alternative land use comprising commercial warehousing or industrial estate, for example.

9.10. The transport effects of the development are demonstrated on nine road links as agreed with DC Highways, for future years 2023 and 2033 as agreed through the EIA Scoping process. The future year traffic flows take full account of relevant committed development schemes as agreed with DC Highways.

9.11. The transport work undertaken demonstrates that, following mitigation, the residual adverse impacts are at worst negligible with traffic flows from the proposed development being no greater than the day-to-day variation that would be experienced on the local road network.

9.12. DC Highways accept that the volumes of traffic generated by the development (even under a worst-case assessment) are insignificant in the context of other committed development and the traffic levels permitted under the 2010 Revised Harbour Revision Order which are set at 469 vehicles two way in the morning peak hour and 407 vehicles two way in the evening peak hour. Furthermore, the peak hour traffic flows generated by the development are insignificant and within the normal daily variation of traffic flows experienced on any highway network.

9.13. Consequently it is my view there are no highways reasons for refusal,. DC Highways are also satisfied that the scheme will cause no detrimental effects to the highway network and that it satisfies all their policy requirements and those in the National Planning Policy Framework as confirmed by Paragraph 8.14 of the Planning Officer's Committee Report:

> The highway authority considers that the submitted transport documents are satisfactory and the residual cumulative impacts of the development cannot be thought to be severe in highway terms. Consequently, Dorset Highways has no objection subject to conditions.

9.14. Paragraph 8.21 of the Planning Officer's Committee Report also confirms that National Highways are satisfied that the transport assessment presents a suitably robust worst-case scenario with regard to the traffic impact on the strategic road network, and raised no objection:

> No objection - Having reviewed the further information provided, we are satisfied that the transport assessment presents a suitably robust worst-case scenario with regard to the traffic impact on the strategic road network, noting that the applicant states that they are in active discussion to secure a contract to export incinerator ash by sea. Our recommendation of no objections provided previously remains appropriate.

9.15. It is therefore concluded that the existing highway network would satisfactorily accommodate the additional traffic arising from the proposed ERF plant without resulting in any severe impacts, and therefore the traffic impact of the scheme is considered to be acceptable in light of the requirements of the NPPF.

9.16. It is therefore considered that the Proposed Development is acceptable in transport terms, and that there are no highways related reasons that should prevent Planning Permission from being granted.