

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

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Summary PoE

Traffic and Transportation

PPF18



- 0.1 I am Ian David Awcock, a Chartered Civil Engineer with 39 years' experience in transportation, highways design and assessment. I am also a member of the Institution of Civil Engineers, the Chartered Institution of Highways and Transportation and the Chartered Institute of Water and Environmental Management.
- 0.2 My team at Awcock Ward Partnership (AWP) has advised Powerfuel Portland and Portland Port Ltd on transportation matters associated with the development of land for the proposed Portland ERF since 2019 and prepared the Transport Assessment for the Application.
- 0.3 A planning application was submitted, and an appeal has now been lodged against the refusal of planning permission by Dorset Council.
- 0.4 The application was refused on various grounds covered by other evidence in this Appeal. However, there are no highways reasons for refusal and DC Highways (the local highway authority) has confirmed that in its view the scheme will cause no detrimental effects to the highway network and that it satisfies all its policy requirements and those in the National Planning Policy Framework (NPPF) 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.

- 0.5 Paragraph 8.21 of the Planning Officer's Committee Report also confirms that National Highways is 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.

- 0.6 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.
- 0.7 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.
- 0.8 The revised assessment was required due to new consented developments, specifically at the heliport on Coode Way, needing to be included in the assessment owing to the passage of time since the original assessments were undertaken.
- 0.9 Neither of The Stop Portland Waste Incinerator Group and The Portland Association objector groups has raised any new issues of material significance that have not already been accepted by DC Highways.
- 0.10 In response to one of the comments raised, we understand that there is anticipated to be 56 cruise ships in 2023 and potentially up to 65 in the future operating out of the cruise terminal. The associated incidental coach trips would be within the daily variation of traffic on the local road network and insignificant over the whole day.
- 0.11 The early chapters of the Transport Assessment cover a summary of 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.
- 0.12 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.
- 0.13 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.
- 0.14 The traffic generation assessment assumes that the plant will be operating at full capacity and therefore represents the maximum level of RDF for processing.

- 0.15 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.
- 0.16 Staff that 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.
- 0.17 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.
- 0.18 Both DC Highways and National Highways accept and concur that a 'worst case' assessment has been undertaken in traffic generation terms.
- 0.19 Further analysis undertaken by AWP has involved comparing the traffic generation for the proposed ERF against three other potential B2/B8 land uses of the same scale (industrial estate, commercial warehousing and storage warehousing). This demonstrates that the proposed ERF would generate significantly fewer HGVs than a commercial warehousing use, but more than industrial estate and storage warehousing uses. However, all comparative uses tested would generate vastly more overall vehicle trips than the proposed ERF across the peak hour and daily time periods considered.
- 0.20 Therefore, 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.
- 0.21 The proposed routeing of development generated HGV traffic across the local road network is acceptable to DC Highways. This utilises the one-way system through Weymouth that the Highway Authority has implemented to assist with reducing potential conflicts between HGV vehicles travelling in opposing directions. This was a specific requirement of DC Highways that was raised at the pre-application scoping stage.

- 0.22 The transport effects of the development is demonstrated for 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. The assessment is undertaken in accordance with the “*Guidelines for the Environmental Assessment of Road Traffic*” prepared by the Institute of Environmental Management and Assessment.
- 0.23 To summarise, the traffic impact assessment demonstrates that all links would experience negligible change in traffic flows with a maximum 4.7% increase in HGV flow and maximum 1% increase in total traffic flow in the AM/PM peak hours, which is well below the IEMA threshold of a 10% increase for sensitive receptors as the point at which further assessment may be required.
- 0.24 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 worst 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.
- 0.25 The ES also concluded 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*”.
- 0.26 On all issues the assessment demonstrates that, following mitigation, the residual adverse impacts are, at worst, negligible with traffic flows from the development being no greater than the day-to-day variation that would be experienced on the local road network.
- 0.27 DC Highways accept that the volumes of traffic generated by the development (even under a worst-case assessment), with only 4 vehicles anticipated in the peak hours, 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 generated by the development are insignificant and within the normal daily variation of traffic flows experienced on any highway network.

- 0.28 Consequently, there are no highways reasons for refusal and DC Highways are satisfied that the scheme will cause no detrimental effects to the highway network and that it satisfies all its policy requirements and those in the NPPF, as confirmed by Paragraph 8.14 of the Planning Officer's Committee Report.
- 0.29 In conclusion, it is my considered opinion 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.
- 0.30 In my view, therefore, the Proposed Development is acceptable in transport terms, and that there are no highways related reasons that should prevent Planning Permission from being granted.