



Opening Statement

1. CHAIN is extremely disappointed that its 3 main requests have been turned down prior to the commencement of this Public Inquiry.
2. Its first request was that the venue of this Inquiry should be re-located to a position more central in the town of Northwich. Despite finding a perfectly suitable alternative venue, in CHAIN's opinion, right in the centre of Northwich town, this alternative venue was turned down. CHAIN wishes to point out that this is a Public Inquiry and this alternative venue, in the centre of Northwich, would have allowed a greater participation by the public in and throughout this Inquiry.
3. The second request was a plea by CHAIN to delay the start of this Inquiry because the Consolidated Environmental Statement did not, in CHAIN's opinion, contain sufficient information for the general public to come to a meaningful decision on the environmental effects of this waste incinerator proposal on their lives.

4. The third request concerns the PCT/HPA letter of 3 February which most certainly has not received full and transparent disclosure to the public.
The contents of this letter, we believe, would have had a major effect on the objectors' case statements. CHAIN has included it in its proofs but, owing to its late disclosure, has not been able to fully investigate its implications and resultant consequences.
 5. Despite these disappointments, CHAIN will vigorously present its case and pursue cross-examination of TATA's Expert Witnesses to the best of its ability.
 6. CHAIN's Proof of Evidence will centre around 7 separate areas:-
 - i) The need for the proposed development
 - ii) Sustainability against the waste hierarchy with special reference to new legislation
 - iii) Perceived adverse health effects on the local community
 - iv) Increased and unacceptable traffic implications
 - v) Visual and landscape effects
 - vi) Localism, perception of risk and the views of local MPs
 - vii) Socio-economic effects
- I will present areas 1,2,3,5 and 7 and my colleague Mr. Byrne areas 4 and 7.

7. I do not intend to go into any detail on the 7 areas above for this Opening Statement. However, in outline, CHAIN will, during its proof statements attempt to:-

- i) Give clear and cogent reasons why there is no need for this proposed development
- ii) Review the suggested sustainability of this proposal against new legislation and demonstrate that it is not long term sustainable
- iii) Hi-light some of the health fears of local residents and demonstrate that certain areas in the field of health have not been pursued, although recommended by the health authorities (HPA & PCT)
- iv) Explore the real consequences of all traffic using the roads around the proposed waste incinerator site and give meaningful data as to why traffic, especially HGV traffic would bring the roads to a virtual standstill
- v) Demonstrate that by using “Best Design Techniques”, the visual and landscape effects would be adverse to the people living in and around the proposed plant site
- vi) Examine the implications of the proposed “Localism Bill”, the perception of risk by the local inhabitants and propose that hazard and risk are inseparable
- vii) Last but not least, investigate the socio-economic aspects of this

development, and in particular, some of the unsatisfactory areas of communication which have prevailed during the lead up to this Public Inquiry.

We will attempt to present these areas in a clear and unambiguous way during the course of the Inquiry.

8. As an objector to this proposed development, CHAIN believes there are environmentally more friendly ways to produce Green Energy. If this waste incinerator is given the go-ahead, we will have a 30-35 years lifespan of old technology on this site whilst many new technologies in waste treatment are already proven and newer technologies are constantly emerging.

9. CHAIN will present its case based on all these areas of uncertainty throughout its witness and proofs.