

# **South Humber Bank Energy Centre Project**

Planning Inspectorate Reference: EN010107

**South Marsh Road, Stallingborough, DN41 8BZ**

**The South Humber Bank Energy Centre Order**

## **7.5 - Statement of Common Ground with Highways England**

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**Applicant: EP Waste Management Ltd**  
**Date: July 2020**

## DOCUMENT HISTORY

<b>Document Ref</b>	Statement of Common Ground with Highways England		
<b>Revision</b>	Draft for Comment		
<b>Author</b>	Jonathan Scott		
<b>Signed</b>		<b>Date</b>	July 2020
<b>Approved By</b>	Peter Firth		
<b>Signed</b>		<b>Date</b>	July 2020
<b>Document Owner</b>	AECOM		

## GLOSSARY

Abbreviation	Description
ACC	Air-cooled condenser.
CCGT	Combined Cycle Gas Turbine.
CTMP	Construction Traffic Management Plan.
CWTP	Construction Worker Travel Plan.
DCO	Development Consent Order: provides a consent for building and operating an NSIP.
EfW	Energy from Waste: the combustion of waste material to provide electricity and/or heat.
EIA	Environmental Impact Assessment.
EPUKI	EP UK Investments Ltd.
EPWM	EP Waste Management Limited ('The Applicant').
ES	Environmental Statement.
HE	Highways England.
HGV	Heavy Goods Vehicle.
mAOD	Metres Above Ordnance Datum.
MW	Megawatt: the measure of power produced.
NELC	North East Lincolnshire Council.
NSIP	Nationally Significant Infrastructure Project: for which a DCO is required.
OWTP	Operational Worker Travel Plan.
PA 2008	Planning Act 2008.
PEI	Preliminary Environmental Information.
PINS	Planning Inspectorate.
Q2	Quarter 2.
RDF	Refuse derived fuel.
SHBEC	South Humber Bank Energy Centre.
SHBPS	South Humber Bank Power Station.
SoS	Secretary of State.
SRN	Strategic Road Network.

## CONTENTS

<b>1.0</b>	<b>Introduction.....</b>	<b>1</b>
1.1	Overview.....	1
1.2	The Applicant.....	1
1.3	The Proposed Development Site .....	1
1.4	The Proposed Development .....	2
1.5	Purpose of this Document.....	3
1.6	Status of this Version .....	3
<b>2.0</b>	<b>The Role of Highways England .....</b>	<b>4</b>
<b>3.0</b>	<b>Relevant Matters .....</b>	<b>5</b>
3.1	Consultation with Highways England .....	5
3.2	Mitigation Measures.....	6
<b>4.0</b>	<b>Matters Not Agreed.....</b>	<b>8</b>

## APPENDICES

**APPENDIX 1: TRANSPORT ASSESSMENT SCOPE DATED 21<sup>ST</sup> NOVEMBER 2019**

**APPENDIX 2: HIGHWAYS ENGLAND RESPONSE TO TRANSPORT ASSESSMENT SCOPE DATED 2<sup>ND</sup> DECEMBER 2019**

**APPENDIX 3: AECOM RESPONSE TO COMMENTS RECEIVED BY HIGHWAYS ENGLAND TO TRANSPORT ASSESSMENT SCOPE DATED 20<sup>TH</sup> FEBRUARY 2020**

**APPENDIX 4: HIGHWAYS ENGLAND CONFIRMATION OF NO OUTSTANDING ISSUES DATED 26<sup>TH</sup> FEBRUARY 2020**

**APPENDIX 5: HIGHWAYS ENGLAND CONFIRMATION OF NO OBJECTIONS TO THE PROPOSED DEVELOPMENT DATED 3<sup>RD</sup> JULY 2020**

## **1.0 INTRODUCTION**

### **1.1 Overview**

- 1.1.1 This Statement of Common Ground ('SoCG') with Highways England ('HE') (Document Ref. 7.5) has been prepared on behalf of EP Waste Management Limited ('EPWM' or the 'Applicant'). It forms part of the application (the 'Application') for a Development Consent Order (a 'DCO'), that has been submitted to the Secretary of State (the 'SoS') for Business, Energy and Industrial Strategy, under section 37 of 'The Planning Act 2008' (the 'PA 2008').
- 1.1.1 EPWM is seeking development consent for the construction, operation and maintenance of an energy from waste ('EfW') power station with a gross electrical output of up to 95 megawatts (MW) including an electrical connection, a new site access, and other associated development (together 'the Proposed Development') on land at South Humber Bank Power Station ('SHBPS'), South Marsh Road, near Stallingborough in North East Lincolnshire ('the Site').
- 1.1.2 A DCO is required for the Proposed Development as it falls within the definition and thresholds for a 'Nationally Significant Infrastructure Project' (a 'NSIP') under sections 14 and 15(2) of the PA 2008.
- 1.1.3 The DCO, if made by the SoS, would be known as the 'South Humber Bank Energy Centre Order' ('the Order').
- 1.1.4 Full planning permission ('the Planning Permission') was granted by North East Lincolnshire Council ('NELC') for an EfW power station with a gross electrical output of up to 49.9 MW and associated development ('the Consented Development') on land at SHBPS ('the Consented Development Site') under the Town and Country Planning Act 1990 on 12 April 2019. Since the Planning Permission was granted, the Applicant has assessed potential opportunities to improve the efficiency of the EfW power station, notably in relation to its electrical output. As a consequence, the Proposed Development would have a higher electrical output (up to 95 MW) than the Consented Development, although it would have the same maximum building dimensions and fuel throughput (up to 753,500 tonnes per annum (tpa)).

### **1.2 The Applicant**

- 1.2.1 The Applicant is a subsidiary of EP UK Investments Limited ('EPUKI'). EPUKI owns and operates a number of other power stations in the UK and is a subsidiary of Energetický A Průmyslový Holding ('EPH'). EPH owns and operates energy generation assets in the Czech Republic, Slovak Republic, Germany, Italy, Hungary, Poland, Ireland, and the United Kingdom.

### **1.3 The Proposed Development Site**

- 1.3.1 The Proposed Development Site (the 'Site' or the 'Order limits') is located within the boundary of the SHBPS site, east of the existing SHBPS, along with part of the carriageway within South Marsh Road. The principal access to the site is off South Marsh Road.

- 1.3.2 The Site is located on the South Humber Bank between the towns of Immingham and Grimsby; both over 3 km from the Site.
- 1.3.3 The Site lies within the administrative area of NELC, a unitary authority. The Site is owned by EP SHB Limited, a subsidiary of EPUKI, and is therefore under the control of the Applicant, with the exception of the highway land on South Marsh Road required for the new Site access.
- 1.3.4 The existing SHBPS was constructed in two phases between 1997 and 1999 and consists of two Combined Cycle Gas Turbine (CCGT) units fired by natural gas, with a combined gross electrical capacity of approximately 1,400 MW. It is operated by EP SHB Limited.
- 1.3.5 The Site is around 23 hectares ('ha') in area and is generally flat, and typically stands at around 2.0 m Above Ordnance Datum (mAOD).
- 1.3.6 A more detailed description of the Site is provided at Chapter 3: Description of the Proposed Development Site in the Environmental Statement ('ES') Volume I (Document Ref. 6.2).

#### **1.4 The Proposed Development**

- 1.4.1 The main components of the Proposed Development are summarised below:
- Work No. 1— an electricity generating station located on land at SHBPS, fuelled by refuse derived fuel ('RDF') with a gross electrical output of up to 95 MW at ISO conditions;
  - Work No. 1A— two emissions stacks and associated emissions monitoring systems;
  - Work No. 1B— administration block, including control room, workshops, stores and welfare facilities;
  - Work No. 2— comprising electrical, gas, water, telecommunication, steam and other utility connections for the generating station (Work No. 1);
  - Work No. 3— landscaping and biodiversity works;
  - Work No. 4— a new site access on to South Marsh Road and works to an existing access on to South Marsh Road; and
  - Work No. 5— temporary construction and laydown areas.
- 1.4.2 Various types of ancillary development further required in connection with and subsidiary to the above works are detailed in Schedule 1 of the DCO.
- 1.4.3 The Proposed Development comprises the works contained in the Consented Development, along with additional works not forming part of the Consented Development ('the Additional Works'). The Additional Works are summarised below:
- a larger air-cooled condenser ('ACC'), with an additional row of fans and heat exchangers;
  - a greater installed cooling capacity for the generator;
  - an increased transformer capacity; and

- ancillary works.

1.4.4 A more detailed description of the Proposed Development is provided at Schedule 1 'Authorised Development' of the Draft DCO and Chapter 4: The Proposed Development in the ES Volume I (Document Ref. 6.2) and the areas within which each of the main components of the Proposed Development are to be built is shown by the coloured and hatched areas on the Works Plans (Document Ref. 4.3). Three representative construction scenarios (timescales) are described within Chapter 5: Construction Programme and Management in the ES Volume I (Document Ref. 6.2) and assessed in the Environmental Impact Assessment ('EIA').

## **1.5 Purpose of this Document**

1.5.1 This document is intended to summarise clearly the agreements reached between the parties on matters relevant to the examination of the Application and assist the Examining Authority. It has been prepared with regard to the guidance in 'Planning Act 2008: examination of applications for development consent' (Department for Communities and Local Government, March 2015).

1.5.2 This version of the document summarises the agreements regarding matters such as clarity of the construction phase, assignment of HGVs at the Strategic Road Network ('SRN') and compliance with Circular 02/2013: The Strategic Road Network and the Delivery of Sustainable Development. It is based on the information available at this time, which principally comprises the Draft DCO (Document Ref. 2.1) and accompanying ES Volumes I to III (Document Refs. 6.2 to 6.4), which includes the Transport Assessment at Volume III, Appendix 9A (Document Ref. 6.4.12).

## **1.6 Status of this Version**

1.6.1 The SoCG was prepared in July 2020 and subsequently was agreed as suitable and including all of the relevant matters.

1.6.2 Once finalised, it will be submitted to the Examining Authority to assist the examination of the Application.

1.6.3 Section 2 of this document summarises the role of HE, Section 3 sets out details of consultation with HE to date and discussion on agreement of the relevant matters for consideration. Section 4 sets out any areas of disagreement/ matters to be agreed.

## **2.0 THE ROLE OF HIGHWAYS ENGLAND**

- 2.1.1 HE is the government company charged with operating, maintaining and improving England's SRN (motorways and designated A roads).
- 2.1.2 HE's role in relation to the DCO process derives from the PA 2008 and secondary legislation made under the same.
- 2.1.3 HE is a consultee under sections 42 and 56 of the PA 2008, meaning applicants must consult with HE before submitting a DCO application and once an application has been accepted for examination.



### 3.0 RELEVANT MATTERS

#### 3.1 Consultation with Highways England

- 3.1.1 HE was consulted on the scope of the EIA for the Consented Development in July 2018, and on the scope of the Transport Assessment for the Consented Development in September 2018. The scope of these assessments was subsequently agreed.
- 3.1.2 NELC consulted HE on the planning application for the Consented Development. HE responded in February 2019 to recommend that conditions should be attached to any planning permission that may be granted, requiring a Construction Traffic Management Plan and a Travel Plan to be approved by HE. Conditions securing these matters were subsequently imposed on the Planning Permission by NELC.
- 3.1.3 HE was first consulted on the Proposed Development by the Planning Inspectorate ('PINS') in October 2019 in response to EPWM's request for an EIA Scoping Opinion. However no response was provided to PINS.
- 3.1.4 AECOM on behalf of EPWM subsequently produced a Transport Assessment Scope to discuss and agree certain specific matters with HE including:
- assessment scenarios;
  - baseline traffic data;
  - accident data;
  - fuel delivery hours;
  - trip generation and assignment;
  - committed developments;
  - junction capacity assessment;
  - construction traffic assessment; and
  - additional reports.
- 3.1.5 A copy of the Transport Assessment Scope dated 21<sup>st</sup> November 2019 is provided in **Appendix 1**.
- 3.1.6 HE indicated in their email response dated 2<sup>nd</sup> December 2019 that the proposed scope was acceptable, however, the following points were raised:
- **Point 1:** Clarity as to the construction phases planned and the potential overlap between the construction phases/ Consented Development;
  - **Point 2:** The assignment of HGVs at the SRN to be informed by the discussions held with fuel suppliers to ensure it is as accurate as possible; and
  - **Point 3:** The Transport Assessment should be compliant with Circular 02/2013.
- 3.1.7 A copy of HE's full response to the Transport Assessment Scope dated 2<sup>nd</sup> December 2019 is provided in **Appendix 2**.



3.1.8 These points were addressed in an email response to HE on the 20<sup>th</sup> February 2020 as follows:

- **Point 1:** The development will be built in one single construction phase, whether under the Planning Permission or the DCO. Therefore the two phase approach to construction that was considered in the Consented Development ES is no longer proposed. The single construction phase is expected to begin in Q2 2020, or (less likely) Q3 2021 or Q3 2026.
- **Point 2:** It remains some time before contracts will be signed with specific suppliers and in turn the source locations associated with each supplier. We do not therefore have any reliable information on sources of fuel that would justify a change to the assessment approach (a 50:50 east:west split at the A180 Stallingborough Interchange) agreed with HE and NELC as robust for the Consented Development TA.
- **Point 3:** A future year assessment scenario of 2030 (ten years after the registration of the application) will be assessed and the TA is therefore compliant with Circular 02/2013.

3.1.9 A copy of the response to HE dated 20<sup>th</sup> February 2020 is provided in **Appendix 3**.

3.1.10 HE subsequently replied in an email dated 26<sup>th</sup> February 2020 stating that they were now content with the information provided and agreed the transport parameters. The response also set out that HE would welcome the provision of additional detail on fuel suppliers if this information becomes available with regard to the assignment of HGVs to the SRN.

3.1.11 A copy of HE's response dated 26<sup>th</sup> February 2020 is provided in **Appendix 4**.

3.1.12 Following the submission of the DCO application in May 2020, HE subsequently responded in an email dated 3<sup>rd</sup> July 2020, following a review of the Transport Assessment, stating that HE have no objections to the Proposed Development.

3.1.13 A copy of HE's response dated 3<sup>rd</sup> July 2020 is provided in **Appendix 5**.

## 3.2 Mitigation Measures

3.2.1 The following mitigation measures are proposed to limit the construction stage traffic impacts of the Proposed Development:

- Implementation of a Construction Worker Travel Plan ('CWTP') aimed at identifying measures and establishing procedures to encourage construction workers to adopt modes of transport which reduce reliance on single occupancy private car use (a framework CWTP is provided in ES Volume III, Appendix 9A (Document Ref 6.4.12));
- Implementation of a Construction Traffic Management Plan ('CTMP') including measures to control the routing and impact of HGVs and abnormal loads upon the local road network during construction (a framework CTMP is provided in ES Volume III, Appendix 9A, Document Ref 6.4.12) .

- Implementation of an Operational Delivery and Servicing Plan demonstrating how deliveries to the Proposed Development during operation will be managed (a Delivery and Servicing Plan is provided in ES Volume III, Appendix 9A, Document Ref 6.4.12); and
- Implementation of an Operational Worker Travel Plan ('OWTP') aimed at identifying measures and establishing procedures to promote and encourage the use of sustainable transport modes and reduce reliance on the private car once the Proposed Development is operational (a framework OWTP is provided in ES Volume III, Appendix 9A, Document Ref 6.4.12).

3.2.2 These measures would be secured by the following Draft DCO Requirements (Document Ref. 2.1):

- Requirement 16. 'Construction traffic management and travel planning';
- Requirement 24. 'Delivery and servicing plan'; and
- Requirement 25. 'Operational travel plan'.

3.2.3 It is agreed that the measures included within the Draft DCO Requirements provide appropriate mechanisms by which to mitigate the construction and operational traffic impacts of the Proposed Development.

## **4.0 MATTERS NOT AGREED**

4.1.1 There are no areas of disagreement between the parties.

Signed:



**On behalf of: Highways England**

Date: September 2 2020

Signed:



**On behalf of: EP Waste Management Ltd**

Date: 2<sup>nd</sup> September 2020

## **APPENDIX 1: TRANSPORT ASSESSMENT SCOPE DATED 21<sup>ST</sup> NOVEMBER 2019**

Scott, Jonathan (Leeds)

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From: Scott, Jonathan (Leeds)  
Sent: 21 November 2019 16:06  
To: simon.geoghegan@highways.gsi.gov.uk  
Cc: Firth, Peter  
Subject: South Humber Bank Energy Centre DCO Application - Request for Comment on Transport Assessment Scope

Dear Simon,

Request for Comment on Transport Assessment Scope

Full planning permission was granted by North East Lincolnshire Council in April 2019 for an energy from waste power station known as South Humber Bank Energy Centre on vacant land at South Humber Bank Power Station. This 'Consented Development' has a generation capacity of up to 49.9 MW and an Environmental Impact Assessment (EIA) and Transport Assessment (TA) were carried out for it. Since that time, an opportunity to increase the output to up to 95 MW, with no change to the fuel throughput or the maximum building dimensions or stacks, has been identified. This is referred to as the 'Proposed Development'. Some additional works and items of plant would be required and as the capacity would be over 50 MW, a Development Consent Order (DCO) is required to authorise its development.

We are currently undertaking an EIA and TA of the Proposed Development on behalf of the promoter, EP Waste Management Limited. A Preliminary Environmental Information (PEI) Report was published for consultation recently under section 42 of the Planning Act 2008, and is available on the project website at [www.shbenergycentre.co.uk](http://www.shbenergycentre.co.uk) along with our other consultation documents. Following consultation the EIA and TA will then be finalised and an Environmental Statement (ES) including the TA report will be included with the DCO application and submitted to the Secretary of State in early 2020. Your organisation is a statutory consultee and has been formally notified via letter. The notification letter (copy at <https://www.shbenergycentre.co.uk/download/1760/>) was sent to the Company Secretary and explains the response methods and the deadline of 13 December 2019.

As a matter of good practice we like to discuss and agree certain specific matters while drafting the ES and TA report and would welcome a discussion or a response to this e-mail on these. This would be separate to the ongoing statutory consultation.

- assessment scenarios;
- baseline traffic data;
- accident data;
- fuel delivery hours;
- trip generation and assignment;
- committed developments;
- junction capacity assessment;
- construction traffic assessment; and
- additional reports.

Alternatively, if all these matters will be covered in your statutory consultation response then a discussion may not be necessary.

Assessment Scenarios

Whilst the DCO is being sought, the Applicant is likely to progress the Consented Development in accordance with the planning permission. Approximately a three year construction programme is anticipated for the Consented Development, with construction expected to commence in Quarter 1 (Q1) 2020. Following grant of a DCO for the

Proposed Development (which would be anticipated around Q3 2021, approximately half way through the three year construction programme for the Consented Development), the additional works that would be required (in addition to those which benefit from the planning permission) would then be constructed, and the Proposed Development would commence operation in 2023.

Whilst this is the most likely construction programme scenario for the Proposed Development, two other potential construction programme scenarios are also being considered in order that a robust assessment of environmental effects is undertaken. The alternative scenarios relate to the potential for the Proposed Development to be constructed and operated pursuant to only the DCO and commencing either in Q3 2021 (when the DCO would be granted) or Q3 2026 (before the DCO would expire). In these two alternative scenarios the Proposed Development would commence operation in 2024 or 2029 respectively.

For the purposes of the TA (in terms of highway/ junction capacity) the worst case scenario would be the latest construction start date (2026) because baseline traffic flows would be higher. However, for the purposes of the EIA the earliest construction start date (Q1 2020) and the latest construction start date (Q3 2026) are both being assessed for completeness. If construction starts in Q1 2020, before the final ES and TA are completed for the DCO application, the later construction scenario will be discounted.

We would be grateful for your confirmation that the assessment scenarios cover the 'worst case' in terms of the traffic assessment.

#### Baseline Traffic Data

It is proposed to use the baseline traffic counts that were agreed for the Consented Development TA. These counts were undertaken in 2018 and are therefore still valid and include the following:

- MCC 1: South Marsh Road / Hobson Way;
- MCC 2: Hobson Way / Laporte Road / Kiln Lane;
- MCC 3: Kiln Lane / North Moss Lane / Trondheim Way;
- MCC 4: A1173 / Kiln Lane;
- MCC 5: A1173 / A180 Stallingborough Interchange; and
- MCC 6: A180 / Moody Lane / Pyewipe Road (Westgate Roundabout);
  
- ATC 1: South Marsh Road (East of Hobson Way);
- ATC 2: South Marsh Road (West of Hobson Way);
- ATC 3: Hobson Way (North of South Marsh Road);
- ATC 4: Kiln Lane (West of Hobson Way);
- ATC 5: A1173 (West of North Moss Lane)
- ATC 6: A1173 (North of A180); and
- ATC 7: A180 (East of Westgate Roundabout).

We would be grateful for your confirmation that this study area remains appropriate and 2018 data remains valid.

#### Accident Data

As agreed for the Consented Development TA, accident data will be obtained from Crashmap. This will cover the period 1<sup>st</sup> January 2014 to 31<sup>st</sup> December 2018.

We would be grateful for your confirmation that Crashmap accident data for this period is appropriate for use in the TA.

#### Fuel Delivery Hours

No changes are proposed in terms of the overall layout, fuel throughput, staffing levels, HGV routing or vehicle access. However since planning permission was granted for the Consented Development, discussions with potential

fuel suppliers have progressed and it is now clarified that fuel deliveries will be Monday to Sunday 00:00 – 23:59 (excluding Christmas Day, Boxing Day and New Years Day). However, for the purposes of the Proposed Development TA, as a 'worst case' it is assumed that all deliveries (consumables and fuel) and collections (bottom ash and flue gas treatment residues) will take place between 06:00 and 18:00, as per the Consented Development TA.

We would be grateful for your confirmation that this approach will provide a worst case assessment for traffic.

#### Trip Generation and Assignment

The operational vehicle movements assessed in the Consented Development TA were based on several worst case assumptions (including minimum fuel calorific value/ maximum tonnage and 16 tonne HGV loads). As the sources of fuel are not yet known, the Consented Development TA assumed a 50:50 east:west split at the A180 Stallingborough Interchange. The same assumptions are proposed for the Proposed Development TA.

We would be grateful for your confirmation that this approach will provide an appropriate, worst case assessment for traffic.

#### Growth Factors

As described above the Proposed Development is due to be fully operational at the earliest in 2023 and the latest in 2029 and these have therefore been identified as the assessment years for the Proposed Development TA. If construction starts in Q1 2020, before the final TA is completed for the DCO application, the later construction scenario will be discounted.

As agreed for the Consented Development TA, traffic growth factors will be based on TEMPRO Version 7.2 for the North East Lincolnshire District. A future operational year of 2030 will also be assessed (10 years following submission of DCO application).

We would be grateful for your confirmation that the use of these growth factors is appropriate.

#### Committed Developments

The following committed developments that were included within the Consented Development TA will be taken account of within the Proposed Development TA:

- North Beck Energy Centre;
- Stallingborough Employment Site;
- End-of-Life Tyre Pyrolysis Plant, Scandinavian Way
- Paragon/ Kia Development, Kiln Lane;
- Renewable Power Facility, Kiln Lane
- Stallingborough Link Road.

In addition to the committed developments outlined above, a proposed sustainable transport fuels facility at Portlink 180, Hobson Way, Stallingborough will also be included in the Proposed Development TA.

We would be grateful for your confirmation that this list of committed developments is appropriate for the TA.

#### Junction Capacity Assessment

Junction capacity assessments will be undertaken at the following junctions as agreed for the Consented Development TA:

- Hobson Way/ South Marsh Road (East of Hobson Way) T-Junction;
- Hobson Way/ South Marsh Road (West of Hobson Way) T-Junction;
- Laporte Road/ Kiln Lane/ Hobson Way Roundabout;



- A1173/ Kiln Lane Roundabout;
- A1173/ SHIP Site Access;
- A180 Stallingborough Interchange; and
- A180/ Moody Lane/ Pyewipe Road (Westgate Roundabout).

Junction capacity assessments will be undertaken for the following scenarios:

- 2018 Base;
- 2023 Base + Committed Development;
- 2023 Base + Committed Development + Proposed Development;
- 2030 Base + Committed Development; and
- 2030 Base + Committed Development + Proposed Development.

We would be grateful for your confirmation that the list of junctions to be modelled and the operational junction capacity assessment scenarios are appropriate for the TA.

#### Construction Traffic Assessment

No changes are proposed to construction workforce numbers, construction HGV numbers or the assignment of construction vehicles to the network as set out in the Consented Development TA are proposed for the Proposed Development TA.

As described above construction of the Proposed Development is due to start in Q1 2020 with the construction programme lasting around 36 months and the peak construction period anticipated to be in 2021. However should construction not start in early 2020, the worst case scenario in terms of traffic would be construction starting in 2026 with the peak construction period anticipated to be 2027.

Junction capacity assessments will be undertaken at each of the junctions listed above for the following scenarios:

- 2021 Base + Committed Development;
- 2021 Base + Committed Development + Proposed Development;
- 2027 Base + Committed Development; and
- 2027 Base + Committed Development + Proposed Development.

We would be grateful for your confirmation that the construction junction capacity assessment scenarios are appropriate for the TA.

#### Additional Reports

As agreed for the Consented Development TA, the following reports will accompany the Proposed Development TA:

- Framework Operational Travel Plan;
- Framework Construction Travel Plan;
- Framework Construction Traffic Management Plan; and
- Delivery and Servicing Plan.

We would be grateful for your confirmation that no other specific reports are required to accompany the TA.

Yours sincerely

**Jonathan Scott BSc (Hons), MSc, MCIHT**  
 Senior Transport Planner, Development Planning  
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**AECOM**

## **APPENDIX 2: HIGHWAYS ENGLAND RESPONSE TO TRANSPORT ASSESSMENT SCOPE DATED 2<sup>ND</sup> DECEMBER 2019**

Scott, Jonathan (Leeds)

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From: Geoghegan, Simon <Simon.Geoghegan@highwaysengland.co.uk>  
Sent: 02 December 2019 16:08  
To: Scott, Jonathan (Leeds); planning@nelincs.gov.uk  
Cc: Firth, Peter; Newsome, Donna  
Subject: DM/0575/18/SCO - South Humber Bank Energy Centre DCO Application - Request for Comment on Transport Assessment Scope  
Attachments: AECOM - Scoping - DM-0575-18-SCO - South Marsh Road DCO Power Station.pdf

FO: Jonathan Scott, Cheryl Jarvis

I write on behalf of Highways England in response to a Request for Scoping Opinion - Construction and operation of an energy from waste power station with a maximum gross electrical output of 49.9 MW, at South Humber Bank Power Station South Marsh Road Stallingborough, Grimsby.

Highways England have reviewed a Technical Memorandum [TM] recently submitted by Jonathan Scott of AECOM, and the purpose of this communication is to review that TM, which is attached here. We found three deficiencies.

Please contact me if I can assist further.

**Simon Geoghegan, Planning and Development**

Highways England | Lateral | 8 City Walk | Leeds | LS11 9AT

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**Web:** <http://www.highways.gov.uk>

**GTN:** 0300 470 2420

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Your ref: DM/0575/18/SCO

Jonathan Scott  
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2 City Walk  
Leeds  
LS11 9AR

**For the attention of Jonathan Scott**

Simon GP Geoghegan  
Asset Manager  
3 SOUTH  
Lateral  
8 City Walk  
Leeds LS11 9AT

Direct Line: 0300 470 2420

2 December 2019

Dear Mr Scott

## **SOUTH HUMBER BANK ENERGY CENTRE DCO APPLICATION - TRANSPORT SCOPING NOTE**

### **Task Overview**

The purpose of this Technical Memorandum [TM] is to respond to AECOM's email received on 21st November 2019 [the email] which was prepared and submitted in response to the previous Technical Memorandum (DevHU0015.TM001) regarding South Humber Bank Power Station - Discharge of Condition 10.

The development proposal is located at South Marsh Road, Stallingborough - located close to the A180, which forms part of the Strategic Road Network [SRN], hence the requirement for Highways England to be consulted.

Planning permission was granted for the development proposals in April 2019, and AECOM has now approached Highways England via email regarding the transport documentation required to support a Development Consent Order [DCO] application, with the aspiration to agree the transport parameters in advance of the submission.

This TM reviews the background of the development proposals and correspondence to date, before reviewing the contents of the AECOM email, in the order in which the issues are presented. A summary and conclusions are presented at the end of the TM.

### **Background**

Highways England have been advised on three previous occasions regarding the development proposals at South Humber Bank Power Station. For completeness, deficiencies, conclusions and recommendations from each review are listed below in order:

**TM001 679066.AE.18.37.01, South Humber Bank Energy Centre: EIA Scoping – CH2M Review, 25th July 2018**

- The Environmental Statement [ES] – and the CEMP – will need to be reviewed and accepted by Highways England before construction can commence at the site;
- No junctions on the SRN have been included within the study area, and as such, justification is required as to this omission;
- Given that the EIA identifies that the SRN needs be considered during the construction and operation phases, the SRN should be considered within the study area;
- Whilst this early consideration of the construction and operational traffic is welcomed, more precise information will be required within the Transport Assessment [TA];
- The TA should pay due cognisance to the requirements of Circular 02/2013;
- The scope of the TA looks broadly acceptable at this point in the process. However, has concerns that the SRN is not being considered within the assessment of the impact of the construction and operational trips before said trips have been derived and agreed. As such, until it can be demonstrated that the development proposals will not severely impact the capacity, operation and safety of the SRN, the SRN should be included within the scope of the TA; and
- The proposed link road – Planning application reference: DM/0094/18/FUL – from Hobson Way to Moody Lane should be considered within the study area as the link road will impact upon the distribution of trips to and from the development proposals

**TM001a, 679006.AE.18.62.12, South Humber Bank Energy Centre: Review of Transport Assessment and Travel Plan, 1st February 2019**

A holding direction was recommended to be placed on the application until further information was provided:

- The ATC counts have not been provided for review and should be provided to Highways England for completeness;
- There some discrepancies in HGV development traffic which should be clarified;
- It is not clear what distribution committed developments are using and this should be identified;
- It is considered that the CTMP should be secured by a planning condition by Highways England to protect Highways England's interests with regards the SRN; and
- It is considered that the Travel Plan should be secured by a planning condition by Highways England to protect Highways England's interests with regards the SRN.

Subsequently, in reply to AECOM's response via email on 25th February 2019, it was agreed that a CTMP and CWTP would be secured by planning condition.

**TM001, Dev HU0015, 679066.AA.19.17.07, South Humber Bank Power Station – discharge of condition 10, 20th August 2019**

No objection was raised, although noting there were assessment deficiencies:

- Clarification on the distribution of HGV delivery trips that take place between 07:00 – 19:00

### **Assessment Scenarios**

It is stated that whilst the DCO is being sought, the applicant is likely to progress the development proposals in accordance with the planning permission obtained in April 2019.

In addition, it is stated that there will be a three-year construction programme for the development proposals, with construction expected to commence in Quarter 1 (Q1) 2020. Furthermore, it is stated that following grant of a DCO for the development proposals – which is stated as being anticipated around Q3 2021 – approximately half way through the three-year construction programme for the development proposals - the additional works that would be required (in addition to those which currently benefit from the planning permission) would then be constructed, and the development would commence operation in 2023.

However, whilst AECOM state that the above is the most likely construction programme scenario for the development proposals, two other potential construction programme scenarios are also being considered in order to ensure that a robust assessment of environmental effects is undertaken. This approach is welcomed as it covers a range of scenarios.

The alternative scenarios relate to the potential for the development proposals to be constructed and operated pursuant to only the DCO and commencing either in Q3 2021 (when the DCO would be granted) or Q3 2026 (before the DCO would expire). It is stated that in these alternative scenarios the development proposals would commence operation in 2024 or 2029 respectively.

In terms of translating these scenarios into a TA, it is stated that the 'worst case' scenario would be the latest construction start date (2026) because baseline traffic flows would be higher. We agree with this statement.

However, for the purposes of the EIA, it is stated that the earliest construction start date (Q1 2020) and the latest construction start date (Q3 2026) are both being assessed for completeness; and if construction starts in Q1 2020, before the final ES and TA are completed for the DCO application, the later construction scenario will be discounted.

We welcome the detail provided with regards to the range of scenarios. However, from the information provided, it is unclear as to whether there will be two separate construction phases, and therefore overlap between the two. As such, clarity should be provided on this. In addition, it is accepted that the 'worst case' scenario would indeed be with the latest construction date (2026), but more importantly, the assessment year used in the TA should be realistic as well as compliant with Circular 02/2013.

## **Baseline Traffic Data**

It is proposed by AECOM to use the baseline traffic counts that were agreed for inclusion within the consented TA. These counts were undertaken in 2018 and include the following:

- MCC 1: South Marsh Road / Hobson Way;
- MCC 2: Hobson Way / Laporte Road / Kiln Lane;
- MCC 3: Kiln Lane / North Moss Lane / Trondheim Way;
- MCC 4: A1173 / Kiln Lane;
- MCC 5: A1173 / A180 Stallingborough Interchange; and
- MCC 6: A180 / Moody Lane / Pyewipe Road (Westgate Roundabout).
- ATC 1: South Marsh Road (East of Hobson Way);
- ATC 2: South Marsh Road (West of Hobson Way);
- ATC 3: Hobson Way (North of South Marsh Road);
- ATC 4: Kiln Lane (West of Hobson Way);
- ATC 5: A1173 (West of North Moss Lane);
- ATC 6: A1173 (North of A180); and
- ATC 7: A180 (East of Westgate Roundabout).

Given that these locations have already been agreed by Highways England, the proposed study area for the DCO application is agreed.

## **Accident Data**

It is stated that accident data will be collected via CrashMap for the same study area as the consented TA and will be collected for the dates 1st January 2014 to 31st December 2018.

We accept the use of the consented study area, but if the TA is delayed into early 2020, it may be possible to collect more up to date information including 2019 statistics.



## **Fuel Delivery Hours**

TM001 (20th August 2019) requested clarification on the distribution of HGV delivery trips that take place between 07:00 – 19:00.

Since planning permission was granted, it is stated that discussions with potential fuel suppliers have progressed and it is now clarified that fuel deliveries will be Monday to Sunday 00:00 – 23:59 (excluding Christmas Day, Boxing Day and New Year's Day). But for the purposes of the proposed TA, as a 'worst case' it is assumed that all deliveries (consumables and fuel) and collections (bottom ash and flue gas treatment residues) will take place between 06:00 and 18:00.

Given that this results in more HGVs being assessed in the network peak hours, this is considered a robust approach and is accepted.

## **Trip Generation and Assignment**

It is stated that as the sources of fuel are not yet known, the consented assumed a 50:50 east:west split at the A180 Stallingborough Interchange, and that the same assumptions are proposed for the proposed TA.

This is accepted at this point. However, given that it is stated that discussions with potential fuel suppliers have progressed, it is considered that this information should be used to inform the trip distribution at the SRN.

## **Growth Factors**

The email states that the development proposals are to be fully operational at the earliest in 2023, and the latest in 2029, and these have therefore been identified as the assessment years for the proposed TA. As mentioned earlier within this TM, we would expect the TA to be compliant with Circular 02/2013.

Furthermore, it is stated that traffic growth factors will be based on TEMPRO Version 7.2 for the North East Lincolnshire District, as per the consented TA, and this is accepted.

## **Committed Developments**

The following committed developments that were included within the consented TA are stated as being considered within the proposed TA:

- North Beck Energy Centre;
- Stallingborough Employment Site;
- End-of-Life Tyre Pyrolysis Plant, Scandinavian Way;
- Paragon/ Kia Development, Kiln Lane;
- Renewable Power Facility, Kiln Lane; and
- Stallingborough Link Road.

In addition to the committed developments outlined above, it is stated that a proposed sustainable transport fuels facility at Portlink 180, Hobson Way, Stallingborough will also be included in the proposed TA.

We agree with the list provided, but it is considered that liaison is undertaken with North Lincolnshire Council to ensure the list of committed developments is exhaustive.

## **Junction Capacity Assessment**

AECOM state that junction capacity assessments will be undertaken at the following junctions, as agreed for the consented TA:

- Hobson Way/ South Marsh Road (East of Hobson Way) T-Junction;
- Hobson Way/ South Marsh Road (West of Hobson Way) T-Junction;
- Laporte Road/ Kiln Lane/ Hobson Way Roundabout;
- A1173/ Kiln Lane Roundabout;
- A1173/ SHIP Site Access;
- A180 Stallingborough Interchange; and
- A180/ Moody Lane/ Pyewipe Road (Westgate Roundabout).

These are accepted by our Transport Consultants.

In addition, it is stated to undertake junction capacity assessments will be undertaken for the following scenarios:

- 2018 Base;
- 2023 Base + Committed Development;
- 2023 Base + Committed Development + Proposed Development;
- 2030 Base + Committed Development; and
- 2030 Base + Committed Development + Proposed Development.

It is recommended that the assessment scenarios should be compliant with Circular 02/2013.

## **Construction Traffic Assessment**

It is stated that no changes are proposed to construction workforce numbers, construction HGV numbers or the assignment of construction vehicles to the network as set out in the consented TA are proposed for the proposed TA.

Should construction not start in early 2020, the 'worst case' scenario in terms of traffic would be construction starting in 2026, with the peak construction period anticipated to be 2027. With this in mind, junction capacity assessments are to be undertaken at each of the junctions listed above for the following scenarios:

- 2021 Base + Committed Development;
- 2021 Base + Committed Development + Proposed Development;
- 2027 Base + Committed Development; and
- 2027 Base + Committed Development + Proposed Development.

As commented upon previously, it is recommended that the assessment scenarios should be compliant with Circular 02/2013.

## **Additional Reports**

AECOM state that as agreed for the consented TA, the following reports will accompany the proposed TA:

- Framework Operational Travel Plan;
- Framework Construction Travel Plan;
- Framework Construction Traffic Management Plan; and
- Delivery and Servicing Plan.

These are accepted by our Transport Consultants.

## **Summary and Conclusions**

Highways England commissioned CH2M to respond to AECOM's email, 21st November 2019, regarding South Humber Bank Power Station – Discharge of Condition 10.

The development proposals are located near to the A180, part of Highways England's Strategic Road Network; and planning permission has been granted for the development in April 2019.

AECOM has asked Highways England for guidance regarding the transport documentation required to support a Development Consent Order application, with the aim to agree the transport parameters in advance of the submission.

This Technical Memorandum has been prepared to advise Highways England on the suitability of the information provided at this stage, paying due cognisance to the impact of the development proposals on the capacity, operation and safety of the Strategic Road Network.

On the basis of this review, some key deficiencies have been highlighted and are:

1. Clarity as to the construction phases planned and the potential overlap between the construction phases / consented development;
2. The assignment of HGVs at the SRN should be informed by the discussions held with fuel suppliers to ensure it is as accurate as possible; and,
3. The Transport Assessment should be compliant with Circular 02/2013.

Please contact me if I can assist further with this matter.

Yours sincerely



**Simon GP Geoghegan**  
**Planning and Development**  
**Email: [simon.geoghegan@highways.gsi.gov.uk](mailto:simon.geoghegan@highways.gsi.gov.uk)**

**APPENDIX 3: AECOM RESPONSE TO COMMENTS RECEIVED BY  
HIGHWAYS ENGLAND TO TRANSPORT ASSESSMENT SCOPE  
DATED 20<sup>TH</sup> FEBRUARY 2020**

Scott, Jonathan (Leeds)

---

From: Scott, Jonathan (Leeds)  
Sent: 20 February 2020 16:10  
To: Geoghegan, Simon  
Cc: Firth, Peter; Newsome, Donna; Cobb, Kirsty; Colin Turnbull  
Subject: RE: DM/0575/18/SCO - South Humber Bank Energy Centre DCO Application - Request for Comment on Transport Assessment Scope

Simon,

Thank you for your response dated 2nd December 2019 in relation to my request dated 21st November 2019 regarding the South Humber Bank Energy Centre DCO application Transport Assessment scope.

Please see our responses below to your comments and trust that these provide the necessary information.

Regards,  
Jonathan

1. Clarity on whether there are two construction phases, with an overlap between the two.

The development will be built in one single construction phase, whether under the Planning Permission or the DCO. Therefore the two phase approach to construction which was being considered in the ES for the Planning Permission is no longer proposed. This could be either beginning Q2 2020, or (less likely) Q3 2021 or Q3 2026.

2. The assignment of HGVs at the SRN should be informed by the discussions held with fuel suppliers to ensure it is accurate as possible;

Discussions with potential fuel suppliers revealed that there is potentially a need to allow 24hr deliveries. These discussions are ongoing and involve a large number of potential suppliers (more than would in practice supply the plant) and it remains some time before contracts will be signed with specific suppliers and in turn the source locations associated with each supplier. We do not therefore have any reliable information on sources of fuel that would justify a change to the robust assessment approach (a 50:50 east:west split at the A180 Stallingborough Interchange) agreed with HE and NELC for the Consented Development TA at this stage.

3. The Transport Assessment should be compliant with Circular 02/2013;

A future year assessment scenario of 2030 (ten years after the registration of the application) will be assessed and the TA is therefore compliant with Circular 02/2013.

**Jonathan Scott BSc (Hons), MSc, MCIHT**  
Senior Transport Planner, Development Planning  
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M +07827 224965  
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From: Geoghegan, Simon <Simon.Geoghegan@highwaysengland.co.uk>  
Sent: 02 December 2019 16:08  
To: Scott, Jonathan (Leeds) <jonathan.scott@aecom.com>; planning@nelincs.gov.uk  
Cc: Firth, Peter <peter.firth@aecom.com>; Newsome, Donna <Donna.Newsome@highwaysengland.co.uk>  
Subject: DM/0575/18/SCO - South Humber Bank Energy Centre DCO Application - Request for Comment on Transport Assessment Scope

FO: Jonathan Scott, Cheryl Jarvis

I write on behalf of Highways England in response to a Request for Scoping Opinion - Construction and operation of an energy from waste power station with a maximum gross electrical output of 49.9 MW, at South Humber Bank Power Station South Marsh Road Stallingborough, Grimsby.

Highways England have reviewed a Technical Memorandum [TM] recently submitted by Jonathan Scott of AECOM, and the purpose of this communication is to review that TM, which is attached here. We found three deficiencies.

Please contact me if I can assist further.

**Simon Geoghegan, Planning and Development**  
Highways England | Lateral | 8 City Walk | Leeds | LS11 9AT  
**Tel:** +44 (0) 300 4702420 | **Mobile:** personal  
**Web:** <http://www.highways.gov.uk>  
**GTN:** 0300 470 2420

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## **APPENDIX 4: HIGHWAYS ENGLAND CONFIRMATION OF NO OUTSTANDING ISSUES DATED 26<sup>TH</sup> FEBRUARY 2020**

Scott, Jonathan (Leeds)

---

From: Geoghegan, Simon <Simon.Geoghegan@highwaysengland.co.uk>  
Sent: 26 February 2020 14:51  
To: Scott, Jonathan (Leeds)  
Cc: Firth, Peter; colin.turnbull@dwdllp.com; Firth, Peter; Newsome, Donna  
Subject: DM/0575/18/SCO - Comments for: South Humber Bank Energy Centre DCO Application -

Scott

Thank you for your comments of February 20<sup>th</sup>. These have served to give some clarity on the three points we raised in December 2019.

Overall Highways England are now content with the information provided. We therefore AGREE the transport parameters supplied to us at this point in time.

We would welcome the provision of additional detail which you have suggested may be available from fuel suppliers. If this information comes forward it will provide more depth to that which exists already and helps the case.

Thank you for your efforts here and your assistance to us, we look forward to continuing to work with you.

Regards

**Simon Geoghegan, Planning and Development**  
Highways England | Lateral | 8 City Walk | Leeds | LS11 9AT  
**Tel:** +44 (0) 300 4702420 | **Mobile:** personal  
**Web:** <http://www.highways.gov.uk>  
**GTN:** 0300 470 2420

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## **APPENDIX 5: HIGHWAYS ENGLAND CONFIRMATION OF NO OBJECTIONS TO THE PROPOSED DEVELOPMENT DATED 3<sup>RD</sup> JULY 2020**

Scott, Jonathan (Leeds)

---

Subject: RE: South Humber Bank Energy Centre – Notification of Acceptance in accordance with s56 Planning Act 2008, Reg 8 APFP regulations and Reg 16 EIA regulations.

From: Geoghegan, Simon <[Simon.Geoghegan@highwaysengland.co.uk](mailto:Simon.Geoghegan@highwaysengland.co.uk)>  
Sent: 03 July 2020 10:04  
To: [Ellie.Mcgrath@dwidlp.com](mailto:Ellie.Mcgrath@dwidlp.com); Planning - IGE (ENGIE) <[planning@nelincs.gov.uk](mailto:planning@nelincs.gov.uk)>  
Cc: Firth, Peter <[peter.firth@aecom.com](mailto:peter.firth@aecom.com)>; Newsome, Donna <[Donna.Newsome@highwaysengland.co.uk](mailto:Donna.Newsome@highwaysengland.co.uk)>; [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk); growthandplanning <[growthandplanning@highwaysengland.co.uk](mailto:growthandplanning@highwaysengland.co.uk)>  
Subject: [EXTERNAL] South Humber Bank Energy Centre – Notification of Acceptance in accordance with s56 Planning Act 2008, Reg 8 APFP regulations and Reg 16 EIA regulations.

Ellie

Thank you for your communication of May 27 2020 inviting Highways England to comment on the Development Consent Order application for the South Humber Bank Energy Centre Project.

Highways England is now in a position to provide that response

The Transport Assessment [TA] concludes that it is not considered that the development proposals will have a material impact in terms of highway capacity or safety and that the development proposals represents acceptable development in highways and transport terms; and that the construction and operational traffic flows associated with the development proposals are the same as the construction and operational traffic flows associated with the consented development.

Our Transport Consultants (CH2M/Jacobs) have reviewed this TA, and concluded;

- that the development quantum and associated traffic flows have remained the same since planning approval, and as such, are in agreement with AECOM's conclusion.
- That the CWTP and CTMP are considered to be the appropriate tools and fit for purpose.

On the basis of this review, Highways England have no objections to this development as proposed.

During the Coronavirus Pandemic in common with many of my colleagues I am working from home and no messages should be left on the Lateral Phone Number. My **personal** mobile number is given below but this should only be given out to direct stakeholders with a business need.

**Simon Geoghegan, Planning and Development**  
Highways England | Lateral | 8 City Walk | Leeds | LS11 9AT  
~~Tel: +44 (0) 300 4702420~~ | **Mobile: 0742 747 9830**  
Web: <http://www.highways.gov.uk>  
GTN: 0300 470 2420

# South Humber Bank Power Station DCO Application – CH2M Review

PREPARED FOR: Simon Geoghegan (Highways England)  
PREPARED BY: Jonathan Parsons  
DATE: 1st July 2020  
PROJECT NUMBER: 679066.AA.20.05.20 DevHU0015  
DOCUMENT REF: TM001  
REVIEWED / APPROVED BY: Gavin Nicholson (CH2M)

## Task Overview

The purpose of this Technical Memorandum [TM] is to review the Development Consent Order [DCO] application (reference EN010107) for the South Humber Bank Power Station development proposals.

The development proposals are located at South Marsh Road, Stallingborough - located close to the A180, which forms part of the Strategic Road Network [SRN], hence the requirement for Highways England to review the DCO application.

The development proposals comprise:

- An electricity generating station located on land at South Humber Bank Power Station, fuelled by refuse derived fuel (RDF) with a gross electrical output of up to 95MW at ISO conditions;
- Two emissions stacks and associated emissions monitoring systems;
- Administration block, including control room, workshops, stores and welfare facilities;
- Electrical, gas, water, telecommunication, steam and other utility connections for the generating station; and
- Landscaping and biodiversity works.

Planning permission was granted for the development proposals in April 2019, and in November 2019, AECOM approached Highways England via email regarding the transport documentation required to support the DCO application, with the aspiration to agree the transport parameters in advance of the submission.

This TM reviews the background of the development proposals and correspondence to date, before reviewing the contents of the DCO application – which includes a Transport Assessment [TA], Construction Workers Travel Plan [CWTP] and Construction Management Travel Plan [CMTP] - in the order in which the issues are presented. A summary and conclusions are presented at the end of the TM.

## Background

CH2M has advised Highways England on four previous occasions regarding the development proposals at South Humber Bank Power Station.

For completeness, deficiencies, conclusions and recommendations from each review are listed below in order:

**TM001 679066.AE.18.37.01, South Humber Bank Energy Centre: EIA Scoping – CH2M Review, 25th July 2018**

- The Environmental Statement – and the Construction Environmental Management Plan – will need to be reviewed and accepted by Highways England before construction can commence at the site;
- No junctions on the SRN have been included within the study area, and as such, justification is required as to this omission;
- Given that the Environmental Impact Assessment identifies that the SRN needs be considered during the construction and operation phases, the SRN should be considered within the study area;
- Whilst this early consideration of the construction and operational traffic is welcomed, more precise information will be required within the Transport Assessment;
- The Transport Assessment should pay due cognisance to the requirements of Circular 02/2013;
- The scope of the Transport Assessment looks broadly acceptable at this point in the process. However, CH2M has concerns that the SRN is not being considered within the assessment of the impact of the construction and operational trips before said trips have been derived and agreed. As such, until it can be demonstrated that the development proposals will not severely impact the capacity, operation and safety of the SRN, the SRN should be included within the scope of the Transport Assessment; and
- The proposed link road – Planning application reference: DM/0094/18/FUL – from Hobson Way to Moody Lane should be considered within the study area as the link road will impact upon the distribution of trips to and from the development proposals.

**TM001a, 679006.AE.18.62.12, South Humber Bank Energy Centre: Review of Transport Assessment and Travel Plan, 1st February 2019**

A holding direction was recommended to be placed on the application until further information was provided:

- The Automated Traffic Counts have not been provided for review and should be provided to Highways England for completeness;
- There are some discrepancies in HGV development traffic which should be clarified;
- It is not clear what distribution committed developments are using and this should be identified;
- It is considered that the Construction Traffic Management Plan should be secured by a planning condition by Highways England to protect Highways England's interests with regards the SRN; and
- It is considered that the Travel Plan should be secured by a planning condition by Highways England to protect Highways England's interests with regards the SRN.

Subsequently, CH2M agreed with AECOM's response via email on 25th February 2019, where it was agreed that a Construction Traffic Management Plan and Construction Workers Travel Plan would be secured by planning condition.

**TM001, Dev HU0015, 679066.AA.19.17.07, South Humber Bank Power Station – discharge of condition 10, 20<sup>th</sup> August 2019**

No objection was raised, although noting there were assessment deficiencies:

- Clarification on the distribution of HGV delivery trips that take place between 07:00 – 19:00.

**TM002, Dev HU0015, 679066.AA.19.17.07, South Humber Bank Power Station – 29<sup>th</sup> November 2019**

On the basis of the review, some key deficiencies were highlighted:

- Clarity as to the construction phases planned and the potential overlap between the construction phases / consented development;
- The assignment of HGVs at the SRN should be informed by the discussions held with fuel suppliers to ensure it is as accurate as possible; and,
- The Transport Assessment should be compliant with Circular 02/2013.

## DCO Application Review

Given that CH2M and Highways England have agreed the transport parameters of the consented planning approval, it is considered that the review of the DCO application is primarily a checking exercise to ensure that the agreed parameters remain consistent between applications and that the submitted documentation deal with the transport issues pertaining to the site.

## Document Ref: 6.4 Environmental Statement – Volume III Appendix 9A: Transport Assessment

It is stated that a TA scoping exercise was undertaken with North East Lincolnshire Council [NELC] and Highways England via email to agree the parameters of the TA for the consented development, and this is provided within Annex 1.

Furthermore, it is stated that this is still considered to be relevant because the traffic generation and proposed HGV traffic routing for the development proposals will be the same as that for the consented development. Nonetheless a further scoping exercise was undertaken by AECOM with NELC and Highways England via email to agree the parameters of the TA for the development proposals.

Following the scoping exercise, this assessment for the DCO application includes for the opening of the South Humber Bank Link Road which is due to open in late 2020 and assigns some construction and operational staff vehicle traffic to the Link Road. This approach is accepted by CH2M.

### Policy Context

A policy review is included within the TA, but it is noted that DfT Circular 02/2013 is not included.

### Baseline Traffic Flows

It is stated that the study area has been defined based on the sensitivity of the route and the percentage impact that development traffic adds to baseline flows with reference made to the 'Guidelines for Environmental Assessment of Road Traffic' (IEA, 1993), and was agreed with NELC and Highways England during TA scoping. However, the study area has been extended since the consented development TA at the request of NELC to include the new South Humber Bank Link Road and the A180 / Estate Road/ Gilbey Road junction (Pyewipe Roundabout). This approach is supported by Highways England as it enables additional assessment of the impact of the development proposals at the SRN.

It is worth noting that CH2M's previous reviews of the transport documentation provided by the applicant, the level of impact was considered on absolute impacts – via junction modelling – and not on percentage impacts.

Baseline traffic flows for the immediate local highway network have been established through peak hour classified junction counts at the junctions within the study area, as agreed with NELC and Highways England. Furthermore, it is stated that the traffic counts were undertaken to inform the TA



for the consented development and remain valid for the purposes of the DCO application as they are less than three years old, and this is agreed by CH2M.

The traffic counts comprise:

- Manual Classified Count (MCC) 1: South Marsh Road / Hobson Way;
- MCC 2: Hobson Way / Laporte Road / Kiln Lane;
- MCC 3: Kiln Lane / North Moss Lane / Trondheim Way;
- MCC 4: A1173 / Kiln Lane;
- MCC 5: A1173 / A180 Stallingborough Interchange;
- MCC 6: A180 / Moody Lane / Pyewipe Road (Westgate Roundabout); and
- MCC 7: A180 / Estate Road / Gilbey Road (Pyewipe Roundabout).

For completeness, it is stated that MCCs 1, 2 and 4 were undertaken on Thursday 7<sup>th</sup> June 2018, MCC 5 was undertaken on Wednesday 5<sup>th</sup> July 2017, MCC 7 was undertaken on Thursday 6<sup>th</sup> July 2017 and MCCs 3 and 6 were undertaken on Thursday 11<sup>th</sup> October 2018.

Overall, it can be concluded by CH2M that the base flows / base scenarios are as agreed as planning application stage, with the addition of Pyewipe Roundabout within the study area.

### A180 / A1173 Stallingborough Interchange

The TA states that this junction operates within capacity within the 2018 base scenario. CH2M agree with the assumption drawn.

### A180 / Estate Road / Gilbey Road (Pyewipe Roundabout)

The modelling outputs suggest the junction operates above its theoretical capacity on the A180 Eastern arm during the AM Peak with a queue of 55.7 PCUs. The TA states that it should be noted that with RFC values exceeding 1.0, the junction model can become unstable resulting in spurious queue lengths being generated.

Whilst the above caveat is noted, it is considered that the Pyewipe Roundabout currently operates above capacity and NELC is in the process of developing a scheme at this location. As such, it is considered by CH2M that the 2018 base scenario modelling reflects the operation of the junction.

### Personal Injury Accident Data

The accident study area shown in Figure 5.1 – which includes the Stallingborough Interchange - identified a total of 12 reported accidents over the past five years of which eight were classed as slight in severity and four serious severity. In addition, Pyewipe Roundabout is considered in isolation later within this section within the TA.

#### **A180 / A1173 Stallingborough Interchange**

It is stated that over the five-year study period a total of five accidents occurred, three located at the junction and two along the A180 northbound off slip approach.

Of the five accidents, four were of slight severity and one of serious severity. Within the TA, analysis of the accident reports has identified that the incidents were due to driver error due to lack of awareness of their surrounding and poor judgment as opposed to any physical alignments on the highway infrastructure.

#### **Pyewipe Roundabout**

The accident study area shown in Figure 5.3 in the TA includes Pyewipe Roundabout and identified a total of 16 reported accidents over the past five years, of which 14 were classed as slight in severity and 2 were of serious severity.

Within the TA, analysis of the accident reports has identified that the incidents were due to driver error due to lack of awareness of their surrounding and poor judgment as opposed to any physical alignments on the highway infrastructure.

It is considered by CH2M that there is not an accident / safety issue at the junctions on the SRN within the study area that the development proposals will exacerbate.

## Development Proposals

It is stated that whilst the DCO is being sought, the applicant is likely to progress the consented development in accordance with the planning permission.

With regards to construction, it is anticipated within the TA that a three-year construction programme is anticipated for and is expected to commence in Q2 2020. Furthermore, it is stated that following the granting of a DCO for the development proposals (which would be anticipated around Q3 2021, approximately halfway through the three year construction programme for the consented development), the additional works that would be required (in addition to those which benefit from the planning permission) would then be constructed, and the development proposals would commence operation in 2023.

Whilst the above is stated as being the most likely construction programme scenario for the development proposals, two other potential construction programme scenarios are also being considered in order that a robust assessment of environmental effects is undertaken. This approach is welcomed by CH2M.

The TA states that the alternative scenarios relate to the potential for the development proposals to be constructed and operated pursuant to only the DCO and commencing either in Q3 2021 (when the DCO would be granted) or Q3 2026 (just before the DCO would expire). In these two alternative scenarios it is stated that the development proposals would commence operation in 2024 or 2029 respectively.

For the purposes of the TA (in terms of highway / junction capacity) it is stated that the worst-case scenario would be the latest construction start date (2026) because baseline traffic flows would be higher. However, for the purposes of this assessment all three scenarios have been assessed for completeness.

The assessment scenarios in the TA are as follows:

- Construction – assumed for TA purposes that construction starts in either Q2 2020, Q3 2021 or Q3 2026; and
- Opening (start of operation) – assumed for TA purposes that operation commences in either Q2 2023, Q3 2024 or Q3 2029.

It is stated that during construction, the development proposals would require a maximum of around 750 workers per day at the peak of construction; and that once operational, the development proposals would create around 56 new permanent full-time jobs.

The TA states that it is expected that each year the development proposals will be taken offline for approximately three weeks to allow for invasive maintenance activities such as internal inspection of the boiler. Furthermore, every five to six years the facility will be taken offline for a major outage for substantial maintenance activities such as replacement sections of the boiler; and such a major outage is likely to last approximately five weeks where it could be expected that up to 200 staff could be on site on any one day.

The TA also goes on to discuss the activities involved in the decommissioning process for the development proposals, but it is stated that these are not yet known in detail, as it has a design life of approximately 30 years. As such, there would be expected to be some traffic movements associated with the removal (and recycling, as appropriate) of material arising from demolition and potentially the import of materials for land restoration and reinstatement. However, it is stated that vehicle numbers are not expected to be higher than those experienced during the construction or operational period. This information is noted by CH2M.

## Proposed Site Operating Hours and Staffing Levels

It is stated that the development proposals will operate twenty-four hours a day, seven days a week, with occasional offline periods for maintenance.

The TA states that whilst the timings allow for deliveries every day of the week, it is likely that the majority of fuel deliveries will be Monday to Friday; and as such, for the purposes of the TA and to ensure a robust assessment it is assumed that all deliveries will occur Monday to Friday. This is considered by CH2M to allow for a robust assessment of this element to be undertaken.

With regards to operation, it is estimated that around 56 staff will be required on a shift basis to be spread over a 24-hour period, which is stated as likely to be undertaken via three 8-hour shifts (06:00 – 14:00, 14:00 – 22:00, and 22:00 – 06:00). On these shifts, it is anticipated there will be a maximum of 14 staff per shift, with an additional 14 day / management staff being employed at the development proposals. Given the numbers presented, combined within the proposed shift patterns, it is not considered by CH2M that the operational staff numbers will have a severe impact at the SRN.

## Operational HGV Routing

It is proposed that all operational HGV traffic to / from the development proposals will be required to route to / from the A180 via the A1173, Kiln Lane, Hobson Way and South Marsh Road which was agreed with NELC for the consented development. It is stated that this designated route ensures all HGVs keep to the strategic and principal road network and avoid the use of minor local roads. CH2M considers that the designated route is the most appropriate route.

To ensure the routing is enforced, it is stated that it will be formalised by a routing agreement and will be rigorously enforced by the operator. This is considered by CH2M to be the appropriate mechanism.

## Development Trip Generation and Assignment

The TA states that the calculation of the number of average fuel deliveries per day is set out below and is likely be in the region of 202 HGVs per day based on deliveries occurring Monday to Friday (as a worst-case scenario):

- Fuel tonnes per annum [tpa]: 753,500 tpa;
- Average HGV payload: 16 tonnes;
- Fuel deliveries per year: 753,500 tpa / 16 tonnes = 47,094 fuel deliveries per year;
- Assuming all deliveries occur Monday to Friday between 06:00 and 18:00 = 260 delivery days per year, but allowing for outages this is expected to be reduced to c.233 delivery days per year;
- Fuel deliveries per day: 47,094 / 233 days = 202 average fuel deliveries per day (one-way); and
- Fuel deliveries per hour: 202 deliveries per day / 12 hours = 17 average fuel deliveries per hour (one-way).

To estimate the peak daily and hourly traffic flow, the following variables have been applied to ensure a robust assessment:

- Daily variation of fuel deliveries will occur due to sourcing and fuel suppliers. As an approximation, it is estimated that daily traffic flows might vary by +/- 20%. It is stated that this imposes a 20% increase on the average daily flows; and
- Hourly flows are difficult to control, depending on HGV drivers and loading times at other facilities. It is estimated that the hourly peak flow during a day is likely to be about twice that of the average hourly flow.

Based on the above variables, peak daily and hourly fuel deliveries are stated in the TA as follows:

- Daily peak fuel deliveries: 242 HGVs (one-way); and
- Hourly peak fuel deliveries: 34 HGVs (one-way).

In addition to the above, it is stated that there would be a maximum of 5 HGV consumable deliveries per day (5 in + 5 out) or 1 in 1 out during the hourly peak. There would also be HGV movements associated with bottom ash and flue gas treatment residues with a maximum of 65 HGVs per day (65 in + 65 out) or 9 in and 9 out during the hourly peak.

Overall, the peak hour development HGV demand is predicted to occur during the period 06:00 – 07:00 when 87 HGV movements (in and out) could be expected to take place.

Given the numbers presented, combined within the proposed shift patterns, it is not considered by CH2M that the operational HGV numbers will have a severe impact at the SRN.

## Predicted Staff Traffic Demand

As mentioned previously, it is estimated that around 56 staff will be employed at the development proposals. Given the 24-hour operation of the facility a staff shift system will be in operation and is likely to be undertaken via three 8-hour shifts (06:00 – 14:00, 14:00 – 22:00, 22:00 – 06:00). On these shifts, it is anticipated there will be a maximum of 14 staff per shift, with an additional 14 day / management staff being employed at the development proposals.

It is stated that given the remote location of the site and the nature of the shift system, it is anticipated that the majority of staff would travel to the site by car, and to ensure a robust assessment, vehicle occupancy of one staff member per vehicle has been applied.

As such, it is considered that the numbers presented in Table 7.2 pertaining to staff arrivals and departures would not have a severe impact at the SRN.

## Growth Factors and Network Changes

The TA states that the development proposals are anticipated to be fully operational at the earliest in 2023, 2024 or the latest in 2029 and these have therefore been identified as the assessment years for this TA. In addition, following scoping discussions with Highways England for the consented Development, a future operational year of 2030 has been assessed and is compliant with Circular 02/2013. This approach is welcomed by CH2M.

Traffic growth factors for the North East Lincolnshire District have been obtained from TEMPro Version 7.2 software, with a local adjustment to the National Trip End Model to provide localised growth factors for geographical areas. This approach is supported by CH2M.

In addition to the above, the TA has paid due consideration to the South Humber Link Road. The proposed Link Road is due to open in September 2020 and will result in the re-distribution of existing traffic flows within the study area. It is stated that the proposed changes to link and junction flows within the Study Area have been obtained from Appendix D of the South Humber Bank Link Road TA prepared by Atkins in January 2018 and that the changes in traffic flows within the study area during the morning and evening peak hours as a result of the Link Road opening have been applied to the future baseline flows. This approach is accepted by CH2M.

## Committed Development

All of the committed developments listed within the TA are accepted by CH2M and it is considered that it is a comprehensive assessment.

## Junction Capacity Assessment

This section describes the junction capacity assessments carried out at selected junctions within the study area in order to determine the level of impact during operation. The selected key junctions include:

- Hobson Way / South Marsh Road (East of Hobson Way) T-Junction;
- Hobson Way / South Marsh Road (West of Hobson Way) T-Junction;
- Laporte Road / Kiln Lane/ Hobson Way Roundabout;
- Kiln Lane / North Moss Lane / Trondheim Way Roundabout;
- A1173 / Kiln Lane Roundabout;
- A1173 / SHIP Access;
- A180 Stallingborough Interchange;
- A180 / Moody Lane / Pyewipe Road (Westgate Roundabout); and
- A180 / Estate Road / Gilbey Road (Pyewipe Roundabout).

For the purposes of this TM, there is only a requirement to consider the impact of the development proposals at the SRN – namely the Stallingborough Interchange and Pyewipe Roundabout.

It is stated that all junctions have been modelled using the TRL Software package Junctions 9 and that the modelling has been undertaken based on passenger car unit values (PCUs) in order to best reflect any operational effects associated with HGV traffic.

### Stallingborough Interchange

This junction has been modelled using the 'Lane Simulation' mode within Junctions 9 and allows lane specific movements for each approach to be considered resulting in Level of Service [LOS] based on delay and queue. The transportation LOS system uses the letters A to F, with the definitions below being typical:

- A = Free flow
- B = Reasonably free flow
- C = Stable flow
- D = Approaching unstable flow
- E = Unstable flow
- F = Forced or breakdown flow

As part of the modelling, it is noted within the TA that as part of the Stallingborough Employment Site development, it is proposed to marginally widen the northern arm (A1173) into the roundabout to increase the flare length on the approach whilst maintaining a two-lane entry. The junction has therefore been modelled with this improvement in place for the remaining scenarios, and this is accepted by CH2M.

### 2030 Base + Committed + Development Scenario

For the purposes of this TM, it is not considered necessary to review all scenarios if the junction is operating under free flow conditions. As such, the worst-case scenario – full development plus committed development in 2030 – has been considered.

It is stated that the modelling outputs suggest the junction will operate within free flow conditions (LOS = A) during the morning peak on all arms apart from the A1173 northbound approach which will operate within Reasonably Free Flow conditions (LOS = B). During the evening peak all arms operate within free flow conditions (LOS = A).

Given that the junction operates in free flow conditions in the worst-case scenario, it is not considered that the development proposals will have a severe impact at this junction.

### **Pyewipe Roundabout**

#### **2018 Base Scenario**

The modelling outputs suggest the junction already operates above its theoretical capacity on the A180 Eastern arm during the morning peak with a queue of 55.7 PCUs. It is stated that it should be noted that with RFC values exceeding 1, the junction model can become unstable resulting in spurious queue lengths being generated and that by 2023, 2024 and 2030, the junction would continue to operate above theoretical capacity largely due to the increase in background traffic flows. This is noted by CH2M and reflects the current operation of the junction.

However, AECOM has not undertaken modelling of the junction for the subsequent assessment years, and instead, has undertaken percentage impact analysis. This analysis states that the development traffic as a percentage of total traffic at this location is likely to be in the order of 1.5% in the morning peak and 0.5% during the evening peak in future years. As such, AECOM conclude that considering the small percentage that development flows are adding to the junction, it is reasonable to consider that mitigation at this junction would be disproportionate to the marginal impact on the junction's performance. Therefore, no mitigation is proposed at this junction.

Whilst it is considered by CH2M that it would expect Pyewipe Roundabout to be modelled for all assessment years, given that the junction operates over capacity within the base year modelling, it is understood as to why it has not been undertaken. For completeness, it is worth stating that the element of the junction which operates over capacity in the 2018 base is on the local road network. In addition, the South Humber Link Road would provide a route from the development proposals to Grimsby and Cleethorpes that would avoid the need to use the SRN.

As such, the development proposals would likely only result in a severe increase on the local road network elements of the junction. It is known that NELC has developed an improvement scheme at this location, and as such, this is considered to be within their gift to deliver.

### **Construction Generation**

The estimated profile of workforce over the construction period for the development proposals reveals the peak workforce is forecast to occur in the period around Q2 2021, Q3 2022 or Q3 2027 when up to around 750 workers are expected on site.

In relation to traffic generation associated with construction workers, an average occupancy of two workers per vehicle has been applied. It is stated by AECOM that this occupancy rate has been accepted by transport stakeholders on other recent power station construction projects including the consented development, Eggborough CCGT and Knottingley CCGT and is therefore considered robust.

A CWTP aimed at identifying measures and establishing procedures to ensure the vehicle occupancy rates used in assessment are achieved will be implemented by the appointed contractor, and this is reviewed later within this TM.



When this occupancy rate is applied to the workforce associated with construction of the development proposals at the peak of construction (Q2 2021, Q3 2022 or Q3 2027), this equates to 375 daily one-way car movements per day.

In addition, it is stated that the volume of construction HGVs on the network is predicted to be at its maximum of around 412 two-way daily vehicle movements (206 in and 206 out) at the start of the construction period (around Q2 2020, Q3 2021 or Q3 2026), associated with the potential cut and fill of the top layer of ground within the main development area for geotechnical purposes. During the remainder of the construction period HGV movements will vary between 18 and 116 daily two-way movements.

### Daily Vehicle Profile during the Peak Month

Based on a traffic count undertaken at the site entrance of a current energy from waste plant construction project at Ferrybridge, near Wakefield (known as Ferrybridge Multifuel 2) and operated by SSE, a profile of arrivals and departures over the working day has been produced within the TA.

The percentage of daily inbound and outbound trips – set out in Table 11.3 within the TA - on an hour-by-hour basis and calculates the totals for the peak of construction (around Q2 2021, Q3 2022 or Q3 2027). It is considered by CH2M that it is evident that there is peak spreading in the both the morning and evening peaks, which would reduce the impact of the development proposals at the SRN in the peak hours.

### Abnormal Loads

It is stated that, during the construction phase of the development proposals, a number of AIL deliveries to the site are expected. Although it is noted in the TA that the site is located adjacent to the existing site so there is a history of abnormal load access to the site.

Furthermore, the TA states that the contractor will work with the relevant authorities and stakeholders to secure appropriate approvals for the transportation of AILs on the strategic and local road networks. Specific mitigation measures that would be investigated to deliver abnormal loads to the site could include the temporary removal of street furniture (i.e. pedestrian islands, signage) and avoiding peak traffic periods for the delivery of abnormal loads. Such an approach is welcomed by CH2M and it is considered that the appropriate Highways England teams should be consulted to secure the appropriate approval.

### Trip Distribution and Assignment

The TA states that the distribution of construction workforce traffic to the network has been based on the population of towns and cities within a 45-minute drive time of the site and the shortest / quickest route to the site. Table 11.4 within the TA shows the workforce distribution and the number of workers this equates to at the peak of construction (around Q2 2021, Q3 2022 or Q3 2027). CH2M has reviewed this, and this appears to be an appropriate distribution.

In addition, it is stated that the routing of HGVs between the construction site and the A180 will be controlled through the implementation of a HGV routing plan included as a measure within the CTMP which will be prepared by the appointed contractor. The CTMP is reviewed later in this TM.

### Junction Capacity Assessment

In order to determine the level of impact during the peak of construction of the development proposals, junction capacity assessments have been carried out at key junctions within the study area. It is stated that it was agreed with NELC during scoping that junction modelling was not required at Pyewipe Roundabout as construction flows in the peak hours are below the 30 two-way trip threshold for assessment. This is noted by CH2M; and paying due cognisance to the previous modelling of this

junction within the TA, it is evident that any junction modelling would show that the junction operates over capacity from the base scenario onwards.

Junction capacity assessments have been undertaken at the following junctions:

- Hobson Way / South Marsh Road (East of Hobson Way) T-Junction;
- Hobson Way / South Marsh Road (West of Hobson Way) T-Junction;
- Laporte Road / Kiln Lane / Hobson Way Roundabout;
- Kiln Lane / North Moss Lane / Trondheim Way Roundabout;
- A1173 / Kiln Lane Roundabout;
- A1173 / SHIP Site Access;
- A180 Stallingborough Interchange; and
- A180 / Moody Lane / Pyewipe Road (Westgate Roundabout).

The scenarios tested included:

- 2021 Base + Committed;
- 2021 Base + Committed + Peak of Construction;
- 2022 Base + Committed;
- 2022 Base + Committed + Peak of Construction;
- 2027 Base + Committed; and
- 2027 Base + Committed + Peak of Construction.

### **Stallingborough Interchange**

#### ***2021 Base + Committed Development Scenario***

The modelling outputs suggest the junction will operate within free flow conditions (LOS = A) during the morning and evening peak periods on all arms.

#### ***2027 Base + Committed + Peak of Construction Scenario***

The modelling outputs suggest the junction will operate within free flow conditions (LOS = A) during the morning and evening peak periods on all arms.

Having reviewed both of these scenarios, it is considered by CH2M that the construction traffic will not have a severe impact on the operation of the Stallingborough Interchange.

## **Summary and Conclusions**

The TA concludes that it is not considered that the development proposals will have a material impact in terms of highway capacity or safety and that the development proposals represents acceptable development in highways and transport terms; and that the construction and operational traffic flows associated with the development proposals are the same as the construction and operational traffic flows associated with the consented development.

Having reviewed the TA, it is concluded by CH2M that the development quantum and associated traffic flows have remained the same since planning approval, and as such, are in agreement with AECOM's conclusion.



## Transport Assessment Annex 27: Framework Construction Worker Travel Plan

It is stated that the Framework CWTP is designed to promote and encourage the use of sustainable transport modes and reduce reliance on the private car during the construction phase of the development, which is expected to take 36 months.

In addition, it is stated that EP Waste Management Limited is committed to the sustainable development agenda and realise that the success of the travel plan will be based on its enthusiasm and commitment to ensure that the chosen contractor encourages and promotes the suggested measures detailed within the CWTP to their workers.

The CWTP states that the appointed contractor will be required to use this as the starting point for their final CWTP and demonstrate how the targets defined in this Framework CWTP will be achieved. It also identifies the suggested measures to be implemented by the contractor.

### Objectives

It is stated that the final CWTP will act in helping the environment by reducing the number of trips made to and from the construction site by private car. All staff during construction will be made aware of the measures included in the final CWTP so that benefits can be delivered, and the number of car borne trips can be reduced by promoting car sharing and minibus use. Such an approach is welcomed by CH2M.

The primary objectives which are of most relevance during the construction period of the development proposals are to:

- Ensure that an appropriate package of measures is employed to encourage sustainable transport behaviour;
- Reduce car usage (particularly single occupancy journeys);
- Raise awareness of the sustainable transport measures serving construction site; and
- Minimise the impacts of traffic on sensitive locations.

It is considered by CH2M that the named objectives are appropriate.

### Roles and Responsibilities

The Travel Plan Co-ordinator [TPC] has a key role to play in managing, monitoring and implementing the individual measures within the CWTP. It is stated that the TPC will be appointed by the contractor to manage and deliver the CWTP and their contact details will be supplied to NELC and Highways England.

The responsibilities of EP Waste Management Limited will primarily include:

- Contractually committing the contractor to finalise the CWTP and to comply with the guidelines outlined within it.

The responsibilities of the TPC will primarily include:

- Ensuring the obligations of contractors / sub-contractors related to the CWTP are adhered to;
- Ensuring the travel plan notice board is located in a prominent position and that the information is kept up to date;
- Monitoring parking to ensure no parking on any public highway leading to the Site;
- Being based on the Site;

- Acting as the key point of contact for issues related to construction traffic;
- Reviewing cycle parking provision on a regular basis;
- Engaging with local stakeholders;
- Monitoring performance against the targets of the final CWTP; and
- Implementing additional measures if not delivering on targets set.

It is considered by CH2M that the responsibilities outlined are appropriate.

In addition, it is stated that the contractor will be responsible for managing how their workers travel to and from the site. Given the limited number of parking spaces to be provided, the contractor's responsibilities will primarily include:

- Providing a TPC to oversee the management and delivery of the CWTP;
- Encouraging and promoting the use of sustainable transport measures included within the final CWTP; and
- Organising crew minibuses to transport workers to and from the site if appropriate.

## Travel Plan Measures

To encourage sustainable travel behaviour by construction staff throughout the period of construction, it is stated that it is important that an appropriate package of measures is introduced, and that the measures should primarily aim to minimise the level of construction worker traffic and then whenever possible minimise the impact and disruption on the remaining traffic and local road network.

It is considered by CH2M that the measures presented within the CWTP appear to be appropriate and varied.

## Targets

The CWTP states that without management, construction industry standards suggest a typical vehicle occupancy of 1.35 which would result in 555 vehicles arriving and departing the site per day at the peak of construction.

One of the prime objectives of an active CWTP is to set clear and realistic targets and it is stated that the main target to be achieved during the construction of the development proposals is:

- To achieve a car occupancy of two workers per vehicle over the duration of the construction project. Up until handover of the development proposals, no more than one car or van should be parked on site for every two people registered on site per day.

This target represents a 32% reduction in vehicles arriving at the site when compared to the industry standard. Such an approach is welcomed by CH2M as it will minimise any impact at the SRN.

## Monitoring

It is stated that the TPC will be responsible for monitoring the final CWTP, to ensure an efficient and effective execution of the measures, and to refine the measures where necessary to cope with the changes in demand over the life of the construction project.

The TPC will monitor the total number of construction workers on-site and the number of parking spaces provided to ensure car occupancy targets are being met. Furthermore, it is stated that it is anticipated that monitoring will be undertaken on one day per month throughout construction with a six-monthly monitoring report prepared by the TPC and submitted to NELC's Travel Plan Officer. In addition, monitoring of the local road network will be undertaken by the TPC periodically during construction to ensure no parking on the public highway leading to the Site.

It is considered by CH2M that the proposed monitoring regime is appropriate.

## Transport Assessment Annex 28: Framework Construction Traffic Management Plan

It is stated that the document is a Framework CTMP and that the appointed contractor will be required to use this framework document as the starting point for the final CTMP.

### Designated Route to Site

The CTMP states that the HGV routing plan will be distributed to all drivers during their induction. It will be a condition of contract between EP Waste Management Limited and the appointed contractor to ensure that all HGV deliveries to the site are instructed to use the designated route to access and egress the construction site; and sanctions will be put in place to deal with non-compliance. This approach is considered to be appropriate by CH2M.

### Abnormal Indivisible Loads

It is stated that the ports of Immingham, Hull and Goole are situated near to the development proposals and that detailed consideration will be given to the appropriate port and AIL routes during detailed design once final details of the size and origin of loads are known.

In addition, it is stated that Abnormal Loads Officers at Highways England and NELC will be consulted at the earliest opportunity on the programme and plan for the delivery of AILs via the usual notification procedures. Network Rail will also be consulted in advance to confirm that the AIL route is viable and to agree a strategy to protect Network Rail asset(s) from any potential damage caused by abnormal loads. The public will also be made aware of when abnormal load deliveries are taking place via social media, local radio and the local press.

It is considered by CH2M that the procedure to be put in place is appropriate.

### Monitoring

It is stated that monitoring will be undertaken by the appointed contractor to assess the effectiveness of the measures included in the final CTMP to control the routing and impact of construction HGVs; and that the appointed contractor will maintain gatehouse records of construction HGVs entering and leaving the site and they will be available to NELC on request.

In addition, should any complaints be raised by members of the public with regards to construction HGVs not using the dedicated HGV route to the site, gatehouse records will be used to identify the offending HGV involved and appropriate sanctions put in place to ensure no repeat events.

It is considered by CH2M that the proposed monitoring regime is appropriate.

### Consultation

It is stated that a formal process of liaison between all relevant parties (Principal Contractor, North East Lincolnshire Council Highways and Highways England) is proposed to:

- Establish a channel of communication between the contractor and the regulating authorities;
- Make all parties aware of the results of monitoring of the final CTMP;
- Provide a route by which any complaints can be communicated and dealt with;
- Provide a route through which transport related issues can be identified and dealt with; and
- Provide prior notice of significant events e.g. delivery of abnormal loads, in accordance with standard protocols.

It is proposed that a short, written report is prepared on behalf of the contractor on a six-monthly basis and circulated to all key stakeholders; and that any comments generated by the report will be circulated to all key stakeholders and a meeting may be held if required.

It is considered by CH2M that the proposed consultation regime is appropriate.

## Summary and Conclusions

The purpose of this Technical Memorandum is to review the Development Consent Order application (reference EN010107) for the South Humber Bank Power Station development proposals.

The development proposals are located at South Marsh Road, Stallingborough - located close to the A180, which forms part of the Strategic Road Network, hence the requirement for Highways England to review the DCO application.

The development proposals comprise:

- An electricity generating station located on land at South Humber Bank Power Station, fuelled by refuse derived fuel with a gross electrical output of up to 95MW at ISO conditions;
- Two emissions stacks and associated emissions monitoring systems;
- Administration block, including control room, workshops, stores and welfare facilities;
- Electrical, gas, water, telecommunication, steam and other utility connections for the generating station; and
- Landscaping and biodiversity works.

The TA concludes that it is not considered that the development proposals will have a material impact in terms of highway capacity or safety and that the development proposals represents acceptable development in highways and transport terms; and that the construction and operational traffic flows associated with the development proposals are the same as the construction and operational traffic flows associated with the consented development.

Having reviewed the TA, it is concluded by CH2M that the development quantum and associated traffic flows have remained the same since planning approval, and as such, are in agreement with AECOM's conclusion.

Furthermore, having reviewed the CWTP and CTMP, it is considered by CH2M that these are appropriate tools and fit for purpose.

On the basis of this review, the recommendation to Highways England in relation to this development proposals is:

<b>No objection – the assessment is sufficient to reach this view</b>
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