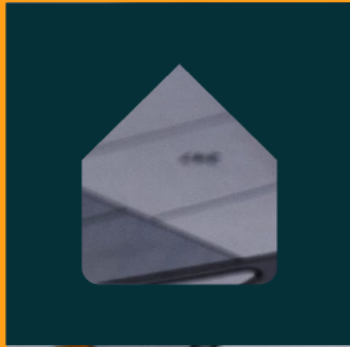


North Lincolnshire Green Energy Park Project – Examination of Development Consent Order

Summary Written Representations on behalf of AB Agri Limited
15 December 2022

Planning Inspectorate Ref: EN010116
Interested Party Ref: 20032351



- 1.1 These Summary Written Representations (WR) have been prepared on behalf of AB Agri Limited and include our response to the Applicant's comments on the Applicant's comments on the Relevant Representations. The summary should be read in conjunction with the full Written Representations submitted in parallel.
- 1.2 The Written Representations expand on the matters raised in our Relevant Representations, and address the following matters relating to AB Agri's long-standing animal feed mill adjacent to the application proposals.
- 1.3 **Risks to Biosecurity** - the measures proposed by the applicant do not provide adequate control measures to minimise biosecurity risks, the need for which cannot be overstated, as it has the potential to cause a major implication the food supply chain. We consider that the Applicant has not demonstrated that risks to the animal feed facility have been considered and addressed, as proportionate to the critical nature of the risks involved.
- 1.4 The animal feed production facility has been operating from Flixborough for a number of years, and has a very low risk of biosecurity. Biosecurity risks from the Glanford Power Station facility are mitigated by a range of measures, whereas the proposed NLGEP proposal increases biosecurity risks owing a range of identified factors.
- 1.5 Notwithstanding this, a range of mitigation measures are sought to minimise biosecurity risks posed by the proposed development to an acceptable level. If these measures are not applied, then AB Agri's operations will be substantially prejudiced and a knock-on effect on the UK's food supply chain as described above will arise, unless wide ranging and costly measures are applied at the animal feed facility to mitigate the biosecurity risk that would rise otherwise.
- 1.6 **Flood Risk** - the flood model used to inform the Flood Risk Assessment is not suitable for detailed design of food defences or for informing a flood management and evacuation plan. AB Agri continues to engage with the Applicant on the detailed flood modelling to ensure that necessary flood defence measures are agreed. It is also concerned that the potential overtopping of the existing defences along the dock area may have been represented accurately in the applicant's model.
- 1.7 **Access to AB Agri's facility** - AB Agri operates 24 hours a day, 7 days a week, all year round (except for Christmas Day) and requires constant access as a result. As a result, AB Agri seeks a range of measures to be included in the construction traffic management plan to be secured by a condition. We request the Applicant to engage with AB Agri on traffic flow and construction planning as per their commitment to do so.
- 1.8 **Temporary Acquisition** - possession for three years of approximately one third of the perimeter of the AB Agri's site and one half of its road frontage will significantly compromise AB Agri's enjoyment of its land, not least due to AB Agri requiring full access around all buildings and temporary land, and the biosecurity and contamination risks that would arise. The Applicant has not demonstrated a compelling case to take temporary possession in light of the potential damage that it may cause AB Agri's business.