

Lake Lothing Third Crossing

On behalf of Nexen

Mayer Brown response to: -

The Examining Authority's written questions and requests for information (ExQ2)

Question 1.15

"In the response to the Applicant's NMC6 proposed change to the scheme [REP7-003, Appendix I], the Nexen Group suggest that a low-loader would have to "*pass in very close proximity to [...] any vehicle parked up and waiting at*" the factory doors. Currently, how would a low-loader be able to pass a vehicle so parked at the doors? "

Response

1. In responding to this question, I would first point out that it is not only the low-loader manoeuvre that provides a cause for concern. It is in fact a situation that arises for all hgv manoeuvres. The low-loader is simply an example situation and has been described previously because this is the only vehicle for which swept path analysis has been undertaken and provided by the Applicant.
2. I provide a number of new vehicle swept path drawings to illustrate i] the existing situation and ii] the worsened situation that would be created by the Applicants access proposals for the Nexen site.

Drawing NEXEN.2/01

This drawing shows the existing access arrangement.

A delivery lorry (rigid, 10m) is shown parked at the Nexen 'goods-in' door.

An articulated lorry (16.5m) is shown entering the site and passing the parked vehicle.

Drawing NEXEN.2/05

This drawing shows the existing access arrangement.

A delivery lorry (rigid, 10m) is shown parked at the Nexen 'goods-in' door.

A low-loader is shown entering the site and passing the parked vehicle.

Drawing NEXEN.2/02

This drawing shows the Applicant's proposed new access.

A delivery lorry (rigid, 10m) is parked at the Nexen 'goods-in' door.

An articulated lorry (16.5m) is shown entering the site on the new access.

The swept path analysis illustrates the conflict of the entering vehicle and the parked vehicle. The Applicant's proposed access does not provide sufficient space for the vehicle entering the site to pass a vehicle parked at the factory door.

Drawing NEXEN.2/06

This drawing shows the Applicant's proposed new access.

A delivery lorry (rigid, 10m) is parked at the Nexen 'goods-in' door.

A low-loader is shown entering the site on the new access.

The swept path analysis illustrates the conflict of the entering vehicle and the parked vehicle. The Applicant's proposed access does not provide sufficient space for the vehicle entering the site to pass a vehicle parked at the factory door.

3. It is apparent from NEXEN.2/01 and NEXEN.2/02 that the existing access layout allows for a large articulated lorry or a low-loader to enter the site and to drive past a vehicle parked at the factory 'goods-in' door.
4. It is apparent from NEXEN.2/05 and NEXEN.2/06 that the Applicant's proposed access does not provide sufficient space for a large articulated lorry or a low-loader to pass a vehicle parked at the factory 'goods-in' door.
5. The existing access arrangement allows the entering vehicle to pass the parked up delivery vehicle in a straight line of travel and with good visibility of operatives on the ground attending the delivery vehicle.
The position of the Applicant's proposed access, in close proximity to the Nexen goods-in door, presents an increased safety concern for operatives attending a parked delivery vehicle. The attention of the driver, being drawn to making a turn to enter the site and seeking to avoid the parked delivery vehicle, increases the chance of him not seeing an operative standing on the ground with the potential for the operative to be struck.
The north access proposal of Nexen (as described in greater detail below in the response to Question 1.16) would remove any risk from the entering vehicle having to pass a parked up delivery vehicle.

Question 1.16

"In the response to the Applicant's NMC6 proposed change to the scheme [REP7-003, Appendix I], the Nexen Group suggest that "*an alternative access route further to the north should be considered*". How would a low-loader then service the existing factory doors on the western façade of the building? "

Response

1. In responding to this question, I would first point out that the manoeuvre to park a low-loader at the factory doors is not a common occurrence. Rather, the vehicles that park at the factory doors are more usually large articulated or large rigid delivery vehicles. The low-loader is simply an example situation and has been described previously because this is the only vehicle for which swept path analysis has been undertaken and provided by the Applicant.
2. I provide drawings to illustrate an alternative access route further to the north being used by large vehicles to enter the Nexen site.

Drawing NEXEN.2/03

This drawing shows the proposed access located to the north and adjacent to Lake Lothing. A delivery lorry (rigid, 10m) is shown parked at the Nexen 'goods-in' door.

The drawing illustrates that an articulated lorry (16.5m) can enter and turn in the yard with no effect at all on vehicles at the goods in door.

A suggested position for a relocated weighbridge is shown. A vehicle can turn to drive on to this and then use the northerly access to leave the site.

Drawing NEXEN.2/04

This drawing shows the proposed access located to the north and adjacent to Lake Lothing.

A delivery lorry (rigid, 10m) is shown entering the site and turning / reversing to park at the goods-in door.

Drawing NEXEN.2/07

This drawing shows the proposed access located to the north and adjacent to Lake Lothing.

A low-loader is shown entering the site and turning / reversing to park at the goods-in door.

3. It is apparent from NEXEN.2/03, NEXEN.2/04 and NEXEN.2/07 that the alternative access route located further to the north can accommodate, without conflict, all the turning manoeuvres of all large vehicles that use the Nexen factory site.
4. The north access would also provide greater assurance to Nexen that unhindered access to the factory site can be provided at all times, including during the LLTC construction phase. The separation of this access from the existing Nexen access would mean that construction works can be undertaken to a staged programme that requires work in the vicinity of only one access location at a time.
5. The alternative north access is also part of a three access strategy (the third access being the access road on the east side of the adjacent Lings property) that Nexen seek to ensure access/egress at all times, particularly during periods of construction and maintenance, for both the Nexen factory site and their Development Land.

T P Moore
Director
Mayer Brown Limited

11th April 2019