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15 OCT 2018

National Infrastructure
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN



11/10/2018

Ref: TR030001

Dear Sir/Madam

With reference to:

The Able Marine Energy Park Development Consent Order 2014-S.I. 2014 No 2935

Section 153 of the Planning Act 2008- Changes to, and revocation of, orders granting development consent

Consultation on an application for a Non-Material change to Schedule 1 and 11 under paragraph 2(1) of Schedule 6 of the planning Act 2008 and Regulation 7 of the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 (as Amended) (the '2011 Regulations')

In January 2014, the Secretary of State for Transport granted a DCO to Able UK, authorising construction of the "Able Marine Energy Park" on the Humber Estuary. To my knowledge this so called "Energy Park" was to enable the construction of wind turbines, in order to provide green energy, which if it had gone ahead, would have helped to mitigate the threat of "Global Climate Change", and if Able UK were to be believed, would have provided an estimated 3,000 jobs to local people. A noble and just endeavour, and as such, I also believe, that large sums of public moneys were awarded by our Government to Able UK, to help facilitate this fine and decent purpose.

Unfortunately like most things in life this impossible dream wasn't quite realised. As far as I am aware, not a single wind turbine has yet been built. In fact quite the contrary, The "Able Marine Energy Park" has become more about consuming energy than producing it.

Indeed the real reason that Able UK wish to make a "Non Material" Change to the DCO, which was surely, originally granted for the production of wind turbines that would have resulted in the production of green energy, to the benefit of the local and global environment is so they can rip up several green fields, i.e. Mitigation Area A, and build a "Car Storage Facility" on them.

“according to 2016 figures from the Department for Business, Energy and Industrial Strategy (BEIS) – the most recent year for which they are available.

Transport now accounts for 26 per cent of the UK’s greenhouse gas emissions, compared to 25 per cent coming from energy supplies.”

(The Independent (06/02/2018))

As can be seen from the above quote from the Independent Newspaper, vehicles are the single biggest contributor to greenhouse gas production in the UK. It would therefore seem to me that a wise stance to take in the fight against Climate Change would be to actively try to reduce the number of cars on Britain’s roads. Obviously another car storage facility, in a region that already has its fair share would demand quite the opposite strategy.

After a cursory internet search I discovered that DCOs are granted for “Nationally significant infrastructure projects” of course I freely admit that I am not an expert on what does, and what does not, constitute a nationally significant infrastructure project, but I would tentatively suggest that perhaps yet another Car Storage facility falls into the latter category.

Thus, my objection to the application for the Proposed “Non Material” change to the Able Marine Energy Park DCO 2014 has three arguments;

- 1) The DCO was granted on the premise that wind turbines would be constructed, and along with other infrastructure would, according to Able UK provide employment for an estimated 3,000 people and due to the nature of wind energy, would also help to alleviate the threat of Climate Change, by reducing fossil fuel consumption. In contrast, the proposed Car Storage Area, the construction of which, let’s remember, is the purpose for Able UK wanting to change the DCO, would provide mainly low quality, zero hour contracted, unskilled employment for only a fraction of this number of people, and as far as green energy is concerned, the extra vehicles imported would increase the consumption of fossil fuels, which is completely hostile to the original scheme.
- 2) Mitigation Area A was intended to provide a haven for the wildlife of this area that would, inevitably be displaced by the Able Marine Energy Park, these being bats, deer, amphibians, birds and the small mammals on which some feed, including the Barn Owl that roosts in my wood shed. I assume that the proposed replacement at Halton Marshes exists at the present time alongside that of mitigation Area A, so therefore unless Halton Marshes was destined to be built upon, this “Non Material” change is not a replacement, but rather a reduction in habitat. If on the other hand Halton Marshes is designated to be developed, then perhaps the car storage facility

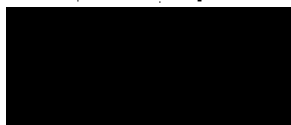
could be built there, thus negating the need to make a "Non-Material" change to the DCO altogether. I suspect though that Halton Marshes is not suitable for development and that is why Able wish to relocate Mitigation Area A there, consequently releasing the better quality land of Mitigation Area A for development.

- 3) Finally my last argument is in regards to what I believe is the deceitful way in which this application has been presented. As I have stated earlier I do not profess to be an expert on planning, nor am I proficient in legalese, but how an amendment to a DCO, that if agreed to, would almost definitely result in a massive Car Storage Facility being built, less than 10 metres from my property, on green fields that are currently reserved as habitat for wildlife, can in all seriousness be described as a "Non-Material" Change is beyond me. If it wasn't for the fact that I had been consulted earlier this year, by the local council, regarding Able UK's prior planning application for the Car Storage Facility I would not have understood the significance of this application. I would have dismissed it as something that didn't affect me. Little realising the profound change it would wreak on my property's outlook and as a result the detrimental effect on my family's and my quality of life.

In conclusion it seems to me that the "Able Marine Energy Park" has become something so different from, and so diametrically opposed to what was originally conceived, that in my opinion, not only should the amendment to the DCO not be granted, but the DCO should be revoked completely, and any public money given to Able UK, by our Government on our behalf should be returned. Of course as a UK citizen who has watched this countries' sad decline under the mismanagement of numerous Governments over the past forty years or so, I do not expect the objection or suggestions I have made here will make the slightest difference to the Secretary of State for Transport's decision in this matter, but as a local resident who is growing tired of big business/industry riding rough shod over my right to a healthy environment, I had to have my say.

For your reference and perusal, I am including here, my letter of objection to the original application for planning from Able UK, to our local council's planning committee, which preceded this application, for the "Car Storage Facility" which they propose to build on Mitigation Area A, once the DCO has been amended. As you know, I am not a planning expert so I imagine that strictly speaking these separate applications are probably unable to be dealt with as one but will be regarded as separate entities, but as a layman I believe that the link between the two applications cannot on moral grounds be ignored.

Yours Faithfully



Dr Graham Milner

Objection to the original planning application submitted to North Lincolnshire Planning Department by R. Cram for a Car Storage Facility.

Application Number: PA/2017/2141

With regards to the above application for planning permission, I feel I must object strongly.

Able Marine Energy Park (AMEP) was granted a Development Consent Order (DCO), for a development of port facilities “designed for the renewable sector to provide a multi user facility for the manufacture, storage, assembly and deployment of offshore wind turbines and their associated supply chains”. I believe they received 15 million pounds of taxpayers’ money for the initial ground works to this end.

As of date I don’t believe any one has yet signed up to build any of these wind turbines, in their own words “AMEP development is not yet formally implemented”. Perhaps the green energy banner was used to hoodwink the government into handing them millions of pounds, the same ploy also worked in getting them the DCO order which to my mind is a blank cheque to ride rough shod over planning laws, (Which this planning application is proof) and grab up as much land as possible, including compulsory purchasing some prime real estate from ABP.

To my mind Able Marine are using the DCO to bully the council into granting planning permission. Below is an extract from Able Marine’s planning statement. The author of the planning statement has inadvertently left the paragraph unfinished, but I think the implication is clear.

Whilst unlikely, should the alternative plans that have been submitted for approval not be approved, the implementation of any subsequent consent for the car storage and distribution facility would technically leave the DCO un-implementable. However, this fact should not prevent the determination of this application for the Marsh Lane Car Storage and Distribution Facility as land may lawfully have the

So we were promised a green energy park but what we seem to have got is a bog standard port facility. The renewable energy promise has proved to be hollow, unless of course the importation of thousands of cars per year will help alleviate climate change. Able marine have used this promise of green energy, to fool the government, not difficult to do, into handing over millions of pounds. The promise of thousands of new jobs to gain the goodwill of the local community and to coerce the council into granting planning permission that perhaps would otherwise be more closely scrutinised. The expected number of new jobs was put at about 3000. To date only a fraction of this number has been employed. According to their planning application the car storage facility will employ 2 shifts of 100 people each; again I think this number is greatly exaggerated for the benefit of the application. It will be interesting to see just how many are eventually employed there.

And as part of the DCO, Able committed to addressing the recognised ecological impacts that the AMEP would have. A package of ecological mitigation and compensation measures were agreed including the following “new” habitats, I put new in inverted commas because as far as I am aware these habitats pre-existed the AMEP.

- Mitigation Area A on Killingholme Marshes
- Mitigation B
- Compensatory grassland at Halton Marshes
- Cherry cob sands wet grassland
- Cherry Cobb Sands Regulated Tidal Exchange

Mitigation Area A was to compensate for ecological interests that would be adversely affected by AMEP. It now transpires that planning permission has been granted for another Mitigation area known as Halton Marshes Wet grassland Scheme (HMWGS), whether NLC were aware when they granted planning permission for HMWGS that Able Marine intended to use this as a replacement for Mitigation Area A, or whether they thought it was extra to Mitigation Area A, I do not know.

Either way it is unfortunate for us, the residents of Hazeldene as we now face the prospects of an ugly car storage facility less than 10 metres from our door.

We have resided here for 39 years. In this time local industry has relentlessly encroached on us, to the point where this area is no longer recognisable. While not happy with this situation we never the less accepted it. We have also been liberally scattered with coal dust for the Past 20 or so years, although when we reported this to the council they said they could not determine who was responsible, I suggested maybe it was the people who had the 30 metre high coal heaps, but alas no action could be taken. If this was happening to some rural town in The Republic of China, it would be sad but all too familiar, but this is happening in a supposedly civilised western democracy.

This latest proposal however, is going too far. Building an industrial complex so close to a residential property should always be the last resort and certainly not the first, as seems to be the case here. There is plenty of space to the north of Marsh lane. In fact it should be built as far to the northern boundary of mitigation area A as possible, or better still not be built on mitigation area A at all, as per the original agreement. I hope the presence of a DCO will not detract from this.

According to the planning statement, access to and from the car storage facility will be via Marsh lane, and the cars to be driven to the storage facility are to come down Rosper Road either from the south or the north, so I cannot see why access to the storage facility needs to be on Marsh Lane at all. Surely it would make more sense to enter and exit directly from Rosper Road. This would negate the need to widen Marsh Lane.

However there could be some reason to this madness. A couple of years ago I had a conversation with a workman who was constructing the bridge over the railway line on Marsh Lane, east of Hazeldene. He told me that a road from the docks and parallel with the railway line was going to be built, leading, I assume all the way to the AMEP. If this is the case, and I have no reason to doubt it, as it is reminiscent of a similar encounter two or three years ago with an employee of Northern Grid, who said something like, "we really need to replace the main electric cable along Marsh Lane, but we are waiting to see what happens with the car park that is going opposite the road there" He pointed away from Hazeldene over Marsh Lane in the direction of Mitigation Area A. A similar thing again, when I was informed by a contractor whom I met in our local shop, many years ago that a gas powered power station (KCPH) was going to be built only a field away from us, a year before work started on it. As you may have gathered, I never hear of any major industrial developments that are to take place in close proximity to Hazeldene from the relevant authorities, only from casual conversations with strangers, which in itself is a disgrace, don't you think?

But I digress, if this road is implemented, cars would be able to drive straight off the docks and into Marsh Lane, avoiding Rosper road altogether. This possibility isn't mentioned in Able's planning application. But with a quick amendment to the plans after they've been passed, as seems to have happened on numerous occasions with their past planning consents, this probably wouldn't cause them a problem.

It would of course cause problems for us, as their planning statement says, "96 vehicles per hour over a 24 hour period", right past our front door.

I also note that it is the Hazeldene side that will accommodate the extra road width, thus reducing the depth of our property's frontage, causing us to be nearer the road. This and the increased volume of traffic will make it more dangerous when we are entering or exiting our driveways.

I am also concerned with the extra light levels that will be produced from the 35metre high floodlighting.

Then there is the risk of flooding. The planning application shows that the height of the ground will be raised by about 2.5 metres. Where will the run off go to, presumably onto the lower lying ground i.e. Hazeldene.

The noise levels will be considerably increased, I see that work will be limited to certain times during construction, but once built it will be a 24 hour operation with cars being moved day and night. The sound of engines starting, stopping, accelerating, reversing etc can travel quite remarkably, I know from experience as I can hear vehicles operating from the docks at night when the wind is in the right direction. This manifests as a low rolling and pitching drone which can make sleeping difficult. To have this less than 10 metres from our

property will be a nightmare. Also movement of cars will cause a lot of pollution, which will affect my son's [REDACTED]

In summary my objections are: Noise, Light pollution, Air pollution, increased risk of flooding and increased traffic, but mainly location. If the only land available to Able was the area for the proposed development then I could understand, but they own Hundreds of acres, and yet they decide to place it as close to Hazeldene as they can possibly get. If I didn't know better I would say they were being vindictive. But I suppose with the court case with ABP going in their favour, (which I felt was a very dangerous precedent) and the granting of the DCO they feel they can do whatever they like, perhaps they can.

Graham Milner