

ABLE HUMBER PORTS LTD

RELEVANT REPRESENTATION ON THE PROPOSED IMMINGHAM EASTERN Ro-Ro TERMINAL

PINS REFERENCE TR030007

1 Introduction

- 1.1 This relevant representation summarises Able Humber Ports Ltd.'s ("Able") key concerns in respect of the Immingham Eastern Ro-Ro Terminal Project ("the Project").
- 1.2 Able Humber Port is a port development including Able Marine Energy Park (itself authorised by DCO in 2014) on the south bank of the Humber estuary.

2 Summary

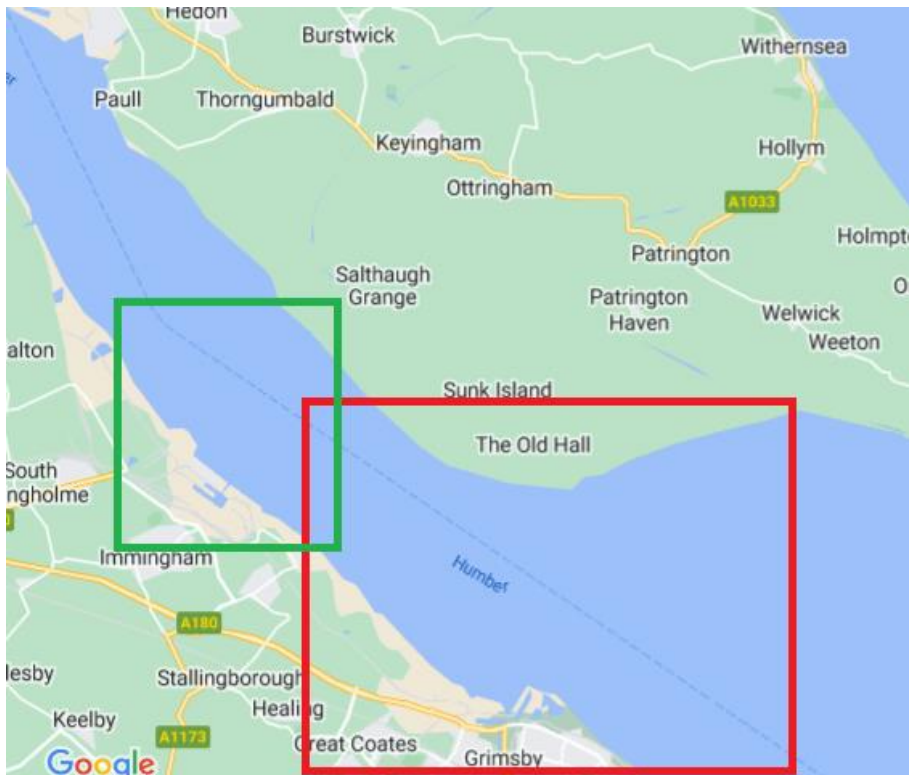
- 2.1 Able objects to the application for development consent for the Immingham Eastern Ro-Ro Terminal on several grounds:
 - 2.1.1 dredging;
 - 2.1.2 the lack of proper assessment of the operational and construction phases of the Project and the Immingham Green Energy Terminal (the "IGET"); and
 - 2.1.3 the lack of proper assessment and mitigation for the impact of increased traffic due to the Project.

3 Dredging

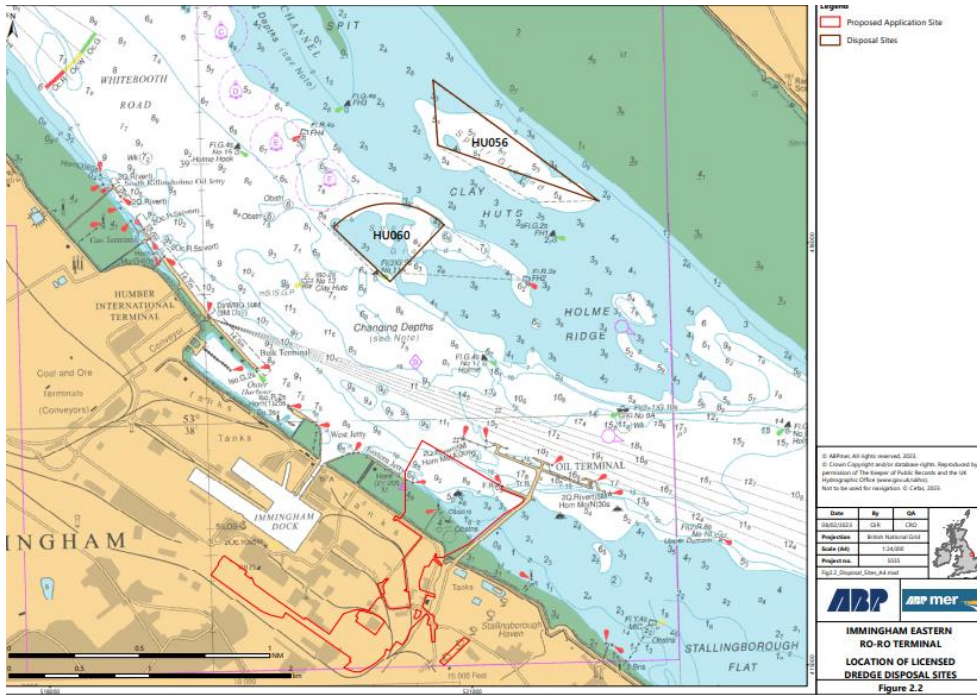
- 3.1 Due to the nature of its hydrography the Humber is an area that experiences high levels of siltation. The Immingham/Killingholme area is particularly affected due to its location and the requirement for multiple deep water 'dredge boxes' at berths in this area. Dredging is important to maintain water depths and stop vessels running aground.
- 3.2 In order to remove silt in this area there is already a constant need for maintenance dredging which is carried out through a combination of suction dredging, grab dredging and bed levelling mostly by carried out by UK Dredging ("UKD") which is a subsidiary of Associated British Ports ("the Applicant").
- 3.3 The Applicant proposes that 190,000m³ of dredge material is removed from the development site (150,000m³ of silt and 40,000m³ of boulder clay) to be disposed of in sites HU056 (Holme Channel) and HU060 (Clay Huts) (see draft DCO Schedule 3, paragraph 4(2) [APP-013]). It is obviously beneficial to the Applicant to use these two sites given their proximity to the development site. However Able believes these sites to be unsuitable to receive this material for the following reasons:

- 3.3.1 The proposed deposit sites are relatively small and are already commonly used for the disposal of material from maintenance dredging campaigns for the Immingham and Killingholme areas. Able is concerned that the disposal of this quantity of material in these two deposit grounds could seriously reduce the capacity to accept material from the continual maintenance dredging campaigns forcing the dredgers carrying out such maintenance dredging campaigns to use other deposit grounds therefore reducing their efficiency and availability.
- 3.3.2 Able is concerned that the disposal of such a quantity of dredge material so close to the Immingham area is likely to find its way back at the south Humber bank and increase siltation there, which could interfere with the construction and subsequent operation of the Able Marine Energy Park. It is of note that the deemed marine licence in Able's own DCO authorises the deposit of dredge arisings at different sites HU080, HU081 and HU082, further downstream towards the mouth of the Humber Estuary, as shown in Map 3 below, extracted from the AMEP Environmental Statement (Chapter 8). Able would wish to see protective provisions whereby any increased dredging requirement at its facility due to this project be paid for by the Applicant.
- 3.3.3 Map 1 below shows the relative locations of Map 2 (green) and Map 3 (red). Map 2 is taken from the Applicant's Environmental Statement (Volume 2, Chapter 2 [[APP-060](#)], figure 2.2) and shows deposit sites HU056 and HU060. Map 3 is taken from Able's Environmental Statement for its Marine Energy Park and shows deposit sites HU080, HU081 and HU082.

Map 1:



Map 2:



Map 3:

Figure 8.3 *Proposed disposal sites in the Humber Estuary (©OS OpenData™), reproduced from Annex 8.1 (JBA, 2011)*



4 Potential overlap between the construction and operational phases of the Project and the IGET.

4.1 The Applicant is proposing as an option to overlap its construction and operational phases by up to 15 months, but the Environmental Statement does not consistently assess these happening simultaneously. This should either be added as a supplement to the Environmental Statement or the option for simultaneous construction and operation removed.

4.2 The Applicant's other proposed DCO application, the Immingham Green Energy Terminal, is acknowledged as being only 100 metres away from the present application and are expected to overlap in terms of construction and operation. Although the cumulative impacts of the two projects are considered at item 57 in Table 20.5 in chapter 20 of the Environmental Statement [APP-056], no additional mitigation is proposed for the current application due to the existence of IGET. Able wish to be reassured that there will be no impact from the two projects' construction and operation on the local road network and on river traffic that might impact upon them.

5 The lack of proper assessment and mitigation for the impact of increased traffic

5.1 The Applicant assessed baseline traffic during autumn 2021 when it was suppressed due to the Covid-19 pandemic. This results in a misleadingly low assessment of the impact of the construction and operation of this project on the local road network. The Applicant assumes a 15%/85% split between HGVs using the Immingham West and East gates respectively, but does not appear to have any control over this – if more vehicles use the West gate than this assumption then there is likely to be a greater impact on the roads near Able's developments to the west of Immingham.

6 Conclusion

6.1 Given the above, Able UK Ltd believes that this project should not be allowed to go ahead in its present form without proper assessment and mitigation.

**Able (UK) Ltd
18 April 2023**