

# IMMINGHAM EASTERN RO-RO TERMINAL



Applicant's Response to ExQ1 Submissions by Interested Parties

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## 1. Purpose of this document

- 1.1 The Examining Authority (ExA) issued its First Written Questions to the Applicant and other Interested Parties on 7 August 2023 **[PD-010]** (“ExQ1”). The Applicant, and the other Interested Parties to which the ExA addressed questions, then submitted their responses on 5 September 2023 (Deadline 2).
- 1.2 In the Examination Timetable appended to the Rule 8 Letter published by the ExA on 2 August 2023 (“the Rule 8 Letter”) **[PD-009]**, the ExA requested that Interested Parties provide comments on submissions received at Deadline 2 by 11 September (“Deadline 3”).
- 1.3 The tables below set out the Applicant’s submissions in relation to the ExQ1 answers provided by other Interested Parties.
- 1.4 The ExA’s questions were set out using an issues-based framework derived from the Initial Assessment of Principal Issues provided as Annex C to the Rule 6 letter of 20 June 2023 **[PD-006]**. Each question has a unique topic prefix identifier (capital letters), a reference number which starts with 1 (indicating that it is from ExQ1) and then a question number.
- 1.5 The questions, along with their topic prefix and reference numbers, appear in Column 1 of the below tables. Column 2 contains the relevant examination library reference number to answers received by the Interest Parties to each question. Column 3 set out the Applicant’s submissions in relation to the ExQ1 answers provided by other Interested Parties.
- 1.6 A glossary of terms and list of acronyms can be found in Section 11.

## 2. Broad, General and Cross-Topic

Question	Reference to Interested Party Response	Applicant's Comments
<p><b>BGC.1.1</b></p> <p><b>Development Plan policies</b></p> <p>NELC and NLC are requested to confirm whether they are content with the Applicant's policy analysis. The local planning authorities in responding to this question should also advise on whether there have been any changes to the Development Plan operative in their respective areas further to the submission of the Nationally Significant Infrastructure Project (NSIP) application and/or as to whether any changes are anticipated prior to 25 January 2024, the latest date by which the Examination must be completed.</p>	<p><b>North East Lincolnshire Council (NELC)</b></p> <p><b>[REP2-025]</b></p> <p><b>North Lincolnshire Council (NLC)</b></p> <p><b>[REP2-026]</b></p>	<p>The Applicant notes the response from North East Lincolnshire Council confirming that they are content and have no concerns with the analysis of the policy position contained within Appendix 3 of the Planning Statement <b>[APP-019]</b>.</p> <p>The Council's confirmation that the Development Plan remains the same as at the time of submission of the IERRT application and that there is unlikely to be any change to the Development Plan prior to the close of the Examination is also noted.</p> <p>The Applicant notes the response from North Lincolnshire Council confirming that they do not object to the approach taken in Chapter 5 of the Environmental Statement (ES) <b>[APP-041]</b>, which does not include an assessment against the Development Plan for North Lincolnshire as no part of the order limits falls within North Lincolnshire's administrative boundary. The Council's confirmation that the Development Plan remains the same as at the time of submission of the IERRT application and that there is unlikely to be any change to the Development Plan prior to the close of the Examination is also noted.</p>
<p><b>BGC.1.2</b></p> <p><b>Neighbourhood Plans</b></p> <p>Are there any relevant made or emerging neighbourhood plans</p>	<p><b>North East Lincolnshire Council (NELC)</b></p> <p><b>[REP2-025]</b></p>	<p>The Applicant notes the response from North East Lincolnshire Council confirming that there are no made or emerging neighbourhood plans in NELC.</p>

Question	Reference to Interested Party Response	Applicant's Comments
<p>that the ExA should be aware of? If there are, please:</p> <p>a) Provide details, confirming their status and, if they are emerging, the expected timescales for their making.</p> <p>b) Provide copies of the relevant parts of any made plan or emerging plan.</p> <p>c) Indicate what weight it is considered the ExA should give to these documents.</p>	<p><b>North Lincolnshire Council (NLC)</b></p> <p><b>[REP2-026]</b></p>	<p>The Applicant notes the response from North Lincolnshire Council confirming that there are no made or emerging neighbourhood plans relevant to the proposed development.</p>
<p><b>BGC.1.3</b></p> <p><b>Updates on other development</b></p> <p>Provide an update on any planning applications that have been submitted or any permissions that have been granted following the NSIP Application's submission which could either affect the Proposed Development or be affected by the Proposed Development and advise whether those developments would affect</p>	<p><b>North East Lincolnshire Council (NELC)</b></p> <p><b>[REP2-025]</b></p> <p><b>North Lincolnshire Council (NLC)</b></p> <p><b>[REP2-026]</b></p>	<p>The Applicant notes the response from North East Lincolnshire Council confirming that it is not aware of any developments that have either been submitted or granted that would either affect the conclusions reached in the Environmental Statement or be affected by the proposed development.</p> <p>The Applicant notes the response from North Lincolnshire Council confirming that it is not aware of any planning applications within its area that have been made since the submission of the NSIP Application which could either affect the Proposed Development or be affected by it.</p>

Question	Reference to Interested Party Response	Applicant's Comments
<p>the conclusions reached in the Environmental Statement (ES).</p>		
<p><b>BGC.1.4</b> <b>Central Government Policy and Guidance</b></p> <p>Are you aware of any updates or changes to Government Policy or Guidance relevant to the consideration of this application that have been made since it was submitted? If yes, what are those changes and what implications, if any, would they have for the consideration of the Proposed Development?</p>	<p><b>CLdN</b> <b>[REP2-034]</b></p>	<p>The Applicant notes that CLdN considers that the <i>Future of Freight: a long-term plan</i> is "...important and relevant to the Secretary of State's decision". However, no further clarity is provided by CLdN in respect of any particular aspect of this document to which the Applicant and the ExA should have regard.</p>
<p><b>BGC.1.5</b> <b>Stena operations at Killingholme</b></p> <p>Stena to:</p> <p>a) explain when and why it will be ceasing all of its</p>	<p><b>Stena Line</b> <b>[REP2-065]</b></p>	<p>The Applicant notes the response by Stena and has no further comments to make.</p>

Question	Reference to Interested Party Response	Applicant's Comments
<p>operations at the Port of Killingholme; and</p> <p>b) comment on whether, in its view, there are any operational factors militating against the expansion of unaccompanied Ro-Ro freight capacity at the Port of Killingholme.</p>		
<p><b>BGC.1.6</b></p> <p><b>Evidence for suitability of an alternative to the Proposed Development</b></p> <p>Comment on the case made by the Applicant that the National Policy Statement for Ports places the onus for producing evidence about the suitability of an alternative on the person promoting an alternative [paragraph 4.3.5 in APP-040]?</p>	<p><b>CLdN</b></p> <p><b>[REP2-034]</b></p>	<p>The Applicant has responded in more detail to CLdN's position on need and alternatives – including points raised in its answer to question BGC.1.6 – within its initial response to CLdN's Written Representation.</p> <p>The Applicant notes CLdN's stated position that they are not seeking to put forward the Port of Killingholme as an alternative to the proposed development. As such, therefore, it has to be accepted that CLdN do not consider that the Port of Killingholme constitutes an alternative to the need which has been identified. A position that reflects the position reached by the Applicant in its application documentation.</p> <p>CLdN rather are arguing that the demand for Ro-Ro freight is not as great as the Applicant predicts and that the available capacity at Killingholme is sufficient to meet this demand such that the IERRT facility is not needed.</p>



Question	Reference to Interested Party Response	Applicant's Comments
		<p>Whilst ABP does not agree with CLdN's argument around this point, it is important to highlight that this does not constitute the need which the Applicant has identified and neither does it reflect what the NPSfP explains the position is in terms of need for new port infrastructure.</p> <p>Fundamentally, the position being put forward by CLdN is at odds with the policy contained within the NPSfP.</p>
<p><b>BGC.1.9</b></p> <p><b>Disposal at sea of dredged material</b></p> <p>The CEMP [paragraph 1.3.9 in APP-111] states “... it is considered that the dredge material is suitable for disposal at sea”. Would the MMO confirm whether it does or does not agree with that statement.</p>	<p><b>Marine Management Organisation (MMO)</b></p> <p><b>[REP2-016]</b></p>	<p>The Applicant notes the MMO's position in its response that material within the dredge area would be acceptable for disposal at sea with respect to concentrations of trace metals, organotins, and polychlorinated biphenyls (PCBs). Furthermore, as stated in the MMO's Deadline 1 submission <b>[REP1-020]</b>, levels of polycyclic aromatic hydrocarbons (PAHs) in samples within the dredge area do not preclude the material being disposed of at sea (noting that sample sites 1, 6 and 7, with slightly higher concentrations of PAHs, no longer fall in the proposed dredge area and will not be disturbed during dredging).</p> <p>With regard to polybrominated diphenyl ethers (PBDEs), the MMO also note that, with the exception of the area around sample site 9 from surface to 2 m depth, the material is acceptable for disposal at sea. However, as noted by the MMO, there are no currently agreed action levels in England for PBDEs and, therefore, the comments with respect to these contaminants at sample site 9 are advisory only (i.e., not mandated under signatory obligations).</p>

Question	Reference to Interested Party Response	Applicant's Comments
		As per best practice under OSPAR, PBDE data should be normalised for organic carbon content. This is provided in Table 8.6 of Chapter 8 of the ES [APP-044] and the Applicant will continue to discuss this matter further with the MMO.
<p><b>BGC.1.11</b></p> <p><b>Inter-active effects consequent on “stemming” of waiting shipping traffic:</b></p> <p>Respond in detail (with signposting of where the assessment of likely effects has been made) to the Relevant Representation made by DFDS [paragraphs 5.2 and 5.4 in RR-008] that maintains that adverse effects both to shipping and to the environment would result from “stemming” (waiting) of shipping traffic.</p>	<p><b>Harbour Master Humber</b></p> <p><b>[REP2-057]</b></p>	<p>The Applicant notes the response provided in paragraph 2.6 [REP2-057], whereby the Harbour Master Humber does not consider that the reported level of increased traffic arising from the IERRT is likely to cause significant interference with existing vessel waiting areas and that this is no different from the current position in the Estuary.</p>

### 3. Compulsory Acquisition, Temporary Possession and other Land Rights Considerations

Question	Reference to Interested Party Response	Applicant's Comments
<p><b>CA.1.1</b></p> <p><b>Any Book of Reference etc inaccuracies</b></p> <p>Are any Affected Persons aware of any inaccuracies in the Book of Reference [APP-016], Statement of Reasons [APP-017] or Land Plans [APP-006]? If so, please identify what those inaccuracies are and provide the correct details.</p>	<p><b>Affected Persons</b></p>	<p>The Applicant notes that no Affected Persons have identified any inaccuracies in the Book of Reference [APP-016], Statement of Reasons [APP-017] or Land Plans [APP-006].</p>
<p><b>CA.1.2</b></p> <p><b>Protective Provisions</b></p> <p>Please advise of the progress you are making to negotiate Protective Provisions with the Applicant, highlighting any areas of disagreement with the Applicant in terms of agreeing the wording for Protective Provisions.</p>	<p><b>Environment Agency [REP2-014]</b></p>	<p>The Applicant agrees with the Environment Agency's response that discussions are ongoing between the parties with a view to agreeing the disapplication of the Environmental Permitting Regulations 2016 in respect of flood activity permits.</p> <p>The Applicant has considered the Environment Agency's comments at paragraphs 1.6 and 1.7 of its Written Representation <b>[REP2-013]</b> (as referenced in its response to ExQ1 CA.1.2). The Applicant will continue to engage with the EA to settle an agreed form of the protective provisions.</p>
<p><b>CA.1.3</b></p> <p><b>Crown land consent</b></p>	<p><b>Crown Estate Commissioners</b></p>	<p>The Applicant is not aware of a response to ExQ1 C.A.1.3 submitted by The Crown Estate Commissioners. In any event, both</p>

<p>Can the Crown Estate Commissioners provide an update regarding the discussions between it and the Applicant about the giving of its consent for the use of the Crown land affected by the Proposed Development. Most particularly whether agreement will be reached before the close of the Examination which will be not later than 25 January 2024.</p>		<p>parties are engaged in positive dialogue and the Applicant is seeking to agree all matters by the close of the Examination.</p>
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#### 4. Climate Change

Question	Reference to Interested Party Response	Applicant's Comment
<p><b>CC.1.1</b> <b>Green House Gas (GHG) emission sources considered</b></p> <p>Are you content with the Greenhouse Gas (GHG) emissions sources considered by the Applicant in the lifecycle GHG Impact Assessment? If not, why not?</p>	<p><b>CLdN</b> <b>[REP2-034]</b></p>	<p>As indicated within Chapter 19 (Climate Change) of the Environmental Statement <b>[APP-055]</b>, the Applicant has undertaken the Greenhouse Gas (GHG) assessment in alignment with the requirements of PAS 2080 (Carbon Management in Buildings and Infrastructure) and the Greenhouse Gas Protocol (GHGP). Table 19.13 and Table 19.14 of Chapter 19 of the ES <b>[APP-055]</b> present the emission totals alongside the source of the data emissions factors and conversion unit used. Further data transparency is provided in Table 19.14 of Chapter 19 <b>[APP-055]</b> with references to relevant chapters for further information provided where required.</p> <p>For freight transport movements, it was referenced in Table 19.14 of Chapter 19 of the ES <b>[APP-055]</b> that <i>"The Air Quality chapter (Chapter 13) of the ES informed these results."</i> Furthermore, as mentioned in Table 19.14 of Chapter 19 of the ES <b>[APP-055]</b> emissions from <i>"operational tugs were calculated by the Air Quality assessment (Chapter 13 of this ES)"</i>. As explained in Section 13.8.51 of Chapter 13: Air Quality:] <i>"Land-tugs are required to move all unaccompanied freight to docked vessels during loading and from docked vessels during unloading"</i> <b>[APP-049]</b>.</p>
<p><b>CC.1.2</b> <b>Climate parameters considered for Climate Change Review (CCR)</b></p>	<p><b>CLdN</b> <b>[REP2-034]</b></p>	<p>As explained in Table 19.9 of Chapter 19 of the ES <b>[APP-055]</b>, <i>"In the UKCP18 Wind Factsheet, the Met Office states (Met Office, 2020): "There are no compelling trends in storminess, as determined by maximum gust speeds, from the UK wind network over the last four decades." and "Wind speed is not available for the probabilistic</i></p>

Question	Reference to Interested Party Response	Applicant's Comment
<p>Are you content with the climate parameters considered by the Applicant in the CCR? If not, why not?</p>		<p><i>projections as they did not pass our credibility checks." While reference could be made to the winter wind speed anomaly data from the 12 km land projections dataset, the climate models do not show any clear trends. Due to this uncertainty, projected windspeed cannot be addressed in the ES".</i></p> <p>However, the impact of storms is assessed in Chapter 19 of the ES <b>[APP-055]</b>, and embedded storm mitigation measures were identified during construction and operation as detailed in Table 19.19 and 19.21 of Chapter 19 of the ES <b>[APP-055]</b> and summarised below:</p> <p><u>Construction</u></p> <ul style="list-style-type: none"> <li>• <i>"Provision of safe refuge within the IERRT terminal building and the production of a flood response plan along with other mitigation measures are detailed in the Coastal Protection, Flood Defence and Drainage chapter (Section 11.9 in Chapter 11 of this ES)."</i></li> </ul> <p><u>Operation</u></p> <ul style="list-style-type: none"> <li>• <i>"Provision of safe refuge within the terminal building and the production of a flood response plan along with other mitigation measures are detailed in the Coastal Protection, Flood Defence and Drainage chapter (Section 11.9 in Chapter 11 of this ES).</i></li> <li>• <i>The Drainage Strategy is based upon the flood risk assessment's findings to ensure that suitable surface water drainage is embedded into the IERRT project, which considers</i></li> </ul>

Question	Reference to Interested Party Response	Applicant's Comment
		<p><i>climate change. The Drainage Strategy is provided in Annex C of the Flood Risk Assessment at Appendix 11.1 Volume 3 of ES (Application Document Reference number 8.4).</i></p> <ul style="list-style-type: none"> <li><i>It is ABP's intention that the standard of protection afforded by the existing flood defences under their jurisdiction, along both the IERRT site frontage and the wider Port of Immingham, will be kept under consideration and reviewed as appropriate to account for climate change in line with 'Hold the line' management policies in the flood risk management plan and Shore Management Plan 3 (Section 11.9 in Chapter 11 of this ES).</i></li> <li><i>The Coastal Protection, Flood Defence and Drainage chapter provides more information on this (Section 11.9 in Chapter 11 of this ES)."</i></li> </ul>
<p><b>CC.1.3</b>  <b>Determination of current baseline for climate change</b>                      Do you consider the desk-based review of information as set out in Chapter 19 of the ES [APP-055] is adequate to determine the current baseline conditions? If not, why not?</p>	<p><b>CLdN</b>  <b>[REP2-034]</b></p>	<p>Extreme weather events were considered in Chapter 19 of the ES [APP-055] as stated in Section 19.7.9: <i>"It is generally concluded that extreme weather events, including intense and/ or prolonged precipitation, storm events and poor sea conditions, will increase in frequency, but the low confidence in the climate change projections means that it is difficult to predict any changes (Met Office, 2018b). Under these assumptions, it is considered that extreme weather will become more frequent. Projected increases in the frequency of extreme weather events are taken into account as part of the Coastal Protection, Flood Defence and Drainage chapter (Chapter 11) of this ES."</i></p> <p>Furthermore, as explained in paragraph 19.8.25 of Chapter 19 of the ES [APP-055], <i>"A full technical assessment of the site's vulnerability</i></p>

Question	Reference to Interested Party Response	Applicant's Comment
		<p><i>to sea-level rise, extreme weather events and intense precipitation is detailed in the Coastal Protection, Flood Defence and Drainage chapter (Chapter 11) of this ES."</i></p>
<p><b>CC.1.4</b>  <b>GHG emission calculations</b>                      Do you consider that GHG emissions have been calculated in line with the most up to date available guidance?</p>	<p><b>CLdN</b>  <b>[REP2-034]</b></p>	<p>At the time of submission of the ES for the proposed development on 6 March 2023, the GHG Assessment as presented within Chapter 19 of the ES <b>[APP-055]</b> was completed using the most up-to-date guidance. The updated PAS 2080:2023 was released in April 2023.</p> <p>However, considering the updates from the latest PAS 2080:2023, which <i>"Expanded scope to include all the built environment (buildings and infrastructure),"</i> the GHG Assessment is considered comprehensive. Fundamentally, this is because, as detailed in Table 19.1 of Chapter 19 of the ES <b>[APP-055]</b>, the construction and operational lifecycle stages were scoped into the assessment, already encompassing all buildings and infrastructure in the IERRT project.</p> <p>It is important to explicitly recognise as explained in Section 19.3.9 of the ES <b>[APP-055]</b> that: <i>"The level of significance of total project-related emissions has been determined using IEMA's (2022) significance criteria which are not solely based on whether a development emits GHG emissions alone, but how it makes a relative contribution towards achieving a science based 1.5°C aligned transition towards net zero"</i>.</p> <p>As detailed in paragraph 19.9.23 of the ES <b>[APP-055]</b>: <i>"In line with the UK government's Clean Maritime Plan and Transport</i></p>



Question	Reference to Interested Party Response	Applicant's Comment
		<p><i>Decarbonisation Plan, it is predicted that the activities occurring at the IERRT will continue to decarbonise in accordance with the budgeted, science based 1.5°C trajectory. Therefore, based on the IERRT project's GHG emissions being below the indicative 5% threshold and the expectation that associated activities will decarbonise in accordance with the UK government's agendas, it is considered that the magnitude of impact from the combination of construction and operation GHG emissions is minor adverse. As such, the construction and operation of the IERRT project is not expected to affect the UK in meeting its Carbon Budget."</i></p> <p>Therefore, in alignment with PAS2080:2023, Chapter 19 of the ES <b>[APP-055]</b> adequately assessed the IERRT project's impact towards the UK's net zero trajectory.</p>

## 5. Draft Development Consent (dDCO)

Question	Reference to Interested Party Response	Applicant's Comment
<p><b>DCO.1.14</b>  <b>Requirement 9 Drainage: obstruction to Habrough Drain</b>            Provide confirmation that you are content with the provision of this Requirement that the developer should have 28 days to respond to a notice of obstruction to Habrough Drain.</p>	<p><b>Environment Agency [REP2-014]</b></p> <p><b>North East Lindsey Internal Drainage Board</b></p>	<p>The Applicant notes that the Environment Agency has no objection to the inclusion of Requirement 9 as drafted.</p> <p>The Applicant is not aware of a submission from North East Lindsey Internal Drainage Board (IDB) in response to ExQ1 DCO.1.14. However, the Applicant has engaged separately with the North East Lindsey Drainage Board on protections for the Habrough Marsh Drain, as well as other land drainage aspects of the draft DCO.</p>

## 6. Historic Environment including Marine Archaeology

Question	Reference to Interested Party Response	Applicant's Comments
<p><b>LHE.1.1</b>  <b>Comments on Draft Marine Written Scheme of Investigation</b>                      Please comment in detail on whether the Draft Marine Written Scheme of Investigation [APP-107] provides sufficient detail about proposed management of effects for marine archaeological assets and if not, why not?</p>	<p><b>Historic England</b>  <b>[REP2-015]</b></p>	<p>The Applicant welcomes Historic England's agreement that the Marine Written Scheme of Investigation is acceptably robust and technically appropriate.</p>
<p><b>LHE.1.2</b>  <b>Impact on setting of heritage assets</b>                      Does HE accept the Applicant's assessment of the effect of the Proposed Development on the setting of heritage assets [paragraphs 15.8.24 to 15.8.32 in APP-051] and if not, why not?</p>	<p><b>Historic England</b>  <b>[REP2-015]</b></p>	<p>The Applicant welcomes Historic England's agreement that the assessment is sufficient and appropriate.</p>

## 7. Biodiversity, Ecology and Natural Environment

Question	Reference to Interested Party Response	Applicant's Comments
<p><b>BNE.1.8</b>  <b>Effects arising from the use of artificial lighting</b></p> <p>With respect to effects for the qualifying features of the SAC, SPA and Ramsar site arising from the use of artificial lighting during the construction and operational phases of the Proposed Development, please identify which qualifying features it is considered would be affected, as referred to in key issue 10 in your Relevant Representation [RR-015], as amended by [AS-01]1 and [AS-015].</p>	<p><b>Natural England</b>  <b>[REP2-019]</b></p>	<p>Natural England accept that additional construction lighting will not significantly impact any relevant features of the Humber Estuary designated sites.</p> <p>An updated HRA report will be provided at D5 which will provide the information requested and resolve this issue.</p>
<p><b>BNE.1.15</b>  <b>References to the Institute of Estuarine and Coastal Studies toolkit</b></p> <p>In your Relevant Representation [RR-015], as amended by [AS-011] and [AS-015], concern has been raised about the Applicant's use of the Institute of Estuarine and</p>	<p><b>Natural England</b>  <b>[REP2-019]</b></p>	<p>It is noted that Natural England does not endorse the IECS (2013) 'Waterbird disturbance mitigation toolkit'. The toolkit has, however, only been used to provide contextual information for the assessment. Typically, this comprises findings from direct observations and monitoring of bird species in respect of flood defence works (including piling and use of plant/machinery) which is considered analogous to port related construction activity. It is acknowledged that caution should be used with respect to the very specific thresholds stated for individual species in the toolkit. For this reason, the Chapter 9 of the IERRT ES <b>[APP-045]</b> and HRA</p>

Question	Reference to Interested Party Response	Applicant's Comments
<p>Coastal Studies water disturbance mitigation toolkit. Please elaborate on what the concern is about the use of the toolkit and how that might have affected the assessment undertaken by the Applicant.</p>		<p>report <b>[APP-115]</b> do not apply the toolkit thresholds in the assessment(s) and instead take a broader approach by considering the evidence base as a whole. In addition, a wide range of literature and evidence sources have been taken into account within the assessments to provide a robust understanding of the relative sensitivity of different species and the responses they might have to disturbance stimuli. Taken together, this information represents a robust evidence base to underpin the respective assessments and the conclusions drawn from those assessments.</p> <p>Discussions regarding mitigation is ongoing and Natural England has previously indicated that it is likely that all of the concerns raised can be addressed during the course of the Examination <b>[REP1-022]</b>.</p>
<p><b>BNE.1.16</b>  <b>Effectiveness of construction mitigation measures</b>                      In your Relevant Representation [RR-015], as amended by [AS-011] and [AS-015], concern has been raised about the proposed construction mitigation measures. Please elaborate on what additional information would be required to demonstrate the</p>	<p><b>Natural England</b>  <b>[REP2-019]</b></p>	<p>Discussions with Natural England regarding mitigation for SPA birds is ongoing. This includes with respect to applicability to the main construction activities, the effectiveness of the measure and the associated level of certainty.</p> <p>Natural England has previously indicated that it is likely that all of the concerns raised can be addressed during the course of the Examination <b>[REP1-022]</b>.</p>

Question	Reference to Interested Party Response	Applicant's Comments
effectiveness of the proposed construction mitigation measures.		
<p><b>BNE.1.17</b>  <b>In-combination assessment</b>                      In terms of the matters raised in your Relevant Representation [RR-015], as amended by [AS-011], [AS-015] and [AS-016] and the assessment of in-combination effects, is there any additional information that you consider should be submitted by the Applicant to enable the ExA to comprehensively report on this matter when it makes its recommendation to the SoST? In answering this question Natural England should identify and submit any information that the Applicant has provided to it following the submission of the application on 10 February 2023. Should any such information have already been submitted as an Examination document then it will only be necessary to cite the Examination Library document reference number for that documentation.</p>	<p><b>Natural England [REP2-019]</b></p>	<p>The Applicant maintains that Chapter 20 of the ES [APP-056] includes a comprehensive cumulative and in-combination assessment. This assessment was based on the information available at the time of submission of the IERRT DCO application, including in respect of the Immingham Green Energy Terminal (IGET) project.</p> <p>As the Applicant noted in its response to ExQ1 BGC.1.19 [REP2-009], the IGET DCO application has not yet been submitted. When it is, the cumulative and in-combination effects will be assessed (with mitigation proposed if necessary) in respect of the IGET project in the IGET DCO application documentation.</p> <p>Natural England has not identified any specific plans or projects that have not already been captured within the assessment.</p>

Question	Reference to Interested Party Response	Applicant's Comments
<p><b>BNE.1.18</b>  <b>Identification of matters needing to be addressed by the Applicant before a DCO could be made</b>                      Further to: 1) your Relevant Representation [RR-015], as amended by [AS-011], [AS-015] and [AS-016]; and 2) the requirement placed on the Applicant by the ExA to submit an updated version of the HRAR by not later than Examination Deadline 5, please identify the matters in your view needing to be addressed by the Applicant before the ExA could recommend that a DCO could be made. (If not fully addressed in any Written Representations to be made by Natural England at Deadline 2.)</p>	<p><b>Natural England</b>  <b>[REP2-019]</b></p>	<p>The Applicant can confirm that they are intending to provide an updated HRA report <b>[APP-115]</b> to address the points raised by Natural England by Deadline 5.</p>

Question	Reference to Interested Party Response	Applicant's Comments
<p><b>BNE.1.19</b>  <b>Mitigation of suspended sediment impacts on fish species</b>  Applicant to clarify whether further assessment and mitigation relating to suspended sediment impacts for fish is proposed, and, if not, why not? What is the MMO's position on this?</p>	<p><b>Marine Management Organisation (MMO)</b>  <b>[REP2-016]</b></p>	<p>The Applicant welcomes the MMO's confirmation that it does not expect the Applicant to carry out any further assessment of this pathway and agrees with the MMO's acknowledgement that: <i>'As no significant impacts are expected to occur as a direct result of the dredging, the requirement to undertake monitoring is difficult to justify'</i>.</p>



## 8. Navigation and Shipping

Question	Reference to Interested Party Response	Applicant's Comments
<p><b>NS.1.1</b>  <b>Stakeholder consensus in NRA</b>                      Expand on the views made at ISH2 that the Applicant is required to produce a Navigational Risk Assessment (NRA) with stakeholder consensus. (If not already included in written note following representations made at ISH)</p>	<p><b>IOT Operators [REP2-062]</b></p> <p><b>DFDS [REP2-037]</b></p>	<p>In response to NS.1.1, DFDS and the IOT Operators have provided an excerpt of the PMSC which describes the 'essential' nature of involving those who work in the port by establishing good channels of consultation.</p> <p>The Applicant notes that DFDS's NRA <b>[REP2-043]</b> only included DFDS and one additional port user (excluding consultants) and the IOT Operators' NRA did not include any stakeholder engagement at all.</p> <p>The DFDS response to NS.1.1 mentions that during the HAZID there were "<i>occasions</i>" when there was disagreement between attending stakeholders. This is to be expected when a large group of people with differing viewpoints meet. Importantly, there was a process in place to deal with disagreement – to take the median value of the disagreeable positions or, if the positions were adjacent, the upper category of the two was taken.</p> <p>The Applicant disagrees with DFDS's comment that ABP/ABPmer "<i>appeared to ignore the views of the stakeholders and set out their own views as the record of the meeting.</i>" ABPmer facilitated the workshop and did not register its own position on the risks. Rather, ABPmer simply repeated back to stakeholders what had been said. The example provided regarding the Applicant being told that the tidal flow is wrong is not relevant to the HAZID process of resolving issues around consensus.</p>

Question	Reference to Interested Party Response	Applicant's Comments
		<p>However, the Applicant has responded to this point at NS.1.21 in this document.</p> <p>Further, the section of the PMSC highlighted by the IOT Operators describes how an organisation should <b>seek</b> consensus. There has been considerable attempt by the Applicant to seek consensus with stakeholders in workshops and additional meetings. Where consensus has not been possible in respect to risk assessment, the method described previously in this response was applied.</p>
<p><b>NS.1.2</b>  <b>Need for Protective Provisions</b>                      Expand on the point made at ISH2 that Protective Provisions for Port of Killingholme are needed to cover the eventuality that restrictions on use of the river following a marine accident or incident would affect operations at the Port of Killingholme. (If not already included in written note following representations made at ISH)</p>	<p><b>CLdN</b>  <b>[REP2-034]</b></p>	<p>The Applicant has reviewed CLdN's comments on the scope of any protective provisions in CLdN's favour and the Applicant does not consider that such – or any – protective provisions are necessary.</p> <p>The Applicant has written to CLdN to this effect – a copy of which is appended to <b>document 10.2.26 – Applicant's Response to CLdN's Written Representation</b> – and awaits a response.</p>
<p><b>NS.1.4</b>  <b>Safety Case and Duty Holder at Port of Killingholme</b>                      Is there a specific MSMS for the Port of Killingholme and if so, who is the Duty Holder, who is the Designated Person and how does</p>	<p><b>CLdN</b>  <b>[REP2-034]</b></p>	<p>The response provided in this respect does we suggest further amplification.</p>

Question	Reference to Interested Party Response	Applicant's Comments
the production and maintenance of that MSMS relate to the duties exercised by the Humber Harbour Master?		
<p><b>NS.1.5</b>  <b>Port Marine Safety Management Systems and Risk Assessment process</b>  Please advise on the following:</p> <p>a) Whether port developers are required by UK government or International Maritime Organisation (IMO) policy to produce a Navigational Risk Assessment (NRA) with stakeholder consensus to assess the safety for a proposed development?</p> <p>b) Whether use of Marine Guidance Note (MGN) 654 guidance would be appropriate or inappropriate alongside the Port Marine Safety Code (PMSC) guidance in the production of a NRA for a port development proposal?</p> <p>c) Whether a port MSMS may be wholly withheld from</p>	<p><b>Maritime and Coastguard Agency (MCA)</b></p>	<p>The Applicant is not aware of a response to NS.1.5 submitted by the MCA.</p>

Question	Reference to Interested Party Response	Applicant's Comments
<p>stakeholders if there are security considerations concerning aspects of the MSMS.</p> <p>d) In the production and maintenance of a MSMS, is there a process for referring differences of opinion relating to acceptability or tolerability of risk to an authority higher than the Port or Harbour Board such as an independent arbitrator or regulatory body? If yes, who is the body or person in higher authority?</p> <p>e) If the Duty Holder's Designated Person would normally attend HAZID workshops and/or workshops to agree parameters for navigational pilotage simulations in connection with the planning for new developments concerning a port(s)/harbour(s)?</p> <p>f) Any other comments from the MCA on the normal process for assessing safety risks for a proposed development, such as the Proposed Development,</p>		

Question	Reference to Interested Party Response	Applicant's Comments
<p>where port stakeholders have concerns about the process and conclusions relating to the tolerability of risks identified.</p>		
<p><b>NS.1.6</b>  <b>Marine Incident in vicinity of IOT</b>                      Confirm/signpost how a marine incident reported in recent years involving allision of a tanker with a mooring buoy in the vicinity of the Proposed Development has been taken into account in the submitted NRA [APP-089] and the MSMS to date.</p>	<p><b>Harbour Master Humber</b>  <b>[REP2-060]</b></p>	<p>The Applicant notes the response from the Harbour Master Humber and has no further comments.</p>
<p><b>NS.1.9</b>  <b>Bunkering from barges</b>                      Do vessels at the finger pier berths 8 and 9 ever need to be bunkered from barges rather than the jetty's infrastructure?</p>	<p><b>IOT Operators</b>  <b>[REP2-062]</b></p>	<p>The Applicant notes the response from the IOT Operators that vessels at the Finger Pier berths 8 and 9 are not bunkered from barges.</p> <p>The Applicant is aware of the request to accommodate tank washings from alternative feedstocks. This is a new proposed operation under consideration by the IOT Operators.</p>

Question	Reference to Interested Party Response	Applicant's Comments
<p><b>NS.1.10</b>  <b>Tug assistance at IOT Berths 8 and 9</b>                      How frequently is it necessary to use a tug or tugs for arriving or departing vessels and what are the factors that determine when and how many tugs will be required?</p>	<p><b>IOT Operators</b>  <b>[REP2-062]</b></p>	<p>The Applicant notes the response from the IOT Operators and has no further comments.</p>
<p><b>NS.1.14</b>  <b>Consequences of decision to abort berthing manoeuvre</b>                      If a pilot or ship's master with a pilot exemption certificate for Immingham decides dynamically that conditions would make it unsafe to continue with a berthing manoeuvre or entry into the Port's lock, what are the consequences for that physically and administratively?</p>	<p><b>Harbour Master Humber</b>  <b>[REP2-058]</b></p> <p><b>IOT Operators</b>  <b>[REP2-062]</b></p> <p><b>DFDS</b>  <b>[REP2-037]</b></p>	<p>The Applicant notes the response from the Harbour Master Humber and has no further comments.</p> <p>The Applicant notes the response from the IOT Operators.</p> <p>The Applicant does not agree with the response provided by DFDS and would note that the DFDS operation at the Port of Immingham takes place in the Outer Harbour, which is highly constrained by existing sensitive port infrastructure.</p>

Question	Reference to Interested Party Response	Applicant's Comments
<p><b>NS1.15</b> <b>Pilot and tug availability</b> Explain how many pilots and tugs are currently available to serve vessel arrivals and departures at the existing Port Immingham and what implications the operation of the Proposed Development might have for the availability of pilots and tugs.</p>	<p><b>Harbour Master Humber</b> <b>[REP2-059]</b></p>	<p>The Applicant notes the response from the Harbour Master Humber and has no further comments.</p>

Question	Reference to Interested Party Response	Applicant's Comments
<p><b>NS.1.17</b>  <b>Societal Risk Assessment</b>                      Explain what risks have been assessed in the application with respect to the potential impact of the Proposed Development's proximity to Control of Major Accident Hazards (COMAH) sites, including collateral societal risk for energy supply in the United Kingdom and how any necessary mitigation would be secured in a made DCO.</p>	<p><b>IOT Operators</b>  <b>[REP2-062]</b></p>	<p>As explained by the Applicant in its response to ExQ1 <b>[REP2-009]</b>, it is not appropriate to apply COMAH risks or controls to an NRA, as the NRA covers Navigational Risk only, and any societal risk posed by the development to the COMAH site should be considered as part of the COMAH risk assessments as part of the safety plan for the COMAH site as explained in the Applicant's response at Deadline 2.</p> <p>The HSE as the Competent Authority for COMAH in the UK are the lead authority and should be satisfied that the risk has be addressed and mitigated for the COMAH site and not the port infrastructure. The Applicant has engaged with HSE in respect of the IERRT and the HSE has confirmed that it would not advise against the proposed development.</p> <p>The Alternative NRA provided by the IOT Operators at Deadline 2 incorrectly draws from COMAH and HSE Guidance as noted by the Applicant in its comments on the two submitted Alternative NRAs.</p>
<p><b>NS.1.19</b>  <b>Vessel types and manoeuvrability</b>                      With regard to paragraph 3.1.9 of DFDS' Relevant Representation <b>[RR-008]</b>, provide elaboration of what vessel types and sizes DFDS understands would use the Proposed Development, together</p>	<p><b>DFDS</b>  <b>[REP2-037]</b></p>	<p>DFDS have not answered the question and have misleadingly suggested that the Applicant has failed to identify the types of vessels that are to use the terminal. Chapter 3 of the Environmental Statement <b>[APP-061]</b> explains that the berthing facilities have been designed to handle vessels with a length overall (LOA) of 240 m, a breadth of 35 m, and a draught of up to 8 m.</p> <p>As the ExA will be aware, the Navigational Simulation reports provide clear details of the design vessels that have been modelled.</p>



Question	Reference to Interested Party Response	Applicant's Comments
<p>with an explanation of their manoeuvrability in comparison with the vessels used in the simulation runs that have informed the Applicant's NRA.</p>		<p>Section 2.3 of <b>[APP-090]</b> and Section 2.4 of <b>[APP-092]</b> provide an overview with Table 2.1 of each report providing detailed vessel characteristics. In both cases, the ship manoeuvring models were verified by experienced masters and PEC holders, with confirmation received that the manoeuvring model was consistent with their experience of the vessel in reality.</p> <p><b>[APP-092]</b> records that the PEC holders considered the model to be slightly conservative - in other words, considered the vessel to be more manoeuvrable in real life.</p> <p>The Applicant is not required to identify the exact vessel as the berths are not designed for a single vessel. The Applicant has identified a key design parameter (size) of a likely vessel and has conducted simulations with vessels that may represent this. It seems that DFDS are making the assertion that a berth is designed for a vessel and that vessel is the only ship type that will berth there. This is simply not the case in any port, a prime example would be to consider what vessel DFDS will be using in however many years' time for their operations, and if the design of their berth was made for only the vessels they use today or for vessels of a certain size and nature in general.</p> <p>It is not the Applicant's intention to use the IERRT for Pure Car Carriers and the infrastructure has not been specifically designed or tested to accommodate this vessel type. As DFDS well know from handling these vessels at its own terminal, this type of operation</p>

Question	Reference to Interested Party Response	Applicant's Comments
		<p>has specific functional requirements, for example, the necessary quayside space to deploy large quarter ramps from the starboard quarterdeck which is not provided at the IERRT berths. This comment from DFDS does not directly address the ExA's question, and the Applicant is concerned that this is an unhelpful distraction from the principal issues under examination.</p>
<p><b>NS.1.20</b>  <b>Use of bow thrusters, tugs and pilots</b>                      With regard to paragraph 3.1.10 of DFDS' Relevant Representation [RR-008], provide evidence to support the observation that "the Applicant over-relies on use of bow thrusters, tugs and pilots to achieve successful simulations".</p>	<p><b>DFDS</b>  <b>[REP2-037]</b></p>	<p>The Applicant must once again reiterate that the concerns made by DFDS are not supported by evidence.</p> <p>The purpose of the simulations was to find the operational limits and the full use of the equipment is required to confirm this. In a normal operational situation, the vessel would be manoeuvred under standard operating conditions and not with reliance of the maximum available power.</p> <p>The operational endurance of the bow thrusters is confirmed to be 30 minutes on full power, after which time the power needs to be reduced to control the temperature of the electromotor. This was completed during the test trials and witnessed by the senior master of the vessel.</p> <p>The simulation team considered during every run the reserve power available to the pilot.</p>

Question	Reference to Interested Party Response	Applicant's Comments
<p><b>NS.1.21</b>  <b>Direction of current</b>                      Explain the implications of the contention that the current direction north of the Proposed Development is different to that modelled in the navigation simulations presented by the Applicant.</p>	<p><b>DFDS</b>  <b>[REP2-037]</b></p>	<p>The Applicant is alarmed by the submissions made by DFDS in response to NS.1.21 and NS.1.23 as DFDS appear to have misrepresented and potentially misconstrued the oral representation made in ISH2 by the Applicant's simulation consultant. DFDS state that the tide is wrong in the vicinity of the IOT and that the Applicant's simulation witness conceded this point at the hearing. This is a gross oversimplification of this complex and important matter. As the Applicant's witness went on to explain comprehensively at ISH2, the focus of the modelling has been to ensure that the flows at the IERRT are as representative as possible so that the feasibility of large ships operating in the vicinity of the new infrastructure has been properly assessed.</p> <p>The Applicant has set out its position in respect of the current direction in Table 2 of <b>[REP2-010]</b> and has provided extensive details of the data collection and tidal model verification process in its response to ExQ1 NS.1.18 <b>[REP2-009]</b>.</p> <p>The Applicant has provided at <b>[REP1-009]</b> (Appendix 13) a figure showing the area of high confidence in the flow model based on verification with observed data, as well as a detailed response to Action Point 27.</p> <p>The Applicant would also note the submission made by the Humber Harbour Master in <b>[REP2-061]</b> at paragraph 3.9, which states that <i>"HMH understands that DFDS remains concerned about the discrepancy between the simulated tide north of the Immingham Oil Terminal and experienced real-life conditions. HMH is satisfied that</i></p>

Question	Reference to Interested Party Response	Applicant's Comments
		<p><i>this has no material bearing on the outcome of the trials which were primarily focussed on manoeuvring to and from the potential new infrastructure rather than on movements within the area north of IOT where there is already ample experience of vessels manoeuvring today."</i></p> <p>DFDS note an Appendix 1 to its submission, however, this appears to be missing from DFDS's D2 submission documents in the Examination Library.</p>
<p><b>NS.1.22</b> <b>Potential congestion of navigation</b> Expand on the argument made at ISH2 that the operation of the Proposed Development would cause shipping movement congestion in and around the Port of Immingham. (If not already included in any post ISH2 submissions)</p>	<p><b>DFDS</b> <b>[REP2-037]</b></p>	<p>The Applicant has previously addressed comments from DFDS relating to vessel congestion in its response to the Relevant Representations <b>[REP1-013]</b>.</p> <p>The Applicant also notes from the D2 submissions provided by the Humber Harbour Master <b>[REP2-054]</b> paragraphs 24 and 32 that congestion within the Humber Estuary is prevented by the SHA's vessel planning protocols, and that the Harbour Master is of the view that the IERRT will not have a material impact on the operation of the Humber.</p>
<p><b>NS.1.23</b> <b>Admiralty Chart data on current direction</b> With regard to paragraph 3.23 of DFDS' Relevant Representation <b>[RR-008]</b>, submit a copy of the</p>	<p><b>DFDS</b> <b>[REP2-037]</b></p>	<p>Admiralty Charts are produced by the United Kingdom Hydrographic Office who incorporate data from highly trained hydrographers to make amendments to charts over time as changes occur. Since the data collected by the AWAC buoys is highly reliable, confirmed by a second reading, and was collected by highly skilled hydrographers – it is not unreasonable to foresee a future amendment to the chart referenced by DFDS that includes</p>

Question	Reference to Interested Party Response	Applicant's Comments
<p>cited Admiralty Chart data and provide a commentary on how the direction of tidal current in the vicinity of the western end of the IOT jetty and pontoons might affect the safety of berthing manoeuvres for the Proposed Development and the IOT's berths. (If not already fully answered in written submission following ISH2)</p>		<p>the data collected as part of this development to better describe the navigational environment. DFDS have failed to provide key data in their response that states when the tidal data on the admiralty chart was collected as there is scope for this to be quite out of date.</p>
<p><b>NS.1.24</b>  <b>Relationship of project lifetime to risk assessment</b>                      With regard to paragraph 3.68 of DFDS' Relevant Representation [RR-008], expand on the contention as to why the lifetime of the project "<i>serves to downplay risk</i>".</p>	<p><b>DFDS</b>  <b>[REP2-037]</b></p>	<p>DFDS state that the lifetime of the terminal has been 'decided' at 50 years and incorrectly assert that there is no evidence to back this up. This demonstrates a fundamental lack of understanding from DFDS of the detailed design considerations and industry standards followed by the Applicant.</p> <p>During the planning and design phase of maritime structures, it is imperative to carefully consider the design working life of the facility. This encompasses the anticipated period for which a structure or its components are intended to be used, factoring in expected maintenance without necessitating major repairs (as defined in BS EN 1990:2002+A1:2005, 1.5.2.8).</p> <p>In the case of the IERRT, a 50-year design working life aligns with industry standards for facilities in the marine environment and, while it is conceivable that the facility may extend beyond this initial design working life, it is crucial to acknowledge that prolonged operational capabilities would necessitate substantial maintenance,</p>

Question	Reference to Interested Party Response	Applicant's Comments
		<p>repairs, and renewals. This approach not only adheres to established industry standards but also ensures economic practicality in the design and construction of the facility.</p> <p>Moreover, it is essential to highlight that the 50-year design working life does not negate the potential for future adaptation of the structure to prolong its life. This fully aligns with paragraph 3.2.25 of <b>[APP-039]</b>.</p> <p>DFDS have failed to answer the ExA's question in that they have not identified why assessing risk at the lifetime of the project downplays the risk. Instead, DFDS has provided its opinion of tolerability based on an example that considers a fatality occurring within 50 years.</p> <p>DFDS reference paragraph 4.2.1 of its NRA submitted at Deadline 2, however, the Applicant was unable to find this reference.</p>

## 9. Socio-Economic

Question	Reference to Interested Party Response	Applicant's Comments
<p><b>SE.1.1</b>  <b>Socio-Economic indirect effects and potential displacement</b>            Consultation Report Appendices [APP-034, page 209] responds to comment PI41 made by C.Ro Ports Killingholme (now CLdN) by referring to paragraph 16.8.5 onwards and Table 16.9 of <i>“this ES chapter”</i>, taken to mean [APP-052, ES Chapter 16). Does CLdN accept that relevant indirect affects have been assessed? If not, please clarify the point being made.</p>	<p><b>CLdN</b>  <b>[REP2-034]</b></p>	<p>The Applicant notes the response provided by CLdN.</p> <p>CLdN in their response to ExQ1 SE 1.1 <b>[REP2-034]</b> state the <i>“First, paragraph 16.8.92 appears to still refer to construction phase employment impacts when concluding on the operational phase employment effect.”</i></p> <p>The Applicant would like to highlight that paragraph 16.8.92 of Chapter 16 to the ES <b>[APP-052]</b> refers only to the operational phase employment impacts. Paragraph 16.8.16 (construction impacts) discusses the context of construction jobs created within the construction labour pool in the Grimsby TTWA.</p> <p>CLdN in their response to ExQ1 SE 1.1 <b>[REP2-034]</b> also note, <i>“It also states that the creation of 176 net additional jobs created in the Grimsby TTWA would have a high magnitude of impact (and hence moderate beneficial and significant effect). For context, the Grimsby TTWA currently supports 82,000 jobs (Office of National Statistics, 2022. Business Register and Employment Survey 2021), meaning that these 176 jobs would be equivalent to an uplift of 0.2%. This is clearly not a high magnitude of impact, and as a result it is a stretch to say that this operational employment effect is significant.”</i></p> <p>The Applicant would like to clarify that the operational jobs created by the IERRT project should be seen in the context of the existing</p>

		<p>employment within the relevant sub sectors of the transport and storage sector, within which the IERRT jobs are likely to be classified. Within this classification, Grimsby TTWA supports 9,100 jobs (Business Register and Employment Survey 2021). This would mean that 176 jobs would be equivalent to an uplift of 1.9%. It is also important to note that operational jobs are considered permanent unlike construction jobs which are considered temporary and so carry more weight when being assessed. As such, the findings and conclusions of the socioeconomic assessment remain valid.</p>
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## 10. Terrestrial Transport and Traffic

Question	Reference to Interested Party Response	Applicant's Comments
<p><b>TT.1.6</b>  <b>Cumulative impact of HGV traffic if construction and operation is overlapped</b>            Advise as to whether or not you are content that any cumulative impact of HGV movements on strategic and local highway networks has been adequately assessed for the worst-case scenario of there being an overlap between a second phase construction period while the first phase of the Proposed Development would be operational?</p>	<p><b>National Highways and</b>  <b>[REP2-017 and REP2-018]</b></p> <p><b>North Lincolnshire Council (NLC)</b>  <b>[REP2-026]</b></p> <p><b>North Lincolnshire Council (NELC)</b>  <b>[REP2-025]</b></p>	<p>The Applicant notes National Highways have confirmed that they are content that the cumulative impact has been adequately assessed for the worst-case scenario. National Highways reiterate their request for a Construction Traffic Management Plan which will be prepared by the Contractor once appointed and the final construction details are confirmed.</p> <p>The Applicant welcomes the confirmation provided by both NLC and NELC that they are content that the cumulative impact has been adequately assessed for the worst-case scenario.</p>
<p><b>TT.1.7</b>  <b>Statutory compliance</b>            Do the LHAs have any comments to make with respect to the need for any off-site mitigation measures</p>	<p><b>North Lincolnshire Council (NLC)</b>  <b>[REP2-026]</b></p>	<p>The Applicant welcomes NLC's confirmation that <i>"as the LHA for North Lincolnshire, we are satisfied that no off-site highway improvements are required within our area."</i></p>

<p>to assist the operation of the local highway network?</p>	<p><b>North Lincolnshire Council (NELC)</b> [REP2-025]</p> <p style="text-align: right;"><b>East</b></p>	<p>Additionally, the Applicant is pleased to receive NELC's confirmation that as LHA, it is content that this matter has been adequately assessed for the worst case scenario and that it has no objection to raise.</p>
<p><b>TT.1.8 Proposed Travel Plan Management, Measures, Monitoring and Remedial Measures</b> Are the LHAs content with the proposed Travel Plan Management measures, the Monitoring and Remedial Measures identified in [APP-109]? If not please explain what that is?</p>	<p><b>North Lincolnshire Council (NLC)</b> [REP2-026]</p> <p><b>North Lincolnshire Council (NELC)</b> [REP2-025]</p> <p style="text-align: right;"><b>East</b></p>	<p>The Applicant notes that NLC are satisfied with the proposed Travel Plan management measures and the monitoring/remedial measures.</p> <p>The Applicant notes that NELC are content with the proposed Travel Plan Management measures and the Monitoring and Remedial measures in <b>[APP-109]</b>.</p>

## 11. Glossary and List of Acronyms

<b>ABP</b>	Associated British Ports
<b>AIS</b>	Automatic Identification System
<b>ALARP</b>	As Low As Reasonably Practicable
<b>CA</b>	Compulsory Acquisition
<b>CEMP</b>	Construction Environmental Management Plan
<b>CLdN</b>	CLdN Ports Killingholme Limited
<b>dDCO</b>	Draft Development Consent Order
<b>DFDS</b>	DFDS Seaways Limited
<b>DML</b>	Deemed Marine Licence
<b>EIA</b>	Environmental Impact Assessment
<b>EM</b>	Explanatory Memorandum
<b>ES</b>	Environmental Statement
<b>ExA</b>	Examining Authority
<b>HE</b>	Historic England
<b>HOTT</b>	Humber Oil Terminals Trustee Ltd
<b>HRA</b>	Habitats Regulations Assessment
<b>HRAr</b>	Applicant's Habitats Regulation Assessment report
<b>IERRT</b>	Immingham Eastern Ro-Ro Terminal (proposed development)
<b>IOT</b>	Immingham Oil Terminal
<b>IOT Operators</b>	Associated Petroleum Terminals (Immingham) Limited and Humber Oil Terminals Trustee Limited
<b>IP</b>	Interested Party
<b>ISH</b>	Issue Specific Hearing
<b>LHA</b>	Local highway authorities (North East Lincolnshire Council and North Lincolnshire Council)
<b>LIR</b>	Local Impact Report
<b>MCA</b>	Maritime and Coastguard Agency
<b>MGN</b>	Marine Guidance Note
<b>MMO</b>	Marine Management Organisation
<b>MSMS</b>	Marine Safety Management System
<b>NE</b>	Natural England

<b>NELC</b>	North East Lincolnshire Council
<b>NLC</b>	North Lincolnshire Council
<b>NRA</b>	Navigation Risk Assessment
<b>NSIP</b>	Nationally Significant Infrastructure Project
<b>PA2008</b>	The Planning Act 2008
<b>PMSC</b>	Port Marine Safety Code
<b>Proposed Development</b>	The proposed Immingham Eastern Ro-Ro Terminal
<b>RIES</b>	Report on the Implications for European Sites
<b>Ro-Ro</b>	Roll on roll off
<b>RR</b>	Relevant Representation
<b>SAC</b>	Humber Estuary Special Area of Conservation
<b>SHA</b>	Statutory Harbour Authority
<b>SoCG</b>	Statement of Common Ground
<b>SoST</b>	Secretary of State for Transport
<b>SPA</b>	Humber Estuary Special Protection Area
<b>TRO</b>	Traffic Regulation Order
<b>WR</b>	Written Representation