

JSJV (Consultant working on behalf of National Highways has undertaken a review of the ExA's written questions, specifically relating to Question TT.4.01. and Question TT.4.03, including:

- TT.4.01 "do you have any comments to make about the submitted FMP?"; and
- TT.4.03 "In respect of the A160 corridor (A160/Humber Road/Manby Road Roundabout, A160/Habrough Road Roundabout, and A160/A180 Roundabout), in light of the difference of views between the Applicant and DFDS, comment on whether you consider the Proposed Development would create a need for the implementation of any mitigation measures at the A160 corridor junctions?"

Operational Freight Management Plan (FMP) (response to Question TT.4.01)

Para 1.3- JSJV note We welcome the intention to minimise HGV movements within the site and external to the site on to the local and strategic road network;

Para 4.1- JSJV note HGV parking was established based on an estimated arrival / departure profile based on sailing times and legal capacity and it was confirmed within the Transport Assessment that the parking provided was in line with operator requirements;

Para 4.2- JSJV welcome the provision of on-site welfare facilities;

Para 4.3- JSJV agree with this statement;

Para 5.1- JSJV agree with the objectives set out relating to the FMP, including:

- encourage HGV movements to take place outside of the external highway peak periods;
- encourage optimum utilisation of HGV vehicle capacity, and
- encourage the use of East Gate for both outbound and inbound movement of HGVs.

JSJV note that National Highways have previously agreed to the outcomes of a sensitivity test assuming a 60% split of HGV traffic will be assigned via the West Gate and 40% assigned to the East Gate.

National Highways have also previously agreed to the standard 15% assigned via the West Gate and 85% assigned to the East Gate in the TA and revised capacity assessment circulated in November 2023- JSJV agree that the use of the East Gate should be encouraged by signage.

Para 5.2- regarding the Benefit "the avoidance of congestion both within the port estate and on local roads", although JSJV agree that this is a desired outcome of the FMP, JSJV do not agree that the OFMP submitted is comprehensive enough to achieve this benefit.

Para 6.1- "Dealing with the 1,800 / day Limit" Whilst JSJV agree with the 1,800 / day limit imposed to ensure that the development accords with the submitted highway capacity assessments, JSJV have concerns relating to the "messaging system which will be programmed to give an early warning to the responsible terminal manager should the terminal be operating close to the 1,800 units daily maximum."- Further details should be provided with regard to the volume of units anticipated to trigger an early warning; and what actions to be taken with regard to excess units already en-route. JSJV note that Layover parking provision has not been a consideration explored in detail within the TA or any associated documentation to this point. Should the messaging system cause a full shut down, the probability of HGV load surpassing parking available should be explored by DTA with more information provided.

Para 6.3- regarding the signage scheme, JSJV has previously recommended that National Highways ensure Signage drawings are included within the DCO Legal Schedule- National Highways (c/o Simon GP Geoghegan) have previously and reviewed the Draft signage scheme and agreed that it was sufficient, however JSJV are not aware of the "engagement to enhance and upgrade wider strategic signage to the port". The mechanism of delivery should be confirmed within the FMP and if works to the SRN are required to implement the signage strategy.

Para 6.4- We note that usage of the East Gate is preferred rather than mandatory, however once the mechanism of delivery of the signage scheme is agreed to, National Highways should be informed throughout the process as this progresses.

Para 6.5- Vehicle Arrival and Departure Times- ABPs note "As part of the FMP, it is proposed that the Operator of the Terminal, in conjunction with the road hauliers, will manage arrivals and departures to the new terminal site outside these peak periods where possible." JSJV has queries on this statement including:

- How will this be achieved / secured as a measure?
- Is there now a revised requirement for layover parking in advance of the peak periods?
- Over what area will the peak period limitation be actioned, i.e., which junctions are to be included?

JSJV note that we would anticipate that the FMP already include information relating to the minimise HGV movements arising from IERRT during peak periods where practicable. Consequently, National Highways should be included in the strategy development relating to this matter.

Para 6.12- Monitoring- JSJV note that the results of the monitoring will be reported to North-East Lincolnshire Council who will, in discussions with the Applicant and the Operator, identify any necessary remedial actions that can be implemented, however JSJV would recommend that this also be developed in consultation with National Highways- ABP should ensure that this is included and secured within the Schedule requirements.

Statement of Common Ground (response to Question TT.4.03)

JSJV note that the first iteration of the Statement of Common Ground was provided to National Highways for agreement in July 2023 and agreed to by National Highways 20th July 2023 (c/o Simon GP Geoghegan). JSJV has not yet reviewed the SoCG until this point. Considering the comments on the FMP, JSJV would agree that the updated Technical Note 2 and Sensitivity test Notes were agreed to by National Highways (see attached JSJV note TM10), summarising:

- The information presented within the TA, at the time of initial review by National Highways, was based on the most representative information at the time of the DCO application;
- The GHD document submitted [ref: 2578580], provides a high-level review of the Applicant's TA to provide some indications of potential methods for determining and refining the application details.
- The revised capacity assessment is informed by the Statement of Common Ground agreements, informed by substantial correspondence between DFDS and ABP throughout the ongoing DCO process;
- Due to the revised parameters influencing PCU conversion factors, there is no material influence on previously agreed merge / diverge assessments;
- The results confirm that, for all of the SRN junctions assessed, with regard to the maximum reported RFC and estimated

traffic queues, during the most onerous scenarios, including the sensitivity test, at Manby Roundabout, Brocklesby Interchange, Stallingborough Interchange or Habrough Roundabout, the forecast impacts considering all development are marginal and are unlikely to result in a severe impact in the opening year that would have a material impact on highway safety or require mitigation; and

- JSJV recommend to National Highways to ensure that the Applicant provides adequate agreements within the Schedule 2 requirements to refer specifically to the provision of a CTMP prior to works commencing. Once the phasing and construction details are defined, this document should refer to a scenario in which a construction phase and an operational phase occur during the same period.

However, regarding the SoCG entry for 14th December we agree with this entry- only on basis that the applicant provides adequate agreements within the Schedule 2 requirements to refer specifically to the provision of a CTMP prior to works commencing and an updated FMP in light of the comments above. Once the phasing and construction details are defined, the CTMP document should refer to a scenario in which a construction phase and an operational phase occur during the same period.

And finally, JSJV would request that an additional entry be submitted within the SoCG, stipulating that:

The OFMP submitted is not comprehensive enough to achieve objectives. Associated actions should state:

“Further details should be provided with regard to the volume of units anticipated to trigger an early warning; and what actions to be taken with regard to excess units already en-route.

JSJV note that there is no reference in TA for Layover Parking should the messaging system cause a full shut down- this principle should be explored by DTA

Further, DTA should confirm if there is adequate HGV parking for this occurrence or would queueing impact SRN? DTA to confirm mechanism for providing proposed signage scheme circulated via email 26th September 2023.

Further details are required relating to the results of the FMP monitoring reporting mechanism to North-East Lincolnshire Council- note that this should also include National Highways as a consultee.”

CTMP (Additional information submitted to National Highways)

JSJV note that a CTMP has now been submitted to JSJV for review. As agreed, with reference to the reviewing period available, JSJV is in the process of reviewing this prior to the agreed deadline on the 12th January.

We will follow up with a comprehensive response on this document in line with the agreement with National Highways, however at this point, as stated previously, we will be looking to ensure that the CTMP includes the following as a minimum:

- Length of construction period;
- Hours of operation;
- Peak trip generation [including type of vehicles];
- Access routes, including consideration of abnormal loads [vehicle swept path analysis may be required] and details of proposed signage, implementation and enforcement;
- Mitigation measures – limited delivery times [and details of enforcement e.g., penalty clauses for contractor, noise reduction, wheel washing];
- Travel plan type measures;
- A dust management plan;
- A noise management plan;
- Pollution prevention measures;
- Staffing numbers;
- Contractor parking;
- Construction traffic routes;
- Details of delivery arrangements [including for any abnormal loads]; and
- Measures to limit and manage transfer of debris on to the highway.

Note that the Applicant has committed, within the TA, to provide a detailed Construction Traffic Management Plan [CTMP] and a Construction Workers' Travel Plan [CWTP] to be prepared by the contractor once the final construction details are confirmed- to be accepted by National Highways. Consequently, JSJV reaffirms our recommendation to National Highways to ensure that the Applicant provides adequate agreements within the Schedule 2 requirements to refer specifically to the 'provision of a CTMP prior to works commencing that is agreed to by National Highways'. Once the phasing and construction details are defined, this document should refer to a scenario in which a construction phase and an operational phase occur during the same period.

Further to this recommendation, with reference to the FMP submitted, our recommendation to National Highways now also includes to ensure that the Applicant provides adequate agreements within the Schedule 2 requirements to refer specifically to the 'provision of a FMP prior to works commencing that is agreed to by National Highways'.