

IMMINGHAM EASTERN RO-RO TERMINAL



Applicant's Response to Deadline 8 Submissions made by Highway
Authorities
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1 **Executive Summary**

1.1 This document provides the Applicant's response to the information submitted by

- (a) North East Lincolnshire Council ("NELC");
- (b) North Lincolnshire Council ("NLC"); and
- (c) National Highways ("NH").

together the "Highways Authorities" submitted at Deadline 8.

1.2 The submissions to which response are now being provided are:–

- (a) NELC's Response to ExQ4 [**REP8-039**];
- (b) NLC's Response to ExQ4 [**REP8-040**]; and
- (c) NH's Response to ExQ4 [**REP8-036**] and its Technical Memorandum [**REP8-037**].

1.3 The transport implications of the proposed IERRT Development have been subject to an extensive and comprehensive transport assessment. This has included wide comprehensive consultation with the three relevant Highway Authorities (National Highways (NH), North East Lincolnshire Council (NELC) and North Lincolnshire Council (NLC)). All three Highway Authorities were consulted on the drafting of the Transport Assessment prior to submission and have reviewed the relevant submitted information provided as part of the formal Examination.

1.4 All three Highway Authorities have confirmed that they have no objection to the scheme and that they do not consider physical mitigation is required (to deal with either capacity or safety implications of the scheme).

1.5 Measures are proposed within the DCO to ensure the impacts cannot exceed those assessed in the ES, in particular:

- Part 4 (Operational Provisions) Paragraph 21 defines the limit of 1,800 units per day leaving or entering the terminal from the public highway.
- Schedule 2 Requirement 8 secures the provision of construction traffic management and work travel plans.
- Schedule 2 Requirement 12 secures the provision of capacity enhancement works at East Gate prior to the operation of the authorised development.

1.6 Schedule 2 Requirement 13 secures the finalisation and agreement of a Freight Management Plan. The outline document submitted at [**REP8-018**] has been agreed with NELC and includes an appropriate level of detail at this stage to secure the details sought by NH and other interested parties. The Transport Assessment and its subsequent addendum has been subject to

appropriate scrutiny by the relevant Highway Authorities and the Examination process itself. The outcome of that review confirms that the conclusions of the original TA remain unaltered with the conclusion being that the development would not result in a severe impact on highway safety or capacity and would meet the relevant national tests as set out in the NPSfP and the NPPF.

1.7 Therefore, there is no reasonable highway or transport reason to withhold consent.

1.8 As well as the pre-application discussions which led to the application TA **[AS-008]**, the Highway Authorities have been party to the examination and engaged as they deemed appropriate. In response to the repetitive comments of DFDS (Para 6, 48, 49, 50, 61, 81 and 87 of **[REP8-045]**) all three authorities have reviewed the appropriate documents in full and made comment to the examination at Deadline 8 and the relevant SOCG updates have been made. The updated SOCG for National Highways accompanies this deadline (document reference 7.2) and the updated SOCG for NELC will be provided by Deadline 10.

1.9 In specific submissions to the Examination the Highway Authorities comment as follows:

2 North Lincolnshire Council [REP8-040]

2.1 NLC confirm that – “*NLC is therefore satisfied that the North Lincolnshire Council highway network will continue to operate within theoretical capacity and no junction mitigation measures are required*”. This is recorded in the final statement of Common Ground **[REP8-008]**.

2.2 The Applicant agrees with this position.

3 North East Lincolnshire Council [REP8-039]

3.1 NELC confirm that “*NELC has undertaken a thorough assessment of all documentation that has been submitted as part of the DCO application, including commissioning external transport consultants to review transport assessments and data.*” They conclude that “*Whilst NELC is in agreement that there will be an impact at these junctions [within NELC Area], it is not considered that these impacts will be ‘severe’ as defined by the test in the NPPF*”.

3.2 This is recorded in the final statement of Common Ground **[REP7-005]** and the Applicant agrees with this position.

4 **National Highways [REP8-036 and REP8-037]**

- 4.1 NH have provided a detailed response to the documentation at [REP8-037]. That document concludes that *“The results [of the final submitted assessments] 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”*.
- 4.2 NH have additionally requested requirements in Schedule 2 to secure the finalisation of a Construction Traffic Management Plan (CTMP) and Freight Management Plan with their consultation. These are secured by Requirements 8 and 13 respectively.
- 4.3 NH make a number of detailed recommendations in respect of the detail of the FMP. All of these are acceptable in principle and appropriate amendments can be made for the formal submission as required by Requirement 13.
- 4.4 Matters relating to the 1,800 unit daily cap and the terminal management system is now further clarified (Ref Para 6.1 of [REP8-036]). The intention of the management system (and the monitoring) is to review throughput on a regular basis, as throughput on the terminal increases over time. As has been explained the expectation is that the terminal would operate in the first instance with the two existing Stena Line services transferring to the new facility.
- 4.5 The Terminal Management System will be created and updated to allow the long-term monitoring of growth and to track the throughput against the 1,800 unit daily cap as described in the dDCO Paragraph 21.
- 4.6 It is the intention that this would prevent the limit from being breached through advance planning and could include an initial warning at some lower level of throughput as suggested by NH. The system would have the ability to prevent advance bookings from exceeding the limit, preventing any vehicles in transit being denied access to the terminal. It is not intended to impose or create any cut off or closure of the terminal on any particular day. There will, therefore, be no impact on the day-to-day operation of the facility other than to regulate the volumes below the agreed threshold or cap.
- 4.7 In respect of the comment at Paragraph 6.4 of [REP8-036] relating to vehicle departure and arrival times, the operator will investigate the implementation of booking systems with hauliers to manage check in times to meet the operational requirements of the port. These generally relate to departure times of vessels and thus generally avoid highway peak periods. This will be

defined and refined as part of the design process for the management systems.

- 4.8 There have been further discussions with NH on Requirement 8 and Requirement 13 having regards to the points above. The position of National Highways is recorded in the final statement of Common Ground which is submitted at this Deadline (document reference 7.2) as agreeing the conclusions from the updated TA and no further requirement for mitigation.

5 Issues raised by DFDS relating to TAA.

- 5.1 In response to various points made by DFDS ([REP8-045] inter alia paragraphs 3, 4, 6, 48-50, 61, 73 and 87) these conclusions of the Highway Authorities have been reached by each authority separately and are based on their own review of the original application documents and the additional relevant data and information submitted in a clear and transparent way as part of the Examination process. Response to TT.4.03 and TT.4.04. To reiterate the points made in paragraph 4.1 of this document, National Highways have met with DFDS's transport consultant, GHD, and considered the position presented by them. However, they have still determined that the Applicant's conclusion that mitigation is not required is the correct position, in contradiction to the conclusions reached by DFDS.

Glossary

Abbreviation / Acronym

ABP
CTMP
DCO
dDCO
IERRT
NELC
NH
NLC
PA 2008
PINS
RFC
Ro-Ro
SoCG
SRN
TAA

Definition

Associated British Ports
Construction Traffic Management Plan
Development Consent Order
Draft Development Consent Order
Immingham Eastern Ro-Ro Terminal
North East Lincolnshire Council
National Highways
North Lincolnshire Council
Planning Act 2008
Planning Inspectorate
Required Flow Capacity
Roll-on/roll-off
Statement of Common Ground
Strategic Road Network
Transport Assessment Addendum