

IMMINGHAM EASTERN RO-RO TERMINAL



Document Information

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1 **Executive Summary**

1.1 This document provides the Applicant's response to the information submitted by CLdN at Deadline 8. These submissions in turn draw upon information by CLdN prior to that deadline.

1.2 The CLdN submission to which responses are now being provided is CLdN's Response to the Applicant's Deadline 7 and Deadline 7A Submissions **[REP8-043]**.

The Applicant's position

1.3 The Applicant has throughout the examination attempted to respond to CLdN's objections in an ordered and temperate manner – despite the repetitive style of response adopted by CLdN and its failure to respond to all questions raised.

1.4 The Applicant's position has been made more difficult in this respect, however, by CLdN's attempt to conjure reasons for objection which, as the Applicant has demonstrated, are on occasion, irrational and unsubstantiated.

1.5 The reason for the approach adopted by CLdN is somewhat transparent. As the Applicant has indicated on a number of occasions, by raising a raft of unjustified objections, CLdN are simply attempting to conceal the real motive for their objection, namely that Stena Line, the potential operator of IERRT, present as a commercial competitor to CLdN and rather than face that competition – contrary incidentally to the underlying ethos of the National Ports Policy – CLdN are employing every means to prevent Stena from operating at the Port of Immingham – and for that matter, on the Humber.

2 Introduction

- 2.1 This document provides the Applicant's response to the information submitted by CLdN at Deadline 8. These submissions in turn draw upon information by CLdN prior to that deadline.
- 2.2 The CLdN submission to which responses are now being provided is CLdN's Response to the Applicant's Deadline 7 and Deadline 7A Submissions **[REP8-043]**
- 2.3 In setting out its response to CLdN's various submissions the Applicant would point out that where it has not specifically responded to a point in the CLdN Deadline 7 submissions, this does not mean that the point CLdN make is accepted. In a number of respects, CLdN are simply repeating points which they have made earlier made during the examination process, and to which the Applicant has already responded. In such instances the Applicant relies upon the responses previously provided and does not repeat those responses in this document.
- 2.4 Generally, the ExA will have noted that the Applicant has throughout the examination attempted to respond to CLdN's objections in an ordered and temperate manner – despite the repetitive style of response adopted by CLdN and its failure to respond to all questions raised.
- 2.5 The Applicant's position has been made more difficult in this respect, however, by CLdN's attempt to conjure reasons for objection which, as the Applicant has demonstrated, are on occasion, irrational and unsubstantiated.
- 2.6 The reason for the approach adopted by CLdN is, however, somewhat transparent. As the Applicant has indicated on a number of occasions, by raising a raft of unjustified objections, CLdN are simply attempting to conceal the real motive for their objection, namely that Stena Line, the potential operator of IERRT, present as a commercial competitor to CLdN and rather than face that competition – contrary incidentally to the underlying ethos of the National Ports Policy – CLdN are employing every means to prevent Stena from operating at the Port of Immingham – and for that matter, on the Humber.

3 Updated Humber Shortsea Market Study (paragraphs 2.1 to 2.2)

- 3.1 The Applicant submitted its Humber Shortsea Market Study Update at Deadline 8 **[REP8-028]**. The Applicant notes that CLdN intends to provide comments on the Study at Deadline 9 and the Applicant, therefore, reserves its right to provide further comments in response, if considered necessary.
- 3.2 It should be noted, however, that the content of the Humber Shortsea Market Study Update reflects the position set out in information that has already been submitted to the Examination by the Applicant. As a result, the Applicant would not expect any comments provided by CLdN to raise any new or different points to the ones it has already raised during the examination, and which have been responded to by the Applicant.
- 3.3 With regard to the Humber Shortsea Market Study Update, the Applicant would point out in response to the somewhat unjustified criticism from CLdN

that it decided to submit such an Update – even though it reflects information already before the examination – following the invitation of the ExA at ISH5 to consider whether such an update should be submitted. The Market Study Update was not submitted late but submitted at Deadline 8 in order, again with the aim of assisting the Examination, to take account of relevant points raised by IPs in their Deadline 7 submissions.

4 **The Need Case (paragraphs 3.1 to 3.2)**

- 4.1 The Applicant’s position on need matters has been set out extensively within its various submissions to the examination, including most recently in its Deadline 8 submissions (see for example **REP8-028** and **REP8-033**).
- 4.2 The Applicant does, however, need to make the following short points in response to the submissions made by CLdN at Deadline 8 **[REP8-043]**.
- 4.3 *At the end of what is the second paragraph numbered 3.1, CLdN state that they have provided “substantial submissions on why there is not an urgent and imperative need for the Proposed Development on the grounds of demand, capacity, competition or resilience, yet the Applicant has failed to properly engage with these submissions.”*
- 4.4 The Applicant refutes this allegation – which in the circumstances, it finds rather surprising. On the contrary, the Applicant has clearly ‘properly engaged’ with these submissions. In addition, however, the Applicant would also point out that CLdN’s statement - and the analysis preceding it - is, yet again, a challenge to the very clear position set down within the NPSfP.
- 4.5 In brief, the NPSfP identifies an urgent and imperative need for the type of infrastructure being provided by the IERRT facility which of itself responds to the matters listed by CLdN. That need is to be accepted by the decision maker with the consequence that the starting point in the decision making process is a presumption in favour of granting consent.
- 4.6 By taking the position it does, CLdN are effectively asserting that the NPSfP is wrong and that there is no such need. As the Applicant has made clear from the outset of the Examination, any such challenge to the established need set out in Government policy is contrary to policy and the Planning Act.
- 4.7 In paragraph 3.2, CLdN query the position set out in paragraph 6.8 of the Applicant’s submission **[REP7-023]**. Contrary to the view expressed by CLdN, the IERRT terminal would in fact improve competition because, in summary, it would provide an existing and established Ro-Ro operator – Stena Line, who want to grow and expand its operations and activities on the Humber Estuary – with an appropriately located facility with the ability to accommodate large Ro-Ro vessels in a suitably unconstrained way, with sufficient storage and cargo handling areas and where, as the terminal operator, they will have control over their own operations and future activities – which is certainly not the case should they stay at the Port of Killingholme, as evidenced by the fact that CLdN served notice to quit on Stena in respect of their Europort service in December 2021.

4.8 As the Applicant's evidence – and that of Stena Line – to the Examination demonstrates, it is not true that the needs of Stena Line can be provided for at the Port of Killingholme, as appears to be the suggestion being made at the end of paragraph 3.2. The position expressed by CLdN is an overly simplistic and incorrect approach to the matters which have been set out.

5 **Alternatives**

5.1 A response has already been provided by the Applicant to the points raised in paragraph 4.1 in a number of its previous submissions, including its deadline 8 submissions (see for example, section 3 of the Without prejudice HRA Derogation Report **[REP8-033]**). The detail of those submissions is not re-provided here. The Applicant's position is, however, that the Port of Killingholme in its current form is unable to meet the need which has been identified and that even if additional Ro-Ro capacity were able to be provided at the Port of Killingholme this would not constitute an alternative to the IERRT development.

6 **Transport**

6.1 CLdN's response confirms that they are relying on the representations of DFDS **[REP8-045]** on some transport related matters. The Applicant's response to those points is fully set out in its response to DFDS (document reference 10.2.99) and is not, therefore, repeated here.

6.2 Paragraphs 5.2 – 5.4 refer to the 1,800-unit daily limit and the adequacy of the OFMP **[REP8-018]**. The comments reflect a misunderstanding of the purpose of the document. The objectives of the OFMP are clearly set out in paragraph 5.1 of that document alongside the potential benefits at paragraph 5.2.

6.3 The outline document provides a framework to inform a more detailed plan to be prepared once the operator has completed the design of the appropriate management systems for the terminal. As set out in the document this will be designed and the appropriate details provided to both NELC and NH for approval.

6.4 In relation 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 terminal. 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.

6.5 The monitoring process and regime has been discussed with NELC and they have confirmed that to be acceptable. The updated version at **[REP8-018]** allows for them to call on data at more frequent intervals as required.

6.6 Ultimately the Transport Assessment Addendum **[REP7-013]** has robustly considered the sensitivity analysis of different distributions and solo tractor ratios. All three highway authorities agree that sensitivity analysis does not raise the need for mitigation and therefore there is no need for the OFMP to

provide controls in terms of peak hour movements, but rather measures to encourage more efficient operation. This is appropriate and robust.

Operational Freight Management Plan

- 6.7 At paragraph 5.4, CLdN are incorrect when they assert that: (i) the daily cap is only implemented through the use of the OFMP; and (ii) the OFMP is not secured in the dDCO. As to (i), the daily cap is implemented through Article 21 of the dDCO [REP8-005]. As to (ii), Requirement 13 in Schedule 2 of the dDCO [REP8-005] secures approval of the OFMP by both Statutory Highway Authorities (NELC and NH).
- 6.8 CLdN suggest that the OFMP requires further detail on governance and monitoring. These are not necessary at this stage. Approval of the final plan is required from both NELC and NH, who will ensure the document adequately addresses their requirements as the relevant Highway Authorities.
- 6.9 Furthermore, it is clear that the Transport Assessment Addendum [REP7-013] has robustly considered the sensitivity analysis of different distributions and solo tractor ratios, in some instances, unnecessarily so.
- 6.10 All three Highway Authorities agree that the sensitivity analysis undertaken does not raise the need for mitigation. As a consequence, there is no need for the OFMP to provide for more onerous controls but rather simply provide measures to encourage an efficient operation. This conclusion is appropriate and robust – and no actual evidence has been produced by CLdN to the contrary.

Transport Assessment Addendum

- 6.11 Paragraphs 5.6 - 5.10 raise issues relating to the Addendum Transport Assessment [REP7-013]. CLdN criticise the Applicant for the submission of the Addendum Transport Assessment at Deadline 7. For the avoidance of any doubt the need for an Addendum Transport Assessment was identified by the ExA at ISH5 (21st and 22nd November 2023) and was an action point directed to the Applicant. The need for and form of that report was discussed at ISH5 as recorded at REP7-020 at paragraph 85.
- 6.12 The Addendum report clearly sets out in 15 pages what the principal updates to the assessment were, and merely supplements the original Transport Assessment [AS-008]. All of the changes were as a result of queries raised by IPs. This in turn was discussed with the IPs in detail through various separate emails and formal meetings (as recorded in REP6-011). The bulk of document (some 900 pages) relates to an updated Technical Note 2 (traffic modelling) of which the majority is traffic modelling output files. These were first in circulation and discussion with the IPs (including CLdN) during the SOCG meetings and were issued to them on the 26th September 2023. It was specifically discussed and recorded minutes at the meeting on 13th October 2023 (see point 11 at page 31 of REP6-011).
- 6.13 The sensitivity test modelling was first issued to the IPs on the 30th November 2023, when they specifically declined to comment and then formally submitted at Deadline 7 (11th December 2023). This was the earliest date that the data

could be provided given that GHD (acting for DFDS) did not confirm their agreement to input assumptions and modelling details until 22nd November 2023. CLdN did not provide comments on those assumptions.

- 6.14 The suggestion at paragraph 5.7 that there have been changes to the HGV arrival and departure profile due to “numerous changes relating to yard operations” is wholly wrong, unevidenced and deliberately misleading. There have been no changes relating to yard operations that would affect the HGV departure or arrival profile and this is clearly set out in **REP8-027** at paragraph 3.14.
- 6.15 There was no request for such tests by any of the Highway Authorities, but they were nonetheless consulted on them.
- 6.16 On that basis it is clear that the Applicant has acted entirely reasonably and transparently in providing the IPs with visibility of the data within the Addendum in good time. Indeed, they were actively involved in discussions and in the review of the data and refinement of the assessments.

Transport Policy and Mitigation

- 6.17 Paragraphs 5.11 - 5.17 provide CLdN’s views on transport policy and mitigation. The Applicant considers that CLdN have adopted a somewhat entrenched view and as a consequence are refusing to acknowledge that their approach is in direct conflict contrast with all three Highway Authorities (See **REP8-036**, **REP8-039** and **REP8-040**) who have applied the correct interpretation of the policy requirements in considering the impacts of the scheme and which aligns with the Applicant’s own submission in that regard [**REP7-013 Annex A**].
- 6.18 CLdN have in fact made a number of entirely unsubstantiated comments on the need for mitigation throughout their submissions. As clearly confirmed by the Applicant and all relevant Highway Authorities the approach advocated by CLdN has no policy, technical or evidential basis. It is agreed in response to Paragraph 5.12 that the High Court Judgement does not define ‘severe’. What it does define, however, is how the impacts of a scheme should be considered. CLdN (as with DFDS) have provided no credible alternative approach to this.
- 6.19 Paragraph 5.18 – 5.19 relates to the position of NH and NELC. NH have commented comprehensively on the additional information in the examination. Its response to the application and the ExA is as recorded at [**REP8-036**]. NH have considered the assessments and confirmed they consider the management mitigation is appropriate subject to modest changes to the dDCO which the Applicant has accepted.
- 6.20 NELC have been consulted on the changes on the DOC as the examination has progressed. This is reported in their comments at [**REP8-039**]. The applicant agrees with their assessment.
- 6.21 Paragraph 5.21 - 5.22 raises criticisms about the approach to the sensitivity test. The position has in fact been clearly described by the Applicant at Section 1 of Annex J [**REP7-013**] and the Applicant considers the Transport

Assessment to be robust. It should be noted that this includes the assumptions made in respect of traffic generation (including solo tractor ratio) and assignment of HGVs. As confirmed at paragraph 18.27 of **REP8-023**, whilst the tests provide for a proportionate range of different outcomes to be tested, it assesses what the Applicant already considers to be a wholly unrealistic and, therefore, unreasonable assumption as to the level of traffic using the A160 corridor.

- 6.22 Given the robustness of the sensitivity test (i.e. 60% via West Gate and 36% solo tractor ratio vs 15% by West Gate with 10% solo tractor ratio) and the reasons given in Section 6 of **[REP5-027]** it is not considered appropriate to layer on further levels of sensitivity (i.e. considering the 60/40 split plus the generic AM profile).
- 6.23 Paragraph 5.21 suggests that CLdN's conclusion is that the proposed development would result in severe impacts. Paragraph 5.25 then concludes that demand management or capacity mitigation is needed. That conclusion is not credible and is clearly not supported by any of evidence submitted to the Examination by any party. It is certainly not the conclusion reached by the Applicant or any of the Highway Authorities.
- 6.24 Paragraph 5.24 suggests that the decision maker should have made reference to RFCs in considering the impact of the development. This is clearly not the appropriate test and the impact of the development itself needs to be considered in relation to potential for severe or significant adverse impacts. There are none identified by the Applicant or any of the Statutory Highway Authorities. A more detailed response to this point has already been provided at paragraphs 18.33-18.41 of **REP8-023**.

7 **CLdN's Comments on the latest draft DCO issues**

Paragraph 6.2 - Article 2(1) – Definition of “maintain”.

- 7.1 The Applicant has consistently set out its position in respect of retaining the reference to “reconstruct” in the definition of “maintain” in Article 2(1) of the dDCO, explaining its position most recently in the Applicant's Response to the ExA's Schedule of Proposed Changes to the draft Development Consent Order **[REP7-029]** –

“The Applicant believes that “reconstruct” should be allowed to remain the draft DCO. As has been indicated, there is precedent for its inclusion in both the Tilbury 2 and the Lake Lothing Third Crossing DCO where the action of reconstruction was similarly not specifically assessed. The Applicant's view is that the inclusion of “reconstruct” enables the Applicant to reconstruct works the impact of which has been assessed as part of the proposed development. Works of reconstruction which go beyond that assessment would not be permitted by the DCO and would have to be subject to separate assessment and consent. On that basis, the Applicant does not consider that it is necessary for this to be deleted. As has already been referenced, “reconstruct” is ordinarily included in a DCO definition of “maintain” without reconstruction explicitly being mentioned in the Environmental Statement – see paragraphs 8.4 – 8.7 of **[REP5-032]** and document reference 10.2.63 – Written Summary of the Applicant's Oral Case at Issue Specific Hearing 6.”

- 7.2 Accordingly, the Applicant does not accept CLdN's assertion that the Applicant has provided "a lack of justification" for retaining reference to "reconstruct" in the definition of maintain.
- 7.3 **Paragraph 6.3 - Article 7(b)(i) – Limits for vertical deviation.** The Applicant confirms that the drawings submitted at [AS-050] show the typical finished/proposed paving levels. The general notes contained within the drawings also confirm that the building heights are in relation to the finished/proposed paving levels as annotated on the drawings.
- 7.4 **Paragraph 6.4 – Requirement 4 – Construction hours.** The Applicant notes CLdN's comments in respect of Requirement 4. As to subparagraph 6.4.1, the Applicant will amend (for Deadline 10) Requirement 4(2) so that reference to "following works" is replaced by "works of construction for Work Numbers 4 to 13". The Applicant notes the comments provided by CLdN provided at sub-paragraphs 6.4.2 and 6.4.3 but does not consider any amendments to the dDCO are required as a result – the requirement has been amended in line with the ExA's suggestions [PD-019].
- 7.5 **Paragraph 6.5 - Requirement 5 – Travel plan.** The Applicant notes CLdN's comments in respect of the definition of "commence" but considers that no amendments are necessary. The approach taken to the definition has precedence in other made DCOs, such as The Port of Tilbury (Expansion) Order 2019.
- 7.6 As to the comment at paragraph 6.6, this is already addressed by the Applicant in the updated dDCO submitted at Deadline 8 [REP8-005] which has been amended to provide that the "*...operation of the authorised development must not be commenced until...*" which serves the same purpose.
- 7.7 **Paragraph 6.7 - Requirement 8 – construction environmental management plan (CEMP).** The Applicant notes CLdN's comments in respect of Requirement 8. The Applicant has updated this requirement broadly in line with the ExA's comments [PD-019] in the version of the dDCO submitted at Deadline 8 [REP8-005]. The Applicant does not consider that any further amendments to Requirement 8 are necessary.
- 7.8 **Paragraph 6.8 - Requirement 11 – Woodland management and paragraph 6.9 – East Gate Improvements.** The Applicant notes CLdN's comments in respect of Requirement 11 (Woodland management) and Requirement 12 (East Gate improvements) but considers that the drafting of these Requirements [REP8-005] is appropriate and no further amendments are required.
- 8 **Protective Provisions for CLdN**
- 8.1 **Appendix 1 to [REP8-043]** sets out CLdN's position regarding Protective Provisions. The Applicant has reviewed CLdN's letter of 8 January 2024 and would respond as follows, standing by its reasoned justification for its amendments to CLdN's Protective Provisions as set out in [AS-070].

- 8.2 At the outset, CLdN asserts disappointment that the Applicant has made submissions on the Protective Provisions directly to the ExA. The Applicant has repeatedly engaged with CLdN regarding the project and the Protective Provisions, as is recorded in the Protective Provisions Tracker [REP8-017]. The Applicant notes that [AS-078] was produced in response to the ExA's direction that the Applicant should provide a detailed explanation of its position with regards to the CLdN Protective Provisions. The Applicant does not believe it should be criticised for responding directly to the ExA in circumstances where the ExA asked the Applicant to submit such an explanation.
- 8.3 **Paragraph 127 – Application.** The Applicant notes and agrees with the HMH's response to DCO.4.10 in his Deadline 8 [REP8-052] Response to ExQ4. The proposed application of the Protective Provisions in favour of CLdN beyond the construction period is not simply an attempt by CLdN to ensure the status quo. On the contrary, if granted, such a provision would in fact alter the current equitable relationship between CLdN's Killingholme operation and users of the Port of Immingham (as well as the Ports of Goole, and Hull). CLdN are effectively demanding preferential treatment. The reality is that the status quo does not currently afford CLdN such benefits.
- 8.4 HMH has stated that it would be undesirable as a matter of principle to put CLdN in a different position to other vessel operators on the Humber by providing protections which survive beyond the construction period. The Applicant refers the ExA to its own DCO.4.10 response [REP8-020] which agrees that this would be inappropriate as it would place a limitation on the SCNA's statutory duties.
- 8.5 Whilst HMH at [REP8-052] expressed no view on whether continued protections would afford CLdN a commercial advantage, the Applicant submits that this would indeed be the case as any restriction placed on the continued operation of the IERRT by a commercial competitor can only be seen as favourable to that commercial rival, harming their commercial interrelationship. CLdN has failed to recognise that, following the construction period, the Humber will be operating 'as normal' under the control of VTS, and CLdN's operation will return to its present position of "business as usual" – albeit with inclusion of the IERRT.
- 8.6 **Paragraph 128 – Interpretation.** With regard to the Applicant including a definition of 'environmental document', the Applicant is seeking to introduce a limitation which has, in principle if not in final wording, been agreed with DFDS in its Protective Provisions. The Applicant does not understand why this should be different for CLdN, as the assessments within the ES are comprehensive and robust, having been undertaken by expert consultants. To call these independent expert assessments 'the Applicant's own' is a gross mischaracterisation and CLdN's reliance on these assessment's being 'the Applicant's own' in order to expand its Protective Provisions beyond those of DFDS and allowing CLdN to decide for itself (away from public scrutiny) works which are likely to affect it provides undue control over the works to a commercial competitor. The wording suggested by the Applicant will provide sufficient protection for CLdN from works which have been assessed in a

reasonable worst-case scenario as affecting its undertaking, providing a reasonable and predictable baseline for future engagement.

- 8.7 **Paragraphs 132 and 133: Notice of and consultation on works and vessel movements.** The Applicant would refer CLdN to the HMH's submissions at [REP8-056] wherein HMH agrees with the Applicant's changes to these paragraphs in [AS-078]. HMH considers that CLdN's suggested draft would be "*damaging and inappropriate*", and "*would impinge on HMH's area of responsibility*" and "*fetter his ability to properly control vessels to ensure that safety of navigation*". Any potential issues of marine congestion are for the Harbour Master Humber and the Dock Master Immingham, in conjunction with Vessel Traffic Services, who will be responsible for managing all vessel movements including the movements of those vessels involved in the construction of the IERRT. It would not be appropriate for the protective provision to attempt to contradict these statutory jurisdictions, or for the Applicant to be required to provide commitments over which it does not have ultimate control.
- 8.8 **Paragraph 134: Railway.** The Applicant continues to be confused by CLdN's repeated requests for protection to CLdN's railway operations. The proposed development will have no impact on the local railway network, and it would be wholly inappropriate for the Protective Provisions to attempt to anticipate and address (as CLdN propose) any future use of the local railway network by the Applicant in line with the Applicant's existing permitted development rights. The Applicant has explained the process that would have to be followed with Network Rail should it wish to utilise the line – but that is clearly not the case – nor is it supported by any other IP's who may have similar interests.
- 8.9 **Paragraphs 135 and 136: Highways access.** The Applicant does not consider that CLdN would be an appropriate consultee for the Construction Environmental Management Plans. These plans will be approved by the local Highway Authority and will include provisions which ensure that the Port of Immingham West Gate and surrounding road network will not be adversely impacted by the construction of the proposed development. The Highways Authorities, as well as being the appropriate and best placed experts to review highways matters in the local area, will be able to act entirely independently of any commercial considerations, which cannot be said to be the case for a commercial competitor i.e. CLdN. CLdN are effectively demanding that they should be able to influence the relevant approval process. This would be entirely inappropriate and, in the context of approvals which are required from the local Highways Authority, unnecessary.
- 8.10 **Paragraph 137 Indemnity.** The Applicant is content for the oblique dash contained in sub-paragraph (1) to be replaced by the word "or", should the ExA find this preferable.
- 8.11 **Paragraphs 138 and 139: Statutory powers.** CLdN's 8 January letter does not explain why this paragraph is necessary, seemingly indicating that these protections should be included 'just in case'. As the Protective Provisions are designed to afford reasonable and proportionate protections for the recipients from matters directly arising from the proposed development, the Applicant remains of the view that this paragraph is superfluous and should be deleted.

There is no evidence that the dDCO will contradict, limit, or amend the statutory rights and powers vested in CLdN and it is difficult to envisage a scenario when this could arise.

- 8.12 As such, the Applicant considers that the Protective Provision contained in its Deadline 8 dDCO [**REP8-005**] and [**AS-078**] remains proportionate, effective and reasonable.

Glossary

Abbreviation / Acronym

ABP

CLdN

DCO

dDCO

DFDS

ExA

HMH

IERRT

IPs

NELC

NH

NPSfP

OFMP

RFC

Ro-Ro

SCNA

SoCG

VTS

Definition

Associated British Ports

CLdN Ports Killingholme Limited

Development Consent Order

Draft Development Consent Order

DFDS Seaways

Examining Authority

Harbour Master, Humber

Immingham Eastern Ro-Ro Terminal

Interested Parties

North East Lincolnshire Council

National Highways

National Policy Statement for Ports

Operational Freight Management Plan

Ratio Flow to Capacity

Roll-on/roll-off

Statutory Conservancy Navigation Authority

Statement of Common Ground

Vessel Traffic Services