



Immingham Green Energy Terminal

TR030008

Volume 5

5.2 Consultation Report Appendices

Appendix Q: Response Tables - second Statutory
Consultation

Section (37)(3)(c) of the Planning Act 2008

Regulation 5(2)(q)

Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009 (as
amended)

September 2023

Infrastructure Planning

Planning Act 2008

The Infrastructure Planning
(Applications: Prescribed Forms and
Procedure) Regulations 2009 (as amended)

Immingham Green Energy Terminal

Development Consent Order 2023

5.2 Consultation Report Appendices

Appendix Q: Response Tables- second Statutory Consultation

Regulation Reference	APFP Regulation 5(2)(q)
Planning Inspectorate Case Reference	TR030008
Application Document Reference	TR030008/APP/5.2
Author	Associated British Ports Air Products BR

Version	Date	Status of Version
Revision 1	21 September 2023	DCO Application

Appendix Q	Response Tables: Second Statutory Consultation
Q.1	Responses relating to matters not addressed in the ES
Q.2	Responses relating to matters addressed in the ES
Q.3	Additional relevant correspondence

Q.1	Responses relating to matters not addressed in the ES
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Please note: In the columns headed Design Change and Additional Mitigation, where we have used 'no' this should not be taken to mean that there have been no design changes or no additional mitigation. In this context, 'no' means that there have been no specific design changes or particular additional mitigation measures included in the project, directly in response to the feedback received from the consultee. In a number in the technical responses in the Technical Response column.

	Consultee	Date & method of feedback received	Feedback	Response	Design Change?	Additional Mitigation?	References
1	Lloyd and Jones Engineers Ltd	22.05.23 Email	<p>Hello,</p> <p>We have purchased a plot of land at 68 Kings Road DN40 1AN with a view to building a new site for our business following the IGET plans for our current site on Queens Road.</p> <p>It has now been brought to our attention, by Gateley Hamer, that the IGET project may also affect this replacement property, by means of “The Kings Road area will be for utility rearrangements that supply the land your company has interests”.</p> <p>We currently have two active planning applications with North Lincolnshire Council for this plot and need urgent clarification of the impact the IGET property will have on this plot and the surrounding area of Kings Road, Trenchard Close.</p> <p>Thank you.</p> <p>Regards</p> <p>██████████ ██████████████████ Lloyd & Jones Engineers Ltd</p> <p>Tel UK - ██ ██████████</p> <p>Postal Address: Langton House, 76 Regent Road, Bootle Merseyside L20 1BL</p> <p>Website - www.lloyd-jones.com Email - ██</p>	<p>The Applicant’s Land Agent Gateley Hamer has engaged in an ongoing dialogue with the landowner via email and phone since September 2022.</p> <p>Gateley Hamer are continuing to engage with the Affected Party regarding the requirements for land at Kings Road.</p> <p>In June 2023, Gateley Hamer informed the Affected Party via email that the temporary requirements are in relation to periodic lowering and / or lifting of overhead cables to allow large vehicles access to the site. As yet, there has been no response from the Affected Party.</p> <p>On 15 September 2023, Gateley Hamer sent a letter to the Kings Road owners / occupiers to give more information on the planned works and implications.</p>	N/A	N/A	N/A
2	Health and Safety Executive	25.05.23 Email	<p>Dear Project Team</p> <p>HSE acknowledges receipt of this request and will respond by the statutory deadline.</p> <p>Kind regards</p> <p>Sent on behalf of the NSIP team</p> <p>██████████ ██████████████████</p>	<p>The Applicant noted this response.</p> <p>Further correspondence from the HSE and the Applicant’s response is included in response 26 of this table.</p>	N/A	N/A	N/A

3	NATS	26.05.23 Email	<p>Dear Sirs,</p> <p>NATS acknowledges receipt of the second consultation and the changes being proposed.</p> <p>Our position remains unchanged and we have no objection to the scheme.</p> <p>Regards</p> <p>██████</p>	The Applicant noted this response. No further correspondence was received.	N/A	N/A	N/A
4	Northern Gas	26.05.23 Email	<p>Hi</p> <p>Northern Gas Networks do not cover this area.</p> <p>Please use this online tool to find out which gas distribution network you need to contact:</p> <p>https://www.energynetworks.org/operating-the-networks/whos-my-network-operator</p> <p>██████████</p> <p>Administration Assistant</p> <p>Before You Dig</p> <p>Northern Gas Networks</p> <p>1st Floor, 1 Emperor Way</p>	<p>The Applicant noted this response and the relevant gas distribution networks were contacted.</p> <p>Further correspondence and the Applicant's response to other relevant gas distribution networks is included in responses 5, 8, 10, 25 and 41 of this table.</p>	N/A	N/A	N/A

5	SGN Gas	26.05.23 Email	<p>Good evening,</p> <p>Thank you for your email.</p> <p>I am struggling to find an address on your enquiry, can you please provide a local postcode so I can pass this to the relevant team?</p> <p>I will await your response at your earliest convenience.</p> <p>Kind regards</p> <p>████████████████████</p>	<p>The Applicant provided the respondent with the local postcode as requested.</p> <p>No further correspondence was received.</p> <p>Further correspondence and the Applicant's response to other relevant gas distribution networks is included in responses 4, 8, 10, 25 and 41 of this table.</p>	N/A	N/A	N/A
6	DFDS	27.05.23 Email	<p>Hi</p> <p>Thanks for below – could I ask you to ask add ██████████ to this communication as well</p> <p>Best regards</p> <p>██████</p>	<p>The Applicant added the new contact as requested and forwarded on the information.</p> <p>DFDS submitted a formal response to the second Statutory Consultation on 17/07/2023. This is addressed the second Statutory Consultation Technical Response Table at Appendix Q.2 of the Consultation Report [TR030008/APP/5.1].</p> <p>The Applicant responded via letter to DFDS in advance of the submission of the Application to address the comments set out in their response.</p> <p>These included:</p> <ul style="list-style-type: none"> - The absence of IERRT depicted on visual materials - Cumulative effects - Navigational safety (the finger pier) - Navigational safety (methodologies) - Marine navigation and congestion (tug availability) - Marine navigation and congestion – exclusion zone - Marine ecology - Traffic and transport <p>The letter issued to DFDS is included in full at Appendix Q.3 of the Consultation Report [TR030008/APP/5.1].</p>	N/A	N/A	<p>Appendix Q.2 and Q.3 of Consultation Report [TR030008/APP/5.1].</p>

7	Easington Parish Council	27.05.23 Email	<p>Good Morning</p> <p>I advised you previously regarding the address you have sent the document to. It is incorrect, we are based in the East Riding of Yorkshire and NOT County Durham, you confirmed last time that you would change this, but I see from the attached that you have still sent it to the incorrect address. Can you please update your records and note that all correspondence to Easington Parish Council should go to the address detailed below:</p> <p>Kind regards,</p> <p>█</p>	<p>The Applicant responded to apologise for the incorrect address being used.</p> <p>The database was updated with the correct address and a new copy of the consultation pack was posted on 27/05/2023 via Royal Mail First Class delivery.</p> <p>No further correspondence was received.</p>	N/A	N/A	N/A
8	GTC	30 May 2023 Email	<p>Hello,</p> <p>I can confirm GTC has no assets within the vicinity of the secondary consultation of your project. Thanks,</p> <p>█</p>	<p>The Applicant noted this response.</p>	N/A	N/A	N/A
9	Local resident	30.05.23 Email	<p>Good morning █</p> <p>Thanks for getting back to me . I would be willing to meet up again , just let me know what time suits you best and where. I am retired so most days are okay.</p> <p>Thanks</p> <p>█</p>	<p>The Applicant responded on 14/06/2023 to offer a meeting at one of the in-person drop-in sessions on 22/06/2023 or 24/06/2023.</p> <p>The respondent (a representative of the sea angling community) attended the drop-in session on 22/06/2023 and spoke to members of the Project team, who provided an overview of the Project, including the amendments to the Project and any potential impacts this would have on the ability of the anglers to access some locations currently in use by the local sea angling community.</p> <p>The representative welcomed the dialogue and the explanation of the changes from the project team and asked to be kept up to date with the progress of the scheme, so that they can update their fellow sea anglers in turn.</p> <p>Please note the sea anglers are not a formal group, but rather local residents with a shared interest in sea angling in the Humber Estuary.</p>	N/A	N/A	N/A

10	ESP Utilities Group Ltd ("ESPUG")	30.05.23 Email	<p>Good Morning,</p> <p>If you wish for me to run a plant enquiry for you could you please send over the eastings and northings and full address of the site.</p> <p>Kind Regards,</p> <p>██████████</p> <p>Operation Support Specialist</p>	<p>The Applicant responded with the northings and eastings of the site as requested on 03/07/2023.</p> <p>Further correspondence from ESPUG and the Applicant's response is included in response 25 of this table.</p>	N/A	N/A	N/A
11	Lloyd Jones Engineers	30.05.23 Email	<p>Hi</p> <p>Thank you for your reply I believe our property may be affected as shown by the marking on the enclosed map.</p> <p>Kings Road / Trenchard Close junction</p> <p>As advised, we have live planning applications for this plot – can you please advise what you are considering for this area.</p> <p>Regards</p> <p>██████████</p>	<p>The Applicant's Land Agent Gateley Hamer has engaged in an ongoing dialogue with the landowner via email, phone and in person meetings since September 2022.</p> <p>Gateley Hamer are continuing to engage with the Affected Party regarding the requirements for land at Kings Road. In June 2023, Gateley Hamer informed the Affected Party via email that the temporary requirements are in relation to periodic lowering and / or lifting of overhead cables to allow large vehicles access to the site.</p> <p>As yet, there has been no response from the Affected Party.</p> <p>On 15 September 23, Gateley Hamer sent a letter to the Kings Road owners / occupiers to give more information on the planned works and implications.</p> <p>Lloyd Jones Engineers is another contact for Lloyd and Jones Engineers Ltd (see response 1 in this table) and as such the requested information was provided to one contact.</p>	N/A	N/A	N/A
12	Avison Young / FCC Environment Ltd	30.05.23 Email	<p>Dear Sirs</p> <p>Please find attached completed land referencing report for FCC at Immingham.</p> <p>Kind Regards</p> <p>██████████</p>	<p>The Applicant's Land Agent Gateley Hamer engaged with the Affected Party's Land Agent via email in May regarding surveys.</p> <p>These surveys were subsequently not required.</p> <p>The land interest is not within the Site Boundary of the Project.</p>	N/A	N/A	N/A

13	Network Rail	27.06.23 Email	<p>To Whom it may concern</p> <p>I refer to your email below and attached information</p> <p>In order for Network Rail to respond I would be grateful if you could kindly send me SHP file of the limits of Deviation under the DCO</p> <p>Many thanks</p> <p>Kind Regards</p> <p>██████████</p>	<p>The Applicant sent an email on 13/07/2023 with the information requested.</p> <p>Further correspondence received on 27/06/2023 and the Applicant's response is noted in response 4 of the SC2 Technical Response Table at Appendix Q.2 of the Consultation Report [TR030008/APP/5.1].</p>	N/A	N/A	Appendix Q.2 of Consultation Report [TR030008/APP/5.1]
	Network Rail	27.06.23 Email	<p>Consideration should be given to ensure that the construction and subsequent maintenance can be carried out without adversely affecting the safety of or encroaching upon Network Rail's adjacent land. In addition, security of the railway boundary will require to be maintained at all times. In any event you must contact Network Rail's Asset Protection Engineers as soon as possible in relation to this scheme on the following e-mail address ██████████</p>	<p><u>Construction Impact</u></p> <p>The Project has been designed to ensure that the construction and maintenance works can be carried out without having an adverse impact on railway operations or encroaching on adjacent Network Rail line.</p> <p>The Project will be designed to the latest standard to reduce risk of incursion onto the rail network, whilst security fencing designed to adhere to all required British Standards will surround the development.</p>	N/A	N/A	N/A
	Network Rail	27.06.23 Email	<p>Network Rail is prepared to discuss the inclusion of Network Rail land or rights over land subject to there being no impact on the operational railway, all regulatory and other required consents being in place and appropriate commercial and other terms having been agreed between the parties and approved by Network Rail's board.</p>	<p><u>Asset protection</u></p> <p>Applicant is engaged with ongoing discussions with Network Rail regarding Asset Protection.</p> <p>A Statement of Common Ground including details of protective provisions will be developed with Network Rail and submitted to the examination at the appropriate time.</p>	N/A	N/A	N/A
	Network Rail	27.06.23 Email	<p>Impact on Network Rail Infrastructure</p> <p>Network Rail has been reviewing the information provided and note that proposals include routing of the pipeline corridor through operational railway land (at approx. PYE1 106m 1000yds), works in proximity to the railway and the siting of a works compound adjacent to the operational railway. To install and route a pipeline through railway property, the developer will require prior agreement with Network Rail. The developer will need an easement/licencing agreements from Network Rail and we would recommend that they engage with us early in the planning of their scheme in order to discuss and agree this element of the proposals. Our Easements and Wayleaves Team can be contacted at easements&wayleaves@networkrail.co.uk.</p>	<p><u>Land interest query</u></p> <p>The Applicant is engaged with ongoing discussions with Network Rail regarding both Easements and Wayleaves and Asset Protection. A Statement of Common Ground including details of legal agreements and protective provisions will be developed with Network Rail and submitted to the examination at the appropriate time.</p> <p>The protective provisions are being discussed between lawyers acting for Network Rail and the Applicant / Air Products.</p>	N/A	N/A	N/A

	Network Rail	27.06.23 Email	<p>Network Rail will be seeking protection from the exercise of compulsory purchase powers over operational land either for permanent or temporary purposes. In addition, Network Rail will wish to agree protection for the railway during the course of the construction works and otherwise to protect our undertaking and land interests. Network Rail reserves the right to produce additional and further grounds of concern when further details of the application and its effect on Network Rail's land are available. In addition, any rights for power or other lines under, over or alongside the railway line will require appropriate asset protection measures deemed necessary by Network Rail to protect the operational railway and stations. We have standard protective provisions which will need to be included in the DCO as a minimum therefore contact should be made [REDACTED] to obtain a copy of the relevant wording. In addition, a number of legal and commercial agreements will need to be entered into, for example, asset protection agreements, method statements, connection agreements, property agreements and all other relevant legal and commercial agreements. This list is not exhaustive and will need to be reviewed once more details of the scheme are discussed between the parties.</p>	<p><u>Asset protection</u> The Applicant is engaged with ongoing discussions with Network Rail regarding Asset Protection. A Statement of Common Ground including details of protective provisions will be developed with Network Rail and submitted to the examination at the appropriate time.</p>	N/A	N/A	N/A
14	West Lindsey District Council	31.05.23 Email	<p>Good Morning, Please find attached your acknowledgement letter regarding the above application. Kind regards [REDACTED] Dear Sir/Madam APPLICATION REFERENCE NO : 146814 PROPOSAL: Written Enquiry re: Second Statutory Consultation Request LOCATION: North Lincolnshire Green Energy Park Thank you for your communication in relation to the above which is now receiving attention. Please quote the application reference number when contacting this office as it will help staff to assist you.</p>	<p>The Applicant noted this response. Further correspondence received from West Lindsey District Council and the Applicant's response is included in the SC2 Technical Response table at Appendix Q.2 of the Consultation Report [TR030008/APP/5.1].</p>	N/A	N/A	Appendix Q.2 of Consultation Report [TR030008/APP/5.1]

			<p>Yours faithfully</p> <p>██████████</p> <p>On behalf of West Lindsey District Council</p> <p>If you require this letter in another format e.g. large print, please contact Customer Services on 01427 676676, by email customer.services@west-lindsey.gov.uk or by asking any of the Customer Services staff.</p> <p>If you want to know more about how we use your data, what your rights are and how to contact us if you have any concerns, please read our privacy notice: www.west-lindsey.gov.uk/planning-privacy</p> <p><u>Planning Services Feedback</u></p> <p>We value your opinion on our service, as your comments will help us to make improvements. Please visit our website where you may either make your comments online or download our feedback form to fill in and post back: www.west-lindsey.gov.uk/planning</p>				
15	South Killingholme Parish Council	31.05.23 Email	<p>Hello ██████████</p> <p>The council are expecting you 6pm- 6.30pm before the Parish Council meeting as requested.</p> <p>Better to fetch hard copies as our tech is non existent. Photocopier not working and our laptop still on Windows 10!</p> <p>Lots of parking outside the community centre. I will be opening up about 5.30.</p> <p>Kind Regards</p> <p>██████████</p> <p>██</p>	<p>The Applicant noted this response.</p> <p>The Applicant presented to the Parish Council on 05/06/2023.</p> <p>Further information regarding this meeting is included in Table 32 of the Consultation Report [TR030008/APP/5.1].</p>	N/A	N/A	Consultation Report [TR030008/APP/5.1]

16	DIO Safeguarding Office	01.06.23 Email	<p>FAO Immingham Green Energy Terminal Project Team</p> <p>Dear Sir/Madam,</p> <p>Further to your Email below regarding Second Statutory Consultation for Immingham Green Energy Terminal, and after our review, I can confirm that the MOD has no objection regarding this activity. This applies to the offshore element and the Onshore which has been assessed as a Site Outside Safeguarding Areas (SOSA).</p> <p>Regards,</p> <p>[REDACTED]</p> <p>Defence Infrastructure Organisation</p> <p>Estates Safeguarding</p> <p>DIO Head Office St George's House DMS Whittington Lichfield Staffordshire WS14 9PY</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	The Applicant notes the response and no further correspondence was received.	N/A	N/A	N/A
17	Nationwide	01.06.23 Email	<p>Good Afternoon</p> <p>Thank you for forwarding the attached correspondence.</p> <p>We've been unable to identify the mortgage account for the property you told us about.</p> <p>Please send any of the following to the address above:</p> <p>full names of tenants full property address with post code any previous account numbers quoted copy notice of Mortgage Land Registry Office Copy Entries.</p> <p>Thanks</p> <p>[REDACTED]</p>	<p>Gateley Hamer received a completed Land Interest Questionnaire from Nationwide in response to the provision of information from Gateley Hamer.</p> <p>The Applicant has identified the relevant mortgage account with Nationwide and remains listed in the Book of Reference [TR 030008/APP/3.1] under Nationwide Building Society as mortgagee to [REDACTED]</p> <p>The relevant mortgagees have been contacted with their own Land Interest Questionnaire and s42 letters.</p>	N/A	N/A	Book of Reference [TR030008/APP/3.1]

18	Brocklesby Estate	31.05.23 Email	<p>Dear Sirs,</p> <p>Further to my telephone call I have a number of queries, relating to the correspondence we have received dated 24th May 2023 referring to the second statutory consultation period.</p> <p>We have been sent a number of plans identifying a number of parcels of land that I am working through to provide a further update, as per points 3 / 4 below. However, the latest correspondence was addressed to a number of Trustees who are no longer Trustees. I would therefore like those Trustee's details to be removed please from all future correspondence. The details of the 4 Trustees to be removed are detailed below (1-4).</p> <p>[REDACTED]</p> <p>Please note, the correspondence address (for service of the papers on your file is correct) which for clarity is C/o Estate Office, Brocklesby Park, Habrough, Grimsby, DN41 8PN. The 3 remaining Trustees for correspondence, albeit C/o the Brocklesby Estate are:</p> <p>[REDACTED]</p> <p>3. My colleague and I have sent emails to Gately Hamer to ask for confirmation about the proposed fee proposal for our consultants who will facilitate us during this process. Plus, there are elements of work that we are doing in house which is taking time but yet have not received confirmation on what fees are reimbursable for this work also. Please can you look into this for me.</p> <p>4. There is no LIQ to complete and provide IGET with details of our ownership / rights this time. Therefore, what is your preferred method for us to provide this level of information to you.</p> <p>I look forward to hearing from you.</p> <p>Kind regards,</p> <p>[REDACTED]</p>	<p>The Applicant responded on 31/05/2023 acknowledging the email and noting that land agent Gateley Hamer would be in touch directly.</p> <p>The Applicant's Land Agent Gateley Hamer has engaged in an ongoing dialogue with the landowner via email and in person meetings since April 2023. This included meetings with the Estate's agent and with representatives of the Estate at the public consultation drop in event in June 23. These meetings were in regard to the Project and the land required for this.</p> <p>In June 2023 the Applicant's Land Agent Gateley Hamer removed the four trustees listed below from any future correspondence:</p> <p>[REDACTED]</p> <p>In response to point 4, the Applicant's Land Agent Gateley Hamer issued a bespoke LIQ in June 23 to enable the Estate to provide further details of its ownership.</p> <p>Further to this, in response to point 3, Gateley Hamer also confirmed fee payments in August 23 but has yet to receive a response from the Estate's agent regarding the LIQ or fee payments.</p> <p>This is outlined in further detail in the Schedule of Negotiations at Appendix A of the Statement of Reasons [TR030008/APP/3.2].</p>	N/A	N/A	<p>Schedule of Negotiations at Appendix A of the Statement of Reasons [TR 030008/APP/3.2]</p>
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19	Brocklesby Estate	01.06.23 Email	<p>Hi [REDACTED],</p> <p>Thank you for your response.</p> <p>I await to hear from Gateley Hamer.</p> <p>Kind regards</p> <p>[REDACTED]</p>	<p>The Applicant noted this response. There has been regular contact between the Estate's Land Agent and Gateley Hamer since April 23.</p> <p>Further information is provided in response 18 above.</p>	N/A	N/A	Schedule of Negotiations at Appendix A of the Statement of Reasons [TR 030008/APP/3.2]
20	North Lincolnshire Council	02.06.23 Email	<p>Enquiries to: [REDACTED], Development Management</p> <p>T: [REDACTED]</p> <p>E: planning@northlincs.gov.uk</p> <p>Application Ref: CON/2023/1092</p> <p>(Please quote at all times)</p> <p>CONSULTATION REQUEST</p> <p>Thank you for the formal consultation on the above proposal. Please direct any enquiries to the case officer.</p> <p>Development Management</p> <p>Business Development</p> <p>North Lincolnshire Council</p> <p>Church Square House</p> <p>30-40 High Street</p> <p>Scunthorpe</p> <p>DN15 6NL</p> <p>Email planning@northlincs.gov.uk Telephone (01724) 297000</p> <p>PLEASE NOTE: Wherever possible the applicant and/or agent is encouraged to work electronically with us both</p>	<p>The Applicant noted this response.</p> <p>Further correspondence received from North Lincolnshire Council and the Applicant's response is included in row 28 of this table.</p>	N/A	N/A	N/A

			<p>online and by email. Applications can be submitted to us online using this link www.planningportal.co.uk</p> <p>Reference CON/2023/1092 (Please quote at all times) Proposal Immingham Green Energy Terminal Development Consent Order Statutory Consultation Location ABP, Immingham Case Officer [REDACTED]</p>				
21	Immingham Town Football Club	02.06.23 Email	<p>Good Morning</p> <p>I am writing to inquire about the possibility of a sponsorship partnership between your company and Immingham Town Football Club? Our club, has a strong and passionate following in our local community and we believe that partnering with your company would be mutually beneficial.</p> <p>As a sponsor, your company would have the opportunity to increase brand awareness and reach a wider audience by being prominently featured on our team jerseys, website, and social media channels. Additionally, your company would have the opportunity to engage with our loyal fanbase through various sponsorship activation opportunities, such as exclusive fan experiences and events.</p> <p>We believe that our club and your company share similar values and goals, and we are excited about the prospect of working together to achieve these goals. If you are interested in discussing this opportunity further, please do not hesitate to reach out to me at your earliest convenience.</p> <p>Thank you for your time and consideration.</p> <p>Sincerely, [REDACTED] Immingham Town Football Club</p>	<p>The Applicant noted the response.</p> <p>The Applicant is not currently seeking sponsorship opportunities while the Project is in the application phase. Once the Applicant has completed the current application phase, they may consider future opportunities.</p> <p>ABP have a strong presence in the local community, supporting a number of local charities, organisations and initiatives including seven years as supporter of Armed Forces Day in North East Lincolnshire.</p> <p>ABP is also a supporter of Immingham Museum and works closely with the museum on outreach work, as well as supporting local schools and colleges for enrichment and careers activities.</p>	N/A	N/A	N/A

22	National Grid	02.06.23 Email	<p>Good afternoon,</p> <p>Please see attached a response from NGET.</p> <p>Kind regards,</p> <p>[REDACTED]</p> <p>SUBMITTED ELECTRONICALLY: enquiries@imtinghamget.co.uk</p> <p>02 June 2023</p> <p>Dear Sir / Madam</p> <p>RE: Immingham Green Energy Terminal (the Proposed Development)</p> <p>Planning Act 2008 Section 42</p> <p>I refer to your letter dated 24th May 2023 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).</p> <p>Having reviewed the scoping report, NGET has nothing further to add in addition to our response to the first statutory consultation dated 6th February 2023.</p> <p>I hope the above information is useful. If you require any further information, please do not hesitate to contact me.</p> <p>Yours faithfully</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Development Liaison Officer, Complex Land Rights National Grid is a trading name for: National Grid Electricity Transmission plc Registered Office: 1-3 Strand, London WC2N 5EH Registered in England and Wales, No 2366977</p>	<p>The Applicant noted this response.</p> <p>National Grid's submission to the first Statutory Consultation and the Applicant's response is included in the SC1 Technical Response Table at Appendix P.2 of the Consultation Report [TR 030008/APP/5.1].</p>	N/A	N/A	<p>Appendix P.2 of Consultation Report [TR030008/APP/5.1]</p>
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23	South Yorkshire Mayoral Combined Authority	05.06.23 Email	<p>Dear Sir / Madam</p> <p>Thank you for consulting South Yorkshire Mayoral Combined Authority (SYMCA) on the second statutory consultation regarding the proposed Immingham Green Energy Terminal. Please note that these comments represent the views of officers and do not represent the formal views of SYMCA, unless this is specifically stated.</p> <p>Having reviewed the consultation material and changes to the proposals, I can confirm that we have no comment to make at this time. However, I would be grateful if you could update your mailing list so that any future correspondence regarding this proposal be sent to SYMCA.Planning@southyorkshire-ca.gov.uk, rather than to enquiries@southyorkshire-ca.gov.uk.</p> <p>Yours faithfully</p> <p>██████ ██████████</p> <p>Assistant Director Infrastructure, Housing & Planning</p>	The Applicant noted this response and updated the contact details for SYMCA in the stakeholder database.	N/A	N/A	N/A
24	Environment Agency	07.06.23 Email	<p>Good afternoon,</p> <p>I have passed your e-mail to the local customer team who will deal with your request.</p> <p>The Freedom of Information Act and Environmental Information Regulations state that a public authority must respond to requests for information within 20 working days.</p> <p>You can find more information about our service commitment by clicking on the link below:</p> <p>https://www.gov.uk/government/publications/environment-agency-customer-service-commitment</p> <p>You can contact our customer team directly on the contact details below, or call the National Customer Contact Centre on 03708 506506 who will transfer you to the area team.</p> <p>Please quote your enquiry reference ██████ in any correspondence with us regarding this matter.</p> <p>Customers & engagement team</p>	<p>The Applicant noted the response.</p> <p>Further correspondence from the Environment Agency received on 19/06/2023 and the Applicant's response is included in the SC2 Technical Response Table at Appendix Q.2 of the Consultation Report [TR030008/APP/5.1].</p>	N/A	N/A	Appendix Q.2 of Consultation Report [TR030008/APP/5.1]

			<p>Environment Agency</p> <p>Lincolnshire and Northamptonshire Area – Email address Lnenquiries@environment-agency.gov.uk</p> <p>Kind regards</p> <p>████████████████████</p> <p>Customer Services Advisor</p>				
25	ESPUG	12.06.23	<p>12 June 2023</p> <p>Email</p> <p>Reference: DN postcode works</p> <p>Dear Sir/Madam,</p> <p>Thank you for your recent plant enquiry at: Cycle Superhighway : Grimsby - Immingham, Immingham, North East Lincolnshire, England, DN40 1QT, United Kingdom</p> <p>I can confirm that ESP Utilities Group Ltd has no gas or electricity apparatus in the vicinity of this site address and will not be affected by your proposed works.</p> <p>ESP Utilities Group Ltd are continually laying new gas and electricity networks and this notification is valid for 90 days from the date of this letter. If your proposed works start after this period of time, please re-submit your enquiry.</p> <p>Important Notice</p> <p>Please be advised that any enquiries for ESP Connections Ltd, formerly known as British Gas Connections Ltd, should be sent directly to us at the address shown above or alternatively you can email us at: PlantResponses@espug.com</p> <p>ESP have provided you with all the information we have to date however, there may be inaccuracies or delays in data collection and digitisation caused by a range of practical and unforeseeable reasons and as such, we recommend the following steps are taken as a minimum before work is commenced that involves the opening of any ground and reference made to HSG47 (Avoiding danger from underground services).</p> <p>A. Plans are consulted and marked up on site</p>	<p>The Applicant noted the response including the comment stating that the notification remains valid for 90 days.</p> <p>The Applicant will continue communication with ESPUG on the Application.</p>	N/A	N/A	N/A

			<p>B. The use of a suitable and sufficient device to locate underground utilities before digging (for example the C.A.T and Genny)</p> <p>C. Trial holes are dug to expose any marked up or traced utilities in the ground</p> <p>D. If no utilities are shown on any plans and no trace is received using a suitable and sufficient device, trial holes are dug nonetheless using hand tools at the location or at regular intervals along the location that the work is being carried out depending on the length of excavation work being undertaken</p> <p>E. All location work is carried out by individuals with sufficient experience and technical knowledge who may choose to control this activity under a Safe System Of Work</p> <p>Yours faithfully,</p> <p>Plant Protection Team ESP Utilities Group Ltd</p>				
26	Health and Safety Executive	13.06.23 Email	<p>Good afternoon,</p> <p>With regards to the above NSIP Consultation, Second Statutory Consultation under Section 42.</p> <p>HSE has reviewed the changes and our response remains the same.</p> <p>We have no further comments to make to previous advice provided on 17th February 2023 (attached).</p> <p>Kind regards,</p>	<p>The Applicant noted the response.</p> <p>The response issued to the first Statutory Consultation feedback received on 17/02/2023 can be found in the SC1 Technical Response table at Appendix P.2 of the Consultation Report [TR 030008/APP/5.1]</p>	N/A	N/A	Appendix P.2 of Consultation Report [TR030008/APP/5.1]
27	Aegis Energy	13.06.23 Email	<p>Good afternoon,</p> <p>I saw on the IGET site that there may be a webinar as part of the consultation. Can you please let me know if this is going ahead?</p> <p>Kind regards,</p> <p>██████████ ████████████████████</p>	<p>The Applicant acknowledged the query about a webinar in an email.</p> <p>As this was the only request for a webinar, the webinar did not go ahead. However, the Applicant offered the respondent alternative methods of engagement both in person and remote (a meeting or phone call) to discuss the proposals, or to attend one of the drop-in sessions that were coming up at the time.</p> <p>This offer was not taken up.</p>	N/A	N/A	N/A

28	North Lincolnshire Council	16.06.2023	<p>Application Ref: CON/2023/1164</p> <p>(Please quote at all times)</p> <p>CONSULTATION REQUEST</p> <p>Thank you for the formal consultation on the above proposal. Please direct any enquiries to the case officer.</p> <p>Development Management Business Development </p> <p>North Lincolnshire Council</p> <p>Church Square House</p> <p>30-40 High Street</p> <p>Scunthorpe</p> <p>DN15 6NL</p> <p>Email planning@northlincs.gov.uk Telephone [REDACTED]</p> <p>PLEASE NOTE: Wherever possible the applicant and/or agent is encouraged to work electronically with us both online and by email. Applications can be submitted to us online using this link www.planningportal.co.uk</p> <p>Reference CON/2023/1164 (Please quote at all times) Proposal Proposed Immingham Green Energy Terminal - Second Statutory Consultation Location Adjacent authority Case Officer [REDACTED]</p>	The Applicant noted the response.	N/A	N/A	N/A
				No further correspondence was received.			

29	Associated Petroleum Terminals (Immingham) Ltd	19.06.2023 Email	<p>Dear Associated British Ports</p> <p>IMMINGHAM GREEN ENERGY TERMINAL DEVELOPMENT</p> <p>SECOND STATUTORY CONSULTATION</p> <p>We continue to be instructed on behalf of Associated Petroleum Terminals (Immingham) Limited and Humber Oil Terminals Trustee Limited in the relation to the proposed Immingham Green Energy Terminal Development.</p> <p>Our client continues to have concerns on the proposals as set out in response to the first statutory consultation dated 20 February 2023 (see attached). Our client has no further comments to raise at this stage on the proposed development.</p> <p>Kind regards,</p> <p>██████████</p>	<p>The Applicant noted this response and has responded to the concerns identified in their response to the first Statutory Consultation in Appendix P.2 of the Consultation Report [TR030008/APP/5.1].</p> <p>The Applicant issued a formal letter of response to APT prior to the submission of the Application addressing the points raised in their original response.</p> <p>This letter is included in full at Appendix Q.3 of the Consultation Report [TR030008/APP/5.1].</p>	N/A	N/A	Appendix P.2 & Q.3 of Consultation Report [TR 030008/APP/5.1]
30	Coal Authority	20.06.23 Email	<p>Good afternoon,</p> <p>Please find attached our comments in respect of the below consultation.</p> <p>Kind regards</p> <p>██████████</p> <p>-----</p> <p>Dear Sir/Madam</p> <p>Proposed Immingham Green Energy Terminal at the Port of Immingham – Second Statutory Consultation.</p> <p>Thank you for your notification of 26 May 2023 seeking the views of the Coal Authority on the above.</p> <p>I have checked the site location plan against our coal mining information and can confirm that, whilst the proposed development site falls within the coalfield, it is located outside the Development High Risk Area as defined by the Coal Authority.</p> <p>On this basis, the Planning team at the Coal Authority have no comments to make.</p> <p>Please do not hesitate to contact us if you would like to discuss this matter further.</p>	<p>The Applicant noted the response.</p> <p>The Coal Authority will be contacted in the event unrecorded coal mining hazards are encountered at the Site during construction of the Project.</p>	N/A	N/A	N/A

			Yours sincerely, The Coal Authority Planning Team				
31	Individual	20.06.23 Email	Immingham Green Energy Terminal Development Re: Your advertisement in today's Times newspaper, please send me a copy of the documents on a USB stick. I tried the freephone number as suggested in the ad but, although they knew about the project, they did not seem to know about the USB option. Regards, [REDACTED]	The Applicant responded to this email on 22/06/23 to advise that a USB with the consultation documents had been posted by Royal Mail First Class on 22/06/2023 No further correspondence was received.	N/A	N/A	N/A
32	Individual	20.06.23 Email	Second Statutory Consultation 24 May 2023 - 30 June 2023 Please send consultation documents and materials on USB stick as mentioned in your document IGET StatCon 2 Brochure FINAL 18.05.23[36].do [REDACTED]	The Applicant responded to this email on 22/06/23 to advise that a USB with the consultation documents had been posted by Royal Mail first class on 22.06.23. No further correspondence was received.	N/A	N/A	N/A
33	Anglian Water	26.06.23 Email	Good Morning, I am emailing with regard to the attached letter Anglian Water received for the proposed Development Consent Order. Savills work on behalf of Anglian Water with any estate queries. We received the exact same letter from Gateley Hamer a month or so ago and responded with the relevant deeds / agreements that are affected by the application. May I ask if ABP and Gateley Hamer are working in partnership on this project, and if therefore information would be passed between yourselves? It would be useful to know as we would therefore not be repeating ourselves when we receive the same request from either company. I look forward to hearing from you. Kind regards, [REDACTED]	The Applicant responded on 03.07.23 to confirm that Gateley Hamer and ABP are working in partnership on the Project and that any information sent to either Gateley Hamer or ABP will be shared with the project team and considered as part of the DCO application. Anglian Water provided a response to the second Statutory Consultation on 13/07/2023, which alongside the Applicant's response is included in the SC2 Technical Response Tables at Appendix Q.2 of the Consultation Report [TR 030008/APP/5.1]. There has been ongoing engagement with Anglian Water as included in Table 32 of the Consultation Report.	N/A	N/A	Appendix Q.2 of the Consultation Report [TR030008/APP/5.1]


34	Canal and River Trust	28.06.23 Email	<p>Please find attached the response of the Canal & River Trust to the above proposal.</p> <p>Should you need to contact the Louth Navigation Trust, I have cc'd [REDACTED] their secretary into this correspondence.</p> <p>Kind regards [REDACTED]</p> <p>Associated British Ports By email only to: enquiries@imminhamget.co.uk</p> <p>Proposal: Amended Developer Statutory Consultation on Imminham Green Energy Terminal Waterway: River Trent, River Ouse and Aire & Calder Canal</p> <p>Thank you for your consultation relating to the pre-application stage of the above NSIP.</p> <p>We are the charity which looks after and bring to life 2000 miles of canals & rivers. The Canal & River Trust is a prescribed consultee for the purposes of s42(a) Planning Act 2008 for proposed applications likely to have an impact on inland waterways or land adjacent to inland waterways.</p> <p>Having reviewed the Supplementary Consultation Report we wish to make the following comments:</p> <p>Given the location of the project and the relationship of the proposal with our network, we do not believe that the proposals as shown would impact our interests. Our closest waterways are the River Trent, River Ouse and the Aire & Calder Canal, all of which are located over 40km inland from the proposal. The Trust is Navigation Authority for these waterways. Should the scheme be amended to potentially affect our navigations, we would welcome further consultation on the proposals, so that we can advise about any potential impact for our network.</p> <p>The Louth Canal is not owned or managed by the Trust. However, pursuant to the charitable objectives of the Trust, the Trust supports the preservation, conservation and protection of inland waterways for the public benefit. We are aware that the Louth Navigation Trust (LNT) is dedicated to preserving the canal and encouraging future regeneration of the Louth Canal and support such</p>	<p>The Applicant noted this response and has previously issued correspondence to the Louth Navigation Trust in relation to the first Statutory Consultation on 15/02/2023 and the second Statutory Consultation on 26/05/2023.</p> <p>No correspondence from the Louth Navigation Trust was received.</p> <p>No further correspondence from the Canal & River Trust was received.</p>	N/A	N/A	N/A
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			<p>initiatives. We recommend that you correspond with the LNT regarding your proposal, and we advise that consideration is given to any response from LNT on any impact that the proposal might have on preservation and regeneration objectives.</p> <p>Please do not hesitate to contact me with any queries you may have.</p> <p>Yours sincerely,</p> <p>██████████</p>				
35	East Lindsey District Council	30.06.23 Email	<p>Hello,</p> <p>please find attached response to second round of consultation for this project.</p> <p>Regards</p> <p>██████████</p> <p>-----</p> <p>Dear Sir / Madam</p> <p>Thank you for notifying East Lindsey District Council of the second round of consultation on your Green Energy Terminal project.</p> <p>Having considered the documentation provided on your website, I can confirm that this authority has no comments to make on the amended project or additional consultation process.</p> <p>Yours,</p> <p>██████████</p>	<p>The Applicant noted the response.</p> <p>No further correspondence was received.</p>	N/A	N/A	N/A


36	NHS Humber and North Yorkshire	30.06.23	<p>Dear Colleague</p> <p>Please see attached the consultation response from NHS Humber and North Yorkshire Integrated Care Board NEL Place</p> <p>Should you require anything further, please do not hesitate to contact me</p> <p>Kind Regards,</p> <p>██████████</p> <p>-----</p> <p>To Whom It May Concern</p> <p>Re: IGET Consultation</p> <p>Thank you for the opportunity to consult on the proposed IGET development in Immingham and the materials you sent to that effect.</p> <p>This proposal has been considered by the senior management team of the ICB in North East Lincolnshire and we believe the development will make a significant contribution to the overall economic development in the Borough and aligns with our own strategic priorities for the area.</p> <p>We wish you well in bringing the development to fruition.</p> <p>Yours sincerely,</p> <p>██████████</p>	<p>The Applicant noted the response and welcomes the support for the project.</p> <p>No further correspondence was received.</p>	N/A	N/A	N/A
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37	Kingston upon Hill City Council (Hull City Council)	30.06.23 Email	<p>Please find attached Hull City Council's response to the second consultation on this project.</p> <p>Best regards,</p> <p>IMMINGHAM GREEN ENERGY TERMINAL PROPOSALS: STATUTORY CONSULTATION FROM WEDNESDAY 24 MAY 2023 TO 23:59 ON FRIDAY 30 JUNE 2023 ON PROPOSED APPLICATION FOR DEVELOPMENT CONSENT BY ASSOCIATED BRITISH PORTS SECTION 42(1)(a), (aa) and (b) AND SECTION 43 OF THE PLANNING ACT 2008 REGULATION 13 OF THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 REGULATION 3 and SCHEDULE 1 OF THE INFRASTRUCTURE PLANNING (APPLICATIONS: PRESCRIBED FORMS AND PROCEDURE) REGULATIONS 2009</p> <p>Thank you for consulting Hull City Council and inviting comments on the proposed project changes.</p> <p>Following review of the updated project information, the Council does not wish to make any detailed comments regarding the content thereof, but would take this opportunity to express its support for the project in general terms, in light of the net zero, clean growth economy, and renewables sector ambitions and imperatives for the wider Humber area.</p>	The Applicant noted the response and welcomes the support for the project.	N/A	N/A	N/A
38	CLdN	30.06.23 Email	<p>Good afternoon</p> <p>Please see attached response from CLdN Ports Killingholme.</p> <p>Dear Sirs</p> <p>Immingham Green Energy Terminal</p> <p>Thank you for providing a copy of the PEIR addendum, which we have had the opportunity to review. At this stage we are not able to provide detailed consultation responses.</p> <p>We made comments in reply to the PEIR consultation in relation to:</p>	<p>The Applicant provided a written response to CLdN prior to the submission of the Application addressing the points raised in their consultation responses to both the first and second Statutory Consultations.</p> <p>The Applicant's response is detailed in Appendix Q.2 of the Consultation Report [TR030008/APP/5.1].</p> <p>In summary this addresses the key points raised in their response to the second Statutory Consultation:</p> <ul style="list-style-type: none"> • Vessel calls • Absence of Navigational Risk Assessment ("NRA") or supporting information 	<p>Following the first Statutory Consultation, the jetty design was revised varying the two berth design to a single berth.</p> <p>Following this change in berth design the maximum forecast vessel arrivals for the jetty are now 292 vessels per annum of which up to 12 per year</p>	No	<p>Further information can be found in</p> <p>Chapter 12: Marine Transport and Navigation of the ES [TR030008/APP/6.2]</p> <p>Appendix 12.A: Navigational Risk Assessment [TR030008/APP/6.4]</p> <p>Appendix Q.2 of Consultation Report [TR030008/APP/5.1]</p>

	<ol style="list-style-type: none"> 1. The approach to assessment of vessel calls, with only 12 of the potential 400 annual vessel calls being associated with other development and uses which are not identified or assessed; 2. The absence of any navigation risk assessment or supporting information; 3. Impacts from reduced sailing speeds in the vicinity of the project; and 4. a request to be involved in navigational risk assessments/HAZID workshops. <p>Although we note that you have reduced the scale of the marine elements of the project (but the land side elements remain the same), the PEIR addendum does not contain sufficient information to enable us to assess the potential impacts of the revised project.</p> <p>We understand the approach taken in the PEIR addendum is that the likely significant effects of the revised project can be expected to be no worse than the previous proposals. However, the revised project is different to the original proposals and so the environmental effects can be assumed to be potentially different. Therefore in our opinion they would require further environmental impact assessment to be carried out specific to the details of the revised project. We believe our comments in the February response including in relation to uncertainty around future transport effects and sailing speed restrictions remain. The construction impacts of the new project can also be expected to be different, in particular in relation to a shorter construction period. We would also expect revised navigational risk assessment and HAZID to be undertaken.</p> <p>28 June 2023</p> <p>CLdN Ports Killingholme Ltd</p> <p>██████████ ██████████</p> <p>W1D 5EU, London, UK Registered in England number: 00278815 VAT Registration number: GB-668.3350.141</p> <p>We would welcome an invitation for our attendance at those navigational risk and HAZID workshops and are</p>	<ul style="list-style-type: none"> • Impacts from reduced sailing speeds in the vicinity of the Project • NRA / HAZID workshops <p>The letter issued to CLdN is included in full at Appendix Q.3 of the Consultation Report [TR030008/APP/5.1].</p>	<p>would be ammonia carriers.</p>		
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			able to review further environmental information when it is made available.				
39	JNCC	30.06.23 Email	<p>Good Afternoon, Immingham GET.</p> <p>JNCC co-ordinates nature conservation advice at a UK-level and advises UK Government on matters relating to nature conservation internationally. Within each UK country the separate statutory bodies are responsible for nature and landscape conservation, these being: Natural England (NE), Natural Resources Wales (NRW), NatureScot (NS) and the Council for Nature Conservation and the Countryside Northern Ireland (CNCCNI).</p> <p>JNCC has responsibility for the provision of nature conservation advice in the offshore area; 'offshore' being defined as beyond 12 nautical miles (nm) from the coastline, to the extent of the United Kingdom Continental Shelf (UKCS). Within territorial limits (<12nm) nature conservation advice is the responsibility of the relevant country bodies.</p> <p>This development proposal is not located within the offshore area, does not have any potential offshore nature conservation issues and is not concerned with nature conservation at a UK-level, therefore JNCC does not have any comments to make on the consultation.</p> <p>Yours sincerely, </p>	<p>The Applicant noted the response.</p> <p>No further correspondence was received.</p>	N/a	N/a	N/a

40	Polynt	30.06.23	<p>Dear Sir or Madam</p> <p>We now attach our client's response to the Second Statutory Consultation.</p> <p>We should be grateful if you would acknowledge safe receipt.</p> <p>Kind regards ----- Dear Sir or Madam,</p> <p>Polynt Composites UK Ltd. Laporte Road Stallingborough - Near Grimsby North East Lincolnshire DN41 8DR United Kingdom Phone +44 1469 552570 Fax +44 1469 552597</p> <p>contact.it@polynt.com www.polynt.com</p> <p>PROPOSED DEVELOPMENT CONSENT ORDER (DCO) IMMINGHAM GREEN ENERGY TERMINAL (IGET PROJECT) REPRESENTATIONS IN RESPONSE TO SECOND STATUTORY CONSULTATION</p> <p>Polynt Composites UK Limited (Polynt) have reviewed the information provided with the Second Statutory Consultation but are disappointed to have had no direct engagement with Associated British Ports (ABP) or Air Products Limited (APL) since submission of our response to the First Statutory Consultation on 20 February 2023.</p> <p>We write, therefore, to reiterate our response to the First Statutory Consultation and confirm that our concerns as made out at this time have not been satisfactorily addressed by the revisions to the IGET Project.</p> <p>We are concerned that the inclusion of the southern part of the Long Strip woodland within the DCO will exacerbate the already detrimental impact the IGET Project could have on the health and wellbeing of our employees as a result of the removal of trees in the vicinity of our site. Further, the proposed diversions to existing public rights of way and informal access points are also likely to have adverse impacts on the health and wellbeing of employees, particularly those who live locally.</p>	<p>The Applicant noted this response and responded on 03.07.23 to confirm receipt of the consultation response and to confirm their concerns identified in their response to the first Statutory Consultation in Appendix P.2 of the Consultation Report [TR030008/APP/5.1].</p> <p>A letter was issued to Polynt on 20/07/2023 responding to the key points of the topics raised in their SC1 response and their response to SC2.</p> <p>This included information on:</p> <ul style="list-style-type: none"> • Groundwork investigation and baseline assessments • Contract duration • Alternatives • Traffic and transport impacts during construction and operation • Ground conditions • Waste generation • Flood risk • COMAH • Non COMAH risks to human health • The inclusion of the southern part of Long Strip woodland, and; • Diversion of public rights of way. <p>This is summarised in the SC1 Technical Response Table at Appendix P.2 and is included in full in Appendix Q.3 of the Consultation Report [TR 030008/APP/5.1]</p> <p>The Applicant also engaged directly with the respondent via email, online and in person meetings as outlined in Table 32 of the Consultation Report [TR030008/APP/5.1] to discuss the concerns directly.</p> <p>A follow up meeting to discuss the project is arranged for 21/09/2023.</p>	N/A	N/A	<p>Consultation Report [TR030008/APP/5.1]</p>
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			<p>The speed limit adjustments proposed on Laporte Road were essential given the increased number of vehicle movements identified as being generated during the construction and operational phases of the IGET Project. We do, however, we note that the adjustments have no impact on the likely significant effects presented in the PEI Report.</p> <p>Please acknowledge these representations as Polynt's formal response to the Second Statutory Consultation exercise for the IGET Project.</p> <p>We continue to await effective, direct engagement with ABP and APL and their representatives.</p> <p>Yours faithfully ,</p> <p></p>				
41	ES pipelines	03.07.23 Email	<p>Thank you for your enquiry. This email confirms receipt of your request.</p> <p>We will aim to process your request and provide a response within 10 working days.</p> <p>For plant location enquiries, did you know ESP Utilities group keep an up to date record of our asset location on Line Search https://www.linesearchbeforeudig.co.uk/</p> <p>Searches are free.</p> <p>Regards,</p> <p>ES Pipelines Ltd</p>	<p>The Applicant noted the response.</p> <p>No further correspondence was received.</p>	N/A	N/A	N/A

42	Boyers Industrial Turning services	13.07.23 Email	<p>Att. [REDACTED]</p> <p>Good afternoon.</p> <p>Please can you help with some queries on the proposed Pipeline for Air products/ ABP?</p> <p>My name in [REDACTED] Boyers Industrial Turning Services Limited, Unit 2, Queens Road, Immingham DN40 1QP [REDACTED]</p> <p>I would be pleased to receive a telephone call from your colleague with reference to the above project.</p> <p>Thank you.</p> <p>Kindest Regards</p> <p>[REDACTED]</p> <p>Boyers Industrial Turning Services Limited, [REDACTED]</p>	<p>The Applicant returned the call on 14 July and advised the respondent that Land Agent Gateley Hamer would provide further information.</p> <p>Gateley Hamer have notified the Affected Party that their interests are not within the scheme and as such will remain unaffected by any proposed developments. The Affected Party has been made aware of the works proposed for Kings and Queens Road, but that access will not be restricted to their premises.</p> <p>Gateley Hamer received a response from the Affected Party concerning disruption to utility provisions throughout the construction phase. Gateley Hamer are in the process of drafting a response to the Affected Party.</p>	N/A	N/A	
43	Community	Feedback form (ref. Q2, rows 1; 2; 3; 6; 7; 8; 10)	Respondent satisfied with information provided on the changes to the IGET proposals.	The Applicant noted this response.	N/A	N/A	N/A
44	Community	Feedback form (ref. Q2, rows 12 & 4)	Not satisfied or unsure about information provided on the changes to the IGET proposals.	The Applicant noted this response.	N/A	N/A	N/A
45	Community	Feedback form (ref. Q3, rows 1; 3; 4; 6; 7; 8; 9; 10;	General support for proposals.	The Applicant welcomes the support for the project and notes the response.	N/A	N/A	N/A
46	Community	Feedback form (ref. Q3, rows 2; 5; 12)	Does not support the proposals.	The Applicant notes this response.	N/A	N/A	N/A

47	Community	Feedback form (ref. Q4, rows 1; 3; 4; 6; 7; 8; 9; 10; 11; 12)	General support for changes to the proposals.	The Applicant welcomes the support for the project and notes the response.	N/A	N/A	N/A
48	Community	Feedback form (ref. Q4, row 5;	Does not support the changes to the proposals.	The Applicant notes this response.	N/A	N/A	N/A
49	Community	Feedback form (ref. Q5, row 2)	Respondent noted that none of the changes to the proposals relate to concerns raised by local residents as part of the initial consultation.	<p>As set out in Chapter 2 of the first SoCC (Appendix A.4 of the Consultation Report [TR 030008/APP/5.1]) and second SoCC (Appendix B.4 of the Consultation Report [TR 030008/APP/5.1]), the Applicant is committed to running an open and transparent consultation process with the community and local stakeholders, ensuring that all impacted parties and local people have the opportunity to have their say on the Project.</p> <p>The Project Team has carefully considered all responses received. The changes to the design of the proposals were informed by both design development and feedback received from consultees and stakeholders including local residents during Statutory Consultation.</p> <p>The Consultation Report [TR 030008/APP/5.1] provides further explanation at 4.1.174 and information at 5.1.3 on the reasons for the changes to the project following the first Statutory Consultation.</p> <p>In some instances, feedback received has not resulted in any mitigation or design changes to the Application being required.</p>	N/A	N/A	<p>First SoCC – Appendix A.4 of Consultation Report [TR 030008/APP/5.1]</p> <p>Second SoCC – Appendix B.4 of Consultation Report [TR 030008/APP/5.1]</p>
50	Community	Feedback form (ref. Q5, row 3)	The respondent noted that the project team should be engaging better and faster, utilising digital platforms, social media, emails and local advertising.	As set out in Chapter 2 of the first SoCC (Appendix A.4 of the Consultation Report [TR 030008/APP/5.1]) and second SoCC (Appendix B.4 of the Consultation Report [TR 030008/APP/5.1]) the Applicant is committed to running an open and transparent consultation process with the community and local stakeholders, ensuring that all impacted parties and local people	N/A	N/A	<p>First SoCC – Appendix A.4 of Consultation Report [TR 030008/APP/5.1]</p> <p>Second SoCC – Appendix B.4 of Consultation Report [TR 030008/APP/5.1]</p>

				<p>have the opportunity to have their say on the Project.</p> <p>In order to ensure that both the first Statutory Consultation and second Statutory Consultation were as accessible to as many people as possible, the Applicant used a variety of consultation platforms and events to gather feedback from the local community. This included face-to-face events, a freephone line, postal and email addresses, a dedicated website and public notices in a range of local and national newspapers around both Statutory Consultations.</p>			
51	Community	Feedback form (ref. Q5, row 4)	The respondent stated: <i>We put our trust in all the powers to be in this future project. Hoping it's a benefit to all.</i>	The Applicant notes this response and welcomes the support for the Project.	N/A	N/A	N/A
52	Community	Feedback form (ref. Q5, row 9)	The respondent stated: <i>Yes I am a believer in looking forward and meeting the criteria for improved energy resources which will benefit the people and the environment.</i>	The Applicant notes this response and welcomes the support for the Project.	N/A	N/A	N/A
53	Community	Feedback form (ref. Q6, row 3)	The respondent stated: <i>Why taking so long for a very simple and essential project? Engage with communities with an incentive for cleaner cheaper energy.</i>	<p>The Applicant notes this response and welcomes the support for the Project.</p> <p>As a NSIP there are strict legal requirements around the planning process that take time to complete.</p> <p>As set out in Chapter 2 of the first SoCC (Appendix A.4 of the Consultation Report [TR 030008/APP/5.1]) and second SoCC (Appendix B.4 of the Consultation Report [TR 030008/APP/5.1]), the Applicant is committed to running an open and transparent consultation process with the community and local stakeholders, ensuring that all impacted parties and local people have the opportunity to have their say on the Project.</p>	N/A	N/A	<p>First SoCC – Appendix A.4 of Consultation Report [TR030008/APP/5.1]</p> <p>Second SoCC – Appendix B.4 of Consultation Report [TR030008/APP/5.1]</p>
54	Community	Feedback form (ref. Q6, row 5)	The respondent noted their objection to the proposals and their intention to object to the plans once submitted.	<p>The Applicant notes this response.</p> <p>No further correspondence was received.</p>	N/A	N/A	N/A


55	Community	Feedback form (ref. Q6, row 6)	The respondent stated: <i>Anything to make things greener is a good thing.</i>	The Applicant appreciates the support and notes the response.	N/A	N/A	N/A
56	Community	Feedback form (ref. Q6, row 7)	The respondent requested that the Applicant continues its engagement with the local sea angling community to keep them informed on the project.	The Applicant will continue to keep a dialogue with the local sea angling community as part of ongoing communications around the project. See response 9 above.	N/A	N/A	N/A
57	Community	Feedback form (ref. Q6, row 8)	The respondent stated: <i>No Board maintained watercourses lie within the site boundary however access is required to Board owned land at 519465, 414629. Access required for penstock at 519940, 414977. The Board would like to be consulted if any watercourse is affected whether that be temporary or permanent.</i>	The Applicant has engaged with North Lindsey Drainage Board and a complete record of meetings held can be found in Table 32 of the Consultation Report [TR 030008/APP/5.1]. The Drainage Board also provided a comprehensive technical consultation response which is addressed in Appendix Q.2 of the Consultation Report [TR 030008/APP/5.1].	N/A	N/A	Consultation Report [TR030008/APP/5.1]
58	Community	Feedback form (ref. Q6, row 9)	The respondent noted their support for the project and noted the information provided at the consultation event was clear and concise.	The Applicant appreciates the support and notes the response.	N/A	N/A	N/A
59	Community	Feedback (ref. Q6, row 11)	The respondent requested information on when operational vacancies will be published.	The Project is still in the planning stages however once consented, operational vacancies will be advertised locally closer to the commencement of operation, through the Applicant's website and other appropriate channels.	N/A	N/A	N/A
60	Community	Feedback form (ref. Q6, row 12)	The respondent asked why ABP doesn't do more for local communities and charities.	ABP have a strong presence in the local community, supporting a number of local charities, organisations and initiatives including seven years as supporter of Armed Forces Day in North East Lincolnshire. ABP is also a supporter of Immingham Museum and works closely with the museum on outreach work, as well as supporting local schools and colleges for enrichment and careers activities.	N/A	N/A	N/A


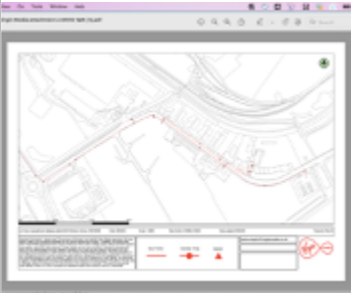
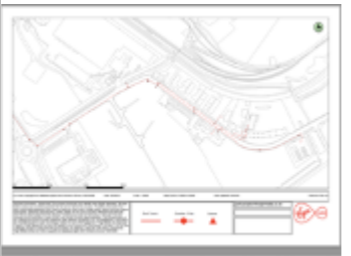
Q.2

Responses relating to matters
addressed in the ES

Please note: In the columns headed Design Change and Additional Mitigation, where we have used 'no' this should not be taken to mean that there have been no design changes or no additional mitigation. In this context, 'no' means that there have been no specific design changes or particular additional mitigation measures included in the project, directly in response to the feedback received from the consultee. In a number of cases mitigation measures that already form part of the project are summarised in the technical responses in the Response column.

	Consultee	Date & method of feedback received	Feedback	Technical response	Design Change?	Mitigation introduced in response to comment	ES chapters referred to
1.	West Lindsey District Council	01.06.23 Email	<p>Dear Sir/Madam</p> <p>Please see attached letter response.</p> <p>Kind Regards</p> <p>██████████</p> <p>Senior Development Management Officer</p> <p>Dear Sir/Madam</p> <p>APPLICATION REFERENCE NO: 146814</p> <p>Guildhall Marshall's Yard Gainsborough, Lincolnshire DN21 2NA Telephone 01427 676676</p> <p>Web www.west-lindsey.gov.uk</p> <p>Your contact for this matter is: ██████████</p> <p>1st June 2023</p> <p>PROPOSAL: Written Enquiry re: Second Statutory Consultation Request</p> <p>LOCATION: Immingham Green Energy Terminal</p> <p>Thank you for your consultation on a proposed application for the installation of an Immingham Green Energy Terminal.</p> <p>West Lindsey District Council in principle supports renewable energy development and the reduction of the local and national carbon footprint.</p> <p>The western edge of the Terminal would be approximately 3 miles to the east of the nearest West Lindsey District boundary. Given the distances it is unlikely that the development would have any</p>	<p>The Applicant has noted and acknowledges West Lindsey District Council (WLDC)'s support for the Project.</p> <p>West Lindsey District is located to the south-west of the Project. The A1173 to the south of the A180 provides the most direct route through West Lindsey to the Project.</p> <p>The traffic generation and distribution is set out within Chapter 11: Traffic and Transport (Section 11.8). As set out in that section and with reference to Table 11-19, all construction HGV traffic is assumed to remain on the M180 which lies to the north of West Lindsey and becomes the A180 and therefore no construction HGVs are predicted to travel through West Lindsey. This would be secured through a requirement - HGV construction routing would be controlled through the CTMP to be approved pursuant to a requirement of the draft DCO [TR030008/APP/2.1].</p> <p>In regard to construction workers, with reference to Table 11-18, 16% of construction workers are assumed to travel along the A1173 south of the A180.</p> <p>Based upon a peak construction workforce of 1,139 (919 on the terrestrial construction and 220 on the marine construction) and assuming that there will be 1.5 workers per car (through the CWTP), this results in a total number of construction worker cars of 759 arriving in the morning and departing in the afternoon per day. Therefore, based upon 16% of this traffic using the A1173 south this results in 123 vehicles per day</p>	No	No	Chapter 11: Traffic & Transport [TR030008/APP/6.2]

			<p>significant material impact on West Lindsey or its residents.</p> <p>West Lindsey's primary consideration would be the impact of the construction, operation and decommissioning phases on the local highway network if traffic was to be directed through parts of West Lindsey. West Lindsey would request that its highway network is considered in any future traffic and transport assessments even if this is to clarify that its highway network would not be utilised. It would be recommended that the Highways Authority at Lincolnshire County Council is consulted for comment.</p> <p>Yours faithfully</p> <p></p> <p>Senior Development Management Officer On behalf of West Lindsey District Council</p> <p>If you want to know more about how we use your data, what your rights are and how to contact us if you have any concerns, please read our privacy notice: www.west-lindsey.gov.uk/planning-privacy</p>	<p>arriving and departing each day via this route, of which (with reference to table 11-18) 39 and 46 would travel in the weekday AM and PM peaks respectively.</p> <p>The above traffic would dissipate across the wider highway network within West Lindsey and is not considered to result in a severe impact.</p> <p>During the operational phase and with reference to Table 11-23 of Chapter 11: Traffic and Transport [TR030008/APP/6.2], there is predicted to be a 8 car trips in each of the weekday AM and PM peak periods travelling along the A1173 south, along with an average of 4 HGVs per hour as a result of the Project, which is not considered to result in a severe traffic impact with West Lindsey.</p> <p>The decommissioning effects of landside traffic and transport are scoped out of the Environmental Impact Assessment based on an agreement on this through the Scoping Opinion (see Table 11-1 of Chapter 11: Traffic and Transport [TR030008/APP/6.2]) and given the commitment to deliver a Decommissioning Environmental Management Plan ("DEMP") which will be secured through a requirement of the draft Development Consent Order [TR030008/APP/2.1].</p>			
2.	Virgin Media	05.06.23 Email	<p>Dear Sir/Madam</p> <p>Thank you for your recent enquiry. I have now completed your search and the results are attached.</p> <p>You will be aware that you have a duty to ensure that no damage results to this equipment as a result of your proposed works. Please note that this apparatus may contain Fibre Optic, Coaxial and/or 240v Power Cables and as such, special care must be taken when excavating this area.</p>	<p>A Utilities Statement [TR030008/APP/7.7] has been prepared for the Project which sets out the existing and new utility requirements for the Project. The Statement lists the existing telecommunications infrastructure that will be protected through protective provisions set out in the draft DCO [TR030008/APP/2.1] and in addition it outlines the telecommunications infrastructure that will be permanently diverted.</p>	No	No	Utilities Statement [TR030008/APP/7.7]

		<p>Should you require Virgin Media Apparatus to be diverted, please contact the diversion team by telephone: Diversionary Team contact number: 0800 408 0088 Option 2.</p> <p>Should your request be in relation to a Residential New Development, Virgin Media would like the opportunity to assist with your diversionary quote and serve your site free of charge, offering your customers the fastest widely available broadband speeds on the market up to 500Mbps.</p> <p>For Commercial New Developments our team can also be reached through the below link, ensuring future businesses to your site are connected to our fibre network.</p> <p>Simply head over to www.virginmedia.com/developer to fill in the enquiry form, and a member of our New Developments team will be in touch within 48 hours.</p> <p>You will also find useful information about additional benefits to you and your site, plus a handy 'developers guide' can be downloaded with detailed installation requirements.</p> <p></p>  	<p>The Applicant will continue to progress discussions with the statutory undertakers post-submission of the Application and will update this Statement during examination to account for any changes in discussions with utilities providers, or changes in how utilities will be treated.</p> <p>Protective provisions are contained in the draft DCO [TR030008/APP/2.1] and will be discussed further with the statutory undertakers.</p>			
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3.	North East Lindsey Drainage Board	14.06.2023 Email	<p>Thank you for the opportunity to comment on the above application. The site is within the North East Lindsey Drainage Board area. The Board maintained Habrough Marsh Drain (8) is on the Northwest of the site.</p> <p>Below are comments on the revisions.</p> <p>Regards [REDACTED]</p> <p>Head of Technical & Engineering Services</p>	<p>The Applicant has responded to each of the comments made by North East Lindsey Drainage Board within ES Chapter 18: Water Use, Water Quality, Coastal Protection, Flood Risk and Drainage [TR030008/APP/6.2]. The points raised are also responded to in the rows below.</p>	Yes	<p>In response to Stat Con 1 (see Appendix P.2 of the Consultation Report [TR030008/APP/5.1]), the project team revised finished elevations and storage solutions on the West Site to ensure that agreed discharge rates can be achieved, introduced as part of Change 3 in the second Statutory Consultation.</p>	<p>Chapter 18: Water Use, Water Quality, Coastal Protection, Flood Risk & Drainage [TR030008/APP/6.2]</p> <p>Appendix 18.A Flood Risk Assessment and Appendix 18.B Drainage Strategy [TR030008/APP/6.4]</p>
	North East Lindsey Drainage Board	14.06.2023 Email	<p>Change No. 3: Routing of pipe-rack & Jetty Access Road in the 'Long Strip' woodland</p> <p>It is essential provision is made to allow for maintenance access adjacent to all watercourses within or adjacent to the site. An unobstructed strip of suitable width should be left adjacent to the watercourse to allow for maintenance be suitable plant. The submitted plants are not clear enough to determine if suitable access has been left.</p>	<p><u>Re Change No 3:</u> The existing small drainage channel that runs along the western edge of the Long Strip woodland within proposed Work No. 2 would be cleared of vegetation and re-lined to ensure its effective drainage function. The available flow area of the channel will be maintained and even improved by the removal of vegetation. An unobstructed strip of land, of suitable width will be left adjacent to the watercourse to allow for maintenance. The Applicant would undertake ongoing maintenance of the drainage channel as set out in the Drainage Strategy, see Appendix 18.B [TR030008/APP/6.4] which will be secured by a requirement in schedule 2 of the draft DCO [TR030008/APP/2.1].</p>	Yes	<p>An unobstructed strip of land, of suitable width will be left adjacent to the watercourse to allow for maintenance.</p> <p>The Applicant would undertake ongoing maintenance of the drainage channel as set out in the Drainage Strategy, see Appendix 18.B [TR030008/APP/6.4].</p>	<p>Chapter 18: Water Use, Water Quality, Coastal Protection, Flood Risk and Drainage [TR030008/APP/6.2]</p>
	North East Lindsey Drainage Board	14.06.2023 Email	<p>Change No. 4: West Site layout, elevations and drainage</p> <p>It is noted land is proposed to be raised from 0.5m to 2.5m, the Board is concerned that any potential land raising within the flood plain (zone 3 on the Environment Agency Flood maps). The residential area of Immingham is within the catchment and loss of flood plain volume is likely to increase flood risk. Also there can be a negative impact of third parties by acting as a dam, diverting surface water flows and locally lifting ground water levels.</p>	<p><u>Re Change No 4:</u> <u>Ground Raising at West Site</u> For the West Site, existing ground elevations range from the highest point of 3.0m AOD at the north-east corner, to 2.0m AOD at the lowest point in the south-west corner. The finished ground level of the West Site, in which Work No. 7 would be constructed, would be approximately 2.5m AOD. The levels are required to ensure the site can drain adequately (see also the Drainage</p>	No	<p>No, aside from the mitigation measures that are outlined within Chapter 18: Water Use, Water Quality, Coastal Protection, Flood Risk and Drainage [TR030008/APP/6.2]</p>	<p>Chapter 2: The Project</p> <p>Chapter 16: Physical Processes</p> <p>Chapter 18: Water Use, Water Quality, Coastal Protection,</p>

			<p>The Board has previously commented on the project directly and to the DCO, these comments below remain valid.</p> <p>The surface water catchment of the site discharges three ways.</p> <ol style="list-style-type: none"> 3. Northwest into the Board maintained Habrough Marsh Drain (8) gravity system. 2. Southwest into the Board maintained Immingham 2 Pumping Station system. 3. Northeast into Stallingborough North Beck. The watercourse is an Environment Agency main river, an Environment Permit (from the Environment Agency) will be required for any works within Byelaw distance and discharge outfall(s). <p>Any surface water discharges into the drainage systems to be attenuated to an agreed rate. As a brown field site the surface water discharge into the Boards drainage systems from any re-development will be expected to be reduced to 70% of the existing 'actual' discharge rate via any discharge points or routes. It is essential a full survey is undertaken to establish the existing surface water drainage system, catchments and current discharge rates. The Board has been contacted directly by the Consultants undertaking the drainage design for the site.</p> <p>Under the terms of the Board's Byelaws, the prior written consent of the Board is required for any proposed temporary or permanent works or structures in, under, over or within the byelaw 9m distance of the top of the bank of a Board maintained watercourse, Habrough Marsh Drain (8).</p> <p>Under the terms of the Land Drainage Act. 1991 the prior written consent of the Board is required for any proposed temporary or permanent works or structures within any ordinary watercourse including infilling or a diversion.</p> <p>An area of concern is the impact off shore. The proposals show new infrastructure in the Humber near to the gravity outfall of Habrough Marsh Drain, there is concern that this will result in siltation which</p>	<p>Strategy, presented in Appendix 18.B [TR030008/APP/6.4]. The finished ground levels for the Project are covered within Chapter 2: The Project [TR030008/APP/6.2].</p> <p>As explained in Section 18.8 of Chapter 18: Water Use, Water Quality, Flood Risk and Drainage [TR030008/APP/6.2] the risk of flooding to the Site is predominantly from tidal sources. The designation of the West Site in tidal Flood Zone 3 on the Environment Agency FMfP does not take in to account the presence of the tidal flood defences. With the defences in place the risk of flooding to the Site is low. The Site is at residual risk of flooding should overtopping or a breach of the flood defences occur. Should a breach or overtopping of the defences occur the South Humber Bank, including the Project, would be inundated. Given the extent of flooding, any increase in flood water level in surrounding areas due to the level increase, is likely to be insignificant.</p> <p>Mapping of fluvial flood extents (as provided in the NELC PFRA (Ref 18-16 of Chapter 18: Water Use, Water Quality, Flood Risk and Drainage [TR030008/APP/6.2]) shows the West Site and the Project overall is predominantly located in fluvial Flood Zone 1 (low risk) with the exception of an area of land to the south of Work No.9 adjacent to the Stallingborough North Beck Drain, which is located in Flood Zone 2. Analysis of the Environment Agency roFSW mapping (Figure 18.3 [TR030008/APP/6.3]) shows only small areas of surface water flooding from low to high risk associated with topographical low spots and constrained to watercourse corridors. Given the location of the Project in an area of low fluvial risk (Flood Zone 1) there would be no loss of floodplain storage and no negative impact on third parties.</p>			<p>Flood Risk and Drainage [TR030008/APP/6.2]</p> <p>Appendix 18.A Flood Risk Assessment</p> <p>Appendix 18.B Drainage Strategy [TR030008/APP/6.4]</p>
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			<p>will impede the discharge. The Flood Risk Assessment should address this and put in place measures to mitigate it.</p> <p>With regard to the land owned by the North East Lindsey Drainage Board a land interest questionnaire was returned on 16th November 2022 . The land is adjacent to Parcel 55 which is the A1173. If the access to the Board's land is affected it is essential the Board is contacted to discuss and agree future access arrangements.</p>	<p><u>Surface Water Discharge</u> Only the East Site contains brownfield land. While the existing drainage infrastructure was identified, there was no clear way to establish the current brownfield discharge rate through measurement due to the time required. During a meeting with the NELIDB, methods of estimating the current discharge rate were discussed and agreed. This resulted in a final discharge rate for the East Site that is reported in the Drainage Strategy and used to develop the proposed drainage solution.</p> <p>The Drainage Strategy (Drainage Strategy presented in Appendix 18.B [TR030008/APP/6.4] includes provision of attenuation storage for surface water over the lifetime of the development and restricts surface water run-off to less than currently drains to the local watercourses so would provide betterment over the current scenario.</p> <p>The Applicant is in discussion with the NELIDB about disapplication of the land drainage consent requirements and any associated consents required by byelaws within the DCO. See Article 3 of the draft DCO [TR030008/APP/2.1].</p> <p><u>Habrough Marsh Drain</u> The Habrough Marsh Drain gravity outfall and the associated intertidal area is considered in Chapter 16: Physical Processes [TR030008/APP/6.2]. The Chapter assesses the impacts of the marine development for both the construction and operation phases of the Project.</p> <p>Chapter 16: Physical Processes [TR030008/APP/6.2] states "<i>Across the wider study area (including the existing berths at Immingham Oil Terminal (IOT), the rest of the intertidal area along the Immingham frontage, the Habrough Marsh Drain and Immingham Sea outfalls, the offshore banks and channels</i></p>			
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				<p>and the wider estuary up- and down-stream), the Project marine facilities have no impact on the existing (baseline) accretion and erosion rates.” Based on this assessment no likely impacts are predicted from the construction and operation of the offshore infrastructure on the function of drains, outfalls etc, therefore any impacts on flood risk onshore are considered unlikely. No additional mitigation measures are required-</p> <p>This is confirmed in the Flood Risk Assessment (“FRA”) presented within Appendix 18.A [TR030008/APP/6.4]</p> <p><u>Access</u> Access to the NELIDB land known as Parcel 55 will not be affected as part of the Proposed Development.</p>			
4.	Environment Agency	19.06.2023 Email	<p>Dear Sir/Madam</p> <p>Immingham Green Energy Terminal - to facilitate the import of bulk liquids including ammonia (for the production of green hydrogen) & import/export of carbon dioxide.</p> <p>Thank you for consulting us on the changes proposed for the Immingham Green Energy Terminal, on 26 May 2023.</p> <p>We have considered the changes along with the Preliminary Environmental Information Report (PEIR) addendum and have the following comments to make on them:</p> <p>Yours faithfully [Redacted]</p>	<p>The Applicant notes the letter from the Environment Agency and has responded in further detail to the comments raised in the feedback provided. Please refer to following rows.</p>	<p>In response to Stat Con 1 (see Appendix P.2 of the Consultation Report [TR030008/APP/5.1]), further design development of access arrangements, in discussions with the Environmental Agency, to enable Environment Agency access to the sea wall (see column left).</p>	<p>In response to Stat Con 1 (see Appendix P.2 of the Consultation Report [TR030008/APP/5.1]), yes, further development of mitigation measures in relation to flood risk, including those detailed in ES Chapter 18: Water Use, Water Quality, Coastal Protection, Flood Risk and Drainage, and The FRA which forms ES Appendix 18.A [TR30008/APP/6.4].</p>	<p>Chapter 18: Water Use, Water Quality, Coastal Protection, Flood Risk and Drainage [TR030008/APP/6.2]</p>

Environment Agency	19.06.2023 Email	<p>1.0 Change 1: Site Boundary Amendments</p> <p>1.1 We welcome the site boundary amendment, which now excludes the permitted Household Waste Site on Queens Road and resolves the issues we previously raised in paragraph 1.3 of our response to the original PEIR.</p> <p>1.2 We note that a permitted power plant remains within the red line boundary (Permit ref: VP3023EZ, at grid reference TA2029014719), although the intended use of this land is not clear. This area was originally labelled as part of the 'corridor for pipeline between East and West Sites' but the current Project Plan shows it to be outside of that area. Plate 6.3 (Page 19) shows the power plant still within the red line boundary but not necessarily an area proposed for development. It would be helpful if the final Environment Statement (ES) could clarify what is intended for this area. It should also contain an assessment of the impact of the development on this power plant, the power plant on King's Road (permit ref: PP3339YQ, at grid reference TA1961714740), and the nearby plasterboard manufacturer (permit ref: JP3531PD at grid reference TA1952915078. The ES should consider if any mitigation will be required to minimise the impacts of the development on adjacent operators. New development should integrate effectively with existing businesses and not place unreasonable restrictions upon them.</p>	<p>The Applicant notes the comment regarding the site boundary amendment which excludes the permitted Household Waste Site on Queens Road.</p> <p>The power plant has since been excluded from the Site Boundary (including the pipeline corridor) and will therefore not be affected by the Project.</p> <p>It is considered that businesses adjacent to the Site Boundary and within the vicinity, are compatible with the operation of the hydrogen processing facility and, save as explained above, will be able to continue to trade during construction, operation and decommissioning.</p> <p>Discussions with any likely affected landowners and occupiers in terms of any implications for the safety planning of their operations have taken place and will be ongoing.</p> <p>An assessment of the impacts to businesses within the vicinity of the Project has been carried out and concluded that there would be no likely significant effects as a result of the Project. This is presented within Chapter 23: Socioeconomics [TR030008/APP/6.2]</p>	Yes	The power plant has since been excluded from the Site Boundary and will therefore not be affected by the Project.	<p>Chapter 2: The Project [TR030008/APP/6.2]</p> <p>Chapter 23: Socioeconomics [TR030008/APP/6.2]</p>
Environment Agency	19.06.2023 Email	<p>2.0 Change 2: Marine Design Changes</p> <p>2.1 Table 7.2 of the PEIR Addendum for Water Quality, Coastal Protection Flood Risk and Drainage states that "The changes in jetty alignment, length, the berth arrangements, and dredging requirements have the potential to increase erosion/deposition rates on the foreshore, tidal water levels and wave heights/velocities which in turn can impact existing features, including existing marine infrastructure, outfalls, estuary banks and channels, and the flood defences". We would welcome further detail on the potential changes to physical processes and impacts and how this affects the Stallingborough North Beck outfall, the foreshore and the standard of protection of flood defences on and off site and any mitigation for this that will be proposed.</p>	<p><u>Re Change No 2</u></p> <p>The Stallingborough North Beck Drain, Habrough Marsh Drain gravity outfall, flood defences and the associated intertidal (foreshore) area is considered in Chapter 16: Physical Processes [TR030008/APP/6.2].</p> <p>Following Change 2, the hydrodynamic modelling was re-run to include the design changes. The Chapter assesses the impacts of the marine development for both the construction and operation phases of the Project. Chapter 16: Physical Processes [TR030008/APP/6.2] states "Across the wider study area (including the existing berths at Immingham Oil Terminal (IOT),</p>	No	No additional mitigation to the measures that are outlined within Chapter 16: Physical Processes [TR030008/APP/6.2]	<p>Chapter 16: Physical Processes [TR030008/APP/6.2]</p>

				<p><i>the rest of the intertidal (foreshore) area along the Immingham frontage, the Habrough Marsh Drain and Immingham Sea outfalls, the offshore banks and channels and the wider estuary up- and down-stream), the Project marine facilities have no impact on the existing (baseline) accretion and erosion rates.”</i></p> <p>Based on this assessment no likely impacts are predicted from the construction and operation of the offshore infrastructure on the function of drains, outfalls etc, therefore any impacts on flood risk onshore are considered unlikely.</p>			
Environment Agency	19.06.2023 Email	3.0 Change 3: Routing of pipe rack & Jetty Access Road in Long Strip woodland 3.1 We have no comments to make on this change.	<p><u>Re Change No 3</u></p> <p>The Environment Agency response to Change 3 is noted and acknowledged.</p>	No	No	N/A	
Environment Agency	19.06.2023 Email	<p>4.0 Change 4: West Site Layout</p> <p>4.1 In the current overall site layout the West Site is not within an area at risk from fluvial flooding from Main Rivers. However, the site may be at risk from local ordinary watercourses for which other risk management authorities, such as the Lead Local Flood Authority or Internal Drainage Board have responsibility. The Flood Risk Assessment should assess the impacts of land raising on the displacement of fluvial flood water and whether any flood plain compensatory storage is required.</p> <p>4.2 As mentioned in the PEIR Addendum, development consent is only sought for these works to be constructed [somewhere] within the relevant works area. Any changes to the location of the West Site could then impact the main river floodplain. Again, if it is likely for this to occur the Flood Risk Assessment should assess the impacts of land raising on displacement of fluvial main river flood</p>	<p><u>Re. Change No 4</u></p> <p>The land in the West Site is being raised from a lowest level of 1.5m AOD to a consistent level of 2.5m AOD. The drainage is planned to capture all flow from the site and limit runoff to a greenfield runoff rate, not just the impermeable parts of the site. By doing this the 1% AEP 1 in 100) event is held on site and the flood risk to surrounding areas is mitigated.</p> <p>As detailed in the FRA, presented within Appendix 18.A [TR030008/APP/6.4], mapping of fluvial flood extents (as provided in the NELC Preliminary Flood Risk Assessment) shows the West Site and the Project overall is predominantly located in fluvial Flood Zone 1 (low risk) with the exception of an area of land to the south of the Temporary Construction</p>	No	No additional mitigation to the measures that are outlined within Chapter 18: Water Use, Water Quality, Flood Risk and Drainage [TR030008/APP/6.2]	<p>Chapter 18: Water Use, Water Quality, Flood Risk and Drainage [TR030008/APP/6.2]</p> <p>Appendix 18.A Flood Risk Assessment [TR030008/APP/6.4]</p>	

			water and whether any flood plain compensatory storage is required.	Area (Work No.9) adjacent to the Stallingborough North Beck Drain. Analysis of the Environment Agency RoFSW mapping (Figure 18.3 [TR030008/APP/6.3]) shows only small areas of surface water flooding from low to high risk associated with topographical low spots and constrained to Ordinary Watercourse corridors. Given the location of the majority of the Project in an area of low fluvial risk (Flood Zone 1) there would be no loss of floodplain storage and no negative impact on third parties. The location of the West Site remains the same as shown in Change 4 design layout.			
Environment Agency	19.06.2023 Email	5.0 Changes 5 & 6 5.1 The Environment Agency has no comments to make in respect of these changes, which are outside of its remit.		The Applicant notes that the Environment Agency has no comments to make with respect to Changes 5 and 6.	N/A	N/A	N/A
Environment Agency	19.06.2023 Email	6.0 Change 7: Public Rights of Way Diversion and removal of other informal access points 6.1 Environment Agency access to the defence of the North site of the jetty must be maintained. We are engaged with Associated British Ports (ABP) and welcome continued pre-application discussions in respect of the works close to and over the existing defences and main rivers. 6.2 The diversion takes the bridleway close to the flood defence assets on Stallingborough North Beck. Appropriate mitigation measures should be put in place to ensure that no access can be gained to the flood defences. We would require a 1m buffer from the landward toe to enable maintenance to be carried out on the flood defences. Sufficient details should be provided to detail these mitigation measures. 6.3 Table 7.2 of the PEIR Addendum for Water Quality, Coastal Protection Flood Risk and Drainage explains that the temporary PRoW diversion may mean that a temporary bridge could be needed over the channel behind the sea wall. We would welcome discussions about this structure as part of our continuing engagement with ABP.		<u>Re Change No 7</u> 6.1 Infrastructure to enable the Environment Agency to have ongoing access to the sea wall for flood defence monitoring and maintenance activities will be provided. This currently comprises a ramp off the Jetty Access Road. ABP recognise the importance of the Environment Agency's continued access to the zone between the IGET jetty and the APT jetty. Access for visual inspections and maintenance works will be provided through an appropriate mechanism. This mechanism will be suitable for the maintenance and emergency vehicles that have been agreed with the Environment Agency during pre-application engagement. 6.2 Appropriate measures will be put in place to prevent pedestrian access to the flood defences. Correspondence from the Environment Agency has confirmed that a	Yes - Correspondence from the Environment Agency dated 23 August 2023 has confirmed that the requirement of a 1m buffer for maintenance purposes is no longer required.	Appropriate measures will be put in place to prevent pedestrian access to the flood defences.	Chapter 18: Water Use, Water Quality, Flood Risk and Drainage [TR030008/APP/6.2]

				1 m buffer for maintenance purposes is no longer required. 6.3 ABP have been actively engaging with the Environment Agency during pre-application and design drawings have been provided at each meeting.			
Environment Agency	19.06.2023 Email	7.0 Change 8 7.1 The Environment Agency has no comments to make in respect of this change, which is outside of its remit. Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me at the number below.	The Applicant notes that the Environment Agency has no comments and acknowledges this feedback.	N/A	N/A	N/A	
Environment Agency	25.08.2023 Email	Immingham Green Energy Terminal - Review of Draft Flood Risk Assessment We have the following comments to make on this, which we hope you will find useful. We hope you will find the above comments useful in finalising your FRA for submission but should you require any additional information, or wish to discuss these matters further, please contact either [REDACTED] Yours faithfully [REDACTED]	The Applicant notes the Environment Agency's comments and has responded in the rows below.	N/A	N/A	Chapter 18 Water Use, Water Quality, Flood Risk and Drainage [TR030008/APP /6.2]	
Environment Agency	25.08.2023 Email	Section 1.3: Data Sources Throughout the document reference is made to the 2011 North East Lincolnshire Strategic Flood Risk Assessment (SFRA); these references should be revised to reflect the updated 2022 SFRA.	Section 1.3 - Noted. This has been updated throughout the FRA , presented within Appendix 18.A [TR030008/APP/6.4]	No	No	Chapter 18: Water Use, Water Quality, Flood Risk and Drainage [TR030008/APP /6.2] Appendix 18.A: Flood Risk Assessment [TR030008/APP /6.4]	

Environment Agency	25.08.2023 Email	<p>Section 2.7: Hydrology and Flood Risk Management Infrastructure Surface Watercourses: paragraph 2.7.1, 2nd bullet point - the Main River that lies to the east and south of the site boundary flowing from east to west is the Stallingborough North Beck.</p> <p>We require an 8m clear strip from the landward toe of the fluvial defence to allow for maintenance and access. Any compound or storage would need to be further than 8m from the landward toe.</p> <p>There is a small area of Work No. 9 which is covered by the 0.1% defended and undefended fluvial extents from the Stallingborough North Beck. We request that nothing is located within this area of the fluvial floodplain to allow storage in case of high flows on the Stallingborough North Beck. Maps may have already been provided to show this area but if these are required, please let us know and we will provide them.</p>	<p>Section 2.7 of the FRA, at Appendix 18.A [TR030008/APP/6.4], has been updated to state “Environment Agency Main River: Stallingborough North Beck Drain (referred to as ‘North Beck Drain’ throughout the FRA) lies to the east and south of the Site Boundary flowing from east to west”.</p> <p>Section 6.10.1 of the FRA, at Appendix 18.A [TR030008/APP/6.4], has been added to reflect this requirement for 8m clear strip from the landward toe.</p> <p>Section 5.4.6 of the FRA, at Appendix 18.A [TR030008/APP/6.4], has been updated to reflect this information to confirm that during the construction phase no temporary buildings, plant or materials will be located within this small area of fluvial floodplain to allow storage of flood water should high flows occur on the North Beck.</p> <p>The requirement to undertake the project in accordance with the FRA is secured by a requirement in schedule 2 of the draft DCO [TR030008/APP/7.7]</p> <p>The additional mapping has been requested for reference from the Environment Agency.</p>	No	No	<p>Chapter 18: Water Use, Water Quality, Flood Risk and Drainage [TR030008/APP/6.2]</p> <p>Appendix 18.A: Flood Risk Assessment [TR030008/APP/6.4]</p> <p>Draft DCO [TR030008/APP/7.7]</p>
Environment Agency	25.08.2023 Email	<p>Section 3.2: Development and Flood Risk Vulnerability Paragraph 3.2.21 - we support the intention to shut down the facility during periods when there is a flood warning in place. We also welcome the confirmation that the site can be shut down in situ or remotely.</p>	<p>The Applicant notes and acknowledges this comment.</p>	No	No	<p>Chapter 18: Water Use, Water Quality, Flood Risk and Drainage [TR030008/APP/6.2]</p> <p>Appendix 18.A: Flood Risk Assessment [TR030008/APP/6.4]</p>

Environment Agency	25.08.2023	Email	<p>Section 3.4: North East Lincolnshire Strategic Flood Risk Assessment</p> <p>Paragraph 3.4.11, 5th bullet point - we do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. This paragraph should be updated to reflect that an appropriate flood warning and evacuation plan will need to be submitted to and approved by North East Lincolnshire Council.</p>	<p>Paragraph 3.4.11 5th Bullet Point in the FRA, at Appendix 18.A [TR030008/APP/6.4], has been amended to reflect the need for an appropriate flood warning and evacuation plan which will need to be submitted to and approved by NELC.</p>	No	No	<p>Chapter 18: Water Use, Water Quality, Flood Risk and Drainage [TR030008/APP/6.2]</p> <p>Appendix 18.A: Flood Risk Assessment [TR030008/APP/6.4]</p> <p>Requirement 13 – Flood risk assessment of the draft Development Consent Order [TR030008/APP/2.1]</p>
Environment Agency	25.08.2023	Email	<p>Section 4.4: Fluvial Sources</p> <p>Paragraph 4.4.8 - an assessment of the residual risk of a breach in the fluvial defences should be made in this FRA, particularly in relation to the temporary construction area (Work No. 9). It has been noted that the modelled flood levels for the Stallingborough North Beck in Table 4-5 show the wrong levels for the 1 in 1000 (0.1%) AEP. This appears to be an error in the model outputs that has since been rectified. A new table with updated levels can be found below, which will allow a more accurate assessment of the residual risk from a breach of the fluvial defences to be made.</p>	<p>Table 4.5 in the FRA at Appendix 18.A [TR030008/APP/6.4], has been updated to present the correct 0.1% AEP flood water levels provided by the Environment Agency.</p> <p>The assessment of residual risk from a breach in the fluvial flood defences is provided in Section 4.4 of the FRA at Appendix 18.A [TR030008/APP/6.4].</p>	No	No	<p>Chapter 18: Water Use, Water Quality, Flood Risk and Drainage [TR030008/APP/6.2]</p> <p>Appendix 18.A: Flood Risk Assessment [TR030008/APP/6.4]</p>
Environment Agency	25.08.2023	Email	<p>Section 5: Impacts of the Development on Flood Risk Paragraph 5.2.5 states that there will be a 'small' impact on "the adjacent foreshore areas fronting the Project site, which include a number of outfalls, including the Habrough Marsh Drain". However, previous paragraphs indicate that Chapter 16: Physical Processes [TR030008/APP/6.2] concludes that there will be no likely impact on existing accretion rates. Could this be clarified, please? Any increase in sedimentation to the Stallingborough North Beck Outfall and the Habrough</p>	<p>Paragraph 5.2.5 has been amended to refer to conclusions in Chapter 16: Physical Processes [TR030008/APP/6.2].</p> <p>Paragraphs 5.3.2 and 5.3.3 in the FRA, Appendix 18.A [TR030008/APP/6.4], have been amended for clarity.</p> <p>The FRA and the summary provided below at Section 18.8 of this chapter concludes that given the presence of the</p>	No	No	<p>Chapter 16: Physical Processes [TR030008/APP/6.2].</p> <p>Chapter 18: Water Use, Water Quality, Flood Risk and Drainage</p>

			<p>Marsh Drain Outfall would require mitigation to ensure flow is not affected.</p> <p>Paragraphs 5.3.2 and 5.3.3 appear to contradict each other – could you please correct them as appropriate?</p> <p>Paragraph 5.3.4 – we note that reference was made in the Preliminary Environmental Information Report (PEIR) addendum for land raising to the West Site but not the East Site. We require a full assessment of land raising and the potential impacts to third parties from tidal sources. This could entail rerunning the individual hazard mapping breach to show where the displaced flood water would go and the impacts of this.</p> <p>In the current overall site layout, the West Site is not within an area at risk from fluvial flooding from the Main Rivers. However, the site may be at risk from local ordinary watercourses for which other risk management authorities, such as the Lead Local Flood Authority or Internal Drainage Board have responsibility. The FRA should assess the impacts of land raising on the displacement of flood water from non-Main River sources and whether any floodplain compensatory storage is required. The FRA has currently only assessed the floodplain compensation from Main River flooding.</p>	<p>tidal flood defences, which would be raised by the Environment Agency in line with flood management plan proposals in order to maintain the standard of protection along the Humber Estuary in this area, the Project is considered to be at low risk of tidal flooding. It is unlikely, given the extent and depth of flooding along the South Humber Bank should a breach occur, that the Project would increase the risk of flooding off site to surrounding land over its lifetime as these areas would be flooded to the same depth as the Site. Any increase in flood water level is likely to be insignificant.</p> <p>As detailed in the FRA, appended as Appendix 18.A Flood Risk Assessment [TR030008/APP/6.4], mapping of fluvial flood extents (as provided in the NELC Preliminary Flood Risk Assessment) shows the West Site and the Project overall is predominantly located in fluvial Flood Zone 1 (low risk) with the exception of an area of land to the south of the Temporary Construction Area (Work No.9) adjacent to the Stallingborough North Beck Drain.</p> <p>Analysis of the Environment Agency RoFSW mapping (Figure 18.3 [TR030008/APP/6.3]) shows only small areas of surface water flooding from low to high risk associated with topographical low spots and constrained to Ordinary Watercourse corridors. Given the location of the Project in an area of low fluvial risk (Flood Zone 1) there would be no loss of floodplain storage and no negative impact on third parties.</p>			<p>[TR030008/APP/6.2]</p> <p>Appendix 18.A: Flood Risk Assessment [TR030008/APP/6.4]</p>
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		<p>25.08.2023</p> <p>Email</p>	<p>Section 6: Mitigation of Future and Residual Flood Risks and Off-Site Impacts</p> <p>Paragraph 6.3.1 - we support the inclusion of the flood resilience and resistance mitigation measures included in this paragraph.</p> <p>Paragraph 6.6.2 - we also support the use of an area of safe refuge. However, it is worth noting that the flood refuge platform would only serve as an area of safe refuge for the control room building itself and its immediate vicinity. The occupants of the rest of the site could have to walk through deep flood water to reach the control room building, which could pose a risk to life. Adding additional areas of safe refuge across the site would provide more options for staff if safe evacuation couldn't be achieved.</p> <p>Paragraph 6.9.3 - this suggests that the existing flood wall will be extended so the existing wall will remain in place. We are of the understanding that the wall will be replaced as it could be difficult to raise the existing wall. Therefore, a secondary containment may be required for the duration of the wall replacement.</p> <p>Paragraph 6.9.5 - the most recent drawings seen by the Environment Agency show a pile through the slope of the embankment. This should be updated in the FRA with the mitigation that the embankment will be monitored and if there is any structural movement or damage to the embankment the damage will be rectified, and we must be notified.</p> <p>Paragraph 6.9.6 - we would like to see a contingency plan for the construction of the new flood wall as part of the Development Consent Order submission. There should be a form of continuity of defence at all times to ensure that flood risk is managed throughout.</p>	<p>Noted. Areas of safe refuge are included at the control room building and Toxic Safe Haven building on the West Site and at the control room building on the East Site.</p> <p>The relevant sections of the FRA, at Appendix 18.A [TR030008/APP/6.4], have been updated to reflect the replacement of the section of flood defence wall underneath and in proximity to the jetty access road/piperack as it crosses the flood defence. It is noted that these works may require a secondary containment for the duration of the wall replacement (Section 6.9 of the FRA, at Appendix 18.A [TR030008/APP/6.4],</p> <p>The contractor will be required to provide a deployable or temporary flood defence works method, approved by the Environment Agency, prior to the commencement of the works, or through structuring the works in such a way that the existing defence wall can remain in situ until the new structure is completed (Section 6.9 of the FRA, at Appendix 18.A [TR030008/APP/6.4],</p> <p>Paragraph 6.9.4 & 6.9.5 of the FRA, at Appendix 18.A [TR030008/APP/6.4], have been amended to reflect the current location of the piling in relation to the embankment and the monitoring/survey required by the Environment Agency has been outlined.</p> <p>Text in Section 6.9 of the FRA, Appendix 18.A [TR030008/APP/6.4], has been amended to state "On the landward side, temporary works and contingency measures will be put in place, as necessary, for the construction of the proposed ramps and new section of flood defence to ensure the continuity of the flood defence throughout the works. The contractor will be required to provide a contingency plan for deployable or temporary flood defence works methods, approved by the Environment Agency,</p>	<p>Yes</p>	<p>The contractor will be required to provide a deployable or temporary flood defence works method, approved by the Environment Agency, prior to the commencement of the works, or through structuring the works in such a way that the existing defence wall can remain in-situ until the new structure is completed.</p> <p>The contractor will be required to provide a contingency plan for deployable or temporary flood defence works methods, approved by the Environment Agency, prior to the commencement of the works, or through structuring the works in such a way that the existing defence wall can remain in-situ until the new structure is completed.</p>	<p>Chapter 18: Water Use, Water Quality, Flood Risk and Drainage [TR030008/APP/6.2]</p> <p>Appendix 18.A: Flood Risk Assessment [TR030008/APP/6.4]</p>
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				<p>prior to the commencement of the works, or through structuring the works in such a way that the existing defence wall can remain in-situ until the new structure is completed”</p> <p>The requirement to undertake the project in accordance with the FRA is secured by a requirement in schedule 2 of the draft DCO [TR030008/APP/7.7]</p>			
5.	Network Rail	27.06.23 Email	<p>I refer to your letter of 24 May 2023 in respect of the ‘second statutory consultation’ under Section 42 of the Planning Act 2008 on the Immingham Green Energy Terminal development on land at the Port of Immingham.</p> <p>Network Rail is a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates, maintains and develops the main rail network. Network Rail aims to protect and enhance the railway infrastructure therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail’s specific land interests, will need to be carefully considered.</p> <p>Network Rail also reserves the right to make additional comments once we have evaluated the proposals in more detail.</p> <p>Summary</p> <p>Network Rail would be grateful if the comments and points detailed within this consultation response are considered by Immingham Green Energy Terminal Development.</p> <p>Network Rail would welcome further discussion and negotiation with Immingham Green Energy Terminal Development/Associated British Ports in relation to the proposed development as required going forward. If you have any questions or require more information in relation to the above please let me know.</p> <p>Kind regards [REDACTED]</p>	<p>Network Rail’s response to the second Statutory Consultation was a resubmitted copy of its response to the first Statutory Consultation.</p> <p>As a result, the following technical response can also be viewed in the first Statutory Consultation technical response table (Appendix P.2 of the Consultation Report [TR030008/APP/5.1]).</p>	No	No	Chapter 11: Traffic and Transport [TR030008/APP/6.2]

	Network Rail	27.06.23 Email	<p>In respect of works adjacent to the operational railway boundary including the compound, we will be keen to ensure that there are sufficient boundary treatments in place (appropriate fencing and Armco barriers) to prevent trespass and vehicle incursion onto the operational railway line.</p> <p>Any lighting on the site should be designed so that it does not glare/distraction to train drivers. The routing of construction traffic (including HGVs/abnormal loads) and subsequent operational site traffic will require further consideration and discussion with Network Rail if such routes take in railway assets such as bridges (with low clearance/weight restrictions) and railway level crossings. At this stage the information supplied is not sufficiently detailed to fully assess potential impacts of the scheme on the railway and further information will be required to properly respond on the likely impacts of the proposed scheme.</p> <p>In order to ensure that the scheme does not impact on operational railway safety, the developer must liaise closely with Network Rail Asset Protection to ensure that the haulage routes into the site are appropriate, and the design and construction of the new facility and associated infrastructure will not have an adverse impact on railway operations. It is therefore assumed that a condition of the Order would be that detailed specifications of the proposed scheme and traffic management plans are to be provided and agreed in writing before development can commence.</p>	<p><u>Boundary Treatments</u> With regards to boundary treatments, the Project will be designed to the latest standards to reduce risk of incursion onto the rail network, whilst security fencing designed to adhere to all required British Standards will surround the scheme.</p> <p>The hydrogen production facility is closest to the rail line. The lighting has not been designed in detail for the East Site or West Site as yet. The lighting assessment acknowledges that the design strategy will need to consider impacts to train drivers and avoid creating glare or distraction to train drivers as part of design development.</p> <p><u>Traffic management</u> The Project's main interaction with railway infrastructure is the bridge on Queens Road over the railway line, which is not signed as having any traffic / weight restrictions. Therefore, use by HGVs will not require any restrictions to be put in place.</p> <p>The Applicant has engaged with Network Rail Asset Protection and has developed an Outline Construction Traffic Management Plan (OCTMP) [TR030008/APP/6.7], that sets out measures to control construction traffic from the commencement of construction and includes site construction, commissioning and reinstatement of the Temporary Construction Areas.</p> <p>A final detailed Construction Traffic Management Plan (CTMP) will be produced post consent, prior to the commencement of construction, and will be in line with the details set out in the OCTMP.</p>	No	Lighting will be confirmed based on final site layout and requirements	<p>Lighting Assessment Appendix 2.B [TR030008/APP/6.4]</p> <p>Chapter 11: Traffic and Transport [TR030008/APP/6.2]</p> <p>Outline Construction Traffic Management Plan [TR030008/APP/6.7]</p>
6.	Natural England	28.06.23 Email	<p>Dear Sirs,</p> <p>Please see the attached NE response to the second S42 consultation. If you have any questions in relation to this response please direct them to consultations@naturalengland.org.uk</p>	<p>Technical responses to Natural England's first Statutory Consultation feedback can be found in the first Statutory Consultation technical response table</p>	The jetty design process has continued to ensure the impacts on the marine environment, and in	Mitigation measures have been developed to reduce potential disturbance effects to birds, fish and marine mammals.	<p>Chapter 2: The Project</p> <p>Chapter 8: Nature Conservation</p>

			<p>Regards</p> <p>James Dear Sirs,</p> <p>Planning consultation: SECTION 42(1)(a), (aa) and (b) AND SECTION 43 OF THE PLANNING ACT 2008 (the “2008 Act”)</p> <p>REGULATION 13 OF THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017</p> <p>REGULATION 3 and SCHEDULE 1 OF THE INFRASTRUCTURE PLANNING (APPLICATIONS: PRESCRIBED FORMS AND PROCEDURE) REGULATIONS 2009 (the “2009 Regulations”)</p> <p>Thank you for your consultation on the above dated 25 May 2023, however we note that the consultation period started 24 May 2023.</p> <p>We would kindly ask the team to incorporate better consultation methods in their approach to statutory consultations. Natural England as a statutory consultee have to manage high casework loads due to increases in development proposals in the Yorkshire and Northern Lincolnshire area, particularly developments around the Humber Estuary.</p> <p>Therefore in a more collaborative approach and to enable forward planning we ask your team to give Natural England better foresight of up and coming consultation periods. We would also like to remind you of the undefined scope contract (UDS-A008028) that is in place whereby Natural England can prioritise advice to inform further statutory consultation prior to DCO submission.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Internationally and nationally designated sites</p>	<p>(Appendix P.2 of the Consultation Report [TR030008/APP/5.1]).</p> <p>The project team has held a number of meetings with Natural England to discuss the Project and the consultation periods. No further rounds of statutory consultation have been undertaken, since this consultation response was received but Natural England’s comments have been noted</p> <p>The assessment provided in Chapter 9: Nature Conservation (Marine Ecology) (Section 9.8) and Section 10.8 of Chapter 10: Ornithology of the ES [TR030008/APP/6.2] consider potential effects from dredging and marine piling based on the revised Project design.</p> <p>A Shadow HRA has been produced [TR030008/APP/7.6] which considers potential effects on the Humber Estuary SAC, SPA and Ramsar site. Where Likely Significant Effects (“LSEs”) were identified at the screening stage of HRA, the relevant impact pathways were taken forward to stage 2 Appropriate Assessment.</p> <p>Marine ecology features of Humber Estuary SSSI are considered in Section 9.8 and ornithology features of the SSSI in Section 10.8 of Chapter 10: Ornithology of the ES. Potential effects on the North Killingholme Haven Pits SSSI are considered in Section 10.8 of Chapter 10: Ornithology of the ES [TR030008/APP/6.2].</p> <p>The maximum and where relevant minimum parameters for relevant aspects of the submission design are detailed in Chapter 2: The Project [TR030008/APP/6.2]</p> <p>The proposed area of woodland planting (as referred to in the Outline Woodland Compensation Strategy [TR030008/APP/6.8]) does not provide supporting habitat to Humber Estuary SPA bird populations.</p>	<p>particular the inter-tidal mudflats, have been minimised as far as possible. This includes consideration of the alignment of the jetty and the berth pocket.</p> <p>Work number 2 (jetty access road, pipe racks, etc.) has been minimised to minimize the loss of woodland from Long Strip Woodland Tree Preservation Order (TPO).</p>	<p>An Outline Woodland Compensation Strategy [TR030008/APP/6.8] has been developed which will deliver enhancement of retained woodland and compensatory woodland planting, in accordance with NELC policy.</p> <p>Approval of the final woodland compensation strategy and compliance with it is secured by a requirement of the draft DCO.</p>	<p>(Terrestrial Ecology),</p> <p>Chapter 9: Nature Conservation (Marine) and</p> <p>Chapter 10: Ornithology [TR030008/APP/6.2]</p>
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		<p>berths decrease from two to just a single berth. Although we welcome these changes and anticipate that the downscaling of infrastructure may have a beneficial effect in terms of reducing the environmental impact on the site, Natural England would need to review the new maximum parameters for all aspects of the new design along with the activities in the construction phase, i.e., updated changes in total dredge volume and number of piles required, so that the correct worst case scenario can be assessed. In addition, we note that the updated layout will be assessed using hydrodynamic modelling to predict the magnitude and extent of changes in the Environmental Statement.</p> <p>Natural England highlights that the area of woodland proposed to be removed is priority habitat (deciduous woodland) and therefore support the commitment from the applicant to submit a 'Woodland compensation strategy' as part of the DCO, if there are no other options that avoid works within this area. Natural England would advise that prospective tree planting sites in the local area should be assessed to ensure that there is no conflict with areas that provide supporting habitat to Humber Estuary SPA bird populations.</p> <p>1 Listed or proposed Wetlands of International Importance under the Ramsar Convention (Ramsar) sites are protected as a matter of Government policy. Section 118 of the National Planning Policy Framework applies the same protection measures as those in place for European sites</p> <p>Should the proposal change whereby further environmental impact is likely to occur, please reconsult us again or alternatively the applicant is reminded of the undefined scope DAS contract whereby advice can be sought prior to DCO submission.</p> <p>Yours sincerely</p> <p>Planning Lead adviser Yorkshire and Northern Lincolnshire area team</p>				
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Natural England	28.06.23 Email	Change No. 1 - Site Boundary Amendments Natural England notes the changes to the site boundary and commends the applicant in their effort to reduce the overall footprint of impact. We welcome that Table 7.2 sets out that “the changes to the site boundary introduce areas that require additional survey to support the terrestrial ecology assessment”.	The applicant notes and acknowledges Natural England’s commendation.	No	No	N/A
Natural England	28.06.23 Email	Change No. 2 - Marine Design Changes: Jetty Alignment, Length, Berthing Arrangement and Dredging Requirements Natural England acknowledges the efforts made to reduce the project footprint, specifically the re-design of the jetty structure, which will see the number of berths decrease from two to just a single berth. Although we welcome these changes and anticipate that the downscaling of infrastructure may have a beneficial effect in terms of reducing the environmental impact on the site, Natural England would need to review the new maximum parameters for all aspects of the new design along with the activities in the construction phase, i.e., updated changes in total dredge volume and number of piles required, so that the correct worst case scenario can be assessed. In addition, we note that the updated layout will be assessed using hydrodynamic modelling to predict the magnitude and extent of changes in the Environmental Statement.	The maximum and where relevant minimum parameters for relevant aspects of the submission design are detailed in Chapter 2: The Project [TR030008/APP/6.2]	No	No	Chapter 2: The Project [TR030008/APP/6.2]
Natural England	28.06.23 Email	Change No. 3 - Routing of pipe rack & Jetty Access Road in Long Strip woodland Natural England highlights the advice in our previous response (dated 16th March) ‘tree works are proposed in Long Strip plantation, an assessment is needed to explain whether these works will impact on birds using the adjacent fields (if this field is still being used by birds during the tree works)’.	<u>Change No 3</u> Ornithology surveys have concluded that the land adjacent to Long Strip plantation (Work No. 9) is not functionally linked to the Humber Estuary SPA/ Ramsar (see ES Chapter 10: Ornithology [TR030008/APP/6.2]). A Woodland Compensation Strategy has been drafted [TR030008/APP/6.8] to secure compensation for the loss of woodland habitat; it is a requirement of the DCO that this is approved by NELC in consultation with NE prior to any clearance of trees or other vegetation within Long Strip forming part of Work No 2 and that part of Work No. 1 above mean high water springs.	Work number 2 (jetty access road, pipe racks, etc.) has been optimised to minimise the loss of woodland from Long Strip Woodland Tree Preservation Order (TPO).	An Outline Woodland Compensation Strategy has been developed which will deliver compensatory woodland planting, in accordance with NELC policy (Outline Woodland Compensation Strategy [TR030008/APP/6.8]). Approval of the final woodland compensation strategy and compliance with it is secured by a requirement of the draft DCO [TR030008/APP/2.1] .	Chapter 8: Nature Conservation (Terrestrial Ecology) Chapter 21: Ground Conditions and Land Quality [TR030008/APP/6.2] Outline Woodland Compensation Strategy [TR030008/APP/6.8] .

Natural England	28.06.23 Email	Change No. 4: West Site layout, elevations and drainage Natural England has no comments on this change.	<u>Change No 4</u> Noted.	No	No	N/A
Natural England	28.06.23 Email	Change No. 5 - Construction Vehicle Numbers Natural England advised in our previous response that vehicle movement numbers, despite being below the AADT threshold for HGV should be considered in the HRA. Natural England notes the increase in HGV vehicle movements and maintains our previous advice.	Noted. Roads that experience an increase in flow due to construction traffic are not located within 200m of a nationally or internationally designated nature conservation site. This pathway is therefore screened out in the HRA [TR030008/APP/7.9], in accordance with the standard guidance for undertaking air quality assessments on designated sites.	No	No	Chapter 6: Air Quality [TR030008/APP/6.2] Shadow Habitats Regulations Assessment [TR030008/APP/7.6]
Natural England	28.06.23 Email	Change No. 6 – Permanent Adjustment to Speed Limits Natural England have no comments on this change.	The Applicant notes that Natural England have no comments on this point.	No	No	Chapter 6: Air Quality [TR030008/APP/6.2]
Natural England	28.06.23 Email	Change No. 7 - Public Rights of Way Diversion (Public Bridleway 36) and stopping up of any informal access in two areas Natural England welcomes that any potential mitigation measures required in respect of water voles or otters will be reported in the ES.	Water vole is confirmed as present within one ditch within the Proposed Development boundary (see Appendix 8.D [TR030008/APP/6.4]). Displacement works from bankside habitat in Ditch 5 (within Work No 1) will be undertaken under a Class Licence approach, under the supervision of an ecologist registered to use a Natural England Class Licence for water vole (see Section 8.9 of Chapter 8: Nature Conservation (Terrestrial Ecology)). The large ditch at the base of the flood embankment (within Work No. 1) has the potential to provide foraging habitat for otter (particularly given its proximity and connectivity to the estuary) although no signs of otter were recorded during a survey undertaken in October 2022.	Yes	A draft Water Vole Precautionary Working Method Statement has been prepared for clearance of bankside habitats on Ditch 5 (within Work No. 1) under a Natural England Class Licence and forms an appendix to the Outline CEMP [TR030008/APP/6.5]. Approval of the CEMP and compliance with it is secured by a requirement of the draft DCO [TR030008/APP/2.1].	Chapter 8: Nature Conservation (Terrestrial Ecology) [TR030008/APP/6.2]
Natural England	28.06.23 Email	Change No. 8 - Temporary Removal of Kings Road Street Furniture and Overhead Line Works Natural England have no comments on this change.	<u>Change No 8</u> This comment has been noted by the Applicant.	No	No	N/A

7.	Marine Management Organisation	29.06.2023 Email	<p>To Whom it may concern,</p> <p>Please find attached, the Marine Management Organisation, consultation response to the 'Supplementary Preliminary Environmental Information Report' submitted by the project. I would be grateful if you could confirm receipt of this document.</p> <p>If there is any issues, please contact the case team directly.</p> <p>Kind Regards,</p> <p>Immingham Green Energy Terminal Project Supplementary Preliminary Environmental Information Report (PEIR consultation – Section 42 Planning Act 2008)</p> <p>Thank you for your email dated 25 May 2022, notifying the Marine Management Organisation (the "MMO") that the supplementary statutory consultation period for the Immingham Green Energy Terminal ("IGET") project would begin 24 May 2023 and end 30 June 2023.</p> <p>You have previously informed the MMO of Associated British Ports' intention to submit an application for a Development Consent Order (DCO) under the Planning Act 2008 (the "2008 Act") for the proposed Project, which entails a new liquid bulk important terminal and associated processing facility to deliver a green hydrogen production facility.</p> <p>The MMO's role in Nationally Significant Infrastructure Projects</p> <p>The MMO was established by the Marine and Coastal Access Act 2009 (the "2009 Act") to make a contribution to sustainable development in the marine area and to promote clean, healthy, safe, productive and biologically diverse oceans and seas.</p> <p>The responsibilities of the MMO include the licensing of construction works, deposits and removals in English inshore and offshore waters and for Welsh and Northern Ireland offshore waters by way of a marine licence¹. Inshore waters include any area which is submerged at mean high water spring ("MHWS") tide. They also include the waters of every</p>	<p>Technical responses to the MMO's first Statutory Consultation feedback can be found in the first Statutory Consultation technical response table (Appendix P.2 of the Consultation Report [TR030008/APP/5.1]).</p> <p>The Applicant notes and acknowledges the MMOs comments regarding their role as a prescribed consultee under the 2008 Act and their future involvement in commenting and providing advice on the Project</p>	<p>Coastal Processes / Benthic Ecology</p> <p>The jetty design has been further optimized during the period following the second Statutory Consultation to ensure the impacts on the marine environment, and in particular the inter-tidal mudflats, have been minimized as far as possible.</p> <p>The parameters for project design are set out in Chapter 2: The Project [TR030008/APP/6.2]</p>	<p>Underwater noise</p> <p>Mitigation measures have been developed which will be secured in the Deemed Marine Licence ("DML") to reduce potential effects arising from underwater noise including:</p> <ul style="list-style-type: none"> • The application of soft start, • vibro piling where possible; and • Seasonal, nighttime restrictions. <p>Best practice guidance has been developed on how to manage marine biosecurity risks and invasive non-native species (INNS) at sites and when undertaking activities through the preparation and implementation of biosecurity plans (Cook et al., 2014). This has been used to develop measures that are w set out in the oCEMP and will be followed during the dredging process and secured by conditions on the DML requiring compliance with a detailed CEMP approved by the MMO:</p> <ul style="list-style-type: none"> • 'Check, Clean and Dry' method: Following the 'Check, Clean and Dry' method, prior to 	<p>Chapter 9: Nature Conservation (Marine Ecology)</p> <p>Chapter 2: The Project [TR030008/APP/6.2]</p>
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		<p>Initially, the terminal would be used for the import and export of green ammonia to be converted to green hydrogen. To facilitate this, a hydrogen production facility, comprising associated ammonia handling equipment, storage and processing units would be constructed as part of the project. It is anticipated that up to 300 MW of hydrogen per annum would be produced, which is estimated to meet up to 3% of the Government's hydrogen production capacity target.</p> <p>The MMO has reviewed the consultation documents that have been available online (https://imtinghamget.co.uk/) since 24 May 2023 in consultation with our scientific advisors at the Centre for Environment, Fisheries and Aquaculture (Cefas) and sets out our follow up comments below:</p> <p>The MMO reserves the right to make further comments on the Project throughout the pre-application process and may modify its present advice or opinion in view of any additional information that may come to our attention.</p> <p>² Section 149A of the 2008 Act ³ https://www.gov.uk/planning-development/marine-licences ⁴ http://infrastructure.planningportal.gov.uk/wp-content/uploads/2013/04/Advice-note-11-v2.pdf</p> <p>Comments on the Immingham Green Energy Terminal Supplementary Statutory Consultation Report</p> <p>Conclusion</p> <p>The MMO welcomes the progress Associated British Ports has made to date to assess the environmental impacts of the Immingham Green Energy Terminal Project. Comments from the MMO's previous response (dated 16 February 2023) need to be addressed alongside the comments raised above.</p> <p>Your feedback</p> <p>We are committed to providing excellent customer service and continually improving our standards and we would be delighted to know what you thought of the service you have received from us. Please help us by taking a few minutes to complete the following short survey – [REDACTED]</p>			<p>being released into the water.</p> <p>Protective Coatings: The use of protective coatings on any vessels used during construction will be employed to reduce the fouling of the vessel's hull and other below-water surfaces. These coatings usually contain a toxic chemical (such as copper) or an irritant (such as pepper) that discourages organisms from attaching. Other coatings, such as those that are silicone-based, provide a surface that is more difficult to adhere to firmly, making cleaning of the hull less laborious. The type and concentration of coatings that can be applied to a boat hull is regulated and can vary between countries.</p>	
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Marine Management Organisation	29.06.2023 Email	<p>1. Benthic Ecology</p> <ul style="list-style-type: none"> 1.1. The MMO does not have any concerns relating to benthic ecology arising from the proposed changes to the project as outlined in the PEIR addendum. We agree with the overall conclusions that there will be no changes to the likely significant effects presented in the PEIR for benthic ecology. The MMO notes that the only significant change to the assessment will be in relation to the reduced number and footprint of the piles which is unlikely to result in new or different pathways to impact on benthic receptors. The MMO does not consider the decrease in the number of proposed berths (from two to one) and the change in the marine site boundary to require additional assessment to that of the first PEIR. 1.2. While the introduction and spread of invasive non-native species (INNS) will be addressed under the Construction Environmental Management Plan (CEMP) for the project, the MMO, in consultation with Cefas, consider that the piles which provide support for the jetty would be a suitable structure for the settlement of INNS, such as the leathery sea squirt, <i>Styela clava</i> which has been recorded in the area, and for others yet to be identified. However, the MMO recommend that the impacts of INNS that may recruit on infrastructure are considered further and included in any monitoring assessment following construction. 	<p>The MMO's confirmation that they do not have any concerns relating to benthic ecology arising from the changes to the Project is Noted.</p> <p>Consideration of the potential for non-native invasive species to colonise piles and other structures has been included within Chapter 9: Nature Conservation (Marine Ecology) (operational phase, Section 9.8).</p> <p>Appropriate biosecurity measures to reduce the spread of invasive non-native species that will be adhered to during the Construction Phase of the scheme are outlined in the Outline Construction Environmental Management Plan (CEMP) [TR030008/APP/6.5] and will be included in the final CEMP.</p>	No	No, aside from the measures included within the Outline Construction Environmental Management Plan (CEMP) [TR030008/APP/6.5]	<p>Chapter 9: Nature Conservation (Marine Ecology) [TR030008/APP/6.2]</p> <p>Outline Construction Environmental Management Plan (CEMP) [TR030008/APP/6.5]</p>
Marine Management Organisation	29.06.2023 Email	<p>2. Coastal Processes</p> <p>2.1. The MMO has no additional comments to make at this stage regarding Coastal Processes, however, our previous comments from the last round of consultation, dated 16 February 2023, remain outstanding despite this PEIR addendum submission.</p>	<p>The Applicant notes that previous comments made on the first round of Statutory Consultation remain and acknowledges this feedback.</p>	No	No	N/A

Marine Management Organisation	29.06.2023 Email	<p>3. Fisheries</p> <p>3.1. The description of the proposed changes to the project generally appear to indicate a reduction in the scale of the project, mainly due to the removal of one of the berths. However, specific details about the reduced width of the jetty are not provided in the report and it is unclear whether the area and volume of material to be removed during capital dredging have changed. Given the reduced scale of the IGET, it would be reasonable to assume that the footprint of the works will be smaller, and that the volume and area of dredging would not increase as a result of the proposed changes. On this basis, the MMO would not expect the likelihood or significance of impacts to fish species to increase as a result of the design changes.</p> <p>3.2. Nonetheless, the MMO's advice provided at PEIR stage raised a number of issues which highlighted concerns with the robustness of the preliminary environmental impact assessment in respect of fisheries, in particular the impacts to fish arising from capital dredging and underwater noise and vibration from piling. Assuming that piling and dredging are still required to construct the IGET project, the EIA should be revisited based on the revised project design, taking into account our comments raised during the initial consultation on 16 February 2023.</p>	<p><u>Fisheries</u></p> <p>The assessment provided in Chapter 9: Nature Conservation (Marine Ecology) [TR030008/APP/6.2] (Section 9.8) considers both potential effects from dredging and marine piling based on the revised Project design, taking into account the MMO's comments raised during the initial consultation on 16 February 2023.</p> <p>Volume of the capital dredge has reduced as a result of the design changes from two berths to a single berth. The capital dredge volume is approximately 4,000m³ (based on the latest available site-specific geotechnical and geophysical information), covering a maximum spatial extent of 10,000m².</p>	No	No	Chapter 9: Nature Conservation (Marine Ecology) [TR030008/APP/6.2]
Marine Management Organisation	29.06.2023 Email	<p>4. Shellfisheries</p> <p>4.1. The MMO has no additional comments to make regarding potential impacts to Shellfisheries as a consequence of this PEIR addendum.</p>	The Applicant acknowledges this comment.	No	No	N/A
Marine Management Organisation	29.06.2023 Email	<p>5. Underwater Noise</p> <ul style="list-style-type: none"> 5.1. In the PEIR addendum there are two proposed changes to the project related to the marine environment. Firstly, the site boundary has been amended in response to the design evolution of the project. The MMO agrees that the reduction of the marine area being used for construction of the green energy terminal should reduce the potential for adverse sound and vibration impacts, but this will be confirmed after the completion of noise modelling for the full environmental impact assessment (EIA). 	<p>Noted. All comments received from the MMO have been addressed and the updated scheme design has been assessed within Chapter 9: Nature Conservation (Marine Ecology) [TR030008/APP/6.2] and the underwater noise assessment (Appendix 9.B [TR030008/APP/6.4]).</p> <p>The change in marine design will involve the installation of approximately 393 steel tubular piles of varying sizes to support the approach jetty and jetty head. Further</p>	Yes	<p>Further consideration has been given to the timing of the proposed activities in relation to key migratory or spawning periods.</p> <p>Marine piling restrictions to avoid sensitive periods for migratory fish have been discussed with the MMO and Cefas and are set out in</p>	<p>Chapter 9: Nature Conservation (Marine Ecology) [TR030008/APP/6.2]</p> <p>Chapter 2: The Project [TR030008/APP/6.2]</p>

			<ul style="list-style-type: none"> 5.2. Secondly, marine design changes to the green energy terminal include that the jetty will now be reduced from a double to a single berth. Table 7.2 <i>Implications of the proposal changes by topic</i>, details that the potential for vibration effects to the existing jetty to the West is reduced or removed given the revision to the marine works. The MMO considers that piling will be the significant source of underwater noise at the site. The original PEIR outlined several mitigation measures including soft start procedures, the use of vibro piling where possible with seasonal/ night-time piling restrictions specifically for migratory fish species and JNCC piling protocols for marine mammals. Given the marine design changes outlined in the addendum, we request that the applicant address whether the change in marine design to a single berth also decreases the number of piles planned (in the original PEIR 380 tubular piles were included), or if the same number of piles and piling schedule is planned. 5.3. Furthermore, in previous advice dated 16 February 2023, several comments were raised regarding underwater noise modelling. Subsequently, the MMO, in consultation with Cefas, look forward to reviewing the noise modelling performed in the environmental impact assessment for the updated marine design. 5.4. Previous advice also emphasised that the applicants should review whether the timing of planned dredging and piling operations overlaps any key feeding or spawning periods. The MMO appreciate that the report highlights that during the environmental statement, the mitigation measures associated with the development will be presented. 5.5. Underwater noise is expected to be produced during dredging and piling operations at the site. Overall, the MMO agrees with the conclusions reached in the PEIR addendum that given the limited extent of the changes, no 	<p>details are provided in Chapter 2: The Project [TR030008/APP/6.2] and this is summarised in the underwater noise assessment (Appendix 9.B [TR030008/APP/6.4]).</p> <p>Further consideration has been given to the timing of the proposed activities in relation to key migratory or spawning periods. It is not, however, possible to confirm the exact timing and programme for the marine piling and dredging at this stage and the assessment has, therefore, been undertaken on the basis that the works could be undertaken at any time of year. Marine piling restrictions to avoid sensitive periods for migratory fish have been discussed with the MMO and Cefas and are set out in Section 9.9 of Chapter 9: Nature Conservation (Marine Ecology) [TR030008/APP/6.2] and will be secured by a condition in the deemed marine licence in schedule 3 of the draft DCO [TR030008/APP/2.1].</p> <p>In order to support the Nature Conservation (Marine Ecology) assessment of potential effects as result of underwater noise on migratory fishes and marine mammals, the suggested literature has been reviewed and is referenced within Chapter 9: Nature Conservation (Marine Ecology) [TR030008/APP/6.2].</p>		<p>Section 9.9 of Chapter 9: Nature Conservation (Marine Ecology) [TR030008/APP/6.2] and will be secured by a condition in the deemed marine licence in schedule 3 of the draft DCO [TR030008/APP/2.1].</p>	<p>Appendix 9.B [TR030008/APP/6.4]</p>
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			new significant effects are identified due to Underwater Noise. Furthermore, the proposed changes do not alter the conclusions with respect to significant effects identified in the first statutory consultation. To minimise the potential effects of underwater noise on migratory fishes and marine mammals, the MMO advise appropriate literature is continued to be reviewed (Popper et al., 2014), (National Marine Fisheries Service, 2018) and consider the timing of the proposed activities in relation to key migratory or spawning periods for marine life.				
Marine Management Organisation	29.06.2023 Email	6. Dredge and Disposal	<ul style="list-style-type: none"> 6.1. Very little detailed methodological information has been provided concerning how the change from two piers to one affects the volume and type of dredging and disposal that may be required. At the previous application stage, the PEIR described the dredging required to constitute 100,000 m³, without specifying the dredge depth. Changes to the anticipated volumes, area, and depth of material to be dredged can significantly change the risk associated with a programme of works. In this respect, the information provided in the addendum is quite limited. 6.2. However, as this is the PEIR stage, and exact methods required are yet to be finalised, and as bespoke sediment sampling is yet to be undertaken to support the development under OSPAR and the London Convention and Protocol, the MMO is content that this information is not essential at this point. 	Noted. The capital dredge volume is approximately 4,000m ³ (based on the latest available site-specific geotechnical and geophysical information), covering a maximum spatial extent of 10,000m ² . The required dredge depth would be approximately 14.5m below Chart Datum. The capital dredge methodology is anticipated to be by backhoe dredger. Further information is provided in Chapter 2: The Project [TR030008/APP/6.2] . A sediment contamination survey was undertaken in March 2023 to characterise the dredge material and to support the application to dispose of the dredge material at an existing licensed disposal site. The results are presented in Chapter 17: Marine Water and Sediment Quality, Section 17.6 [TR030008/APP/6.2] . This was undertaken in accordance with the MMO sample plan (SAM/2022/00106) which confirmed the suite of contaminants, number of samples, sample locations, replicates and sampling depth required, taking account of available guidelines for the management of dredge material to be disposed at sea.	No	No	Chapter 2: The Project [TR030008/APP/6.2] Chapter 17: Marine Water and Sediment Quality [TR030008/APP/6.2]

8.	UK Health Security agency	29.06.2023 Email	<p>Dear Sirs</p> <p>Please find attached the UK Health Security Agency's response to the above consultation.</p> <p>Kind regards</p> <p>Dear Sir/Madam,</p> <p>/ukhsa</p> <p>Your Ref: TR030008</p> <p>Nationally Significant Infrastructure Project Immingham Green Energy, Terminal Dock Office Immingham Dock Immingham Public Consultation Section 42 Stage – Second Statutory Consultation</p> <p>Thank you for your consultation regarding the above development. The UK Health Security Agency (UKHSA) welcomes the opportunity to comment on your proposals and Preliminary Environmental Information Report (PEIR) at this stage of the Nationally Significant Infrastructure Project (NSIP). <i>Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided is sent on behalf of both UKHSA and OHID.</i></p> <p>Please note that we have replied to earlier consultations as listed below and this response should be read in conjunction with that earlier correspondence:</p> <p>Request for Scoping Opinion 28/08/2022 Public Consultation Section 42 20/02/2023</p> <p>The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from, for example emissions to air or road traffic</p>	<p>The UK Health Security Agency's consultation response, as well as the Applicant's technical response, can be viewed in the first Statutory Consultation technical response table at Appendix P.2 of the Consultation Report [TR030008/APP/5.1]</p> <p>The Applicant notes the consultee's comments and that this second response should be read in conjunction with its earlier consultation response.</p>	No	No	N/A
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	UK Health Security agency	29.06.2023 Email	<p>We have considered the submitted documentation and can confirm that we are satisfied with the approach taken in preparing the Environmental Impact Assessment (EIA) and the conclusions drawn.</p> <p>However, we understand that further assessments are expected for consultation in the Environmental Statement, in particular air quality modelling associated with construction traffic and vessels, and also on the health and safety impact and mitigation measures of the industry development on nearby residential receptors.</p>	<p>The Applicant acknowledges and notes that the UK Health Security Agency is satisfied with the approach taken in preparing the EIA and the conclusions drawn.</p> <p>The approach to the construction phase and operational phase assessments for Air Quality can be found in Appendix 6.B of the ES [TR030008/APP/6.4]. This includes the quantitative assessment of construction phase traffic emissions and qualitative assessment of construction phase vessel emissions, and quantitative assessment of operational site emissions on local air quality.</p>	No	No	<p>Chapter 6: Air quality</p> <p>Chapter 24: Human Health and Wellbeing [TR030008/APP/6.2]</p> <p>Appendix 6.B of the ES [TR030008/APP/6.4].</p>
9.	National Highways	29.06.2023 Email	<p>Dear Imminghamget,</p> <p>Please find attached the response to the application for the DCO ref: TR030008 on behalf of National Highways.</p> <p>We would like to observe and request further information with respects to the following comments below:</p> <ul style="list-style-type: none"> • The forthcoming DCO application should be accompanied by a Transport Assessment(TA); • The traffic generation associated with both the Construction and Operational Phase be fully and robustly set out in the TA; The Applicant will need to provide an hourly break-down of the traffic to be generated and depending on the number of vehicular trips during the AM and PM peak-hours, trip distribution and assignment graphs might also need to be submitted for review; • With regards to the operation of the Strategic Road Network (SRN), it is important that the potential impact of the development be established at the A180 / A1173 junction, and elsewhere on the SRN where 	<p>A Transport Assessment has not been undertaken as the required information in regard to the construction traffic impact has been set out within Chapter 11: Traffic and Transport [TR030008/APP/6.2].</p> <p>Chapter 11: Traffic and Transport [TR030008/APP/6.2] includes within Section 8, the traffic generation during the construction phase (Table 11-12 of Chapter 11: Traffic and Transport [TR030008/APP/6.2]), an hourly breakdown of both construction worker (Table 11-13) and construction HGV (Table 11-14) traffic as well as the potential impact upon the SRN during the weekday peak hours (Table 11-18).</p>	No	No	<p>Chapter 11: Traffic and transport</p> <p>Chapter 25: Assessment of Cumulative Effects [TR030008/APP/6.2]</p>

		<p>traffic generation is considered to result in the material impact;</p> <p>Many Thanks</p> <p>A.23.05.25 ABP Immingham Green Energy Terminal Prepared for: Prepared by: Date: Case Reference: Document Reference: Reviewed/approved by: [REDACTED] 28th June 2023 DevHU0144 AA.23.05.25 Immingham Green Energy Terminal [REDACTED]</p>				
National Highways	29.06.2023 Email	<p>Limitation: This document has been prepared on behalf of, and for the exclusive use of National Highways, and is subject to, and issued in accordance with, the provisions of the National Spatial Planning Contract. We accept no liability or responsibility whatsoever for, or in respect of, any use of, or reliance upon, this document by any third party.</p> <p>Introduction and background</p> <p>In June 2023, pursuant to Regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulation 2017, and as part of the second Statutory Consultation, [24 May 2023 to 30 June 2023], ABP has submitted an Addendum to the Preliminary Environmental Information Report (PEIR) which was originally published in January 2023 during the first Statutory Consultation.</p> <p>Previously, in August 2022, and pursuant to Regulation 10 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Associated British Ports [ABP, the Applicant], submitted a request to North Lincolnshire Council for a scoping opinion in relation to the construction of a multi-user liquid bulk jetty named the Immingham Green Energy Terminal (planning reference: PA/SCO/2022/9).</p>	National Highways were contacted as part of the first Statutory Consultation and PEIR on 9 January 2023.	No	No	N/A

			<p>The PEIR Addendum sets out the proposed changes to the Project which have been identified following further design development and feedback from the first Statutory Consultation. An updated Statement of Community Consultation forms part of this current submission.</p> <p>We would note that JSJV was unable to find evidence of National Highways being consulted on the Preliminary Environmental Information Report (PEIR) during the first Statutory Consultation period.</p>				
National Highways	29.06.2023 Email	<p>INTRODUCTION AND BACKGROUND</p> <p>ABP intend to apply in the summer of 2023 for a Development Consent Order (DCO) to authorise the construction and operation of a new multi-user green energy terminal to be located on the eastern side of the Port of Immingham.</p> <p>The proposed development works will comprise:</p> <ul style="list-style-type: none"> a. On the marine side: <ul style="list-style-type: none"> a. A new approach trestle, jetty platform, berthing and mooring dolphins with link walkways b. Topside infrastructure for the handling of liquid bulks, including loading arms and pipework. b. On the land side: <ul style="list-style-type: none"> i. Pipework, pipelines and utilities between the processing facility and the jetty. ii. Refrigerated ammonia storage. iii. Hydrogen production units (converters) that convert ammonia feed to produce the hydrogen. iv. Hydrogen liquefiers to liquify the hydrogen for temporary storage and road transport. v. Loading bays to fill road tankers with hydrogen which would then be distributed to hydrogen filling stations throughout the UK.' <p>The Applicant's Consultant is AECOM and the Local Planning Authority [LPA] is North Lincolnshire Council [SDC].</p> <p>The location of the application site, relative to the Strategic Road Network [SRN], is presented in Figure 1. The site is located approximately:</p>	No comment required; the applicant acknowledges National Highways introduction to the Project.	No	No	N/A	

			<ul style="list-style-type: none"> 6km to the east of the A180 / A160 junction [Brocklesby Interchange]; and 1.6km to the north of the A180 / A1173 junction [Stallingborough Interchange]. Figure 1. Site location in relation to the Strategic Road Network <p>Previous JSJV Response [Sept. 2022]</p> <ul style="list-style-type: none"> In September 2022, JSJV reviewed the Environmental Impact Assessment Scoping Report [EIA Scoping Report] accompanying the scoping request. The EIA Scoping Report identified transport as a key topic that should be 'Scoped In' to the ES due to the significant environmental effects likely to arise as a result of transport related activities. <p>National Highways National Spatial Planning Contract – Yorkshire Humberside and North East 2</p>				
National Highways	29.06.2023 Email	<p>Cumulative Effects</p> <p>JSJV recommended that the following emerging developments be considered alongside the Immingham Green Energy Terminal application, within the ES and requested TA:</p> <ul style="list-style-type: none"> Immingham Eastern Ro-Ro Terminal: roll-on/roll-off [Ro-Ro] facility at Immingham Port; and Station Road South Killingholme, works on land to the east of Rosper Road, Killingholme (planning reference: PA/SCO/2022/7). 	<p>Both the Immingham Eastern Ro-Ro Terminal: roll-on/roll-off [Ro-Ro] facility at Immingham Port; and Station Road South Killingholme, works on land to the east of Rosper Road, Killingholme (planning reference: PA/SCO/2022/7) have been included within and assessed within the Cumulative Effects Assessment for the Project, presented in Chapter 25: Cumulative and In-combination Effects [TR030008/APP/6.2] and Appendix 25.C: Assessment of Cumulative Effects [TR030008/APP/6.4].</p>	No	No	<p>Chapter 25: Cumulative and In-combination Effects [TR030008/APP/6.2]</p> <p>Appendix 25.C: Assessment of Cumulative Effects [TR030008/APP/6.4]</p>	
National Highways	29.06.2023 Email	<p>Current submission</p> <p>The Applicant has now submitted an Addendum to the Preliminary Environmental Information Report (PEIR) which was originally published in January 2023 during the first Statutory Consultation. A Statement of Community Consultation document has also been submitted.</p> <p>Since we found no evidence that National Highways had been consulted on the PEIR, this review will</p>	<p>A Transport Assessment has not been undertaken as the required information in regard to the construction traffic impact has been set out within Chapter 11: Traffic and Transport [TR030008/APP/6.2].</p> <p>Chapter 11: Traffic and Transport [TR030008/APP/6.2] includes within Section 8, the traffic generation during the construction phase including an hourly</p>	No	No	<p>Chapter 11: Traffic and Transport [TR030008/APP/6.2]</p>	

			<p>consider relevant aspects of the PEIR and the PEIR Addendum.</p> <p>PEIR</p> <p>The PEIR has been prepared by AECOM on behalf of the Applicant, with the purpose of presenting the likely significant environmental effects of the project.</p> <p>The Applicant states that the project will be assessed through the ongoing Environmental Impact Assessment (EIA) process, and the technical assessments will be brought together in an Environmental Statement (ES) that will accompany the Development Consent Order (DCO) Application.</p> <p>The Applicant highlights that the PEIR summarises the outcomes, to date, of the following ongoing EIA activities:</p> <ul style="list-style-type: none"> • Scoping; • Review of secondary information, previous environmental studies, publicly available information and databases; • Physical surveys and monitoring; • Establishing baseline conditions (the environment as it currently is without the Project); • Consultation with statutory and non-statutory consultees <p>CURRENT SUBMISSION</p> <ul style="list-style-type: none"> • Consideration of relevant local, regional, and national planning policies, guidelines and legislation relevant to the EIA; • Reference to current guidance; • Consideration of technical standards for the development of effect significance criteria and specialist assessment methodologies; • Desk-top studies; • Design review; • Modelling and calculations; and • Expert opinion. <ul style="list-style-type: none"> • Chapter 11 Traffic and Transport presents the likely effects of mainly the Construction Phase of the Project on the local and wider transport links. 	<p>breakdown of both construction worker (Table 11-13) and construction HGV (Table 11-14) traffic as well as the potential impact upon the SRN during the weekday peak hours (Table 11-18).</p> <p>Chapter 11: Traffic and Transport [TR030008/APP/6.2] also includes an hourly breakdown of operational traffic and the impact upon the SRN.</p> <p>National Highways were contacted as part of the first Statutory Consultation and PEIR on 9 January 2023.</p>			
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			<ul style="list-style-type: none"> Chapter 11, Paragraph 11.2.4, states that, following receipt of the Scoping Opinion regarding the information to be provided in the Environmental Statement (ES), a series of requirements have been identified by the Planning Inspectorate, as shown in Table 1, which will be considered as part of the ongoing traffic and transport assessment. Table 1. Scoping Opinion comments on traffic and transport Operational phase The Applicant states that during operation of the Terminal, minimal site traffic will be generated. For the hydrogen production facility, HGVs will access the Site for loading and distribution of the green hydrogen that will be produced. The Applicant forecasts the number of HGVs accessing the Site during the operational phase to be 49 per day in and out (i.e., 98 two-way per day), and states that these levels are below the screening threshold on highway links where traffic flows will increase by more than 30%, as outlined in the Guidelines for the Environmental Assessment of Road Traffic 1993. It is further stated that there would be a total of 104 employees of whom only 24 are likely to work a “normal” eight-hour day and would therefore travel during the network peak hours. Consequently, the Applicant did not undertake an operational assessment of the Project. However, JSJV highlights that, within the EIA Scoping Report, AECOM had stated that the assessment of the operational phase traffic and transportation effects will be scoped in to the assessment. Additionally, JSJV previously recommended that, given the nature and scale of development, and its proximity to the SRN, the traffic generation associated with the operational phase should be fully set out in the TA. 				
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			The Applicant will need to provide the derivation of the traffic forecast to be generated in peak hour periods during the Operational Phase. Depending on the number of vehicular trips to be generated during the AM and PM peak-hours, trip distribution and assignment diagrams may need to be submitted for review.				
National Highways	29.06.2023 Email	Decommissioning phase Since the environmental effects of traffic and transportation are expected not to be significant during Project decommissioning, the Applicant proposes to leave this matter out of consideration in the ES. Within PEIR Volume 1 it is highlighted that the Project does not make any provision for the decommissioning of the marine facilities, since they would become part of the fabric of the Port estate and would be maintained accordingly. The landside elements of the Project have a design life of approximately 25 years and when appropriate, this infrastructure would be decommissioned. A Decommissioning Environmental Management Plan (DEMP) will be produced prior to decommissioning/demolition works being undertaken, which will detail measures to be implemented to avoid or reduce environmental impact. The provision of a DEMP will be secured by requirement of the DCO. JSJV agrees with the above approach.	The Applicant notes and acknowledges that National Highways agree with the approach to decommissioning.	No	No	N/A	

			<p>Policy and guidance</p> <p>The Applicant lists the following transport Legislation/ Policy/ Guidance as being relevant:</p> <ul style="list-style-type: none"> Guidelines for the Environmental Assessment of Road Traffic 1993; National Policy Statement for Ports 2012; National Planning Policy Framework 2021; Planning Practice Guidance; and Standards for Highways. <ul style="list-style-type: none"> However, we reiterate that the Applicant needs to also consider the following documentation and guidance when preparing the TA: Circular 01/2022 – The Strategic Road Network and The Delivery of Sustainable Development (DfT 2022) (previously Circular 02/2013 – The Strategic Road Network and The Delivery of Sustainable Development); and National Highways’ guidance document ‘The Strategic Road Network: Planning for The Future.’ 	Noted, no comment required.	No	No	N/A
National Highways	29.06.2023 Email	<p>Baseline Traffic Data and Assessment Years</p> <ul style="list-style-type: none"> The baseline traffic data used for the assessment is based on secondary data from surveys undertaken on behalf of ABP as part of the Immingham Eastern Ro-Ro Terminal (IERRT) proposed development. The data used was recorded in 2021 from the David Tucker Associates Preliminary Transport Assessment. Since no data was available for Laporte Road, this link has not been included within this preliminary assessment, and an Automated Traffic Count (ATC) will be undertaken on Laporte Road so that it can be included within the assessment to be reported in the ES. <p>The Applicant highlights that the assessment does not include the Opening Year of the Project due to the worst-case year, more specifically 2025, being assessed as Future Assessment Year. Future Year baseline traffic flows for the assessment year of 2025,</p>	<p>The Applicant acknowledges that the approach to the ES assessment is agreed, although we would note that the peak of construction for traffic is now 2026 rather than 2025, and this is set out within Section 11.8 of Chapter 11: Traffic and Transport [TR030008/APP/6.2]</p> <p>The assessment within Chapter 11: Traffic and Transport [TR030008/APP/6.2] includes the peak of construction and the vehicle trip generation once the development is open and operational, the conclusion being that once open the level of traffic is not considered to represent a severe impact. Therefore, no assessment of the highway network, including the SRN has been undertaken.</p>	No	No	Chapter 11: Traffic and Transport [TR030008/APP/6.2]	

		<p>for the peak in construction, have been derived by the Applicant by applying the national standard programme Trip End Model Presentation Program (TEMPRO) to derive traffic growth factors.</p> <p>Considering the Applicant's approach to the ES assessment, JSJV is content with the scope of assessment, and can accept the Applicant's approach as appropriate.</p> <p>Considering the scope of the TA however, we highlight that Circular 01/2022 does not require the assessment of a Future Year, instead it states that:</p> <p>'...an Opening Year assessment to include trips generated by the proposed development, forecasted growth and committed development shall be carried out to establish the residual transport impacts of a proposed development' and that 'for multi-phase developments, additional assessments shall be provided based on the opening of each phase.</p> <p>Consequently, the TA should consider requirements of Circular 01/2022, to include an Opening Year assessment. The Applicant should provide information regarding what the anticipated Opening Year of the proposed development is, noting that the Opening Year should be considered as the date for first occupation. Please see further details on the requirements for Transport Assessment within Page 9.</p> <p>Please note that Section D.2.7 of TAG Unit M3.1 gives the PCU for HGVs on motorways and all-purpose dual carriageways as 2.5. Given the nature of the highway network around the proposed development site, we request that the PCU equivalent value of 2.5 is used in order to ensure an appropriate assessment of anticipated vehicular traffic associated with the development.</p>	<p>As set out and agreed as an approach to the ES assessment, and as it relates to the SRN the baseline traffic data has been based on secondary data from surveys undertaken on behalf of ABP as part of the Immingham Eastern Ro-Ro Terminal (IERRT) proposed development, and as such the PCU factors used are considered to be agreed. The data used was recorded in 2021 from the David Tucker Associates Preliminary Transport Assessment.</p>			
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National Highways	29.06.2023 Email	Road Safety An analysis of traffic collision data, using data provided by NELC for a period of five years (2017-2022), has been undertaken by the Applicant. However, we would reiterate that it is not considered appropriate to use 2020 and 2021 data for the analysis because the traffic flows during these years were materially influenced by the Covid-19 pandemic, and this will need to be amended by the Applicant.	Section 11-6 of Chapter 11: Traffic and Transport [TR030008/APP/6.2] includes a review of the relevant collision data between 2017 and 2022, and whilst the data from 2020 and 2021 may not be necessarily reflective of “normal” operating conditions, the use of data prior to 2017 is not considered to be necessarily relevant as it would at least 6 years old and may not then reflect current operating conditions.	No	No	Chapter 11: Traffic and Transport [TR030008/APP/6.2]
National Highways	29.06.2023 Email	Standard Mitigation Measures As already mentioned in our previous response in August 2022, we encourage the submission of both the CTMP and CWTP.	An Outline CTMP and Outline Construction Worker Travel Plan (“OCWTP”) [TR030008/APP/6.7] have been prepared and they include the items listed, with the dust, noise and pollution controls being covered in the Outline Construction Environmental Management Plan [TR030008/APP/6.5] .	No	No	Outline CTMP and Outline Construction Worker Travel Plan (“OCWTP”) [TR030008/APP/6.7] Outline Construction Environmental Management Plan [TR030008/APP/6.5]
National Highways	29.06.2023 Email	Trip Generation According to the Applicant, the trip generation flows have been supplied by Air Products which provided an overview of the daily HGV numbers and daily workforce associated for each phase of Project Construction. The trip generation includes all vehicles associated with the construction including all waste removal along with the associated workforce and will be reviewed as part of the studies associated with the ES Chapter to ensure that it is still valid. All workers have been assumed to travel in a private car. The trip generation proposed by the Applicant for the Construction Peak Phase is presented in Table 2. Table 2. Total Daily Development Traffic – Peak of Construction However, the Applicant will need to submit trip generations for the AM and PM peak- hours. Furthermore, the updated number of HGVs, as	With reference to Section 8 of Chapter 11: Traffic and Transport [TR030008/APP/6.2] , once operational there is estimated to be 120 employees, with 67 working a shift pattern and 53 working a “normal” Monday to Friday. The shift workers would travel outside of the normal weekday peak hours, and the impact of the 53 employees working a “normal” Monday to Friday is not considered to result in a severe traffic impact upon the highway network, and from Table 11-23 would only result in 19 trips in the peak hours (5 on the A180 (W) and 14 on the A180 (E)). The ES Chapter has provided, in addition to the percentage increase assessment, details of the construction and operational traffic generation with a daily traffic profile provided for both. The chapter has then provided a quantitative assessment of the	No	No	Chapter 11: Traffic and Transport [TR030008/APP/6.2]

		<p>provided within the newly submitted PEIR Addendum, which estimates upward to 260 movements per day at the peak of the construction period, should be used.</p> <p>The Applicant also provided the total daily development traffic associated with the Operational Phase, as seen in Table 3.</p> <p>Table 3. Total Daily Operational Traffic</p> <p>As previously mentioned, the Applicant stated that there would be a total of 104 employees, of which only 24 are predicted to work a “normal” eight-hour day and would therefore travel during the network peak hours, however the Applicant will need to submit trip generations for the AM and PM peak hours for the Operational Phase of the Project.</p> <p>Trip Distribution and Assignment</p> <p>Construction worker trip distribution has been based on 2011 census data using WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level) for North East Lincolnshire 001.</p> <p>In relation to the HGV distribution, the Applicant assumed that all construction vehicles would travel to and from the site via the A1173 towards the A180 where they have been distributed based upon the existing pattern of movements, as the exact location of construction material required for the Project is not known at this preliminary stage.</p> <p>The trip assignment proposed by the Applicant is shown in Table 4, however it will have to be reproduced to provide the relevant information for the AM and PM peak- hours, and also considering the updated HGV counts.</p> <p>Table 4. Trip Assignment – Peak of Project Construction</p> <p>The Applicant provides an overview of the total percentage increase for total vehicles and HGVs on each of the links within the study area during the peak construction year, 2025, that indicates that that for most of the links within the study area the impact is below 30% for both the total vehicle number and total</p>	<p>additional traffic during the weekday AM and PM peak periods, 0800 to 0900 and 1700 to 1800 respectively and concluded that there would not be a severe impact upon the operation of the road network.</p>			
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			HGVs, consequently of minimal impact, except Queens Road where it is 32%. In the context of a TA, JSJV does not support this method as appropriate when assessing the impact the traffic generation could have on the SRN.				
National Highways	29.06.2023	Email	<p>Cumulative Effects</p> <p>In regard to the cumulative effects of other nearby developments the only site that the Applicant intends to consider as part of the full ES is the adjacent Immingham Eastern Ro-Ro Terminal site.</p> <p>In line with our previous response, JSJV recommends that the following proposed development should also be considered alongside the current Immingham Green Energy Terminal application, within the ES and requested TA:</p> <p>1) Station Road South Killingholme, works on land to the east of Rosper Road, Killingholme (planning reference: PA/SCO/2022/7).</p>	<p>Both the Immingham Eastern Ro-Ro Terminal: roll-on/roll-off [Ro-Ro] facility at Immingham Port; and Station Road South Killingholme, works on land to the east of Rosper Road, Killingholme (planning reference: PA/SCO/2022/7) have been included within and assessed within the Cumulative Effects Assessment for the Project, presented in Chapter 25: Cumulative and In-combination Effects [TR030008/APP/6.2] and Appendix 25.C: Assessment of Cumulative Effects [TR030008/APP/6.4].</p> <p>It is noted and acknowledged that National Highways agree with the approach to decommissioning.</p>	No	No	<p>Chapter 25: Cumulative and In-combination Effects [TR030008/APP/6.2]</p> <p>Appendix 25.C: Assessment of Cumulative Effects [TR030008/APP/6.4]</p>
National Highways	29.06.2023	Email	<p>PEIR ADDENDUM</p> <p>As stated earlier, Statutory Consultation on the preliminary design of the Project and the PEIR was undertaken between 9 January 2023 to 20 February 2023. Information gathered from this Statutory Consultation has been reviewed, and a series of changes within the Project have been identified as presented below:</p> <ul style="list-style-type: none"> • 1) site boundary amendments; • 2) marine design changes including jetty alignment and length; berth arrangement and dredging requirements • 3) routing of the pipe - rack and jetty access road in the Long Strip woodland • 4) West Site illustrative layout, elevation and drainage; • 5) construction vehicle numbers; • 6) permanent adjustment to speed limits on Laporte Road; • 7) Public Rights of Way diversion (Bridleway 36) and removal of informal access in two areas; and • 8) Kings Road street furniture and overhead line works. 	<p>Section 8 of Chapter 11: Traffic and Transport of the ES [TR030008/APP/6.2] sets out the operational and construction phase trip generation with total and daily profile traffic flows included.</p> <p>In the AM peak (0800-0900) there is 53 worker trips and in the PM peak (1700-1800) there is 137 worker trips., of which, with reference to Table 11-15 a total of 35% will travel on the A180.</p> <p>This then results in 19 trips and 48 trips on the A180 in the weekday AM and PM peaks respectively, which is not considered to be severe, and will be managed through a CTMP.</p> <p>With reference to Table 11-14 in Chapter 11: Traffic and Transport of the ES [TR030008/APP/6.2] The number of construction HGVs will be 17 in the weekday AM peak and 18 in the weekday PM peak along the A180, which is not considered to be a severe impact.</p>	No	No	<p>Chapter 11: Traffic and Transport of the ES [TR030008/APP/6.2]</p>

			<p>The Addendum accompanying the current Statutory Consultation is reviewing the above changes, with a view to obtain views and comments from stakeholders and the local community on these changes, prior to the planned submission of the application for development consent later this year.</p> <p>The feedback on the second Statutory Consultation will be included in a Consultation Report, which will form part of the application for development consent.</p> <p>JSJV have the following comments to offer in regard to the changes listed above that could impact the safe and efficient operation of the SRN.</p> <p>Change No. 5: Construction Vehicle Numbers</p> <p>According to paragraph 6.6.1 of the Addendum, the design evolution related to the raising of the finished ground levels on the West Site to deliver the drainage solution, has led to a need for greater quantities of imported fill material. As a result, the number of HGVs which are likely to be required has increased compared to the number reported in the first Statutory Consultation.</p> <p>The PEIR was estimating the HGV total movements at the peak of the construction period for the Project (2025) to be 194 movements per day with 50% less traffic expected in the other phases of construction. This has now been revised upward to 260 movements per day at the peak of the construction period.</p> <p>As previously stated, the Applicant will need to submit trip generations for the AM and PM peak-hours, considering the updated number of HGVs, as per the Addendum.</p>				
National Highways	29.06.2023 Email	Transport Assessment	<p>Due to the proximity of the site, close to the SRN, JSJV would note that a TA should accompany the planning application; however, given the nature and scale of development, we would also recommend that, in addition, a Travel Plan and a Construction Traffic Management Plan be prepared. The impact of the development should be assessed based on relevant regional and national planning policy. In terms of the impact on the SRN, we would request that the Applicant refers to the following policy:</p>	<p>In line with the policy and the Circular 01/2022, the impact upon the SRN has been set out with the daily profile of construction workers and HGVs being included with Section 11.8 of Chapter 11: Traffic and Transport [TR030008/APP/6.2], with the overall conclusion that the impact is not severe and can be managed through a CTMP and CWTP.</p>	No	No	Chapter 11: Traffic and Transport [TR030008/APP/6.2]

			<ul style="list-style-type: none"> • National Planning Policy Framework 2021; • Local Transport Note LTN 1/20; and • DfT Circular 01/2022 – Strategic Road network and the delivery of sustainable development. <p>Circular 01/2022 states:</p> <p>“Where a transport assessment is required, this should start with a vision of what the development is seeking to achieve and then test a set of scenarios to determine the optimum design and transport infrastructure to realise this vision.”.</p> <p>“The company expects development promoters to enable a reduction in the need to travel by private car and prioritise sustainable transport opportunities ahead of capacity enhancements and new connections on the SRN. For residential-led developments, due consideration should be given to home and street layouts, broadband infrastructure, safe and secure cycle parking, and access to local amenities and open space in support of these aims, while mobility or micromobility hubs should be provided in larger schemes. In addition, high-powered and open-access EV chargepoints should be installed where developments include on-street or communal parking”.</p> <p>Firstly, with reference the prevailing policy, National Highways require that the Consultant set out the vision for development. The Consultant should clearly describe the aims of the development in terms of transport and explain how the aims are in line with the prevailing policy. National Highways now expect development promoters to enable a reduction in the need to travel by private car and prioritise sustainable transport opportunities, ahead of capacity enhancements and new connections on the Strategic Road Network.</p> <p>Once National Highways has agreed the vision for the development, they request that the applicant submits a Travel Plan in line with the policy. The Travel Plan should consider the revised development now proposed and demonstrate how the vision can be achieved. To do this, the applicant should put forward clear targets and commitments to manage down the traffic impact of development and maximise the accessibility of and within sites by walking, wheeling,</p>	<p>From the information available on the planning portal, Traffic and Transport has been scoped out of the cumulative effects assessment for Station Road South Killingholme therefore there was no data available to include at this time.</p> <p>This development has been included within the cumulative effects assessment for other topics.</p>			
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			<p>cycling, public transport and shared travel. National Highways recommend that the Travel Plan presents suitable multi-modal (person) trip rates alongside any travel planning targets.</p> <p>Once the vision and supporting travel planning are agreed upon, the approach enables an assessment of residual transport impacts. This should be undertaken in line with the policy, particularly paragraphs 47-54.</p>				
National Highways	29.06.2023	Email	<p>SUMMARY AND CONCLUSIONS</p> <p>Travel Plan</p> <p>JSJV would reiterate that the Travel Plan should be provided for National Highways to review. Nonetheless, we would note where a Travel Plan and a TA is required, this should support the vision of what the development is seeking to achieve.</p> <p>JSJV would expect the Applicant to “put forward clear targets and commitments to manage down the traffic impact of development and maximise the accessibility of and within sites by walking, wheeling, cycling, public transport and shared travel.”</p> <p>The Circular also states that “targets for achieving a modal shift to sustainable transport will need to be subject to sustained monitoring and management by an appointed travel plan coordinator” and that “advice on preparing and monitoring travel plans is contained in the planning practice guidance.”</p> <p>We would expect the Travel Plan to, at least, include the following:</p> <ul style="list-style-type: none"> • <input type="checkbox"/> Firm financial commitments with regards to funding for the measures proposed; • <input type="checkbox"/> Targets for mode shift and vehicular trip generation, which should be taken forward into the Transport Assessment; • <input type="checkbox"/> A sustained monitoring and management strategy to confirm that vehicle trip targets are being met; and • <input type="checkbox"/> A plan detailing the remediation process in the event that targets are not being met. <p>Construction Traffic Management Plan</p>	<p>Within the CWTP, a target has been set to ensure that the contractor will implement a scheme to encourage car sharing with assumed ratio of 1.5 construction workers per car. The CWTP includes measures to then assist in mitigating the impact of the construction traffic as far as is possible through:</p> <ul style="list-style-type: none"> - Monitoring levels of car parking - Providing minibuses for workers, and - Car sharing <p>A CTMP has been produced to manage HGV traffic and a CWTP has been prepared to reduce the impact of construction worker traffic.</p> <p>An Outline CTMP and Outline Construction Worker Travel Plan (“OCWTP”) [TR030008/APP/6.7] have been prepared and they include the items listed, with the dust, noise and pollution controls being covered in the Outline Construction Environmental Management Plan [TR030008/APP/6.5].</p> <p>A final CTMP and CWTP is to be prepared and agreed by the contractor prior to works commencing on site. These will be secured by requirements in schedule 2 of the draft DCO [TR030008/APP/2.1].</p> <p>Circular 01/2022 – The Strategic Road Network and The Delivery of Sustainable Development; and - National Highways’ guidance document ‘The Strategic Road Network: Planning for The Future and been considered within Table 11-2 of</p>	No	No	<p>Outline CTMP and Outline Construction Worker Travel Plan (“OCWTP”) [TR030008/APP/6.7]</p> <p>Outline Construction Environmental Management Plan [TR030008/APP/6.5]</p> <p>draft DCO [TR030008/APP/2.1]</p> <p>Chapter 11: Traffic and Transport [TR030008/APP/6.2]</p>

			<ul style="list-style-type: none"> • Due to the proposed site location being in close proximity to the SRN, JSJV would also recommend a CTMP is submitted alongside the application. This should be provided to National Highways for review and agreement in writing prior to commencement of construction. Construction will then be expected to proceed in accordance with the approved CTMP. • The CTMP will need to include at least the following: <ul style="list-style-type: none"> ○ A dust management plan; ○ 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. • Summary and Conclusions • This review has considered a Preliminary Environmental Information Report (PEIR) which was originally published in January 2023, and the PEIR Addendum, submitted by Associated British Ports in relation to the construction of a multi-user liquid bulk jetty named the Immingham Green Energy Terminal. <p>The request is made pursuant to Regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulation 2017.</p>	<p>Chapter 11: Traffic and Transport [TR030008/APP/6.2]</p>			
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National Highways	29.06.2023 Email	<p>A summary of our comments is set out below:</p> <ul style="list-style-type: none"> The forthcoming DCO application should be accompanied by a TA; The traffic generation associated with both the Construction and Operational Phase be fully and robustly set out in the TA; The Applicant will need to provide an hourly break-down of the traffic to be generated and depending on the number of vehicular trips during the AM and PM peak-hours, trip distribution and assignment graphs might also need to be submitted for review; With regards to the operation of the SRN, it is important that the potential impact of the development be established at the A180 / A1173 junction, and elsewhere on the SRN where traffic generation is considered to result in the material impact; The Applicant should consider the following documentation and guidance when preparing the TA: <ul style="list-style-type: none"> - Circular 01/2022 – The Strategic Road Network and The Delivery of Sustainable Development; and - National Highways’ guidance document ‘The Strategic Road Network: Planning for The Future.’; The TA should include a collision data analysis covering the most recently available complete five-year period for the SRN, including the A180 / A1173 junction and elsewhere on the SRN where traffic generation is considered to result in the material impact; however it is not acceptable to use 2020 and 2021 data for the analysis because the traffic flows during these years were materially influenced by the Covid-19 pandemic; In terms of assessing the cumulative effects, the following development should also be considered alongside the current Immingham Green Energy Terminal application, within the ES and requested TA: Station Road South 	<p>A Transport Assessment has not been prepared as full details of the following have been included within Section 8 of the Chapter 11: Traffic and Transport [TR030008/APP/6.2], which then provides sufficient information to identify the impacts during the peak month of construction on the SRN:</p> <ul style="list-style-type: none"> Construction traffic generation for both workers and HGVs at the peak month of construction A daily profile of both construction workers and HGVs to allow the impact during the weekday AM peak and PM peak to be identified. Distribution of traffic for both workers and HGVs to enable the additional levels of traffic on the SRN to be identified both daily and in each hour throughout the day. <p>From the information available on the planning portal, Traffic and Transport has been scoped out of the cumulative effects assessment and therefore no data was available for us to include at this time.</p>	No	No	Chapter 11: Traffic and Transport [TR030008/APP/6.2]
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			<p>Killingholme, works on land to the east of Rosper Road, Killingholme (planning reference: PA/SCO/2022/7);</p> <ul style="list-style-type: none"> • National Highways supports and requires the preparation and implementation of Travel Plans to limit the volume of private vehicle trips to and from developments and to promote sustainable modes of travel; • A CTMP should be prepared and be a condition of a planning consent. It will need to be submitted and approved in writing by National Highways prior to the commencement of construction. The CTMP will need to include at least: <ul style="list-style-type: none"> ○ 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) ○ measures to limit and manage transfer of debris on to the highway 				
National Highways	29.06.2023 Email	<p>JSJV welcomed the methodology used by AECOM, which had been informed by guidelines set out in the “Guidelines for the Environmental Assessment of Road Traffic” by the Institute of Environmental Management and Assessment [IEMA]. However, no mention was made to the preparation of a Transport Assessment [TA] or Travel Plan [TP].</p> <p>Given the nature and scale of development and its proximity to the SRN, JSJV recommended that the application be accompanied by a TA, TP, and Construction Traffic Management Plan [CTMP] to identify the impact of the development on access and accessibility, sustainability, and the free flow of traffic, and to inform the preparation of the ES.</p> <p>Where an assessment indicates that a development would have an unacceptable safety impact or the residual cumulative impacts on the Strategic Road Network would be severe, the developer must identify when, in relation to the occupation of the</p>	<p>A Transport Assessment has not been prepared for the Project as the required information in regard to the construction traffic impact has been set out within Chapter 11: Traffic and Transport [TR030008/APP/6.2].</p> <p>However, an Outline CTMP and Outline Construction Worker Travel Plan (“CWTP”) [TR030008/APP/6.7] have been prepared for the Project.</p>	Yes	<p>An Outline CTMP and Outline Construction Worker Travel Plan [TR030008/APP/6.7] have been prepared for the Project.</p>	<p>Chapter 11: Traffic and Transport [TR030008/APP/6.2]</p> <p>Outline CTMP and Outline Construction Worker Travel Plan [TR030008/APP/6.7]</p>	

			<p>development, transport improvements become necessary.</p> <p>JSJV note paragraph 44 of the Circular 01/2022:</p> <p>“...promoters must put forward clear targets and commitments to manage down the traffic impact of development and maximise the accessibility of and within sites by walking, wheeling, cycling, public transport, and shared travel. Targets for achieving a modal shift to sustainable transport will need to be subject to sustained monitoring and management by an appointed travel plan coordinator.”</p> <p>Where an assessment indicates that the residual vehicle trip generation would have an unacceptable safety impact or the cumulative impacts on the SRN would be severe, the Applicant must identify when, in relation to the occupation of the development, transport improvements will become necessary.</p>				
	National Highways	29.06.2023 Email	<p>It is proposed that, prior to the start of the Construction Phase, a Construction Traffic Management Plan (CTMP) to control HGV movements, as well as a Construction Worker Travel Plan (CWTP) to control the trips made by the construction workers, would be prepared. The CTMP and CWTP would be based on, and incorporate, the contents and requirements of the Outline CTMP (OCTMP) and Outline CWTP (OCWTP) which will be submitted with the DCO application.</p>	<p>An OCTMP and Outline Construction Worker Travel Plan (“OCWTP”) [TR030008/APP/6.7] have been prepared as part of the application and they include the items listed above, with dust, noise and pollution controls being covered in the Outline Construction Environmental Management Plan [TR030008/APP/6.5].</p> <p>A final CTMP and CWTP would be prepared and agreed by the contractor prior to works commencing on site pursuant to a requirement of the draft DCO.</p>	No	No further mitigation aside from the measures outlined within the Outline Construction Environmental Management Plan [TR030008/APP/6.5] , Outline Construction Traffic Management Plan and Outline Worker Travel Plan [TR030008/APP/6.7]	<p>Chapter 11: Traffic and Transport [TR030008/APP/6.2]</p> <p>Outline Construction Environmental Management Plan [TR030008/APP/6.5]</p> <p>Outline Construction Traffic Management Plan and Outline Worker Travel Plan [TR030008/APP/6.7]</p>
10.	Lincolnshire Wildlife Trust	30.06.2023 Email	<p>Good afternoon,</p> <p>Please find the attached response on behalf of the Lincolnshire Wildlife Trust to the Second Statutory Consultation for the Immingham Green Energy Terminal (IGET) development.</p>	<p>The Applicant acknowledges the feedback from Lincolnshire Wildlife Trust and has provided a response to the areas of concern in the following rows.</p>	No	No	N/A

		<p>Within the response, LWT have outlined our key concerns regarding the proposed development that we believe will require addressing. Several of these concerns were raised during the previous Statutory Consultation in response to the Preliminary Environmental Information Report (PEIR) and remain unaddressed. We will continue to monitor progress against these concerns throughout the planning process. Please feel free to contact me directly with any questions and LWT would welcome an invitation to discuss the issues raised in this response.</p> <p>Best wishes,</p> <p>To Whom it May Concern,</p> <p>27 June 2023</p> <p>The Lincolnshire Wildlife Trust's response to the Second Statutory Consultation for the Immingham Green Energy Terminal.</p> <p>Lincolnshire Wildlife Trust (LWT) welcomes the opportunity to comment during the Second Statutory Consultation for the Immingham Green Energy Terminal (IGET) development. LWT is not a statutory consultee at the pre-application stage of the planning process, and we are therefore providing our comments directly to the Applicant. Please accept this letter, and details herein, in place of the online questionnaire.</p> <p>In our response to the First Statutory Consultation and Preliminary Environmental Impact Report (PEIR), LWT highlighted areas that needed evaluation by the Applicant with regards to impacts and mitigation. While LWT has not been contacted directly by the Applicant, we do appreciate that some of our concerns have been indirectly acknowledged in the recent revisions published during this second stage. In summary, our main concerns were:</p> <ul style="list-style-type: none"> • Impacts/loss of TPO protected and irreplaceable woodland within the Long Strip Wood. We also recommended scoping terrestrial invertebrates into further assessments based on presence of white-letter hairstreak <i>Satyrrium w-album</i>, a Priority Species 				
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			<ul style="list-style-type: none"> • Proper assessment and commitment to Biodiversity Net Gain • Proper evaluation of marine works impacts • We gave notes about data sources and noise modelling (Appendix A) • Capital dredging and maintenance dredging issues <p>While positive progress has been made in this Second Statutory Consultation, LWT believes that the Applicant continues to fall short in addressing some our concerns for the environmental impacts of this large development. We have detailed these below.</p> <p>...</p>				
Lincolnshire Wildlife Trust	30.06.2023 Email	...	<p>Impacts to Long Strip Wood</p> <ul style="list-style-type: none"> • While changes have been made to the routing of the Pipe Rack and jetty access road (Change No. 3), the revised design, which includes a proposed access road carriageway, proposed footway and proposed pipe rack, is estimated to result in the direct loss of roughly 36% of the Long Strip Wood (estimated from Plate 6.2 using QGIS Georeferencer). These proposed changes are described by the Applicant as benefiting the Long Wood by avoiding the ‘highest value tree in the TPO’, a single veteran ash tree in the north east corner of the woodland. However, the Applicant acknowledges that several of the remaining trees distributed throughout the Long Strip Wood are of ‘high and moderate quality’. In our First Statutory Consultation response, we highlighted that the Long Strip Wood was last surveyed as a potential Local Wildlife Site (LWS) in 2008, and the guidelines have since been updated (third edition). It is uncertain what the status of this site would be with updated survey data and using current LWS guidelines. We go further to say: <p><i>“Regardless, because of its naturalness—consisting almost entirely of native trees and shrubs appropriate to the area—this site has potential to be classified as Lowland Mixed Deciduous Woodland Priority habitat:</i></p>	<p><u>Impact on Long Strip Woodland</u> The route of the jetty access road and pipe-rack and the associated buildings, which comprise Work No. 2, have been designed to minimise the impacts on the Long Strip woodland and to ensure a veteran tree can be retained as explained further in ES Chapter 3: Need and Alternatives [TR030008/APP/6.2]. The majority of the woodland within the Long Strip would be retained.</p> <p><u>Impact on habitats within Long Strip Woodland</u> The permanent loss of woodland and indirect effects on retained woodland are acknowledged and assessed in Chapter 8: Terrestrial Ecology, Paragraphs 8.8.6 – 8.8.9. The impact is assessed as moderate adverse (significant).</p> <p>The Outline Woodland Compensation Strategy explained below is acknowledged in Paragraph 8.8.9 of Chapter 8: Nature Conservation (Terrestrial Ecology) [TR030008/APP/6.2].</p> <p>As stated above, the route of the jetty access road and pipe-rack and the associated buildings, which comprise Work No. 2, have been designed to minimise the impacts on the Long Strip</p>	Yes	<p>An outline Woodland Compensation Strategy to compensate for the woodland loss in the Long Strip TPO woodland has been prepared and submitted as part of the Application [TR030008/APP/6.8] and submission and approval of the final document is secured by requirement of the DCO.</p> <p>An Outline Landscape and Ecology Management Plan (OLEMP) [TR030008/APP/6.9] has been prepared and identifies opportunities to provide limited areas of habitat planting within the terrestrial operational site.</p> <p>The provision and approval of a detailed landscape measures prior to the relevant parts of Work No’s 3, 5 and 7 being brought</p>	<p>Chapter 8: Nature Conservation (Terrestrial Ecology) [TR030008/APP/6.2]</p> <p>Draft DCO [TR030008/APP/2.1]</p> <p>Outline Woodland Compensation Strategy [TR030008/APP/6.8]</p> <p>Outline Landscape and Ecology Management Plan (OLEMP) [TR030008/APP/6.9]</p>

			<p>• <i>Lowland mixed deciduous woodland includes woodland growing on the full range of soil conditions, from very acidic to base-rich, and it takes in most semi-natural woodland in southern and eastern England, and in parts of lowland Wales and Scotland.</i></p> <p>In addition to the direct loss of moderate to high value trees, LWT would argue that the indirect, negative effects on this habitat and its inhabitants would likely be much greater due to several short-term (e.g., displacement through construction related activities) and long-term impacts (e.g., noise and pollution from prolonged road use and operational maintenance), and based on the extent and nature of the proposed development.</p> <p>We outlined our stance on these impacts to the Long Strip Wood in our previous response:</p> <p><i>“Given its age, rarity and significance, the Long Strip Wood is considered by LWT to be irreplaceable and invaluable to local biodiversity and heritage. LWT would urge the developers to make further efforts to avoid ‘predicted loss of woodland’ within the Long Strip Wood following the mitigation hierarchy. While we understand that the scale of woodland loss is unknown to the Applicant at this time, we are concerned that ‘it is expected to be a large part of the woodland’. Currently, we do not find this acquiescence to remove such a large area of irreplaceable woodland to be acceptable. There should be more efforts to avoid this impact in the design of the development.”</i></p> <p>In Section 6.4.4, the Applicant quotes the PEIR which states that, ‘In order to mitigate for tree loss from the Long Strip and elsewhere, the following approach is proposed:</p> <ul style="list-style-type: none"> • Tree planting within some peripheral areas around the operational sites of the hydrogen facility, although these opportunities will be very limited; and • Opportunities to be explored for potential off-site tree-planting within areas to be agreed with local bodies/organisations’ • LWT would like to point out that the Applicant has provided two examples of non-localised compensation, rather than mitigation. Therefore, further due diligence towards the 	<p>woodland. However, this woodland cannot be avoided by the Project, and this is explained further in ES Chapter 3: Need and Alternatives [TR030008/APP/6.2].</p> <p>Through an iterative design process, the Applicant has sought to minimise loss of the trees and in particular to ensure the protection of a veteran tree within this area. Part of the Long Strip, including the veteran tree, would be retained as shown in Annex A of Appendix 8.F [TR030008/APP/6.4].</p> <p>An Outline Woodland Compensation Strategy has been prepared [TR030008/APP/6.8]. The Strategy sets out the approach to off-site planting of trees in the Immingham area, as well as enhancement of existing retained on-site woodland, to ensure that the tree loss from the Long Strip is appropriately compensated. Further details are provided at section 8.7 of Chapter 8: Nature Conservation (Terrestrial Ecology) [TR030008/APP/6.2]. An Outline Landscape and Ecology Management Plan (“Outline LEMP”) has been prepared to support the Application [TR030008/APP/6.9]. The Outline LEMP defines the opportunities which are available within the operational site boundaries to provide landscape and ecological measures to enhance the operational layout. This includes tree, shrub and wildflower grassland in peripheral areas around the operational facility.</p> <p>Regarding the recommendation from Lincolnshire Wildlife Trust that terrestrial invertebrates be scoped into further assessments, no requirement for further terrestrial invertebrate surveys has been identified since relevant species are not specifically protected and appropriate enhancement of retained woodland, as well as compensatory woodland planting,</p>		<p>into use is secured by a requirement of the draft DCO [TR030008/APP/2.1]</p>	
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			<p>mitigation hierarchy is recommended, and the above examples should be considered last resorts, according to best practice. Simply put, this particular woodland is considered irreplaceable and invaluable to local biodiversity and heritage, thus avoidance and mitigation should be emphasised, and the suggested compensation is likely to be unequal to the negative consequences of the projected habitat loss. Consequently, LWT's stance regarding mitigation and compensation remains unchanged from our previous response:</p> <p><i>"Were losses to the Long Strip Wood deemed to indeed be unavoidable following the mitigation hierarchy, LWT would expect commitments that go well beyond 'appropriate mitigation/compensation' to be put forward. This would need to include a significant effort and commitment to mitigating impacts and losses to this site, as well as a minimum delivery of 10% Biodiversity Net Gain—with encouragement from LWT to aim for targets beyond the minimum 10%.</i></p> <p><i>Lastly, given that recent surveys at Long Strip Wood found evidence of white-letter hairstreak, LWT would recommend that terrestrial invertebrates be scoped into further assessments."</i></p> <p>While it is clear that efforts have been made to address concerns for the impacts to the Long Strip Wood (e.g., Pipe Rack and jetty access road redesign), LWT believes that the current revisions fall short for delivering on assurances of minimal impact to the Long Strip Wood and due diligence according to the mitigation hierarchy. At this time, our stance remains the same and we will continue to monitor developments regarding impacts to the Long Strip Wood going forward.</p> <p>...</p>	<p>will maintain habitat availability for invertebrates. Chapter 8: Nature Conservation (Terrestrial Ecology) [TR030008/APP/6.2] acknowledges the recorded presence of white-letter hairstreak within the woodland. However, further survey for this species is not merited since its presence has already been confirmed. Justification for scoping out terrestrial invertebrate surveys is set out in Appendix 8.B (Preliminary Ecological Appraisal Report) [TR030008/APP/6.4]. White-letter hairstreak is dependent on the presence of elms and while some elms will be removed in association with Work No 2, some elms would also be retained. As a nationally significant infrastructure project ("NSIP"), the Project is not subject to the requirement to deliver 10% (terrestrial) biodiversity net gain ("BNG") under the Environment Act 2021, as the requirement is yet to come into force. Biodiversity Net Gain calculations are therefore not mandatory for NSIPs and have not been undertaken. There is currently no mechanism for undertaking a marine BNG metric assessment.</p>			
Lincolnshire Wildlife Trust	30.06.2023 Email	<p>... <u>Biodiversity Net Gain</u></p> <p>LWT is disappointed that the updated documents for the Second Statutory Consultation continue to neglect Biodiversity Net Gain (BNG). Therefore, our stance remains the same:</p>	<p>The Applicant acknowledges LWT's stance on the consideration of Biodiversity Net Gain. Justification for the position taken by the Project is provided below.</p> <p>It is anticipated that the secondary legislation implementing mandatory 10%</p>	Yes	An Outline Woodland Compensation Strategy [TR030008/APP/6.8] has been prepared for the Project. this is a separate strategy to address the permanent	<p>Chapter 3: Need and Alternatives</p> <p>Chapter 8: Nature Conservation (Terrestrial</p>	

			<p>“Schedule 15 of the Environment Act 2021 makes provision about biodiversity gain in relation to development consent for nationally significant infrastructure projects (NSIPs), but implementation details are not yet clear and not likely to come into force until November 2025, Regardless LWT urges all developers, whether working on local developments or NSIPs, to follow the net gain approach and demonstrate at least a 10% measurable net gain in biodiversity within proposals for developments.</p> <p>LWT agrees with Natural England that, ‘Major infrastructure developments should set the highest environmental standards and deliver significant gains’, as stated in their response to the Scoping Report for this development. Given that BNG was included in the Scoping Opinion, LWT is disappointed not to find committed effort towards assessing and delivering BNG within the PEIR. LWT would urge proper, detailed assessment of BNG (both terrestrial and marine), using the appropriate metrics, going forward. For reference, the main requirements for BNG include:</p> <ul style="list-style-type: none"> • Minimum 10% gain required, calculated using the Biodiversity Metric • Approval of a biodiversity plan • Habitat is secured for at least 30 years via planning obligations and/or conservation covenants. <p>We will be monitoring assessment and delivery of BNG (terrestrial and marine) going forward.”</p> <p>LWT would encourage the Applicant to include BNG in the planning and delivery of this project, and we would also encourage separate terrestrial and marine BNG delivery. Lastly, LWT would strongly suggest that mitigation/compensation for impacts to the Long Strip Wood are considered separate and additional to any BNG measures.</p> <p>...</p>	<p>net gain under the Environment Act 2021 will not be in place until November 2025 for Nationally Significant Infrastructure Projects (“NSIPs”). Current guidance indicates that NSIPs accepted for examination before the specified commencement date would not be required to deliver mandatory (terrestrial) biodiversity net gain, and therefore formal calculations using the DEFRA metric have not been undertaken for the Project. There is currently no mechanism for undertaking a marine BNG metric assessment. However, a qualitative approach to biodiversity enhancements will be taken and the following commitments are made within the ES:</p> <ol style="list-style-type: none"> 1) Habitat creation and enhancement within the Site Boundary. The delivery and management of these areas are explained in the Outline Landscape and Ecology Management Plan (“LEMP”) [TR030008/APP/6.9]; the provision and approval of the final measures are secured by a DCO Requirement. 2) The commitment to a compensation strategy for woodland loss within Long Strip is secured by a DCO Requirement and an Outline Woodland Compensation Strategy [TR030008/APP/6.8] has been prepared. This is a separate strategy to compensate for the permanent loss of woodland within Long Strip through localised enhancements to the existing areas of retained woodland, as well as off-site planting of woodland in a defined area within the operational port boundary proposed following liaison with NELC <p>Whilst not part of the Application, it should be noted that ABP also intends to allocate to the Project the environmental benefits and enhancements generated by an area of one hectare of intertidal habitat that is being created through an already approved (and currently under construction) realignment scheme known as the Outstrays to Skeffling Managed</p>		<p>loss of woodland within Long Strip through localised enhancements to the existing areas of retained woodland, as well as appropriate compensatory measures proposed following liaison with stakeholders.</p> <p>There is a commitment within the ES for the provision of a 50% uplift in the number of replacement trees planted, to meet NELC policy requirements.</p>	<p>Ecology) [TR030008/APP/6.2]</p> <p>Outline Landscape and Ecology Management Plan (OLEMP) [TR030008/APP/6.9]</p> <p>Outline Woodland Compensation Strategy [TR030008/APP/6.8]</p>
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Lincolnshire Wildlife Trust	30.06.2023 Email	... Capital Dredging and Maintenance Dredging LWT is pleased to see that the level of dredging required for the Project has now reduced with the decision to implement one berth instead of two. However, the details of dredging works remain vague at this time, and LWT will continue to monitor this as more information is given. Our concerns regarding capital dredging and maintenance dredging were not addressed in the updated documents for this Second Statutory Consultation. Therefore, we have included our previously stated views in an appendix (Appendix A) to this letter. ...	<p>Capital dredging is assessed in Section 9.8 of ES Chapter 9: Nature Conservation (Marine Ecology) [TR030008/APP/6.2].</p> <p>The need for future maintenance dredging within the new berth pocket is expected to be very limited (if required at all). Further information on maintenance dredging has been provided in Section 9.8 of ES Chapter 9: Nature Conservation (Marine Ecology) [TR030008/APP/6.2]. The assessment considers the impact on habitats of maintenance dredging during the operational phase.</p> <p>Cumulative effects of dredging are also considered within Chapter 25: Cumulative and In-Combination Effects of the ES [TR030008/APP/6.2].</p>	No	No	<p>Chapter 9: Nature Conservation (Marine Ecology)</p> <p>Chapter 25: Assessment of Cumulative Effects [TR030008/APP/6.2]</p>	
Lincolnshire Wildlife Trust	30.06.2023 Email	... Future Endorsement and Final Remarks LWT will consider endorsement of IGET provided that the above concerns are addressed appropriately. LWT request a meeting with IGET to discuss the issues detailed in this response. LWT will continue to work with the developers during the planning process	<p>The Applicant acknowledges LWT's future endorsement and final remarks.</p> <p>A meeting was held between the Applicant and LWT on 10.08.23 to discuss the approach to ecological mitigation and enhancements in both the terrestrial and marine environments.</p>	No	No	N/A	

			<p>to ensure the correct data is gathered and assessed in order to address our concerns.</p> <p>Yours sincerely,</p> <p>██████████ Conservation Officer Lincolnshire Wildlife Trust</p> <p>...</p>				
Lincolnshire Wildlife Trust	30.06.2023 Email	<p>...</p> <p>APPENDIX A: Pertinent sections from LWT’s response to the First Statutory Consultation and PEIR for IGET</p> <p><u>A.1. Assessment of Marine Impacts</u></p> <p>Given the extent of dredging and marine construction described in the PEIR, it is prudent that the Applicant properly evaluates potential impacts on features within the Humber Estuary. This would require current, site-specific data on distributions of species of interest in the local and surrounding areas. While the Applicant has provided several sources to help establish a baseline, LWT would argue that several of these datasets are not current (older than five years) or are too far to be relevant to the local area in question (questionable data sources listed below). While these datasets may be used to help establish a historic baseline and understanding for expected species, LWT does not feel that these datasets alone are sufficient to determine an ecological baseline or to directly inform potential impacts and mitigation for the proposed project. Therefore, these historic datasets would need to be supplemented with more current, site- specific data.</p> <p>Table 1. Benthic datasets older than five years.</p> <p>Data Source</p> <p>Able Marine Energy Park Benthic Surveys Humber Estuary SAC Intertidal Sediment Survey South Humber Channel Marine Studies HU056 Disposal Site Monitoring Clay Huts Disposal Benthic Monitoring</p> <p>Date Collected</p>	<p>Benthic Data</p> <p>With respect to benthic data, project specific benthic data (grab samples) were collected from within and near the potential development footprint in 2022. All the faunal samples collected over the survey area were very impoverished in nature with commonly occurring species recorded and assemblages similar to recent previous samples collected nearby for the proposed Immingham Eastern Ro-Ro Terminal (“IERRT”) project in 2021 (<0.5-1km away). Based on an understanding of the subtidal ecology of the local area more generally, the samples are considered representative of the impoverished subtidal communities found in this section of the Humber Estuary which are subject to physical disturbance as a result of strong tidal currents and sediment movement. On this basis there is considered to be no requirement for the collection of any additional benthic samples.</p> <p>Fish Data</p> <p>With respect to fish data, it is acknowledged that some of the data sources are more than five years old, and while relatively near to the development footprint, do not directly overlap. However, given the wide variety of surveys and studies undertaken on fish in the region as well as the mobile nature of fish, the surveys are considered broadly representative of the fish assemblage that could be present within the dredge footprint and surrounding local area. Furthermore, based on an understanding</p>	No	No	Chapter 9: Nature Conservation (Marine Ecology) [TR030008/APP/6.2]	

			<p>2015 and 2016 2014 2010 2017</p> <p>2008</p> <p>Table 2. Fish datasets older than five years. Bold datasets are used for the fish species records presented in Tables 9.7 and 9.8.</p> <p>Data Source</p> <p>South Humber Channel Marine Studies EA TraC Fish Monitoring EA Review of fish population data Ellis et al. 2012 – Spawning and nursery grounds</p> <p>Date Collected</p> <p>2010 2017 2013 2012</p> <p>...</p>	<p>of potential impacts it is diadromous migratory fish (which would not be targeted by fish survey methods in the development footprint) rather than other fish species which are considered most likely to be sensitive to potential impacts. On this basis, site-specific data fish data is not considered to be needed to inform the assessment.</p>			
Lincolnshire Wildlife Trust	30.06.2023 Email	<p>...</p> <p><u>A.2. Marine Impacts – Benthic Surveys (PEIR Appendix 9.A)</u></p> <p>The dynamic and localised nature of benthic ecology necessitates comprehensive, localised data to properly establish a baseline for ecological assessment. Furthermore, data outside the proposed Site Boundary would likely be required given the type of sediment and extent of dredging and pile-driving that are proposed for this project. LWT recognises that current data from grab samples have been provided in Appendix 9.A; however, we would argue that this level of data is insufficient (sample size of eight taken during a single day of sampling) to establish a clear understanding of the local and surrounding benthic habitat that is likely to be impacted by such an extensive level of construction and dredging. Therefore, LWT would recommend that further surveys be undertaken prior to approval of dredging and construction.</p> <p>...</p>	<p>Project specific benthic data (grab samples) were collected from within and near the potential development footprint in 2022. The scale of the sampling was considered comparable to those undertaken for other recent developments and proportionate based on an understanding of the subtidal assemblages known to occur in the local area.</p> <p>All the faunal samples collected over the survey area were very impoverished in nature with commonly occurring species recorded and assemblages similar to recent previous samples collected nearby for the proposed IERRT project in 2021 (<0.5-1km away).</p> <p>Based on an understanding of the subtidal ecology of the local area more generally, the samples are considered representative of the impoverished subtidal communities found in this section of the Humber Estuary which are subject to physical disturbance as a result of strong tidal currents and sediment movement. On this basis there is no</p>	No	No	Chapter 9: Nature Conservation (Marine Ecology) [TR030008/APP/6.2]	

				requirement for the collection of any additional benthic samples.			
Lincolnshire Wildlife Trust	30.06.2023 Email	... A.3. Marine Noise Impacts and Modelling LWT appreciates the Underwater Noise report provided in Appendix 9.B. However, we believe that this exercise did not go far enough to properly assess potential risk or impacts to marine fauna. Currently, the assessment only provides noise propagation models for construction/dredging, known hearing sensitivities and responses of marine fauna, and characterisations of proposed development activities. We believe that this exercise could have been improved by modelling species distributions based on current data in conjunction with noise propagation models based on the location and time of year of the construction phase¹. This type of investigation might be used to quantify potential risk to sensitive species based on the anticipated timing of construction and predicted habitat use, and therefore would be a valuable tool for avoiding/mitigating impacts (e.g., timing construction based on anticipated risk and interaction with sensitive species). ...	The underwater noise assessment is based on the worst case assumption that any sensitive marine species that are known to occur in the study area (i.e. the Humber Estuary) have the potential to overlap with the underwater noise generated by the proposed development activities. It takes account of the published evidence on marine species' temporal (i.e. seasonal and day/night movements) and spatial distribution that is reviewed in this chapter to identify the key species that require to be assessed but it does not attempt to quantify the risk through modelling which is likely to have inherent uncertainties associated with it and potential to misrepresent or underestimate the effects. Furthermore, this approach was not identified as a requirement at the scoping stage of the Project.	No	No	Chapter 9: Nature Conservation (Marine Ecology) [TR030008/APP/6.2]	
Lincolnshire Wildlife Trust	30.06.2023 Email	... A.4. Capital Dredging and Maintenance Dredging LWT recognises that marine works (capital dredging and piles) have been scoped in and we will be monitoring further assessments of pile-driving impacts, capital dredging impacts and dredge disposal. We have provided details above that will facilitate assessments of dredging and construction impacts. However, we do not agree with the scoping out of maintenance dredging in the operational phase. While the Applicant has claimed that <i>'the predicted impacts on benthic habitats and species as a result of maintenance dredging are considered to be equivalent or lower than capital dredge and comparable to the existing maintenance dredge regime'</i> , it is currently unclear how this proposed maintenance would contribute to cumulative impacts of ongoing works within the Humber Estuary. Therefore, we recommend that maintenance dredging is scoped into further	Dredging Capital dredging is assessed in Chapter 9: Nature Conservation (Marine Ecology) [TR030008/APP/6.2] (Section 9.8). The need for future maintenance dredging within the new berth pocket is expected to be very limited (if required at all). Further information on maintenance dredging has been provided in Chapter 9 (Section 9.8). The assessment considers the impact on habitats of maintenance dredging during the operational phase. Cumulative effects of dredging are considered within Chapter 25: Cumulative and In-Combination Effects of the ES [TR030008/APP/6.2].	No	No	Chapter 9: Nature Conservation (Marine Ecology) Chapter 25: Cumulative and In-Combination Effects [TR030008/APP/6.2]	

			assessment, and that both capital dredging and maintenance dredging are included in future cumulative impact assessments.				
11.	Historic England	30.06.2023 Email	<p>Dear Immingham Green Energy Project Manager</p> <p>Historic England Advice on S42 Reconsult</p> <p>We note the additional information that has been provided. This provides a greater degree of certainty with regards to potentially sensitive peat deposits (and similar) will be handled further down the line. With the GI investigations in the marine environment we are still uncertain about the impact on any unknown wrecks &c. However, if the applicant is confident that—based on the data they have gathered through marine geophysical surveys—they can undertake this work whilst avoiding impacts on aforementioned historic environment assets, then we have no objection to the approach set out (suitably secured by requirements).</p> <p>Yours sincerely, [REDACTED] for HE</p>	<p>The requirement for further investigation on activities in relation to the peat deposits is detailed in Chapter 14: Historic Environment (Terrestrial) paragraphs 14.9.3 and 14.10.2 [TR030008/APP/6.2]. This work will be undertaken as recommended in the geoarchaeological report (paragraphs 8.2.1 – 8.2.2 of Appendix 14.G: Report on Geoarchaeological Survey and monitoring of Geotechnical investigations [TR030008/APP/6.4]).</p> <p>This approach was agreed with NELC during a meeting held on 28 July 2023.</p> <p>As per Chapter 15: Historic Environment (Marine) [TR030008/APP/6.2] (paragraph 15.9.4), GI works will avoid any known archaeological receptors as identified by the assessment of geophysical survey data. If previously unknown sites or material are encountered during the Project, a Protocol for Archaeological Discoveries will be adopted to reduce level of impact on unexpected discoveries (Appendix 15.B: Archaeological Written Scheme of Investigation [TR030008/APP/6.4]). Existing marine borehole locations have avoided known A1 and A2 archaeological receptors.</p>	No	<p>The additional investigation into peat deposits is being progressed and will be reported at the earliest opportunity.</p> <p>As per the WSI, presented in Appendix 15.B [TR030008/APP/6.4] Borehole logs will be archaeologically assessed by qualified archaeologist and reported on.</p>	<p>Chapter 14: Historic Environment (Terrestrial)</p> <p>Chapter 15: Historic Environment (Marine)</p> <p>Appendix 14.G: Report on Geoarchaeological Survey and monitoring of Geotechnical investigations</p> <p>Appendix 15.B: Archaeological Written Scheme of Investigation [TR030008/APP/6.4]</p>
12.	Anglian Water	13.07.2023 Email	<p>Dear Immingham Green Energy Terminal team</p> <p>Please find attached Anglian Water's response to the second statutory consultation from my colleague [REDACTED]</p> <p>Dear [REDACTED]</p> <p>Immingham Green Energy Terminal (IGET) Second Statutory consultation</p> <p>Anglian Water Services</p> <p>Our ref: StatConR.IGET.NSIP.22.ds</p>	<p>The commercial offer received from Anglian Water over the supply of resources, means that no further assessment is required of any impacts associated with water demand or supply, including any environmental impacts which might be associated of the provision of resources including any new abstractions.</p> <p>Anglian Water as part of their Water Resources Management Planning (WRMP24) process would have made their own assessment in order to give this response. The offer now received from</p>	No	No	<p>Chapter 18: Water Use, Water Quality, Coastal Protection, Flood Risk and Drainage [TR030008/APP/6.2]</p> <p>Drainage Strategy - Appendix 18.B [TR030008/APP/6.4]</p>


			<p>Thorpe Wood House Thorpe Wood Peterborough PE3 6WT</p> <p>www.anglianwater.co.uk</p> <p>Thank you for consulting Anglian Water on the second statutory consultation for the project, which is within North East Lincolnshire and the road servicing the site for construction and operation to the north is in North Lincolnshire.</p> <p>Anglian Water's response follows our previous correspondence including our February 2023 response to the first statutory consultation and our October 2022 response to The Planning Inspectorate on the project's Scoping Report. Our agent Jacobs also provided a template of draft DCO Protective Provisions, although we have now taken the NSIP application back in house given its prospective water demands. On this point we meet with the project and other projects on the South Humber on 16 March 2023 with the prospective water retailer. Your advice and letter to Anglian Water has since enabled us to secure agreement with the Environment Agency (EA) that we can plan to supply an additional 60MLD of water to service the South Humber decarbonization projects.</p> <p>Anglian Water supports the decarbonisation role of the project and is both a user of hydrogen and a potential developer of smaller scale hydrogen production as one element of our net zero strategy. It should be emphasised that the plan to provide an additional 60MLD of water to service the South Humber cluster is part of our draft Water Resources Management Plan (WRMP) for 2025 to 2030 which will be submitted to regulators later this year. There is no guarantee that the proposed WRMP approach to supplying that 60MLD will be supported by regulators and so the solution to supply the project may not be brought forward by Anglian Water Services (AWS).</p> <p>AWS remain the appointed water and sewerage undertaker for the site. The following response is submitted on behalf of Anglian Water in its statutory capacity and relates to potable water and water assets along with wastewater and water recycling assets. The</p>	<p>Anglian Water (dated 27 July 2023) for a non-potable supply meets the needs of the Project for non-potable water.</p> <p>The Drainage Strategy (Appendix 18.B [TR030008/APP/6.4]) includes provision of attenuation storage for surface water over the lifetime of the development and retains surface water on the West Site up to the 1% AEP plus 40% climate change event. Discharge rates from the West Site are restricted to the greenfield runoff rate and surface water is discharged to the Immingham Pump Drain via a local land drain to the south of the Site, providing betterment over the current scenario. Drainage and runoff should therefore not pose a hydrological risk to AW underground assets.</p> <p>The development of protective provisions in respect of Anglian Water's interests is ongoing. The draft DCO includes proposed protective provisions.</p>			
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			<p>comments are in addition to our previous submissions.</p> <p>We have reviewed the Preliminary Environmental Information Report and materials which are summarised below with our comments and position.</p> <p>...</p>				
Anglian Water	13.07.2023 Email	<p>...</p> <p><u>Public Exhibition Boards</u></p> <p>We note that the efficient use of water and utility connections are part of one of the five objectives for the project. Please find attached Anglian Water's new Non-Domestic Water Demand Position. Without the agreement by regulators to the inclusion of the 60MLD in the draft WRMP, the provision of water for the project would have had to be outside the AWS regulated business. This may still be the case if regulators decline to support the AWS proposal for a desalination plant or final effluent reuse.</p> <p>Please note that the position requires that applicants, including NSIP projects will be required to work with us to produce a Water Resources Assessment as part of the EIA for the project and this will be submitted with the DCO, updated through the Examination – partly in response to the WRMP progression – and will then require finalisation and agreement by the local planning authority as DCO Requirement Approval Body in consultation with the EA and other bodies including AWS.</p> <p>The changes to the project (summarised as A to F on the map) do not materially change the project for AWS or raise new issues for AWS. We support the changes to the project red line area which enable the retention of woodland. We also support the changes in landform which assist in the natural drainage of the site.</p> <p>We note that the DCO application is still intended to be submitted in summer 2023 with a decision by the Secretary of State in summer 2024. Whilst the acceleration of a decision on the project is welcome in principle to support the net zero transition, such a timetable does not accord with the usual determination period for an NSIP. This may make it</p>	<p>The commercial offer received from Anglian Water over the supply of resources, means that no further assessment is required of any impacts associated with water demand or supply, including any environmental impacts which might be associated of the provision of resources including any new abstractions.</p> <p>Anglian Water as part of their Water Resources Management Planning (WRMP24) process would have made their own assessment in order to give this response. The offer now received from Anglian Water (dated 27 July 2023) for a non-potable supply is sufficient for the Project needs for non-potable water.</p> <p>The Applicant expressly acknowledges Anglian Water's support regarding the changes to the Site Boundary and changes in landform.</p>	No	No	Chapter 18: Water Use, Water Quality, Coastal Protection, Flood Risk and Drainage [TR030008/APP/6.2]	

			difficult for a definitive position to be reached by regulators on the AWS WRMP prior to the water resource matters being considered at the DCO Examination. The planning risk that this introduces is of course a matter for the IGET project and may be informed by caselaw regarding the interconnection between a DCO and a subsequent planning application required to enable the DCO to be constructed or operated. ...				
Anglian Water	13.07.2023 Email	...	<u>Project Brochure</u> Thank you for engaging with AWS as water wholesaler and sewage undertaker and with Wave as the prospective water retailer. ...	The Applicant notes and acknowledges this comment.	No	No	Chapter 18: Water Use, Water Quality, Coastal Protection, Flood Risk and Drainage [TR030008/APP/6.2]
Anglian Water	13.07.2023 Email	...	<u>PEIR Non-technical Executive Summary</u> No new comments ...	The Applicant notes and acknowledges this comment.	No	No	Chapter 18: Water Use, Water Quality, Coastal Protection, Flood Risk and Drainage [TR030008/APP/6.2]
Anglian Water	13.07.2023 Email	...	<u>PEIR Addendum</u> 5.16 We concur that one of the most important questions raised by the first Statutory Consultation is the water demand requirements. 6.5.2 We note the ground raising proposed for the west site and support in principle the change to a project to ensure surface drainage can be achieved without adding to water going to public sewers or causing increased flood risk at lower elevations. We would welcome confirmation that the planned drainage and run off rates or other changes proposed have been assessed and do not pose a hydrological risk to AWS underground assets. This assessment	<u>Water demand</u> Air Products has been engaging with Anglian Water in relation to water demand which has resulted in a commercial offer being made. A commercial offer has been received from Anglian Water (dated 27 July 2023) for a non-potable supply which is sufficient for the full Project (Phases 1 to 6). The commercial offer received from Anglian Water covers the supply of resources, meaning that no further assessment is required of any impacts associated with water demand or supply, including any environmental impacts which might be associated with the provision of resources including any new abstractions as stated in Chapter 18: Water Use, Water Quality, Coastal	Yes	The Project now includes greater flexibility to enable cooling by either water cooling or by air cooling, although water cooling remains a design preference. It has been determined that water cooling could be achieved through the use of a non-potable water supply (rather than a potable supply), so reducing reliance on Anglian Water's limited potable water supply.	Chapter 18: Water Use, Water Quality, Coastal Protection, Flood Risk and Drainage [TR030008/APP/6.2] Drainage Strategy Appendix 18.B [TR030008/APP/6.4]

			<p>should be included in the Water Quality, Coastal Protection, Flood Risk and Drainage EIA Chapter.</p> <p>Table 7.2, page 32 and 33. We note the conclusion that the changed landform will assist in managing stormwater and that there are no new or different significant effects. Please include the assessment of the impact on AWS assets in the Water Quality, Coastal Protection, Flood Risk and Drainage EIA Chapter.</p> <p>General comment. Whilst the consultation is to seek views on the eight changes, we would have expected the PEIR Addendum to set out how the EIA will look to address the 'water demand requirements' identified in the first statutory consultation. We would welcome detailed further engagement on the Water Resources Assessment (WRA) at the earliest opportunity and potentially in liaison with the EA to ensure that the WRA methodology is agreed and takes into account and assesses impacts and receptors in the event of a reasonable worst-case scenario as required by EIA regulations. We have advised the Planning Inspectorate on the water resources issue across the Anglian Water region and the requirement now for non- domestic water demand and its supply to be considered by applicants, including NSIPs, when that new demand exceeds 50,000 litres per day.</p> <p>...</p>	<p>Protection, Flood Risk and Drainage [TR030008/APP/6.2].</p> <p>Anglian Water as part of their Water Resources Management Planning (WRMP24) process would have made their own assessment in order to make this offer.</p> <p><u>Drainage strategy</u></p> <p>The Drainage Strategy (Drainage Strategy Appendix 18.B [TR030008/APP/6.4]) includes provision of attenuation storage for surface water over the lifetime of the development and retains surface water on the West Site up to the 1% AEP plus 40% climate change event. Discharge rates from the West Site are restricted to the greenfield runoff rate and surface water is discharged to the Immingham Pump Drain via a local land drain to the south of the Site, providing betterment over the current scenario. Surface water runoff from the Site will not enter the AW system therefore drainage and runoff should therefore not pose a hydrological risk to AW underground assets. Further assessment is included in Chapter 18: Water Use, Water Quality, Coastal Protection, Flood Risk and Drainage [TR030008/APP/6.2].</p>			
Anglian Water	13.07.2023 Email	<p>...</p> <p><u>Project Plans</u></p> <p>We refer you to our comments on the first consultation including the direction to contact our diversions team if these are required for AWS network assets. Based on the published information, we assume diversions of Anglian Water assets are still not required and their protection including crossings during construction will be secured through inclusion of the AWS Protective Provisions previously provided to the IGET project. The Construction Environment Management Plan and Water Management Plan should include steps to remove the risk of damage to Anglian Water assets from plant and machinery including haul roads. These will support the Protective Provisions in the draft DCO.</p>	<p>The presence of Anglian Water assets is noted and this information has been used to inform Project planning and design. Discussions with Anglian Water in relation to asset protection measures are ongoing. The development of protective provisions in respect of Anglian Water's interests is ongoing.</p> <p>The Outline Construction Traffic Management Plan ("OCTMP") for the Project accompanies the DCO Application [TR030008/APP/6.7]. The final OCTMP would be prepared by the contractor, in accordance with the Outline OCTMP, prior to commencement of construction and is secured by Development Consent Order ("DCO") requirement. The Outline OCTMP sets</p>	No	No	<p>Chapter 18: Water Quality, Coastal Protection, Flood Risk and Drainage [TR030008/APP/6.2]</p> <p>Outline Construction Traffic Management Plan [TR030008/APP/6.7]</p>	

			<p>Further advice on minimising and then relocating Anglian Water existing assets can be obtained from: connections@anglianwater.co.uk</p> <p>AWS would welcome the conclusion of discussions on the foul water connection requirements for the project. As AWS has advised the project there are no current envisaged showstoppers to providing a foul water solution, we recommend that this matter is concluded so that it can be included as a matter which has been agreed in the draft Statement of Common Ground (SoCG) to be submitted with the application. Please can the project provide a first draft of the SoCG for AWS to review and comment on. We would anticipate given the importance of water supply that a Statement of Commonality may be required with the EA which may also include your intended water retailer.</p> <p>...</p>	<p>out how the appointed contractor will manage traffic impacts associated with the Project.</p> <p>Air Products is actively working with Anglian Water to agree a statement of common ground on matters including a foul water connection. Drainage of surface water and foul water within the wider Port of Immingham is privately owned and does not discharge to the wider Anglian Water surface water or foul water drainage network beyond the Port of Immingham (Section 18.6 of Chapter 18: Water Use, Water Quality, Coastal Protection, Flood Risk and Drainage [TR030008/APP/6.2]).</p> <p>Discussions on a Statement of Common Ground have commenced and are ongoing.</p>			
Anglian Water	13.07.2023 Email	<p>...</p> <p><u>Statement of Community Consultation</u></p> <p>We note that water is referred to once in the summary of project objectives. We welcome the reference to the role of the EA (para 1.30) and would have anticipated that the projects work with AWS would have been referenced in this section.</p> <p>In developing our non-domestic demand position statement, it is evident that one of the primary concerns of local councils and communities is whether a new major water demand project could jeopardise supplies to homes and existing businesses. Whilst it is our regulatory duty to ensure there is a supply demand balance for current and future planned domestic needs, we would ask the IGET project to ensure that it emphasises in its communications to the community that water supplies to homes and businesses will not be interrupted or reduced as a result of the project. We recommend given the IGET projects promoters that this message of no impact on domestic supplies is included in the cumulative impact assessment for the IGET project</p>	<p>Public water supply in the homes and businesses located within the local community will not be affected by the development being undertaken. The water supply agreement with Anglian Water will not impact on the availability of water within the local area and network infrastructure will not be impacted by construction at the Project Site.</p> <p>It has not been possible to share a draft Consultation Report with Anglian Water. However, the Applicant has been in contact with Anglian Water throughout the Statutory Consultation periods and discussions are continuing. The Consultation Report and appendices address the points raised in Anglian Water's consultation response.</p>	No	No	Chapter 18: Water Use, Water Quality, Coastal Protection, Flood Risk and Drainage [TR030008/APP/6.2]	

			<p>and provided to communities and local business stakeholders.</p> <p>Given the criticality of water resources to the project we would welcome the opportunity to review the draft Consultation Report as well as documents such as the Water Resources Assessment before its submission with the NSIP application. This will ensure that we agree on the factual position and that the approach aligns with or regulatory requirements and consultation on the WRMP, for example. Our approach to provision of water to 2050 relies on both demand management as well as seeking approval to invest in new strategic resource options and wastewater (final effluent) reuse.</p> <p>...</p>				
	Anglian Water	13.07.2023 Email	<p>...</p> <p><u>S47 and S48 Notice</u></p> <p>Other than the revised end date for the consultation we have no new comments.</p> <p>...</p>	The Applicant acknowledges that there are no further comments on the S47 and S48 notice.	No	No	N/A
	Anglian Water	13.07.2023 Email	<p>...</p> <p><u>FAQs</u></p> <p>We recommend that the FAQs are updated to advise the community that the project will not impact domestic water supplies.</p> <p>Yours sincerely,</p> <p></p> <p>Growth Strategy Manager</p> <p>Please do not hesitate to contact me should you require clarification on the above response and prior to design fix and the application submission.</p>	FAQs hosted on the Project website will be updated following the submission of the Application to reflect the feedback from Anglian Water.	No	No	N/A
13.	DFDS	17.07.2023 Email	<p>To Whom It May Concern</p> <p>Please find attached the response of our client, DFDS Seaways, to ABP's Second Statutory Consultation on Immingham Green Energy Terminal ("IGET").</p> <p>Yours faithfully</p> <p>IMMINGHAM GREEN ENERGY TERMINAL</p>	<p>The Applicant issued a formal letter of response to DFDS addressing their comments. This letter can be found in Appendix Q.3.</p> <p>The existing operation of DFDS within the Port of Immingham is acknowledged and understood.</p>	No	No	Chapter 25: Cumulative and In-Combination Effects [TR030008/APP/6.2]

			<p>PINS REFERENCE TR030008 RESPONSE TO SUPPLEMENTARY STATUTORY CONSULTATION FROM DFDS</p> <p>This is a response from DFDS to ABP’s second statutory consultation for its proposed DCO application for the Immingham Green Energy Terminal (“IGET”).</p> <p>DFDS is an international shipping and logistics company and one of the largest users of the Port of Immingham, with around 1000 employees involved in its operations there, both ferry- based and landside.</p> <p>DFDS has responded to both statutory and supplementary consultations for ABP’s other DCO application for the Immingham Eastern Ro-Ro Terminal (“IERRT”) (PINS Reference TR030007) and expressed our concerns with that proposal around navigational safety, trunkway protection around the Immingham Oil Terminal (“IOT”) and land-side congestion among other matters.</p> <p>DFDS responded to the first statutory consultation for the IGET in February 2023, expressing concerns that mitigation for cumulative effects of both the IEERT and the IGET was either incorrectly scoped out or insufficient.</p> <p>We note the changes in this supplementary statutory consultation, namely:</p> <ul style="list-style-type: none"> • site boundary amendments; • marine changes including jetty alignment and length; (berth arrangement reduced to one berth) and dredging requirements; • routing of the pipe-rack and jetty access road in the Long Strip woodland; • West Site illustrative layout, elevation and drainage • construction vehicle numbers increasing; • permanent adjustment to speed limits on Laporte Road from 40mph to 30 mph; • Public Rights of Way diversion (Bridleway 36) and removal of informal access in two areas; • temporary removal of Kings Road street furniture and overhead line works. 	<p>The Applicant notes that consultation responses have also been made by DFDS to the statutory and supplementary consultations on the Immingham Eastern Roro Terminal (“IERRT”) application (PINS Reference TR03007) and is aware of the points made in those responses. The Applicant further notes that the focus of this consultation response from DFDS in relation to the Project is on the cumulative effects of the Project with the IERRT project.</p> <p>With regard to cumulative effects of the two projects, The Applicant can confirm that a cumulative effects assessment of the construction and operation of the Project together with the IERRT project has been undertaken and is set out in detail in Chapter 25: Cumulative and In-combination Effects [TR030008/APP/6.2] of this Environmental Statement (“ES”) and accompanying appendices.</p>			<p>Chapter 22: Major Accidents and Disasters</p> <p>Chapter 25: Cumulative and In- Combination Effects TR030008/APP/ 6.2</p>
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			In light of these changes our concerns remain the inadequate assessment and mitigation of the cumulative and in-combination effects of the IGET with the IERRT. We therefore repeat our previous concerns below and add further concern at the increase of construction traffic. ...				
DFDS	17.07.2023 Email	...	<p>2 Absence of IERRT depicted on any visual materials</p> <p>2.1 The IERRT has now been accepted for examination by PINS. However, the IERRT structure is still omitted in every visual representation in the IGET materials. The omission of the proposed structure misleadingly underplays the possibility of marine congestion in the area during both construction and operation should the two projects go ahead and the consequential safety risks in the vicinity of the jetty on the marine side of the IGET.</p> <p>...</p>	<p>The IERRT application is an entirely separate project, which is at the examination stage and is not yet consented. Consequently, there is no reason why it would need to be depicted visually on the application materials for the Project.</p> <p>The construction and operation of IERRT has been taken into account in the navigational risk assessment (“NRA”) which has been undertaken for the Project. The NRA is contained within Appendix 12.A: Navigational Risk Assessment [TR030008/APP/6.4]. The cumulative effects of the Project with the proposed IERRT project have been assessed and is set out in Chapter 25: Cumulative and In-Combination Effects [TR030008/APP/6.2].</p>	No	No	<p>Chapter 12: Marine Transport and Navigation</p> <p>Chapter 25: Cumulative and In-Combination Effects [TR030008/APP/6.2]</p>
DFDS	17.07.2023 Email	...	<p>3 Cumulative effects</p> <p>3.1 There is inconsistency in the IGET consultation materials, particularly between the PEIR and the documents intended for general local audiences in how they consider the impact of the IERRT alongside the IGET. For example, the Statement of Community Consultation says that IERRT “is a separate project unrelated to the IGET project and the IGET team will make this clear in all materials and correspondence with stakeholders and the public.” This approach underplays the significance of the cumulative effect of the two projects taking place in such close proximity and does not reflect the approach which is better set out in the PEIR which correctly identifies the IERRT as the development in the area with the greatest potential to lead to significant cumulative effects (PEIR Volume 1 Non-Technical Summary at 5.21.) and notes that the two projects are in close spatial</p>	<p>There is no inconsistency (as suggested) in the consultation materials for the Project in respect of the consideration of the cumulative effects of the Project and IERRT.</p> <p>The wording in the Statement of Community Consultation that IERRT “is a separate project unrelated to the IGET project and the IGET team will make this clear in all materials and correspondence with stakeholders and the public” was simply to avoid any confusion (primarily amongst members of the public) that the two projects were the same or directly linked due to both projects having the same applicant and thereby avoiding consultation responses being submitted for the wrong application. It is correct to say the two projects are unrelated and this does not mean (and cannot be said to be suggesting) that the two unrelated</p>	No	No	<p>Chapter 25: Cumulative and In-Combination Effects [TR030008/APP/6.2]</p>

			<p>proximity with the potential for their construction programmes to overlap. The PEIR addendum does nothing to address these concerns despite the progress of the IERRT towards examination.</p> <p>...</p>	<p>projects would not have a cumulative effect.</p> <p>As noted above, the assessment of the cumulative effects of the Project with the proposed IERRT project has been undertaken and is set out in Chapter 25: Cumulative and In-Combination Effects [TR030008/APP/6.2] and within Appendix 25.C: Assessment of Cumulative Effects [TR030008/APP/6.4]. The cumulative effects assessment is also summarised in the non-technical summary of the ES.</p>			
DFDS	17.07.2023	Email	<p>...</p> <p>4 Navigational Safety – the finger pier</p> <p>4.1 Mitigation for the most vulnerable part of the Immingham Oil Terminal (“IOT”) trunkway in the IERRT proposal suggested moving the most vulnerable part of the trunkway, the finger pier, to the eastern side of the main jetty. The IGET prohibits this as a mitigation option as it is in the same space. The IGET proposals consider that there are not likely to be significant cumulative effects in relation to the IERRT when considered together with the IGET for Major Accidents and Disasters and so provides no mitigation for what could be a potentially environmentally and commercially disastrous incident between a vessel and the IOT trunkway as it handles flammable, toxic and potentially polluting products which would affect all users of the port and could affect the operation of critical national infrastructure. This is a major safety concern and alternative mitigation needs to be provided in the IERRT DCO application that does not involve moving the finger pier, as the IGET proposal negates that option.</p> <p>...</p>	<p>We note that in relation to the IERRT application, following a full assessment which included a number of HAZID Workshops and navigational simulations and the submission of a comprehensive navigational risk assessment, which has been considered by the ABPs HASBoard, it has been concluded that the relocation of the IOT finger pier is not required as part of the IERRT development.</p> <p>As a consequence, the IERRT DCO application does not include the relocation of the finger pier as a mitigation and the relocation is not part of the scope of that application. It follows, therefore, that as such the IGET proposal does not conflict with the IERRT DCO application in this regard.</p>	No	No	<p>Chapter 12: Marine Transport and Navigation</p> <p>Chapter 25: Cumulative and In-Combination Effects [TR030008/APP/6.2]</p>
DFDS	17.07.2023	Email	<p>...</p> <p>5 Navigational Safety - methodologies</p> <p>5.1 Te IGET proposes to use the International Maritime Organization FSA methodology and the Port Marine Safety Code to complete the Navigational Risk Assessment. The IGET consultation materials describe this methodology as ‘best practice’ for port</p>	<p>The Project is a separate project to IERRT. However, both projects apply the same risk assessment approach which follows the Port Marine Safety Code and its associated Guide to Good Practice on Port Marine Operations. The methodology used for the assessment are set out in Chapter 12: Marine</p>	No	No	<p>Chapter 12: Marine Transport and Navigation [TR030008/APP/6.2].</p>

			marine operations and the preferred approach of the Maritime and Coastguard Agency. This only serves to bolster our concern that using mixed methodologies in the IERRT proposals is a flawed approach, which we expressed in our response to the supplementary consultation to the IERRT. It is unclear why the Applicant would use different methodologies across these two projects and we suggest they reconsider their approach to IERRT. ...	Transport and Navigation [TR030008/APP/6.2].			
DFDS	17.07.2023 Email	... 6 Marine navigation and congestion – tug availability 6.1 We have further concerns that marine navigation has not been considered cumulatively, in particular tug availability which is likely to be made more in demand by the IGET. If tugs are not so readily available to service the vessel movements on the IERRT and the IGET this will add to marine congestion and create delays in the vicinity. ...	The concerns expressed relating to tug availability are noted. As you know, marine navigational planning is a complex process requiring the review of multiple input scenarios to ensure that the passage of merchant vessels is afforded the most expeditious solution. The role of Vessel Traffic Services therefore is an integral part of that process. The provision of towage on the Humber is wholly driven by market forces and it is reasonable to assume – and indeed has been proven in the past – that should demand for additional towage become apparent, tug providers will increase vessel resourcing accordingly.	No	No	Chapter 12: Marine Transport and Navigation and Chapter 25: Cumulative and In-Combination Effects [TR030008/APP/6.2]	
DFDS	17.07.2023 Email	... 7 Marine navigation and congestion – exclusion zone 7.1 We understand that facilities handling potentially hazardous products, such as IGET, may be required to operate an exclusion zone for vessels and other operations taking place in the vicinity. There is a reference within the topic "Marine Transport and Navigation" on page 29 on the Applicant's PEIR Addendum to "required safety zones" which we assume relates to such a requirement but cannot find any greater detail on this issue in the application documents. Depending on the extent and nature of any such "safety / exclusion zones" the operation of such zones may have a material impact on other operations taking place at the Port of Immingham and on vessel movements on the Humber. The Applicant should therefore provide a detailed assessment of any such "safety / exclusion zones" before its	A 150m safety (exclusion) zone will apply to passing vessels from the berth line. The position of the berth has been aligned with IOT which also has a 150m exclusion zone, to ensure the channel width available to passing vessels is maintained. Simulations have been carried out to successfully demonstrate there is adequate space for passing vessels. This has been assessed within the NRA, including a HAZID Workshop attended by existing port users.	No	No	Chapter 12: Marine Transport and Navigation [TR030008/APP/6.2] Chapter 25: Cumulative and In-Combination Effects [TR030008/APP/6.2]	

			application is progressed any further so that interested parties and existing port users can assess and comment on any potential impact. ...				
DFDS	17.07.2023 Email	...	8 Marine ecology 8.1 The value of the ecological enhancements proposed for the IERRT have not been made clear and nothing has been further suggested in assessing the cumulative effect of both projects. ...	This comment relates to the IERRT Project, which is not part of this application. Cumulative effects of the two projects have been assessed on Marine Ecology and are set out in Chapter 25: Cumulative and In-Combination Effects [TR030008/APP/6.2] and its appendices.	No	No	N/A
DFDS	17.07.2023 Email	9 Traffic and Transport	<ul style="list-style-type: none"> 9.1 The hydrogen produced as outlined in the IGET is going to be taken away from the facility by road tanker which will create a cumulative effect along with the traffic issues of the IERRT and other IGET traffic (e.g. during construction). 9.2 2,200 additional HGVs per day are expected to use the East Gate for IERRT. We have expressed our concerns that the mitigation measures for the IERRT are insufficient, and we disagree with the statement in the IGET PEIR that these mitigation effects will reduce effects on a transport network to a level which is not significant; instead it will have unacceptable impacts on port users as well as local residents and businesses. One of the changes made by ABP to the IGET proposal in this consultation is to revise upwards the number of HGV movements from 195 HGV movements a day during construction to 260 movements per day at the peak of construction and remain at 98 HGV movements a day during operation of the IGET. We were previously concerned that the 194 HGV movements a day had not been considered fully. No doubt this increase to 260 HGV movements a day will further exacerbate the traffic and all its unwelcome impacts, without any additional mitigation being proposed. 	<p>We note the comments made relating to the adequacy of the proposed mitigation measures for traffic effects relates to the IERRT project which is not part of this application. With regard to the comments relating to the adequacy of the assessment undertaken for the Project we would just note that preliminary environmental information has been consulted upon. This information confirmed that a cumulative impact assessment would be carried out for the Project and will be provided as part of the DCO application for the Project which is submitted.</p> <p>The likely significant effects on traffic and transport for the Project have been assessed and are set out in Chapter 11: Traffic and Transport [TR030008/APP/6.2] of the ES. A cumulative impact assessment has been undertaken of the likely significant effects of the two projects on traffic and transport and the results of that assessment is set out in Chapter 25: Cumulative and In-Combination Effects [TR030008/APP/6.2] and its appendices.</p>	No	No	<p>Chapter 11: Traffic and Transport [TR030008/APP/6.2]</p> <p>Chapter 25: Cumulative and In-combination Effects [TR030008/APP/6.2]</p>

			<ul style="list-style-type: none"> 9.3 Our argument that the impacts of these additional HGV movement during construction have not been assessed properly are bolstered by Table 7.2 – Preliminary Environmental Information: Implications of the Proposed Changes by Topic of the PEIR Addendum. The column for “Re-assessment of significant effects” says the following in relation to the topics of Air Quality, Noise and Vibration and Nature Conservation (Terrestrial Ecology) as a result of the increase in HGV movements: 9.3.1 The summary reported in the PEI Report is unchanged. However the residual effects will be confirmed after reassessment within the ES 9.4 This shows that adequate assessment, especially when considered cumulatively with the IERRT, has not yet been carried out 9.5 The PEIR addendum considered the IERRT in relation to Changes No 2 and 3 but does not consider the cumulative effect of the IERRT in relation to Change number 5: Construction Vehicle Numbers and still fails to consider cumulative effects in relation other safety issues such as increased marine traffic near the IOT trunkway or reduced tug availability. 				
DFDS	17.07.2023 Email	<p>...</p> <p>10 Conclusion</p> <ul style="list-style-type: none"> 10.1 We remain extremely concerned that the safety risks, in particular around the IOT trunkway have been scoped out of assessment are not being considered in cumulative effect. 10.2 Mitigation is needed to address the cumulative effect which the IGET will have with the IERRT and robust measures need to put in place before IGET can go ahead. 	<p>As noted above, Chapter 12: Marine Transport and Navigation [TR030008/APP/6.2], identifies the mitigation measures proposed for the Project in respect of marine navigation and safety and (where appropriate) such measures are listed in the Schedule of Mitigation. Marine safety has not been scoped out of the assessment. A cumulative impact assessment has been undertaken of the likely significant effects of the two projects and the results of that assessment will be set out in Chapter 25: Cumulative and In-Combination Effects [TR030008/APP/6.2] and its appendices.</p>	No	No additional mitigation, beyond the measures committed to within Chapter 12: Marine Transport and Navigation [TR030008/APP/6.2]	<p>Chapter 12: Marine Transport and Navigation [TR030008/APP/6.2]</p> <p>Chapter 25: Cumulative and In-Combination Effects [TR030008/APP/6.2]</p>	

14.	Royal Mail	19.07.2023 Email	<p>Proposed DCO Application by Associated British Ports for Immingham Green Energy Terminal Royal Mail Group Limited's response to Second Statutory Consultation ending 20 July 2023 Introduction</p> <p>Royal Mail and its consultants BNP Paribas Real Estate have reviewed the consultation material for the above project and wish to submit this response as part of this consultation. Royal Mail previously submitted a response to the EIA scoping consultation in September 2022 and to the section 42 consultation in February 2023.</p> <p>Royal Mail – relevant information</p> <p>Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.</p> <p>Royal Mail is under some of the highest specification performance obligations for quality of service in Europe. Its performance of the Universal Service Provider obligations is in the public interest and this should not be affected detrimentally by any statutorily authorised project.</p> <p>Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.</p> <p>Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.</p> <p>Royal Mail has five operational properties within 12 miles of the proposed works:</p>	<p>The Applicant acknowledges receipt of Royal Mail's response.</p> <p>Through the adoption of a final detailed CTMP based on the OCTMP [TR030008/APP/6.7], the chosen contractor would be required to liaise closely with all local businesses to inform them of any peaks in activity so that this can be managed, this includes the Royal Mail.</p> <p>The construction compound access points and all site entrances have been designed to ensure adequate separation from existing junctions and appropriate sight lines, so that any queueing on the road network is minimised and avoided wherever possible.</p> <p>There would be some localised highway works to Kings Road, Queens Road and Laporte Road associated with culvert works, utilities connections and protective works and the creation of site entrances.</p> <p>These works would be undertaken using powers included within the draft DCO. Liaison would be undertaken with NELC for all works in the highway and as mentioned above, Royal Mail would be notified of any diversions and closures.</p> <p>Wording has been added to the OCTMP [TR030008/APP/6.7] to state that parties may need to be consulted (e.g. Royal Mail) where required (depending on the works and location) a copy of the CTMP approved pursuant to this OCTMP, along with information on working hours and proposals for traffic management or works on the highways network (including any road closures, diversions or alternative access arrangements) that have potential to affect these parties will be provided at least one month before the relevant works are anticipated to commence.</p>	No	No	<p>Chapter 11: Traffic and Transport [TR030008/APP/6.2]</p> <p>Outline CTMP [TR030008/APP/6.7]</p>
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			<ul style="list-style-type: none"> • Immingham DO – c. 0.15 miles north; • BE 2834, Grimsby DO– c. 5 miles south-east; • BE 2708, Grimsby RTW – c. 5 miles south-east; • BE 2713, Barton upon Humber DO – c. 11.5 miles north-west; and • BE 3211, Barton Antelope Road PAR – c. 11.5 miles north-west. <p>Every day, in exercising its statutory duties Royal Mail vehicles use all of the main roads that may potentially be affected by the proposed Immingham Green Energy Terminal (“IGET”).</p> <ul style="list-style-type: none"> • Any periods of road disruption / closure, night or day, on or to the roads immediately connected to the IGET or the surrounding highway network will have the potential to impact operations and may consequently disrupt Royal Mail’s ability to meet its Universal Obligation service delivery targets. • Royal Mail’s performance of the Universal Service Provider obligations is in the public interest and as indicated above should not be affected detrimentally by any statutorily authorised project. <p>Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.</p> <p>Royal Mail position as at July 2023</p> <p>It is noted that the revised DCO boundary as shown in the Second Statutory consultation plan ref GH-2015660 includes four sections of the A1173 Kings Road, presumably for road works to improve traffic capacity.</p> <p>It is emphasised that Immingham Delivery Office (location shown with a red arrow above) takes access from the A1173 via Middleplatt Road and thus any disruption to this route during works may impact on Royal Mail’s operations to and from Immingham Delivery Office.</p> <p>Royal Mail does not wish to stop or delay the IGET works from occurring. However, Royal Mail does wish to ensure the protection of its future ability to provide</p>				
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			<p>an efficient mail sorting and delivering service to the public from and to the above identified operational facilities in accordance with its statutory obligations.</p> <p>In order to protect Royal Mail's position, it is requested that wording is added to the future Construction Transport Management Plan ("CTMP") to secure the following mitigations:</p> <ol style="list-style-type: none"> 1. the CTMP includes specific requirements that during the construction phase Royal Mail is notified by Associated British Ports or its contractors at least one month in advance on any proposed road closures / diversions / alternative access arrangements, hours of working; 2. where road closures / diversions are proposed, Associated British Ports or its contractors liaise with Royal Mail at least one month in advance to identify and make available alternative highway routes for operational use, where possible; and 3. the CTMP includes a mechanism that informs Royal Mail about works affecting the local highways network (with particular regard to Royal Mail's distribution facilities near the proposed works, as identified above). <p>Royal Mail also wishes to reserve its position to submit representations to the future Public Examination, if required.</p> <p>In the meantime, any further consultation information on this infrastructure project and any questions of Royal Mail should be sent to:</p> <p>[REDACTED] Planning Lawyer, Royal Mail Group Limited [REDACTED] Director, BNP Paribas Real Estate Please can you confirm receipt of this consultation response by Royal Mail.</p> <p>...</p>				
15.	Local resident	15.6.2023 Feedback form (ref. row 5 Q2; row 5 Q3; row 5 Q4)	Request to keep project within the current boundary of Immingham Port.	The majority of the land being used for the project is within ABP's ownership with only small parcels of third-party land falling within the Site Boundary.	No - The Site Boundary has been reduced as far as possible.	No	Chapter 3: Need and Alternatives [TR030008/APP/6.2]

				<p>The East Site, West Site and jetty access road are all ABP owned.</p> <p>A suitable location for the hydrogen production facility within and around the Port was identified taking into account all available space, the Port's existing development plans, ground conditions, presence of existing structures and services including existing transport corridors, proximity to residential conurbations, access, and proximity to the jetty. The two plots of land identified as the proposed location of the hydrogen production facility were selected as the most suitable.</p> <p>Further details are given in Chapter 3: Need and Alternatives, (section 3.5.7) [TR030008/APP/6.2].</p>			
16.	Local resident	27.6.2023 Feedback form (ref. row 9 Q2)	<p>Response stated their own interest in the impact of the project on the local environment; flora, fauna, animals and insects.</p> <p>Support expressed for the new route of the pipe rack to mitigate impact on Long Strip Woodland.</p>	<p>For further information on the impacts associated with the Project on local environment please refer to Chapter 13: Landscape and Visual [TR030008/APP/6.2], for impacts across fauna, flora, animals and insects please refer to Chapter 8: Nature Conservation (Terrestrial Ecology) [TR030008/APP/6.2], Chapter 9: Nature Conservation (Marine Ecology) [TR030008/APP/6.2] and Chapter 10: Ornithology [TR030008/APP/6.2] of the ES.</p> <p>The support for the new route of the pipe-rack to mitigate impact on Long Strip woodland is acknowledged and welcomed.</p> <p>An Outline Woodland Compensation Strategy [TR030008/APP/6.8] has been produced and focuses on the off-site planting of trees in the Immingham area to ensure that the tree loss from the Long Strip is appropriately compensated. Further details can be found at Chapter 8: Terrestrial Ecology (section 8.7) [TR030008/APP/6.2].</p>	<p>No, although through an iterative design process, the Applicant has sought to minimise loss of the trees and in particular to ensure the protection of a veteran tree within this area.</p>	<p>No, although an outline Woodland Compensation strategy [TR030008/APP/6.8] to compensate for the woodland loss in the Long Strip has been prepared. The Woodland Compensation Strategy is secured by requirement in the DCO which requires it to be in accordance with the outline woodland compensation strategy [TR030008/APP/6.8] submitted in this application.</p>	<p>Chapter 8: Terrestrial Ecology [TR030008/APP/6.2]</p> <p>Chapter 13: Landscape and Visual Impact [TR030008/APP/6.2]</p> <p>Chapter 9: Nature Conservation (Marine Ecology) [TR030008/APP/6.2]</p> <p>Chapter 10: Ornithology [TR030008/APP/6.2]</p> <p>Outline Woodland Compensation Strategy</p>

							[TR030008/APP/6.8]
17.	Local resident	29.6.2023 Feedback form (ref. row 11 Q2; row 11 Q5)	Request for information on route of construction and servicing traffic.	All construction HGVs will be required through the CTMP to use the A1173 south to access the A180 and would not travel along the A1173 north through the more residential areas. The traffic generation associated with the construction and operational phase is set out in Chapter 11: Traffic and Transport Table 11.10 and 11.22 [TR030008/APP/6.2] respectively, with an hourly breakdown of the construction traffic shown in Tables 11.13 and 11.14. The distribution of construction traffic shown in Tables 11.16 and 11.18 respectively, with the operational impact upon the strategic road network shown in Table 11.23.	No	No	Chapter 11: Traffic and Transport [TR030008/APP/6.2]
18.	Local resident	30.05.2023 Feedback form (ref. row 2 Q3; row 2 Q6)	Objection to the project noted on basis that western edge of project is too close to residential areas, which could result in a major incident due to the materials stored and processed on site, as well as on neighbouring sites in and around the port.	The Project has submitted a Hazardous Substances Consent application and COMAH notification and will work with the regulatory authorities via the consultation process to appropriately manage the impact of the development on all sensitive receptors, see Chapter 22: Major Accidents and Disasters (Section 22.8), Mitigation Measures [TR030008/APP/6.2]. The impact of the land use planning zones on future development is addressed in Chapter 23: Socio-Economics [TR030008/APP/6.2].	No	No	Chapter 22: Major Accidents and Disasters [TR030008/APP/6.2]. Chapter 23: Socio-Economics [TR030008/APP/6.2].
19.	Local resident	27.6.2023 Feedback form (ref. row 10 Q4)	Noted that the project should have been initiated earlier to contribute green energy sooner.	The Applicant acknowledges the support for green energy. The timing has been driven by the project objectives and need as outlined in Chapter 3: Need & Alternatives but also by the technological advancement that has enabled a viable development at scale.	No	No	Chapter 3: Needs & Alternatives [TR030008/APP/6.2].
20.	Local resident	13.7.2023	Concern expressed about impact of project on local house prices.	As explained in Chapter 2: The Project [TR030008/APP/6.2] , the area surrounding the Port is already industrial	No	No	Chapter 2: The Project

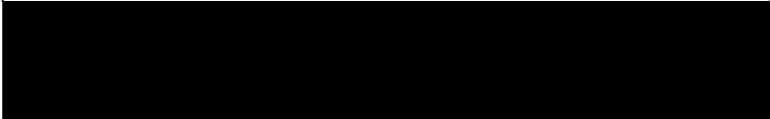
		Feedback form (ref. row 12 Q4)		in nature, being dominated by chemical manufacturing, oil processing and power generation facilities and beyond this, the wider area is largely agricultural. Therefore, it is not anticipated that the Project will adversely affect local house prices.			[TR030008/APP/6.2]
21.	Trustee and Secretary of conservation charity (unspecified)	Feedback form (ref. row 5 Q5)	Concern expressed at 'destruction' of Long Strip Woodland and noted that any re-planting of trees will take decades to absorb the carbon already absorbed by the existing mature trees.	<p>The pipeline corridor connecting the East Site to the jetty and the jetty access road, which comprise Work No. 2, would be situated within the Long Strip woodland belt. Through an iterative design process, the Applicant has sought to minimise loss of the trees and in particular to ensure the protection of a veteran tree within this area.</p> <p>Approximately 0.64ha of woodland will be removed from the Long Strip woodland, which represents approximately 40% of that part of the TPO north of Laporte Road. The loss of part of the woodland from Long Strip is fully assessed in Appendix 8.F: Arboricultural Impact Assessment [TR030008/APP/6.4].</p> <p>A Woodland Compensation Strategy [TR030008/APP/6.8] has been prepared to compensate for the tree loss from the Long Strip . Further details can be found at Chapter 8: Terrestrial Ecology (section 8.7) [TR030008/APP/6.2].</p> <p>The Project's residual emissions will be outweighed by the savings of emissions resulting from the use of low carbon hydrogen energy produced by the Project which aligns with and will contribute to the UK net zero transition scenario. Further details on the Greenhouse Gas Assessment are contained within Chapter 19: Climate Change [TR030008/APP/6.2].</p>	No, although through an iterative design process, the Applicant has sought to minimise loss of the trees and in particular to ensure the protection of a veteran tree within this area.	No, although an outline woodland compensation strategy [TR030008/APP/6.8] to address the woodland loss in the Long Strip TPO woodland has been drafted. The Woodland Compensation Strategy is secured by requirement in the DCO which requires it to be in accordance with the outline woodland compensation strategy [TR030008/APP/6.8] submitted in this application.	<p>ES Chapter 8: Nature Conservation (Terrestrial Ecology) [TR030008/APP/6.2]</p> <p>Chapter 19: Climate Change [TR030008/APP/6.2]</p> <p>Outline Woodland Compensation Strategy [TR030008/APP/6.8]</p>
22.	Local resident	29.06.2023 Feedback form (ref. row 11 Q5)	Request for details on when project will be completed and become operational.	Phase 1 would represent the peak of construction, irrespective of the subsequent programme for Phases 2 onwards. Phase 1 includes the construction of the permanent works	No	No	Chapter 2: The Project [TR030008/APP/6.2]

				<p>Work Nos 1, 2, 4, and 6 in their entirety and substantive elements of Work Nos 3, 5 and 7, as well as the use of temporary construction areas at Work No 8 and 9.</p> <p>An indicative construction phasing timeline is illustrated in Chapter 2 The Project [TR030008/APP/6.2] of the ES. The programme indicates that, subject to the DCO being granted, there would be phased approach to the construction and operation of the Project. Construction of phase 1 of the Project is likely to start in early 2025 and last 3 years. All phases of the Project through to completion of the Project are estimated to cover an eleven-year period.</p>			
23.	Local resident	7.6.2023 Feedback form (ref. row 4 Q6)	<p>We hope from start to finish this project will involve the employment of all where possible local and UK people. My wife and myself are in our 70s and we know changes are necessary. Over many years we have had to put up with heavy traffic, noise, inconvenience, pollution eg coal dust, fertiliser dust and horrid smells, but if its going to give local people jobs and money in their pockets we are willing to put up with a little more.</p>	<p>As stated within Chapter 23: Socio-Economics (Section 23.5) [TR030008/APP/6.2], a wide variety of roles will be created during construction and operation of the Project. On average across North East Lincolnshire, 30% of those working in the area, live outside of it. Therefore, if also applied to the Project, it is assumed that 70% of employment opportunities would remain within North East Lincolnshire. As set out in Chapter 23 (Table 23-16), it is estimated that the Project would provide on average, 645 net jobs, of which 451 are expected to be taken up by residents within the Study Area (North East Lincolnshire). 193 construction job opportunities are therefore estimated to be taken by those from the wider region or further afield.</p> <p>During operation, as set out in Chapter 23 (Table 23-19), it is estimated that the Project would provide a total of 189 net jobs, of which, 132 are expected to be taken up by residents within North East Lincolnshire. 57 operational job opportunities are therefore estimated to be taken by those from the wider region or further afield.</p> <p>Job Centre Plus has also offered to support with employability and skills</p>	No	No	Chapter 23: Socio-Economics [TR030008/APP/6.2]

				training to maximise the local community benefits of the Project.			
24.	CLdN	30.06.23	<p>Good afternoon</p> <p>Please see attached response from CLdN Ports Killingholme.</p> <p>Dear Sirs</p> <p>Immingham Green Energy Terminal</p> <p>Thank you for providing a copy of the PEIR addendum, which we have had the opportunity to review. At this stage we are not able to provide detailed consultation responses.</p> <p>We made comments in reply to the PEIR consultation in relation to:</p> <ol style="list-style-type: none"> 1. The approach to assessment of vessel calls, with only 12 of the potential 400 annual vessel calls being associated with other development and uses which are not identified or assessed; 2. The absence of any navigation risk assessment or supporting information; 3. Impacts from reduced sailing speeds in the vicinity of the project; and 4. a request to be involved in navigational risk assessments/HAZID workshops. <p>Although we note that you have reduced the scale of the marine elements of the project (but the land side elements remain the same), the PEIR addendum does not contain sufficient information to enable us to assess the potential impacts of the revised project.</p> <p>...</p>	<p>The Applicant issued a formal letter of response to DFDS addressing their comments. This letter can be found in Appendix Q.3.</p> <p>1. Vessel calls</p> <p>As noted in your second consultation response, following the first Statutory Consultation the jetty design was revised varying the two berth design to a single berth. Following this change in berth design the maximum forecast vessel arrivals for the jetty are now 292 vessels per annum of which up to 12 per year would be ammonia carriers. The maximum forecast throughput for the jetty has been assumed as a reasonable worst case assumption for both the navigational risk assessment (“NRA”) and for the environmental impact assessment (“EIA”) which have been undertaken for the Project.</p> <p>A total of 27 simulation runs were conducted based on a two berth layout, but adapted to cover the most challenging manoeuvres for a single berth layout which was also being considered as an option at the time of the runs. Subsequent to completing the simulation study, the final Project design was reviewed by HR Wallingford and it was confirmed that the conclusions for the simulation (in respect of the layout option in line with the IOT) were applicable to the final design. The NRA is contained within Appendix 12.A: Navigational Risk Assessment [TR030008/APP/6.4]. We note that CLdN participated in the workshops for the HAZID and NRA.</p> <p>2. Absence of NRA or supporting information</p> <p>As explained above, an NRA has been undertaken for the Project and is contained within Appendix 12.A:</p>	<p>Following the first Statutory Consultation, the jetty design was revised varying the two berth design to a single berth. Following this change in berth design the maximum forecast vessel arrivals for the jetty are now 292 vessels per annum of which up to 12 per year would be ammonia carriers.</p>	No	<p>Chapter 12: Marine Transport and Navigation [TR030008/APP/6.2]</p> <p>Appendix 12.A: Navigational Risk Assessment [TR030008/APP/6.4]</p>

				<p>Navigational Risk Assessment [TR030008/APP/6.4]. The NRA considers the consequences and impacts of the proposed Project on navigation, both during the construction and its consequent operation. The scope of the EIA includes the appraisal of new and existing vessel activity arising as a result of the construction of the new marine infrastructure.</p> <p>We note the references to concerns regarding impact on scheduling of existing services. Vessels moving to and from the Port of Immingham are managed by the Port of Immingham Statutory Harbour Authority and Humber Statutory Harbour Authority (operating as Humber Estuary Services, "HES"). Both authorities have a legal duty to carefully manage all marine movements to facilitate the safe and efficient functioning of the harbour areas. The marine scheduling activities for the Port of Immingham, and all other port facility harbour authorities on the Humber have to dovetail with the overarching marine scheduling role of HES. The process of arranging and managing shipping movements seeks to ensure the equitable use of available port infrastructure and revolves around the efficient timetabling and scheduling of vessel movements.</p> <p>3. Impacts from reduced sailing speeds in vicinity of the Project</p> <p>The Terminal would be able to accommodate vessels of length up to 250m and draught up to 14m. These vessels will require tugs for berthing, as well as line handling/mooring vessels as required. The assessments undertaken for the Project take into account the type and size of vessels calling at the new jetty.</p> <p>The effect of the Project on future marine traffic is assessed with regards to any additional identified hazards, embedded</p>			
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				<p>controls that are already in place on the Humber, and potential future control/mitigation measures in the NRA and Chapter 12: Marine Transport and Navigation [TR030008/APP/6.2] of this ES. Marine congestion is managed by Humber Vessel Traffic Service (“VTS”) as part of the wider port movements planning / live traffic plan. The existing 5 knot speed limit for Immingham Oil Terminal (“IOT”) will be extended to the east to cover the Project berth. A maximum speed limit of 5 knots will apply to vessels passing the Project berth when a vessel is mooring, moored or unmooring (the same as at IOT).</p> <p>The statutory harbour authorities are together required to ensure the safety of navigation and marine operation and in accordance with the requirements of the Port Marine Safety Code, have a duty to review and approve current and proposed controls and processes to ensure that the safety of navigation is maintained.</p> <p>4. NRA/HAZID workshops</p> <p>We note CLdN’s request to be involved in the NRA/HAZID workshops. The navigational assessments undertaken for the Project included a HAZID workshop and risk ranking process in which CLdN participated. The completed NRA is contained within Appendix 12.A: Navigational Risk Assessment [TR030008/APP/6.4] of this ES. The NRA reports on the workshop, which was undertaken and takes into account the comments within the Hazard Log, which informs the EIA which has been undertaken and is presented in Chapter 12: Marine Transport and Navigation [TR030008/APP/6.2] of this ES on Marine Transport and Navigation.</p>			
CLdN	30.06.23 Email	...	We understand the approach taken in the PEIR addendum is that the likely significant effects of the	The NRA considers the consequences and impacts of the proposed Project on navigation, both during the construction and its consequent operation.	No	No	Chapter 12: Marine Transport and Navigation

		<p>revised project can be expected to be no worse than the previous proposals. However, the revised project is different to the original proposals and so the environmental effects can be assumed to be potentially different. Therefore in our opinion they would require further environmental impact assessment to be carried out specific to the details of the revised project. We believe our comments in the February response including in relation to uncertainty around future transport effects and sailing speed restrictions remain. The construction impacts of the new project can also be expected to be different, in particular in relation to a shorter construction period. We would also expect revised navigational risk assessment and HAZID to be undertaken.</p> <p>28 June 2023</p> <p></p> <p>info@cldn.com www.cldn.com</p> <p>W1D 5EU, London, UK Registered in England number: 00278815 VAT Registration number: GB-668.3350.141</p> <p>We would welcome an invitation for our attendance at those navigational risk and HAZID workshops and are able to review further environmental information when it is made available.</p>	<p>The scope of this assessment includes the appraisal of new and existing vessel activity arising as a result of the construction of the new marine infrastructure. The effect of the Project on future marine traffic is then assessed with regards to any additional identified hazards, embedded controls that are in place, and potential future control/mitigation measures. This included a HAZID workshop and risk ranking process in which CLdN participated. The authority for ensuring the safety of navigation and marine operation, in this case the Port of Immingham and HES, are the statutory undertakers and in accordance with the requirements of the PMSC have a duty to review and approve current and proposed controls and processes to ensure that the safety of navigation is maintained.</p>			<p>[TR030008/APP/6.2]</p>
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Q.3

Additional Relevant Correspondence

Immingham Green Energy Terminal

Draft response to DFDS

DFDS Seaways Plc
Nordic House
Western Access Road
Immingham Dock, Immingham
DN40 2LZ

Dear [REDACTED]

Immingham Green Energy Terminal - PINS reference TR030008

We write in reference to the consultation responses submitted by DFDS to the first and second rounds of statutory consultation for Associated British Ports ("ABP") proposed application for a development consent order ("DCO") for the construction and operation of the Immingham Green Energy Terminal and associated development (the "Project"). Thank you for taking the time to respond to the statutory consultation.

We respond to the points made in the DFDS response in this letter below, using the paragraph numbering from the consultation response to the second Statutory Consultation.

Paragraphs 1.1-1.6 - Introduction

The existing operation of DFDS within the Port of Immingham is acknowledged and understood.

ABP notes that consultation responses have also been made by DFDS to the statutory and supplementary consultations on the Immingham Eastern Roro Terminal ("IERRT") application (PINS Reference TR03007) and is aware of the points made in those responses. ABP further notes that the focus of this consultation response from DFDS in relation to the Project is on the cumulative effects of the Project with the IERRT project.

With regard to cumulative effects of the two projects, ABP can confirm that a cumulative effects assessment of the construction and operation of the Project together with the IERRT project has been undertaken and this will be set out in detail at chapter 25 of the Environmental Statement ("ES") and accompanying appendices which will be submitted with the application for the DCO for the Project.

Paragraph 2 – Absence of IERRT depicted on any visual materials

The IERRT application is an entirely separate project, which is at the examination stage and is not yet consented. Consequently, there is no reason why it would need to be depicted visually on the application materials for the Project.

The construction and operation of IERRT has been taken into account in the navigational risk assessment ("NRA") which has been undertaken for the Project. The NRA will be submitted with the DCO application as an appendix to Chapter 12 of the ES on Marine Transport and Navigation. The cumulative effects of the Project with the proposed IERRT project have been assessed and will be set out in chapter 25 of the ES.

Paragraph 3 - Cumulative effects

There is no inconsistency (as suggested) in the consultation materials for the Project in respect of the consideration of the cumulative effects of the Project and IERRT. The wording in the Statement of Community Consultation that IERRT "is a separate project unrelated to the IGET project and the IGET team will make this clear in all materials and correspondence with stakeholders and the public" was simply to avoid any confusion (primarily amongst members of the public) that the two projects were the same or directly linked due to both projects having the same applicant and thereby avoiding consultation responses being submitted for the wrong application. It is correct to say the two projects are unrelated and this does not mean (and cannot be said to be suggesting) that the two unrelated projects would not have a cumulative effect.

As noted above, an assessment of the cumulative effects of the Project with the proposed IERRT project has been undertaken and will be set out in chapter 25 of the ES. The cumulative effects assessment is also summarised in the non-technical summary of the ES.

Paragraph 4 – Navigational safety (the finger pier)

We note that in relation to the IERRT application, following a full assessment which included a number of HAZID Workshops and navigational simulations and the submission of a comprehensive navigational risk assessment, which has been considered by ABP's HASBoard, it has been concluded that the relocation of the IOT finger pier is not required as part of the IERRT development. As a consequence, the IERRT DCO application does not include the relocation of the finger pier as a mitigation and the relocation is not part of the scope of that application. It follows, therefore, that as such the IGET proposal does not conflict with the IERRT DCO application in this regard.

Paragraph 5 – Navigational safety (methodologies)

The Project is a separate project to IERRT. However, both projects apply the same risk assessment approach which follows the Port Marine Safety Code and its associated Guide to Good Practice on Port Marine Operations. The methodology used for the assessment will be set out in chapter 12 of the ES on Marine Transport and Navigation.

Paragraph 6 – Marine navigation and congestion (tug availability)

The concerns expressed relating to tug availability are noted. As you know, marine navigational planning is a complex process requiring the review of multiple input scenarios to ensure that the passage of merchant vessels is afforded the most expeditious solution. The role of Vessel Traffic Services therefore is an integral part of that process. The provision of towage on the Humber is wholly driven by market forces and it is reasonable to assume – and indeed has been proven in the past – that should demand for additional towage become apparent, tug providers will increase vessel resourcing accordingly.

Paragraph 7 – Marine navigation and congestion – exclusion zone

A 150m safety (exclusion) zone will apply to passing vessels from the berth line. The position of the berth has been aligned with IOT which also has a 150m exclusion zone, to ensure the channel width available to passing vessels is maintained. Simulations have been carried out to successfully demonstrate there is adequate space for passing vessels. This has been assessed within the NRA, including a HAZID Workshop attended by existing port users.

Paragraph 8 – marine ecology

This comment relates to the IERRT Project, which is not part of this application. Cumulative effects of the two projects have been assessed on Marine Ecology and will be set out in chapter 25 of the ES and its appendices.

Paragraph 8 - traffic and transport

We note the comments made relating to the adequacy of the proposed mitigation measures for traffic effects relates to the IERRT project which is not part of this application. With regard to the comments relating to the adequacy of the assessment undertaken for the Project we would just note that preliminary environmental information has been consulted upon. This information confirmed that a cumulative impact assessment would be carried out for the Project and will be provided as part of the DCO application for the Project which is submitted.

The likely significant effects on traffic and transport for the Project have been assessed and will be set out in chapter 11 of the ES. A cumulative impact assessment has been undertaken of the likely significant effects

Immingham Green Energy Terminal

Draft response to DFDS

of the two projects on traffic and transport and the results of that assessment will be set out in chapter 25 of the ES and its appendices.

Paragraph 9 – Conclusion

As noted above the Marine Transport and Navigation chapter for the ES (chapter 12) will identify the mitigation measures proposed for the Project in respect of marine navigation and safety and (where appropriate) such measures will be listed in the Schedule of Mitigation. Marine safety has not been scoped out of the assessment. A cumulative impact assessment has been undertaken of the likely significant effects of the two projects and the results of that assessment will be set out in chapter 25 of the ES and its appendices.

Yours sincerely

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Immingham Green Energy Terminal

Draft response to CLdN

CLdN Ports Killingholme Limited
Haven House
Clough Lane
North Killingholme
North Lincolnshire
DN40 3JS

Dear [REDACTED]

Immingham Green Energy Terminal - PINS reference TR030008

We write in reference to the consultation responses submitted by CLdN dated 20 February 2023 and 28 June 2023 to the first and second rounds of statutory consultation for Associated British Ports ("ABP") proposed application for a development consent order ("DCO") for the construction and operation of the Immingham Green Energy Terminal and associated development (the "Project"). Thank you for taking the time to respond to the statutory consultation.

We respond below to the points made in the CLdN consultation responses. We reply using the four numbered points in the letter of 28 June 2023 but drawing on the relevant points made in the 20 February 2023 response (as appropriate).

1. Vessel calls

As noted in your second consultation response, following the first Statutory Consultation the jetty design was revised varying the two berth design to a single berth. Following this change in berth design the maximum forecast vessel arrivals for the jetty are now 292 vessels per annum of which up to 12 per year would be ammonia carriers. The maximum forecast throughput for the jetty has been assumed as a reasonable worst case assumption for both the navigational risk assessment ("NRA") and for the environmental impact assessment ("EIA") which have been undertaken for the Project.

A total of 27 simulation runs were conducted based on a two berth layout, but adapted to cover the most challenging manoeuvres for a single berth layout which was also being considered as an option at the time of the runs. Subsequent to completing the simulation study, the final Project design was reviewed by HR Wallingford and it was confirmed that the conclusions for the simulation (in respect of the layout option in line with the IOT) were applicable to the final design. The NRA will be submitted with the DCO application as an appendix to Chapter 12 of the Environmental Statement ("ES") on Marine Transport and Navigation. We note that CLdN participated in the workshops for the HAZID and NRA.

2. Absence of NRA or supporting information

As explained above, an NRA has been undertaken for the Project and will be submitted with the DCO application as an appendix to Chapter 12 of the ES. The NRA considers the consequences and impacts of the proposed Project on navigation, both during the construction and its consequent operation. The scope of the EIA includes the appraisal of new and existing vessel activity arising as a result of the construction of the new marine infrastructure.

We note the references to concerns regarding impact on scheduling of existing services. Vessels moving to and from the Port of Immingham are managed by the Port of Immingham Statutory Harbour Authority and Humber Statutory Harbour Authority (operating as Humber Estuary Services, "HES"). Both authorities have a legal duty to carefully manage all marine movements to facilitate the safe and efficient functioning of the harbour areas. The marine scheduling activities for the Port of Immingham, and all other port facility harbour authorities on the Humber have to dovetail with the overarching marine scheduling role of HES. The process of arranging and managing shipping movements seeks to ensure the equitable use of available port infrastructure and revolves around the efficient timetabling and scheduling of vessel movements.

3. Impacts from reduced sailing speeds in vicinity of the Project

The Terminal would be able to accommodate vessels of length up to 250m and draught up to 14m. These vessels will require tugs for berthing, as well as line handling/mooring vessels as required. The assessments undertaken for the Project take into account the type and size of vessels calling at the new jetty.

The effect of the Project on future marine traffic is assessed with regards to any additional identified hazards, embedded controls that are already in place on the Humber, and potential future control/mitigation measures in the NRA and Chapter 12 of the ES on Marine Transport and Navigation. Marine congestion is managed by Humber Vessel Traffic Service ("VTS") as part of the wider port movements planning / live traffic plan. The existing 5 knot speed limit for Immingham Oil Terminal ("IOT") will be extended to the east to cover the Project berth. A maximum speed limit of 5 knots will apply to vessels passing the Project berth when a vessel is mooring, moored or unmooring (the same as at IOT).

The statutory harbour authorities are together required to ensure the safety of navigation and marine operation and in accordance with the requirements of the Port Marine Safety Code, have a duty to review and approve current and proposed controls and processes to ensure that the safety of navigation is maintained.

4. NRA/HAZID workshops

We note CLdN's request to be involved in the NRA/HAZID workshops. The navigational assessments undertaken for the Project included a HAZID workshop and risk ranking process in which CLdN participated. The completed NRA will be included in the DCO application as Appendix 12.A to the ES. The NRA reports on the workshop, which was undertaken and takes into account the comments within the Hazard Log, which informs the EIA which has been undertaken and is presented in Chapter 12 of the ES on Marine Transport and Navigation.

Yours sincerely,

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Immingham Green Energy Terminal

Draft response to APT

Associated Petroleum Terminals (Immingham) Ltd
Queens Road
Immingham
N E Lincolnshire
DN40 2PN

Dear [REDACTED]

Immingham Green Energy Terminal - PINS reference TR030008

We write in reference to the consultation response submitted by Associated Petroleum Terminals (Immingham) Limited ("APT") dated 20 February 2023 to the first statutory consultation for Associated British Ports ("ABP") proposed application for a development consent order ("DCO") for the construction and operation of the Immingham Green Energy Terminal and associated development (the "Project"). We note that APT also replied to the second Statutory Consultation resubmitting the earlier consultation response. Thank you for taking the time to respond to the statutory consultation.

We respond to the points made in the APT response in this letter below, using the paragraph numbering from the consultation response submitted.

Introduction – paragraphs 1.1-1.6

We note that the response has been submitted on behalf of both APT and Humber Oil Terminals Trustee Limited ("HOTT") in relation to the existing Immingham Oil Terminal ("IOT"). Discussions are ongoing between ABP, Air Products BR Limited ("Air Products") and the IOT Operators (HOTT and APT) to seek to address the IOT Operators' concerns and resolve outstanding points and we are grateful for the indication that the IOT Operators would welcome further engagement with ABP and Air Products. We note that since the consultation response was received by ABP, APT took part in the Navigational Simulations and the navigational HAZID workshop for the Project.

The Immingham Oil Terminal – paragraph 2

The explanation at paragraph 2 of the consultation response of the relationship between the IOT and the refineries and the importance of the IOT to the refineries' operation is noted.

The status of IOT and the IOT Operators - paragraph 3

The position of HOTT and APT regarding the 'agent of change' principle (paragraph 3.1) and how it is said to apply to the Project (paragraph 3.2) is noted. We note that discussions have commenced regarding appropriate protective measures in respect of the IOT (a detailed response on the principle is not therefore given at this stage).

The explanation of occupation of the IOT by the IOT Operators and the basis of their occupation at paragraphs 3.3 – 3.5 of the consultation response is noted.

Impacts of the Project on the IOT – paragraph 4

The IOT Operators' concerns expressed in paragraph 4 in relation to the Project are noted and as set out above, discussions are continuing with the IOT Operators with a view to addressing outstanding issues.

Over the last 6 months, ABP and Air Products have held a number of meetings and site visits with the IOT Operators and independent consultants (DNV and BakerRisk). Detailed studies are ongoing as set out below,

Immingham Green Energy Terminal

Draft response to APT

the results of which will be discussed and evaluated in conjunction with the IOT Operators. IOT representatives have participated in a number of technical workshops and meetings as referred to above.

IOT Operators' views as to what it considers to be the major accident hazard risks, arising out of the potential for hydrogen and ammonia leakage at the Project (paragraphs 4.2-4.3), are noted. IOT Operators acknowledge ABP and Air Products' commitment to managing risk (paragraph 4.4) - those commitments are further described in Chapter 22 of the Environmental Statement ("ES") on Major Accidents and Disasters submitted with the DCO application.

At paragraph 4.5, the IOT Operators request that additional details are provided to demonstrate how the level of risk will be controlled through design and operational measures and management.

As the IOT Operators are aware, the **Control of Major Accident Hazard (COMAH) Regulations 2015** will apply to the hydrogen production facility, as an "upper tier" establishment (the IOT is also understood to be an upper tier establishment). The "competent authority" enforces the COMAH regime, being the HSE and the Environment Agency acting jointly.

The detailed design and operation of the hydrogen production facility will be controlled appropriately through the application of the COMAH regime, including the requirement for the submission of safety reports before commencement of construction and operation. The analysis contained within those safety reports must demonstrate that risks have been reduced to as low as reasonably practicable ("**ALARP**") and all measures necessary have been taken to prevent major accidents for the Project to proceed.

In the context of the responsibilities of Air Products under the COMAH Regulations, the following studies are being undertaken to inform the detailed design of the Project for the purposes of the safety report:

- As indicated in Chapter 22 of the ES, process safety studies by the independent consultants, commissioned by Air Products, to assess in detail the potential consequences of a loss of containment of hydrogen and ammonia from the facilities are ongoing.
- The process safety studies include consequence modelling, the output of which will show the distance a release of ammonia could potentially extend to in the event of an accidental loss of containment. This will help inform decision making in respect of the detailed layout of the Project, including the location of emergency shelters and toxic refuges which are buildings in which people can safely take refuge in the event of an emergency such as a release of toxic gas and will include an assessment of impacts on the IOT facilities.
- Similarly, modelling will help define thermal radiation exposure levels and explosion overpressure levels which could be reached in the event of an incident involving a loss of containment of flammable material. This will inform the detailed location and design of facilities within the Project, particularly occupied buildings such as control rooms and will include an assessment of impacts on the IOT facilities.

The output of these studies will be shared with key stakeholders, including the IOT Operators, and will be contained within the safety report submitted to the competent authority under the COMAH Regulations. The parties will also share information in the context of responsibilities under COMAH relating to domino effects.

IOT Operators state (paragraph 4.5) that, in addition to the above controls regarding design and operational measures and management, further controls to mitigate the risk of damage to IOT infrastructure and employees should be introduced.

Immingham Green Energy Terminal

Draft response to APT

The outcome of the above studies, discussion, evaluation and co-operation will enable the parties to assess potential impacts on the safety of IOT employees and associated infrastructure, and consider appropriate ALARP measures under the COMAH Regulations.

The IOT Operators seek assurances that infrastructure on the East Site will be constructed, operated and decommissioned in a safe and suitable manner (paragraph 4.8) in order to minimise the risk of a major accident occurring which would impact the IOT. In particular, the IOT Operators seek plans and method statements in advance of construction and decommissioning and the opportunity to provide feedback, along with providing reasonable requirements or conditions for approval.

In terms of major accident hazards, the regime established by the COMAH Regulations provides an appropriate framework for ensuring the safe and suitable construction, operation and decommissioning of the East Site infrastructure, as regulated by the Environment Agency and HSE as competent authorities. The need for an environmental permit will require the application of 'Best Available Techniques'. Air Products are committed to continuing to engage with the IOT Operators during the detailed design process required by the COMAH regime in order to obtain feedback and understand their views.

In terms of other impacts during construction and decommissioning, draft outline Construction and Decommissioning Environmental Management Plans (which form part of the DCO application) have been prepared, with the objectives of managing these activities safely and minimising impacts. The final plans will be submitted to and approved by North East Lincolnshire Council, as the relevant local planning authority, under a requirement of the DCO.

IOT Operators note (paragraph 4.7) that appropriate measures could be secured within the DCO documentation including through requirements and protective provisions. ABP and Air Products are committed to ongoing engagement with IOT Operators to seek to address its concerns including assessment, alongside IOT, as to whether protective measures are appropriate or protective provisions required for IOT's existing infrastructure.

IOT states that it would welcome further discussions with ABP and Air Products to understand the impacts of the Project on the IOT including how the risk of major accidents could be minimised to an acceptable level to IOT Operators. As outlined above, further discussions have taken place since receipt of the IOT Operators' representations and will continue. Air Products and ABP are committed to working closely with the IOT Operators to minimise risks of major accidents in accordance with their statutory requirements.

Assessed Need for the Scheme - paragraph 5

The Planning Statement submitted with the DCO application contains a detailed analysis of the Project against the policies in the **National Policy Statement for Ports ("NPSfP")**, and includes consideration of paragraph 4.17 of that policy on national security.

The acknowledgment from APT that there is no suggestion that the Project is, as a matter of principle, incompatible with the IOT such that national security should be compromised is welcomed.

As noted above, the status of the IOT facility is recognised and discussions are ongoing between ABP, Air Products and the IOT Operators to seek to minimise the impact of the Project on the IOT operations.

Conclusion – paragraph 6

The summary of APT's concerns is noted and understood. The Project team looks forward to continued discussions with the IOT Operators with a view to minimising the impact of the Project on their operations and to the continued sharing of information between the parties.

Yours sincerely

Immingham Green Energy Terminal

Draft response to APT



Polynt Composites UK Ltd
FAO: [REDACTED]
Laporte Road
Stallingborough
Grimsby
DN41 8DR

20 July 2023

Dear [REDACTED]

Following your recent correspondence with Air Products and Polynt's responses to the Immingham Green Energy Terminal Statutory Consultations dated 20 February 2023 and 30 June 2023, we wanted to provide further information on how the project team is taking account of your comments prior to the submission of our development consent order (DCO) application for the construction and operation of the Immingham Green Energy Terminal and associated development (the "Project").

Our teams are preparing the draft application and we refer below to various documents which may be of interest to you on submission, including the Environmental Statement (ES).

Your confirmation in your letter of 20 February 2023 that Polynt is keen to negotiate the provisions of a land and works agreement is helpful. As you are aware from our discussions, we anticipate the agreement covering temporary possession of part of your land currently in agricultural use (referred to in this letter as the Temporary Use Area). We note your comments in your letter regarding the future development potential of that land.

We also note your comments regarding the impact of the Project on the operation of your facility and employees. We do not anticipate that the construction of the Project will interfere with or require you to modify your facility and therefore we do not consider protective provisions will be required. In terms of health and safety (including under the COMAH Regulations 2015), please refer to sections g) and h) below.

Groundwork investigation & baseline assessment

We can confirm that we do not anticipate needing access to your land in order to carry out groundwork investigations at this stage of the process. It was our intention to carry out non-intrusive surveys using radar technology (primarily to identify the location of any potential services) and manual samples to understand the quality of the land. The samples taken and data gathered would have helped us in understanding the condition of the Temporary Use Area ahead of possession being taken.

We propose instead that, in the context of an agreement for temporary possession of the land, we agree what non-intrusive tests or surveys are reasonably required in order to establish the condition of the land and an appropriate process for handing the land back.

The Temporary Use Area is proposed to be used as a temporary construction laydown area. The works to be undertaken to that land are anticipated to be superficial and kept to a minimum; it could include removal of the top soil, levelling, stabilisation and laying of protective matting or similar.

Once the associated construction activities have finished, we would propose to repeat any tests and survey agreed with you (as above) and carry out any appropriate works before handing the site back to you. The process for this can be covered in our agreement.

Your key concerns

In your letter of 20 February 2023, you identify a number of key concerns. We provide below preliminary information in respect of these and also set out where further information will be provided within the DCO application documentation.

- a) Contract duration: The construction work related to the use of the Temporary Use Area is anticipated to start in Q1 2025 for at least three years. [We propose that the agreement to use the land would run [3 years] from the taking of possession.]
- b) Alternatives: The alternatives to the Project will be described in ES Chapter 3 (Needs and Alternatives). In relation to the Temporary Use Land in particular, key factors include the proximity of that land to the construction works comprised for the jetty and the jetty access road (in green below) and what we refer to as the East Site (in yellow below). We also propose to take temporary possession of neighbouring land for the same purposes (also part of the hatched area below).



Extract from the map provided with PEIR – figure2-3 – Site Plan

- c) Traffic and transport impacts during construction and operation: The impact of additional traffic will be assessed in ES Chapter 11: Traffic and Transport.

Saved as set out below, all HGVs are proposed to be required to use the A1173 and only a proportion of those workers and employees residing within Grimsby are forecast to use Laporte Road. Through the adoption of a Construction Traffic Management Plan, the principal contractor will be required to liaise closely with all local businesses to inform them of any peaks in activity so that this can be managed.

HGVs will need access to the temporary construction area (to construct the jetty access road) and the jetty access road (to construct the jetty topsides). HGVs will be used to deliver construction equipment. Access to the temporary construction laydown area will be designed so the equipment can be easily transported in and out without impairing traffic flow on Laporte Road. Access to the Port via Laporte Road will be interrupted temporarily during the construction of a culvert under Laporte Road, but access will remain available via Queens Road and access to Polynt site will remain available from the south via Laporte Road. Equipment delivered to the Project via the Port would be delivered via Kings Road, Queens Road and the north of Laporte Road.

In terms of operations, the Project including the hydrogen production facility is anticipated to create less than 100 two-way (inbound or outbound) HGV movements per day on average at the West Site, from where the hydrogen tankers will operate. The access to the West Site is not located on Laporte Road – it is via the A1173 and on to the A180. Road access to the East Site and the jetty will be kept as a minimum, mostly cars and vans for personnel and maintenance access.

- d) Ground conditions: All necessary ground investigation works relating to the field including Polynt land have completed by accessing the third party area of the field (although further ground investigation works in the TPO area and marine ground investigation will be commencing this month). The contents of ES Chapter 21: Ground Conditions and Land Quality and consideration of the impact on farming in ES Chapters 23: Socio-Economics and Chapter 24: Human Health and Wellbeing may be of interest to you.

As noted above, we would propose to agree any tests or surveys required to establish the condition of the land and the process of handing the land back as part of any agreement with you.

In carrying out operations, measures to manage run off and mitigate the risk of accidental release of contaminants will be undertaken. Those measures will be set out in the construction environmental management plan which will need to be approved and complied with as a requirement of the DCO. An outline of this document will be contained within our application.

- e) Waste generation: Waste management will be addressed in ES Chapter 20 on Materials and Waste. The Project will aim to prioritise waste prevention, followed by preparing for re-use, recycling and recovery and lastly waste disposal to landfill as per the waste

hierarchy. In addition, an outline Site Waste Management Plan (OSWMP) will accompany the DCO application (Appendix 20.A of the ES). The OSWMP has been developed as a guide to those involved in the construction of the Project on how to manage resources and waste, in accordance with best practice requirements. The principal contractor shall use this OSWMP as a framework for producing their own SWMP for use throughout the duration of construction.

- f) Flood risk: A full Flood Risk Assessment (FRA) has been prepared and will accompany the application (Appendix 18.A of the ES) and takes account of climate change. The FRA considers the risk of flooding from all sources to and from the IGET site over the lifetime of the development in line with the National Policy Statement for Ports and the National Planning Policy Framework. Mitigation measures have been designed, as required, to minimise the risk of flooding and to ensure the development remains safe. The FRA also assesses the impact of the Project on flood risk, particularly to tidal, fluvial and surface water sources. A conceptual Drainage Strategy outlines how surface water generated on site will be managed so the risk of surface water flooding is not increased from the existing situation.
- g) COMAH: The health and wellbeing of all employees in the area is of great importance to us. ES Chapter 22 on Major Accidents and Disasters will describe and assess the impacts of operation of the Project as a COMAH regulated facility. Cumulative impacts will be assessed in ES Chapter 25 on Cumulative and In-Combination Effects. Air Products have applied for hazardous substances consent for the hydrogen production facility and the process for determination of that application considers impacts on the surrounding land users. Air Products has begun engagement, and will continue to engage, with local stakeholders regarding emergency plan arrangements required in connection with COMAH.
- h) In terms of other non COMAH risks to human health, ES Chapter 24: Human Health & Wellbeing will assess impacts of changes to air quality on human health, with reference to the findings of the air quality assessment within Chapter 6 of the ES. Chapter 6 also considers the impact of emissions from increased traffic movements and congestion, with reference to relevant guidance published by the Institute of Air Quality Management, National Highways and Defra. In line with that guidance, the assessment focuses on the primary pollutants of concern from such emissions. A key aim of the Project is of course to help decarbonise heavy industry including the heavy transport sector.

In your letter of 30 June 2023, you have raised concerns relating to the inclusion of the southern part of the Long Strip woodland within the DCO and diversion of the public right of way (PROW). No tree removal is proposed for that southern part of the Long Strip woodland, however, access to this area is proposed to be restricted during construction for safety reasons in light of the adjacent temporary construction area. As set out in the PEIR Addendum, the PROW will be temporarily diverted during construction only therefore limiting the impact to local residents or users of these right of way. Once the temporary construction area has been removed, the PROW will be reinstated in its current alignment

and the temporary diversion closed.

We appreciate the importance of your operations at Stallingborough to your business and we look forward to discussing the above with you further.

If you have any questions on the above, please do contact us at enquiries@iminghamget.co.uk – we would be happy to set up a meeting to discuss further.

Yours Sincerely,
Immingham Green Energy Terminal Project Team