

Dated

12 March 2024

**APPLICATION BY ASSOCIATED BRITISH PORTS FOR AN ORDER GRANTING
DEVELOPMENT CONSENT FOR THE IMMINGHAM GREEN ENERGY TERMINAL**

PLANNING INSPECTORATE REFERENCE NUMBER: TR030008

INTERESTED PARTY NUMBER: 20047027

**SUMMARY OF WRITTEN REPRESENTATION
submitted on behalf of Network Rail
Infrastructure Limited**

Summary of Written Representation

1. Network Rail (**NR**) does not object in principle to the Proposed Development. However, it objects to the potential impact of the Proposed Development on operational railway as a result of the proposed cable route and the absence of a mechanism in the Proposed DCO to restrict of the use of Kiln Lane Level Crossing and Marsh Road Level Crossing by construction traffic in the event of a closure of Queens Road Bridge.
2. NR considers it necessary to require consultation with the Applicant prior to the use of Kiln Lane Level Crossing by construction traffic and for the Applicant to adhere to its requirements in relation to such use. The use of Marsh Road Level Crossing by construction traffic should be prohibited as it is unsuitable for HGVs.
3. To mitigate these risks, NR considers it to be important to secure appropriate protective provisions for NR's statutory undertaking, amendments to the CTMP to regulate the use of the level crossings and to enter into an agreement that regulates the use of the level crossings.
4. NR requests that the protective provisions appended to the Written Representation be included in the DCO at Part 5 of Schedule 14 and that amendments be made to the CTMP as set out in the Written Representation (to restrict the use of Kiln Lane Level Crossing and South Marsh Road by construction traffic) to safeguard operational railway.
5. NR will continue to engage with the Applicant's solicitors to move towards resolution and until such time as NR is given the protection and assurances requested as detailed in this Written Representation, NR's objection to the Proposed DCO will not be withdrawn.

Addleshaw Goddard LLP
12 March 2024