



Immingham Green Energy Terminal

9.3 Applicant's Responses to the Examining Authority's First Written Questions

(Responses to "Q1.16. Cumulative Effects and In-
combination Effects")

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1 Introduction

Overview

- 1.1 This document has been prepared to accompany an application made to the Secretary of State for Transport (the "Application") under section 37 of the Planning Act 2008 ("PA 2008") for a development consent order ("DCO") to authorise the construction and operation of the proposed Immingham Green Energy Terminal ("the Project").
- 1.2 The Application is submitted by Associated British Ports ("the Applicant"). The Applicant was established in 1981 following the privatisation of the British Transport Docks Board. **The Funding Statement [APP-010]** provides further information.
- 1.3 The Project as proposed by the Applicant falls within the definition of a Nationally Significant Infrastructure Project ("NSIP") as set out in Sections 14(1)(j), 24(2) and 24(3)(c) of the PA 2008.

The Project

- 1.4 The Applicant is seeking to construct, operate and maintain the Immingham Green Energy Terminal, comprising a new multi-user liquid bulk green energy terminal located on the eastern side of the Port of Immingham (the "Port").
- 1.5 The Project includes the construction and operation of a green hydrogen production facility, which would be delivered and operated by Air Products (BR) Limited ("Air Products"). Air Products will be the first customer of the new terminal, whereby green ammonia will be imported via the jetty and converted on-site into green hydrogen, making a positive contribution to the UK's net zero agenda by helping to decarbonise the United Kingdom's (UK) industrial activities and in particular the heavy transport sector.
- 1.6 A detailed description of the Project is included in **Chapter 2: The Project** of the Environmental Statement ("ES") **[APP-044]**.

Purpose and Structure of this Document

- 1.7 This document contains the Applicant's responses to those of the Examining Authority's Written Questions 1 **[PD-008]** grouped under the theme "Q1.16. Cumulative Effects and In-combination Effects". It represents one of a collection of eighteen such documents, each of which addresses a different theme.
- 1.8 Responses are ordered ascendingly by reference number, replicating the structure of the Examining Authority's Written Questions 1.
- 1.9 Responses are provided in a table. The text of the question appears on the lefthand side, with the Applicant's answer to its right.
- 1.10 Further materials pertinent to the Applicant's response are included at the end of the document as appendices where necessary.

2 Applicant's Responses to the Examining Authority's First Round of Written Questions

Q1.16. Cumulative Effects and In-combination Effects	
Q1.16.1 Cumulative Effects	
Q1.16.1.1	
Question	Response
<p>Long and Short List of Projects</p> <p>Confirm that during the Examination both the Cumulative Effects Assessment Long List [APP219] and Cumulative Assessment Short List [APP-220] will be kept under review, with additional information supplied should the status of projects change, along with the provision of final details at the close of the Examination.</p>	<p>The Applicant can confirm that during the Examination period, the Cumulative Effects Assessment Long List [APP-218], Cumulative Effects Assessment Short List [APP-219] and Assessment of Cumulative Effects [APP-220] will be kept under review, with additional information provided should the status of projects change or new developments come into scope. An update to the cumulative effects assessment between the Project and the Viking CCS Pipeline is provided at Deadline 1 in response to Q1.16.1.3.</p> <p>The Applicant proposes to submit an updated cumulative effects assessment at Deadline 4 so that this can be before the Examining Authority. This would be updated further, if necessary, at Deadline 7 to include any final details.</p>
Q1.16.1.3	
Question	Response

<p>Viking Carbon Storage</p> <p>a) Viking Carbon Storage has now been accepted for Examination (EN070008) and therefore further environmental information is now available. Please provide an updated assessment of the cumulative impact of that scheme with the Proposed Development.</p> <p>b) Further to the Action Point noted at ISH2 [EV4-002] [EV4-003], Applicant to share updated assessment with NELC.</p>	<p>The Applicant has prepared an updated cumulative effects assessment, submitted at Deadline 1 [TR030008/EXAM/9.7]. The updated assessment will be shared with North East Lincolnshire Council ("NELC") for comment.</p>
<p>Q1.16.1.4</p>	
<p>Question</p>	<p>Response</p>
<p>Long Strip</p> <p>The ExA notes that part of Long Strip, to the south-west of Laporte Road has been identified as an area for ecological enhancement as part of the IERRT proposal.</p> <p>a) Has the effects of the Proposed Development been considered upon this area, in particular once the identified IERRT enhancement works have been delivered.</p> <p>b) If not, please submit an assessment.</p> <p>c) If it has, identify what the effects are considered to be. Please see related question in the Habitats Regulation Assessment section.</p>	<p>Environmental Statement ("ES") Chapter 8: Nature Conservation (Terrestrial Ecology) [APP-050] clarifies that this area will not be impacted by the Project, other than by way of the temporary removal of informal access in this area, as follows:</p> <p><i>"The proposed Immingham Eastern Ro-Ro Terminal ("IERRT") ecological enhancements are set out in the woodland enhancement plan document submitted as part of the IERRT application, compliance with which is a draft Development Consent Order ("DCO") Requirement for that scheme. The area of woodland subject to the enhancements associated with the IERRT proposals, which relate to that part of the Long Strip woodland south of Laporte Road, will not be impacted by the IGET scheme, other than by way of the temporary removal of informal access in this area, which is explained in ES Chapter 2: The Project [TR030008/APP/6.2]."</i></p>

	No assessment is therefore required.
Q1.16.1.5	
Question	Response
<p>Construction Traffic</p> <p>ES 5 [APP-067, Table 25-3] states that “The effects of construction traffic have been assessed to include any traffic that would be generated by committed ‘other developments’. The assessment of construction traffic effects is therefore inherently cumulative.”</p> <p>a) Explain, what is meant by committed other developments?</p> <p>b) Does the IERRT fall within this definition?</p> <p>c) If it does not, does that mean that construction traffic from the IERRT has not been considered within the cumulative traffic assessment?</p>	<p>As stated in [APP-067, Table 25-3]: ‘<i>The effects of construction traffic have been assessed to include any traffic that would be generated by committed ‘other developments’. The assessment of construction traffic effects is therefore inherently cumulative. Further details are presented in Chapter 11: Traffic and Transport [TR030008/APP/6.2].</i></p> <p>To clarify, the intention of this text is to inform the reader that the assessment contained within Chapter 11: Traffic and Transport [TR030008/APP/6.2] inherently assesses the potential cumulative effects within the chapter and associated appendix (Appendix 11.B: Traffic and Transport Cumulative Effects Assessment [APP-190]) and therefore the cumulative effects associated with traffic and transport are not presented within Chapter 25: Cumulative and In-Combination Effects [APP-067] as this would have duplicated the assessment already presented within the Traffic and Transport Assessment. It is also worth noting that the Traffic and Transport cumulative assessment apply a different methodology to that presented within Chapter 25: Cumulative and In-Combination Effects [APP-067] and is therefore best presented within the technical chapter itself.</p> <p>a)</p> <p>The term ‘committed other developments’ refers to the cumulative developments identified within ‘Table 1: Cumulative Developments’ within Appendix 11.B: Traffic and Transport Cumulative Assessment</p>

[APP-190] that have been included in the traffic and transport cumulative assessment. These developments have been identified by the traffic and transport assessment as having the potential to result in cumulative impacts and are therefore assessed further. The traffic and transport cumulative developments were selected by initially considering the cumulative shortlist as identified in **Table 1 of Appendix 25.C: Assessment of Cumulative Effects [APP-220]**, the shortlisted cumulative developments identified for the assessment in **Chapter 25: Cumulative and In-Combination Effects [APP-067]**. These were then further refined to identify which resulted in any changes in traffic on the road network that was assessed within **Chapter 11: Traffic and Transport [APP-053]**. The shortlisted cumulative developments that met this criteria were carried through to the Traffic and Transport cumulative assessment and are presented within **'Table 1: Cumulative Developments'** within **Appendix 11.B: Traffic and Transport Cumulative Assessment [APP-190]**.

b)

As presented within **'Table 1: Cumulative Developments'** within **Appendix 11.B: Traffic and Transport Cumulative Assessment [APP-190]**, the Immingham Eastern Ro-Ro Terminal ("IERRT") is included within the Traffic and Transport Cumulative Assessment.

c)

Not applicable, as explained in b) above.

Q1.16.1.6

Question	Response
<p>Construction Traffic</p> <p>Given the length of the construction period for Work No. 5 and Work No. 7, has the assessment of the impact from construction traffic (both HGV deliveries and workforce trips), allowed for traffic growth in the area, especially given that these periods are likely to coincide with the IERRT potentially becoming operational.</p>	<p>Work No. 5 and Work No. 7 fall with Phase 1 of the Construction, which forms the basis of the ES Chapter 11 assessment [APP-053]. Phase 1 is expected to last 3 years with the peak period being month 2023 in 2026. With reference to Table 11-8: Traffic Growth Factor within Environmental Statement ("ES") Chapter 11: Traffic & Transport [APP-053], TEMPRO has been used to provide a growth factor to the peak year of construction, 2026.</p> <p>Furthermore, the construction phase of the Immingham Eastern Ro-Ro Terminal has also been considered within ES Chapter 25: Cumulative and In-Combination Effects [APP-067].</p>
<p>Q1.16.1.7</p>	
Question	Response
<p>Operational Traffic</p> <p>The ES in Appendix 25c [APP-221, Paragraph 1.8.2] states that "Assessment of operational traffic from the Project was scoped out as the traffic flows would be too low to give rise to a significant effect. As such there is no separate assessment of cumulative traffic and transport effects included as part of this ES." However, ES Chapter 11 [APP-053, Table 11-1, page 11-14] states "An assessment of the cumulative impact has been undertaken within Chapter 25: Cumulative and In-Combination Effects and the environmental effects as they relate to traffic and transport are not significant."</p> <p>a) Clarify the position with regards to the assessment</p>	<p>a)</p> <p>No assessment of the cumulative impact of the Project (once operational) with the Immingham Eastern Ro-Ro Terminal ("IERRT") has been included within Environmental Statement ("ES") Chapter 11: Traffic & Transport [APP-053], as once the Project is operational the traffic generated is minimal and generally outside of the network peak hours of 07:00–08:00 and 16:00–17:00. Therefore, no likely significant effects from operational traffic from cumulative impact of IGET and IERRT are anticipated.</p> <p>As set out in Table 11-23 of ES Chapter 11: Traffic & Transport [APP-053], the maximum increase on any road link during the weekday AM and PM periods is 14 vehicles on the A180 (E). This is within the daily</p>

<p>undertaken to consider the potential for cumulative operational traffic impacts with the IERRT.</p> <p>b) Provide evidence to support the position that the effects will not be significant.</p>	<p>variation of traffic flows, is not material and will have no cumulative impact with IERRT.</p>
<p>Q1.16.1.8</p>	
<p>Question</p>	<p>Response</p>
<p>Construction Phase</p> <p>ES [APP-067, Table 25-6] refers to "construction phase". Clarify what is meant by this term. Does this relate to all the proposed Work Nos.?</p>	<p>Table 25-6: Summary of in-combination effects (construction) within Environmental Statement ("ES") Chapter 25: Cumulative and In-Combination Effects [APP-067] outlines the outcome of the in-combination effects assessment for the construction phase. The use of the term 'construction phase' in this table demonstrates that the identified effects will only occur whilst the construction of the Project is underway. The indicative construction phase of the Project is outlined in Table 2-10 and Table 2-11 of ES Chapter 2: The Project [APP-044].</p> <p>The Applicant can confirm that the term 'construction phase' relates to all of the proposed Work Nos.</p>
<p>Q1.16.1.9</p>	
<p>Question</p>	<p>Response</p>

<p>Figure 25.2 Cumulative Assessment Short List</p> <p>Sheet 2 of Figure 25.2 [APP-166] appears to show an element of IERRT to be located on the northern side of the estuary. Clarify and submit an amended plan if necessary.</p>	<p>This polygon at Skeffling shown towards the eastern edge of Environmental Statement ("ES") Figure 25.2: Cumulative Assessment Short List [APP-166] originally formed part of the IERRT application boundary but was removed from those proposals.</p> <p>A replacement plan is provided as ES Figure 25.2 (2) [TR030008/APP/6.3 (2)], and as Appendix 1 of this document, and takes the opportunity to update in full the revised application boundary for the IERRT proposals.</p>
<p>Q1.16.2 Cross-cutting Questions</p>	
<p>Q1.16.2.1</p>	
<p>Question</p>	<p>Response</p>
<p>Advice Note 17</p> <p>In undertaking the in-combination and cumulative assessments, please confirm that the guidance contained in The Planning Inspectorate's Advice Note 17 has been followed. If not, please provide a justification as to why it was not.</p>	<p>As stated within Paragraph 25.4.1 of Environmental Statement Chapter 25: Cumulative and In-Combination Effects [APP-067]:</p> <p><i>"There is no standard method for assessing cumulative and in-combination effects, therefore the CEA has been undertaken on a qualitative basis using a combination of professional judgement, and the results of the individual assessments (presented in Chapters 6 - 24 [TR030008/APP/6.2]). In particular, the Planning Inspectorate's Advice Note 17 (Ref 25-4) has been used to inform the scope of the CEA and to assist with the identification of relevant developments to include."</i></p> <p>The Applicant confirms that the guidance provided within the Planning Inspectorate's Advice Note 17 has been followed and used to inform the scope of the cumulative effects assessment and to assist with the identification of relevant developments to include within the assessment.</p>

As suggested in the Planning Inspectorate's Advice Note 17, the following staged process was adopted:

- Stage 1: Establishing the Zone of Influence and Identifying a Long List of 'Other Development'
- Stage 2: Identify Shortlist of 'Other Development' for the Cumulative Effects Assessment
- Stage 3: Information Gathering
- Stage 4: Cumulative Effects Assessment

3 Appendices to the Applicant's Responses to the Examining Authority's First Round of Written Questions

Appendix 1 - ES Figure 25.2 (2) [TR030008/APP/6.3 (2)]



