



# Immingham Green Energy Terminal

9.23 Draft Statement of Common Ground between  
Associated British Ports, Air Products (BR) Limited and  
CLdN Ports Killingholme Limited

Infrastructure Planning (Examination Procedure) Rules 2010  
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## Status of the Statement of Common Ground

Associated British Ports and Air Products (BR) Limited considers that this draft Statement of Common Ground (SoCG) is an accurate description of the matters raised and the current status of each matter.

### On Behalf of Associated British Ports

Name	[REDACTED]
Position	Project Development Manager
Organisation	Associated British Ports
Signature	[REDACTED]

### On Behalf of Air Products (BR) Limited

Name	[REDACTED]
Position	Commercial Director
Organisation	Air Products
Signature	[REDACTED]

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## 1. Introduction

### Overview

- 1.1 This Statement of Common Ground (“SoCG”) 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 (ABP) ABP was established in 1981 following the privatisation of the British Transport Docks Board. The **Funding Statement [APP-010]** provides further information on ABP.
- 1.3 The Project as proposed by ABP 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 ABP 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]**.

### Parties to this Statement of Common Ground

- 1.7 This SoCG has been prepared by (1) ABP (as the Applicant), (2) Air Products and (3) CLdN Ports Killingholme Limited (CLdN).
- 1.8 ABP is the promoter of the Project and the owner and operator of the Port of Immingham.
- 1.9 Air Products is to be the first user of the new terminal with the construction of its green hydrogen production facility.
- 1.10 CLdN is the owner of CLdN Ports Killingholme (Killingholme), a long-established Ro-Ro terminal. It is one of the UK’s major North Sea Ro-Ro terminals and alongside the ABP facilities at Immingham and Hull, CLdN operates a significant portion of existing Ro-Ro capacity on the river Humber. CLdN is a statutory harbour authority pursuant to the North Killingholme Haven Harbour Empowerment Order 1994 as amended by the Humber Sea Terminal (Phase III) Harbour Revision Order 2006.

1.11 In this SoCG, ABP, Air Products and CLdN are collectively referred to as “the Parties”.

### **Purpose and Structure of this Document**

- 1.12 The purpose of this document is to identify and summarise any agreement, disagreement or matters outstanding between the parties on matters relevant to the examination so as to assist the Examining Authority in its consideration of the Application.
- 1.13 In preparing this SoCG, the guidance provided in ‘Planning Act 2008: examination of application for development consent’ (Department for Communities and Local Government (as it then was), March 2015) has been fully taken into account. In addition, this SoCG has had due regard to the Examining Authority’s **Rule 6 letter [PD-005]**.
- 1.14 Section 1 of this SoCG is designed to act as a general introduction to the Project and to the parties concerned.
- 1.15 Section 2 of this SoCG sets out a summary of the correspondence and engagement between the parties to date.
- 1.16 Section 3 of this SoCG sets out the matters which have been agreed or which remain outstanding, together with any matters upon which it has not been possible to reach agreement.
- 1.17 The Tables in Section 3 use a colour coding system to indicate the status of the matters between the Parties as follows:
- (a) Green – matter agreed;
  - (b) Orange – matter ongoing; and
  - (c) Red – matter not agreed.

## 2. Summary of Engagement

- 2.1 A summary of the consultation and engagement between ABP, Air Products and CLdN up to the date of this SoCG in relation to the Project generally and concerning the matters raised in this SoCG specifically is presented in Table 2-1.
- 2.2 It is agreed by the Parties to this SoCG that Table 2-1 is an accurate record of the meetings and key correspondence between the Parties.

**Table 2-1 – Record of Engagement**

Date	Form of Contact	Summary with key outcomes and points of discussion
<b>Pre-Application</b>		
9 January to 20 February 2023	First Statutory Consultation	CLdN was consulted as part of the First Statutory Consultation.
20 February 2023	Response to First Statutory Consultation	<p>CLdN provided their response to the First Statutory Consultation, Consultation Report Appendices, Appendix P: Response Tables: First Statutory Consultation [APP-040]. The main points noted in CLdN's consultation response were:</p> <ul style="list-style-type: none"> <li>• The approach to assessment of vessel calls, with only 12 of the potential 400 annual vessel calls being associated with the green hydrogen production facility, which is the only associated element of the IGET Project. The shoreside development for the other uses are not identified or assessed in the scope of the EIA</li> <li>• The absence of any navigation risk assessment or supporting information.</li> <li>• Impacts from reduced sailing speeds in the vicinity of the project.</li> <li>• A request to be involved in navigational risk assessments/HAZID workshops.</li> </ul>
10 May 2023	In Person Meeting	CLdN participated in the Marine Hazard Identification (HAZID) Workshop run by ABP.
24 May 2023 to 20 July 2023	Second Statutory Consultation	CLdN was consulted as part of the Second Statutory Consultation.
28 June 2023	Response to Second Statutory Consultation	CLdN provided their response to the Second Statutory Consultation, Consultation Report Appendices, Appendix Q: Response Tables: Second Statutory Consultation

Date	Form of Contact	Summary with key outcomes and points of discussion
		<p><b>[APP-041]</b>. The main points noted in CLdN's consultation response were:</p> <ul style="list-style-type: none"> <li>• the PEIR addendum does not contain sufficient information to enable CLDN to assess the potential impacts of the revised project.</li> <li>• the revised project is different to the original proposals and so the environmental effects can be assumed to be potentially different. Therefore, in CLdN's opinion further environmental impact assessment was required specific to the details of the revised project.</li> <li>• comments in the February response including in relation to uncertainty around future transport effects and sailing speed restrictions remain.</li> <li>• the construction impacts of the new project can also be expected to be different, in particular in relation to a shorter construction period.</li> <li>• CLdN would also expect revised navigational risk assessment and HAZID to be undertaken.</li> </ul>
20 September 2023	Letter to CLdN in response to Statutory Consultation responses submitted on 20 February 2023 and 28 June 2023	Letters in the Consultation Report, Appendix P3, Response Tables, First Statutory Consultation <b>[APP-040]</b> and Appendix Q.3, Response Tables, Second Statutory Consultation <b>[APP-041]</b> responding to the points made in the CLdN's response to the First and Second Statutory Consultation, providing a response to CLdN's concerns regarding, vessel calls, absence of Navigational Risk Assessment (NRA) or supporting information, impacts from reduced sailing speeds in vicinity of the Project and the NRA/HAZID workshops.
21 September 2023	Email	Follow up email, noting an error in the letter sent 20 September 21.
15 February 2024	In Person Meeting	CLdN and ABP met to discuss the Project and CLdN's relevant representation.
21 February 2024	In Person Meeting	Follow up meeting between CLdN and ABP. It was agreed that CLdN would provide ABP with draft protective provisions for consideration and ABP would provide CLdN with a draft Statement of Common Ground.

### 3. Matters Agreed and Matters Not Agreed

- 3.1 It is agreed that the record of engagement included in the **Consultation Report [APP-022]** submitted with the Application, accurately sets out the consultation and engagement undertaken between the Parties in relation to the Application. In particular, the following chapters:
  - 3.1.1 Chapter 4 – First Statutory Consultation – CLdN was consulted by ABP as part of their statutory obligations to consult with the local community.
  - 3.1.2 Chapter 5 – Second Statutory Consultation – CLdN was consulted by ABP as part of their statutory obligations to consult with the local community.
- 3.2 Table 3-1 contains a list of ‘matters agreed’ (shaded green); a list of matters in respect of which discussion is ongoing (shaded orange) and a list of matters not agreed (shaded red) at the date of the Examination along with a concise commentary of what the item refers to and how it came to be agreed between the Parties (as applicable).

**Table 3-1 - List of Matters Agreed, Matters Outstanding and Matters Not Agreed**

ID	Matter	Reference	CLdN Position	ABP Position	Air Products Position	Status	Date
<b>General</b>							
1	Stakeholder Engagement	Consultation Report [APP-022]	CLdN confirms ABP's record of engagement as set out in the Consultation Report [APP-022] and Table 2-1 of this SoCG is accurate.	ABP confirms the record of engagement as set out in the Consultation Report [APP-022] and Table 2-1 of this SoCG is accurate.	As per ABP position.	Discussion ongoing	
2	Principle of development	6.2 Environmental Statement - Chapter 3: Need and Alternatives [APP-045]	CLdN do not have an in-principle objection to the Project.	ABP acknowledges that CLdN do not have an in-principle objection to the Project.	As per ABP position.	Agreed	04 December 2023
<b>Marine transport and Navigation</b>							
3	Exclusion Zone and speed restriction	Relevant Representation [RR-005]  6.4 Environmental Statement Appendices - Appendix 12.A: Navigational Risk	ABP has explained that there will be an exclusion zone around the Project and passing vessels will be subject to sailing speed restrictions. These will be an extension of those restrictions that currently apply for the Immingham Oil Terminal.  CLdN wishes to understand the full extent of these restrictions, including	As noted in 2.2 Project Design Overview in the Environmental Statement Appendix 12-A Navigational Risk Assessment [APP-191] " <i>The berth has been aligned with IOT to the west and includes a 150m exclusion zone extending from the berth line</i> ".  Table 12.6 in Environmental Statement Chapter 12- Marine	As per ABP position.	Discussion ongoing	

ID	Matter	Reference	CLdN Position	ABP Position	Air Products Position	Status	Date
		<p>Assessment [APP-191]</p> <p>6.2 Environmental Statement - Chapter 12: Marine Transport and Navigation [APP-054]</p>	<p>the direct and indirect effects; and notes that they do not appear to have been assessed adequately in terms of their impact, including on other river users.</p>	<p>Transport and Navigation [APP-054] sets out a list of mitigation measures and with regard to the speed limits it states “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). VTS will monitor for unsafe speeds, including during construction work. Sanctions may be used against repeat offenders, e.g., removal of PEC”.</p>			
4	Speed Restrictions	<p>Relevant Representation [RR-005]</p> <p>6.2 Environmental Statement - Chapter 12: Marine Transport and Navigation [APP-054]</p> <p>6.4 Environmental Statement</p>	<p>CLdN is concerned that imposing additional sailing speed restrictions on the Humber will require vessels to increase sailing speeds on other segments of the passage to make up time in order to maintain the sailing schedule.</p> <p>CLdN vessels sail at lower speeds to reduce fuel consumption and CO2 emissions, which is fundamental to CLdN’s sustainability policies as a responsible operator. This would also impact negatively on emissions trading scheme levies. These issues are not</p>	<p>ABP has proposed a speed restriction of 5 knots for vessels passing the IGET jetty head when a vessel is present, which is the same speed restriction required for the three Immingham Oil Terminal (IOT) jetty heads. Equally, it is anticipated that a 150m exclusion zone should be maintained around the IGET jetty head when a vessel is present, which is the same exclusion zone as the three IOT berths. Therefore, IGET’s jetty head will effectively resemble – at least for passing mariners – an</p>	As per ABP position.		

ID	Matter	Reference	CLdN Position	ABP Position	Air Products Position	Status	Date
		Appendices - Appendix 12.A: Navigational Risk Assessment [APP-191]	accounted for or addressed in the Application.	<p>additional jetty head extension to the IOT.</p> <p>CLdN have concerns that the extension of the slow-steaming requirement from the IOT jetty heads to encompass the IGET jetty head would affect their transit times. ABP has therefore commissioned a report looking at AIS track data of vessels carrying out this manoeuvre. The slight extension of the slow-steaming requirement amounts to an additional 2 minutes of passage time, which ABP considers to be insignificant in the context of a journey which spans the North Sea.</p>			
5	Vessel Traffic and Scheduled Services	<p>Relevant Representation [RR-005]</p> <p>6.2 Environmental Statement - Chapter 12: Marine Transport</p>	Exclusion zones and sailing speed restrictions that are today unknown will have the potential to impact significantly other vessel traffic on the Humber, including on scheduled services calling at Killingholme.	<p>ABP notes the references to concerns regarding impacts on scheduling of existing services.</p> <p>Vessels moving to and from the Port of Immingham are managed by the Port of Immingham Statutory Harbour Authority and Humber Statutory Harbour Authority (SHA)(operating as</p>	As per ABP position.		

ID	Matter	Reference	CLdN Position	ABP Position	Air Products Position	Status	Date
		<p>and Navigation <b>[APP-054]</b></p> <p>6.4 Environmental Statement Appendices - Appendix 12.A: Navigational Risk Assessment <b>[APP-191]</b></p>		<p>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.</p> <p>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>The Navigational Risk Assessment in Appendix 12-A of the Environmental Statement <b>[APP-191]</b> considers the consequences and impacts of the proposed Project on navigation, both during the construction and its consequent operation. The scope of</p>			

ID	Matter	Reference	CLdN Position	ABP Position	Air Products Position	Status	Date
				the EIA includes the appraisal of new and existing vessel activity arising as a result of the construction of the new marine infrastructure.			
6	Vessel Calls	<p>Relevant Representation [RR-005]</p> <p>6.2 Environmental Statement - Chapter 2: The Project [APP-044]</p> <p>6.4 Environmental Statement Appendices - Appendix 12.A: Navigational Risk Assessment [APP-191]</p>	<p>ABP has revised the estimated number of vessel calls down to 292 per annum, 12 of which will be ammonia carriers for the purposes of the hydrogen production facilities which are part of the Project and also the subject of the DCO Application. The purpose and nature of the remaining 280 vessel calls per annum, or the type of vessels (including size, manoeuvrability and the cargoes they will carry, which could be hazardous), is unknown at this time.</p> <p>CLdN is concerned that the figure of 292 total annual vessel calls is unevicenced and relates to unknown uses and therefore appears arbitrary.</p>	<p>ABP confirms that, the maximum forecast vessel calls for the jetty are 292 vessels per annum and the impacts of the full 292 vessel calls have been assessed in the application, and appropriate mitigation identified where necessary.</p> <p>As noted in Environmental Statement Chapter 2 The Project [APP-044] <i>“The Terminal would operate 24 hours a day, seven days a week and 365 days a year. The Terminal would have capacity of approximately 11 million tonnes per annum and so be able to accommodate up to 292 vessel calls per year.”</i></p> <p>ABP can confirm that the maximum forecast throughput for the jetty has been assumed as a reasonable worst case assumption for both the</p>	As per ABP position.	Discussion ongoing	

ID	Matter	Reference	CLdN Position	ABP Position	Air Products Position	Status	Date
				<p>Navigational Risk Assessment [APP-191] and for the Environmental Impact Assessment which have been undertaken for the Project and submitted as part of the application .</p>			
7	Scope of the EIA	<p>Relevant Representation [RR-005]</p> <p>6.4 Environmental Statement Appendices - Appendix 12.A: Navigational Risk Assessment [APP-191]</p> <p>6.2 Environmental Statement - Chapter 12: Marine Transport and Navigation [APP-054]</p>	<p>CLdN considers that the impacts associated with future uses of the berth beyond the 12 annual ammonia vessel calls need to be set out and assessed and consulted upon.</p> <p>The majority of future uses of the marine-side capacity of the Project do not fall within the scope of the Environmental Impact Assessment (EIA) or Navigation Risk Assessment (NRA) for the Project and, accordingly, they have not been assessed.</p> <p>The DCO Application indicates that any development associated with additional vessel movements – for example for the transport of CO2 – would be subject to further consents, although it is not clear how this is to be secured.</p> <p>Given the scale of the remaining substantial 280 vessel movements relative to the subordinate 12 vessel</p>	<p>ABP can confirm that the Navigational Risk Assessment [APP-191] and the Environmental Statement have assessed the <u>realistic</u> worst-case scenario of 292 vessel calls <u>per annum</u>. ABP can confirm that the assessment and determination of the impacts of the 292 vessel calls (per annum) have been assessed in the application, and appropriate mitigation identified where necessary. The navigational impact of the new jetty operating to reasonable worst case 'full capacity' level has been assessed. Therefore, the Navigational Risk Assessment is considered to have adequately assessed the navigational risk of the new facility's operation.</p> <p>The Project has been designed, as far as possible, to avoid and minimise impacts and effects to marine transport and navigation through the process of design development, and</p>	As per ABP position.	Discussion ongoing	

ID	Matter	Reference	CLdN Position	ABP Position	Air Products Position	Status	Date
			<p>movements associated with the Project, CLdN believes that it would be inappropriate to defer assessment and determination of the impacts of the remaining 280 vessel calls until some unknown point in the future or, alternatively, that any development consent for the Project should be limited to the assessed 12 ammonia carriers required for the purposes of the hydrogen production facilities.</p>	<p>by embedding mitigation measures into the design. Embedded mitigation also includes controls which are already active and applied by the Harbour Authority within the Port of Immingham or by HES in relation to marine operations in the study area. The mitigation measures are set out in Table 12-6 in the Environmental Statement Chapter 12- Marine Transport and Navigation [APP-054].</p> <p>ABP note that the specific landside infrastructure required to process and/or store other liquid bulks (i.e. not including ammonia) imported across the jetty is not consented under the DCO and would therefore be the subject of further applications for separate consents through the relevant consenting and permitting process and would be subject to environmental assessment at that stage.</p>			

ID	Matter	Reference	CLdN Position	ABP Position	Air Products Position	Status	Date
8	Navigation Management Measures	<p>Relevant Representation [RR-005]</p> <p>6.2 Environmental Statement - Chapter 12: Marine Transport and Navigation [APP-054]</p>	<p>It is not apparent from the Application what further navigation management measures may be necessary to enable other uses of the marine side of the Project by the additional 280 vessels beyond the 12 annual ammonia vessel calls.</p>	<p>ABP can confirm that the Navigational Risk Assessment [APP-191] and the Environmental Statement have assessed the <u>realistic</u> worst-case scenario of 292 vessel calls <u>per annum</u>. ABP can confirm that the assessment and determination of the impacts of the 292 vessel calls (per annum) have been assessed in the application, and appropriate mitigation identified where necessary. The navigational impact of the new jetty operating to reasonable worst case 'full capacity' level has been assessed. Therefore, the Navigational Risk Assessment is considered to have adequately assessed the navigational risk of the new facility's operation.</p> <p>The Project has been designed, as far as possible, to avoid and minimise impacts and effects to marine transport and navigation through the process of design development, and by embedding mitigation measures into the design. Embedded mitigation also includes controls which are already active and applied by the</p>	As per ABP position.	Discussion ongoing	

ID	Matter	Reference	CLdN Position	ABP Position	Air Products Position	Status	Date
				Harbour Authority within the Port of Immingham or by HES in relation to marine operations in the study area. The mitigation measures are set out in Table 12-6 in the Environmental Statement Chapter 12- Marine Transport and Navigation <b>[APP-054]</b> .			
9	Marine Safety Management Plan and Port Marine Safety Management Plan	Relevant Representation <b>[RR-005]</b>  6.4 Environmental Statement Appendices - Appendix 12.A: Navigational Risk Assessment <b>[APP-191]</b>	It is stated in the Application that the Marine Safety Management Plan and Port Marine Safety Management Plan will be updated to take into account the Project. By extension, it is assumed that these documents would be updated again in future to take account of other uses of the berth. These documents have not been provided with the Application, including detail on how they would be updated for future use. As a result, it is not possible to ascertain what mitigations or restrictions will be put in place or be certain that such measures will not impact on other river users.	Port Marine Safety Plan, or Marine Safety Plan, is a strategic level document which lays out the Marine Safety Policy for the port. It fulfils the requirement 1.8 of the Port Marine Safety Code (2016), as published by the Department for Transport, for the Duty Holder to publish a marine safety plan and reporting performance against the objectives and targets set, and report compliance with the Code to the Maritime Coastguard Agency (MCA) every 3 years. It is not dynamic and does not include updates to the operational status of the port/harbour, this is the function of the Marine Safety Management System (MSMS).	As per ABP position.	<b>Discussion ongoing</b>	

ID	Matter	Reference	CLdN Position	ABP Position	Air Products Position	Status	Date
				<p>Both Humber and Immingham have functional/audited and Port Marine Safety Code (PMSC) compliant MSMSs in place. The MSMS is made up by integrating the policy, process and risk assessment/management of the marine operations for each port or SHA. The MSMS is dynamic by its nature and is in a constant state of review, update and improvement. The ports formal risk assessment (FRA) for marine operations forms the backbone of the MSMS, and new or changing marine or navigational situation or operations are implemented as required to ensure that the MSMS is kept current and fit for purpose.</p> <p>ABP has an appointed Designated Person (DP), as required by the PMSC. The DP provides assurance by way of internal and external auditing of the MSMS and reporting its functionality and compliance with the PMSC to ABP's Duty Holders. This in turn allows ABP to state PMSC</p>			

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				<p>compliance to the UK Government every three years as required.</p> <p>The MSMS system will be updated to reflect the construction and operation of IGET. This will include updating the processes, policy and procedures, and will also include the integration of relevant sections of the NRA into the FRA for the SHA/port as required.</p> <p>The system (MSMS) is not in the public domain as it is an ABP operational system, however the top-level strategic document Marine Safety Plan, is publicly accessible as a policy document on the ABP website.</p> <p>CLdN can be reassured that updating the MSMS is an ongoing, iterative process.</p>			
10	Statutory duties of SHA	Relevant Representation [RR-005]	ABP has explained that the safe and efficient functioning of the Project will be subject to the statutory duties of the Port of Immingham Statutory Harbour Authority (SHA) and the Harbour Master	ABP can confirm that the assessment and determination of the impacts of the remaining 280 vessel calls have been assessed in the application, and	As per ABP position.	Discussion ongoing	

ID	Matter	Reference	CLdN Position	ABP Position	Air Products Position	Status	Date
		6.4 Environmental Statement Appendices - Appendix 12.A: Navigational Risk Assessment [APP-191]	<p>Humber. The inference is that the (un-assessed) impacts of future vessel movements will be subject to decisions made by the Immingham SHA and the Harbour Master Humber.</p> <p>Notwithstanding their distinct statutory duties, the Port of Immingham SHA and the Harbour Master Humber are both part of ABP's own organisation. There is no structural independence.</p>	<p>appropriate mitigation identified where necessary.</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>			
11	Controls to prevent unknown impacts arising	<p>Relevant Representation [RR-005]</p> <p>6.4 Environmental Statement Appendices - Appendix 12.A: Navigational Risk Assessment [APP-191]</p>	<p>The Application – if a DCO is made – should not allow the possibility for incremental increases in road traffic or vessel activity without adequate assessment and controls secured in the DCO.</p> <p>CLdN would welcome further discussion with ABP on the matters covered in this Relevant Representation. At this stage CLdN considers that the impacts associated with future uses of the berth beyond the 12 annual ammonia vessel calls need to be set out and assessed, and consulted upon, in order for</p>	<p>The Environmental Statement assessed the impacts of the 292 vessel calls per annum .</p> <p>Any additional landside infrastructure or modifications to accommodate cargoes in addition to ammonia would require further applications for necessary consents for the works, to be approved through the relevant consenting and permitting process and environmentally assessed as part of that application</p>	As per ABP position.	<b>Discussion ongoing</b>	

ID	Matter	Reference	CLdN Position	ABP Position	Air Products Position	Status	Date
			<p>interested parties to understand those and communicate any concerns and secure protections for their statutory undertakings and established operations.</p> <p>Failing that, the DCO should impose controls that prevent unknown impacts arising in future without the necessary consultation and consenting, for example by limiting any development consent granted for the Project to the assessed 12 ammonia carriers required for the purposes of the hydrogen production facilities and providing protection for statutory undertakings and established operations. It should not be open to ABP to deliver unknown other / additional operations at / by virtue of the Project without proper assessment; or for ABP's own organisation to make its own determinations in future.</p>				

## 4. Glossary

<b>Abbreviation / Acronym</b>	<b>Definition</b>
ABP	Associated British Ports
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
HES	Humber Estuary Services
IOT	Immingham Oil Terminal
MSMS	Marine Safety Management System
MMO	Marine Management Organisation
NRA	Navigational Risk Assessment
NSIP	Nationally Significant Infrastructure Project
PA 2008	Planning Act 2008
PINS	Planning Inspectorate
SHA	Statutory Harbour Authority
SoCG	Statement of Common Ground
SoS	Secretary of State for Transport
UK	United Kingdom