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Your Ref:

Our Ref: M-01042556

20 February 2023

Dear Sir or Madam,

**PROPOSED DEVELOPMENT CONSENT ORDER (DCO)  
IMMINGHAM GREEN ENERGY TERMINAL (IGET PROJECT)  
REPRESENTATIONS IN RESPONSE TO CONSULTATION EXERCISE**

**Introduction and Background**

Polynt Group have been active for over 60 years. It is a global market leader in the production, sales, research and development of organic anhydrides and their derivatives, including composites, intermediates and coatings.

Polynt Group develops technologies that are utilised internally for production as well as licensed to third parties. We are now a leader in specialty market niches and is ideally positioned to benefit from the expected growth in the target markets and have a presence on four continents, operating in 16 countries, from 36 sites. We employ over 3,000 members of staff and have a turnover of over €2.3billion.

The Stallingborough facility (**Plant**) is a key part of the composites business unit within the Polynt Group, manufacturing Unsaturated Polyester Resins (UPR), gel coat and cleaning solutions with an output capacity of 23,000 tonnes. Polynt is a market leader in the UK for supply of these composite resins, with the majority of sales volume coming from the Stallingborough site. The plant was built in 1965 and acquired by Polynt in 2019, with considerable investment committed to upgrade and expand its operations.

The Plant, which is located on Laporte Road and adjacent to the red line boundary for the DCO, is a critical commercial and operational component in the Polynt network and comprises a composite resin production factory together with office, warehousing and bulk storage for chemical components including

(amongst others) solvents, resins and additives. There are currently 56 employees working at the Plant, all of whom travel to work through Immingham or using the connecting road network.

Polynt Composites UK Limited also own land within the red line boundary for the DCO (**Order Land**). The Order Land is currently in agricultural use and is actively farmed by a tenant farmer, who grows crops including wheat and oil seed rape. The Order Land is a key interest within the Polynt Group's portfolio and offers significant future development potential as either a chemical manufacturing/processing plant or as warehousing provision given its strategic location.

### **Impact of IGET Project on Polynt**

Polynt Composites UK Limited has been in discussions with Associated British Ports (**ABP**) and Air Products Limited (**APL**) regarding the IGET Project since 26 July 2022. Polynt Composites UK Limited is referred to hereinafter as 'Polynt'.

The project proposals for which development consent is being sought will necessitate the temporary acquisition of the Order Land which, according to the supporting documentation made available to date, will be used as a construction compound during the construction phase of the IGET Project.

Whilst the Order Land is most immediately affected by the IGET Project, assessing the impact of the same on the operation of the Plant and its employees is also of critical importance to Polynt.

Polynt does not object to the principle of the IGET Project, however, in the absence of appropriate mitigation, protective and safeguarding measures, the IGET Project could have a significant impact on the operations of the Plant and on the medium to longer term development potential of the Order Land.

Given the proposed land take required to deliver the IGET Project and the impact this will have on the amenity of the area, traffic and transport and other associated impacts during the construction and operational phases, an optimum solution as regards the internal, physical reconfiguration of the Order Land will need to be identified, programmed and executed. Furthermore, any commercial and operational disruption to the Plant will need to be minimised and proactively managed not only during the carrying out of any reconfiguration works but also, crucially, during the construction and operational phases of the IGET Project.

Polynt would be keen to negotiate with ABP/APL to agree heads of terms and the substantive provisions of a land and works agreement which it is hoped will secure the implementation of the aforementioned mitigation, protective and safeguarding measures. However, pending an agreement being reached, a summary of Polynt's primary concerns in relation to the IGET Project and its anticipated impact on the Plant and Order Land following a review of the information currently available publicly is set out below. Please note that we reserve the right to supplement these representations as and when further, more detailed, information becomes available.

### **Key concerns**

As stated above, management of the impact on the commercial operation of Polynt's interests at Immingham is a key concern. In this regard we require clarity as to the length of time for which the Order

Land is required. In some material there is reference to the construction compound located on the Order Land being required for a period of 2 years, yet elsewhere (including at consultation events) a period of 2-3 years has been mentioned, commencing 2025. We require absolute certainty on this point in order to adequately plan for the future business needs of our operation.

Whilst Polynt is broadly supportive of the IGET Project, we were unable to discern from the information currently available exactly what alternatives to the current proposed scheme have been considered, and presumably discounted, by ABP and APL. As noted above, our aim is to minimise and mitigate impacts on our interests and we have not seen proposals for an alternative scheme that differs to that which is currently being promoted.

We have significant concerns around the traffic and transport impacts of the IGET Project during both the construction and operational phases of the scheme. The data on these impacts that accompanies the consultation information identifies significant increases in vehicle movements on the surrounding highway network, particularly on Kings Road and Queens Road and the junction of the latter with Laporte Road. This is already a very busy route during rush hour, with queuing traffic waiting to access the docks from Queens Road and Laporte Road. Laporte Road is the only access to our Plant, with traffic (and our employees) approaching via Queens Road or Kiln Lane/Hobson Way. A significant increase in traffic here will cause excessive congestion and queues that would impact on our Laporte Road access, causing issues for members of staff and deliveries in and out of the site. To confirm, 34,000 tonnes of raw materials and finished products arrive, or leave the site per annum, by road.

Of further concern is the fact that this increased traffic will comprise a considerable number of HGV movements. As noted, Laporte Road is already a very busy highway being the main access point to the docks at its junction with Queens Road. The proposed access point to the temporary construction compound is circa 200 yards from the entrance to our Plant. We have many HGVs making deliveries to the Plant daily. With no middle right hand turning lane, and limited space at the entrance to our Plant, there are already occasions when the traffic has needed to queue to access the site, leading to a number of near misses in the past with HGV's waiting to gain entry. Increased traffic flow during the construction phase of the IGET Project has the potential to exacerbate this problem and it is not unforeseeable that the queues from the junction with Laporte Road and Queens Road during rush hour could back up to the Plant entrance, restricting access for deliveries, employees and visitors. It is unclear whether any investigation of the potential to use the port to deliver construction materials etc necessary to deliver the scheme has been explored as an alternative measure to reduce/minimise vehicle movements on the local highway network.

In relation to the Order Land, we require further clarity on the extent of the ground investigation work that is proposed at this location. If the IGET Project is to proceed, we will require maximum comfort that the land will be remediated so that there is no impact on the Order Land as a result of its temporary use as a construction compound. If the scheme proceeds the Order Land must be restored to its current state (ie. suitable for agricultural use) as a minimum. Thorough investigation work is necessary in order to ensure that any pre-existing conditions are identified and catalogued and a baseline set that can be referred back to and remediated where necessary post construction. This is particularly important as there is the very real risk of uncontrolled run off and accidental release of potential contaminants during both the construction and operational phase.

Linked to this, we note that the stated aim for delivery of the IGET Project is to ‘minimise waste generation’. Further information as to how waste generation will be ‘minimised’ during the construction phase. This is particularly important to Polynt as the Order Land will presumably be used for the storage of waste materials awaiting removal from the site.

The flood risk implications of the IGET Project are also not assessed adequately in the consultations documentation, with the preliminary information stating that a full Flood Risk Assessment is to be submitted at a later date. Given the Plant and Order Land’s location adjacent to the Humber, and noting the ongoing affects of climate change, the risk of flooding affecting our operation is already significant. We will require comfort that the risk of flooding at both the Order Land and the Plant will not be heightened by the IGET Project.

Finally, and straddling both the construction and operational phases of the IGET Project, we consider that the consultation information contains insufficient information of the assessment of the cumulative impacts of introducing another COMAH hazard to this location, particularly given the traffic and transport impacts referred to above. This is a key concern relative to the health and wellbeing of our employees and the ongoing viability of our operation from the Plant.

Other non-COMAH hazard risks to human health, such as worsening air quality, are also not dealt with adequately in the consultation documentation. Increased levels of harmful dioxins caused by both increased traffic, and queuing traffic in particular, must be fully and adequately assessed and mitigated.

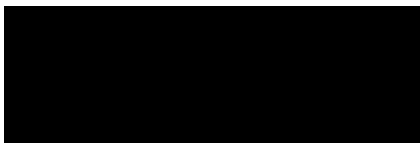
### **Concluding remarks**

Our operations at Stallingborough are a critical part of the Polynt Group’s international business. The Plant makes a major contribution to Group performance and plays an integral role in both serving the company’s customer base in the UK, and in supporting the wider integrated national, and international, network of Polynt sites.

The delivery of the IGET Project, and the public benefits it promises to deliver, should not be at the expense or to the material detriment of such a significant, thriving business (having regard to its economic contribution) and local employer.

Please acknowledge these representations as the formal response to the consultation exercise for the IGET Project, closing 20 February 2023.

Yours faithfully



pp Polynt Composites UK Ltd