



Immingham Green Energy Terminal

9.45 Applicant's Comments on D1 Submissions from
National Highways

Infrastructure Planning (Examination Procedure) Rules 2010
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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 Project, 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 United Kingdom's ("UK's") net zero agenda by helping to decarbonise the UK's industrial activities and in particular the heavy transport sector.
- 1.6 A detailed description of the Project is included in **Environmental Statement ("ES") Chapter 2: The Project [APP-044]**.

Purpose and Structure of this Document

- 1.7 This document provides the Applicant's response as necessary to:
 - National Highways' ("NH's") Written Representation **[REP1-085]**
 - NH's response to the Examining Authority's First Written Questions **[REP1-082]**
- 1.8 Discussions are ongoing with respect to a Statement of Common Ground ("SoCG") with NH which will formally record the agreed position in due course.

2. Applicant's Comments on the Written Representation from National Highways

REP1-085

Response

NH's Written Representation [REP1-085] provides a detailed review of the further information provided to NH by the Applicant on 28 February 2024. NH has also provided an updated draft SoCG with Track Changes [REP1-084]. NH's Written Representation [REP1-085] confirms that the majority of the previously outstanding technical details have been agreed but also requests some further points of clarification. This further information is being provided to NH in the form of an updated technical note with a view to agreeing this technical note with NH for submission into the Examination when agreed.

The NH Written Representation confirms that NH is content with the **Outline Construction Traffic Management Plan [REP1-006]** (formerly [APP-223]). In addition, it requests sight of the **Operational Travel Plan** which was submitted by the Applicant at Deadline 1 [REP1-067] and it is understood that the NH position on this document will be confirmed in due course. The Applicant expects that this will be agreed with NH and that this will be confirmed in the SoCG.

The Applicant does not expect that any of the remaining points of clarification will lead to any material change to the outcome of the assessment that has been undertaken, and subject to further discussion with NH, it anticipates that an agreed assessment and supporting technical note will be submitted formally to the Examination in due course, it is hoped at Deadline 3.

3. Comments on National Highways' Responses to the Examining Authority's First Round of Written Questions

| Q1.10 Traffic and Transport | |
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| Q1.10.1.4 | |
| Question | Interested Party's Response |
| <p>HGV Route Selection</p> <p>The Applicant has proposed a HGV route [APP-102].</p> <p>a) Applicant – Provide the methods and logic used to derive the proposed route, including confirmation of the starting point.</p> <p>b) NH – Are you content with the proposed route and its likely effect on the strategic road network, if not explain your reasons?</p> <p>c) Applicant - On occasions would it be necessary to deviate from the proposed route? What instances do you envisage, where this could be the case? What would be the effects, how have you assessed those effects and how would you mitigate those effects?</p> <p>d) Applicant - What management and enforcement procedures will you have in place, to ensure drivers do not use an</p> | <p>The Applicant proposes that 55% of HGV construction traffic will route to/from the west and 45% to/from the east via the A180/A1173 junction. We would note the impact of the HGV construction traffic on the operation of the A180/A1173 has been assessed as part of junction capacity assessments within the "IGET DCO Examination Response" to National Highway. The conclusions of this assessment indicate that in all scenarios, the A180/A1173 operates within capacity at all arms, with negligible increases in the total queue and delay as a result of the development construction traffic. However, clarification of the inputted traffic flows and modelling results is sought in order to come to a full conclusion.</p> |

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| <p>alternative route, other than when there is a legitimate reason for doing so.</p> | |
| <p>Applicant's Comment</p> | |
| <p>The position of NH is noted. NH has confirmed in its response to the Examining Authority's First Written Questions [REP1-082] that, subject to some further clarification (which is being provided) on the input data to the modes, the conclusions indicate that there will be "<i>negligible increases in the total queue and delay as a result of the development construction traffic</i>". NH has requested further clarification on the operational impacts and this is being provided.</p> | |
| <p>Q1.10.2.1</p> | |
| <p>Question</p> | <p>Interested Party's Response</p> |
| <p>Impact Assessment</p> <p>a) NH/ NELC – The ES [APP-190, Table 17, link No.3] states an increase in traffic of 21%; do you agree with this conclusion?</p> <p>b) Provide your assessment of the severity of the increase in traffic.</p> <p>c) Applicant – Has a worst case scenario for traffic impacts, which includes the port being utilised at full capacity, been carried out?</p> | <p>National Highways has been in discussion with the Applicants transport consultant DTA with regard to the operational and construction traffic volumes.</p> <p>We would note that the impact of the total construction traffic on the operation of the A180/A1173 has been assessed as part of junction capacity assessments within the "IGET DCO Examination Response" to National Highway. The conclusions of this assessment indicate that in all scenarios, the A180/A1173 operates within capacity at all arms, with negligible increases in the total queue and delay as a result of the development construction traffic. However, clarification of the inputted traffic flows and modelling results are sought in order to come to a full conclusion.</p> <p>It was previously concluded that the operational traffic volume would not have an operational impact on the SRN, however, as part of the "IGET DCO Examination Response", the peak two way vehicle trip generation is</p> |

estimated to now be 87 two-way trips between 08:00-09:00 and 17:00-18:00. Consequently, we have recommended the distribution of the 87 two-way vehicle trips on to the network are presented, in order to show the anticipated impact of vehicle trips on the SRN. Consequently, the severity of the increase in traffic will be established once the additional information is provided.

Applicant's Comment

The position of NH is noted. NH has confirmed in its response to the Examining Authority's First Written Questions **[REP1-082]** that, subject to some further clarification (which is being provided) on the input data to the modes, the conclusions indicate that there will be "*negligible increases in the total queue and delay as a result of the development construction traffic*". NH has requested further clarification on the operational impacts and this is being provided. None of these clarifications are expected to materially change the outcome of the assessment, and subject to further discussion with NH, it is anticipated that an agreed assessment and supporting technical note will be submitted to the Examination formally at Deadline 3.