



Immingham Green Energy Terminal

9.42 Applicant's Comments on D1 Submissions from PD
Port Services Limited

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 to the Written Representation of PD Ports Services Limited ("PDPS") submitted at Deadline 1 **[REP1-105]**. Reference is made to Applicant's response to the Relevant Representation from PDPS **[REP1-021]** which addresses many of the points raised in PDPS's Written Representation. The further responses given below supplement the responses previously given and address additional points raised.

2. Applicant's Comments on the Written Representation from PD Ports Services Limited

General
1.6 to 1.7
Response
The Applicant welcomes the support for the Project from PDPS and will continue discussions to resolve any outstanding concerns.
Vehicle Route
2.2 to 2.7
Response
<p>The design of the culvert (Work No. 4) which is required for the installation of piping and cables under Laporte Road to connect the ammonia storage area (Work No. 3) with the hydrogen production units in Work No. 5 and the jetty (Work No. 1 via Work No. 2) is not yet finalised and, as such, the construction methodology is not yet defined.</p> <p>Several options will be evaluated based on factors including safety of workers and road users, construction practicality/viability and minimising road disruption but with no specific order of preference. However, it is currently anticipated the likely methodology will be a short-term full road closure of Laporte Road in order to excavate the road, place a number of oversized sleeves across the road and then reinstate the road. This will allow the road to be fully re-opened as quickly as possible whilst minimising risk to construction workers. The pipes and cables would be installed in the sleeves at a later date without further work being required on the road surface. This approach has been discussed with the Local Highways Authority.</p> <p>Article 8 of the draft DCO ("dDCO") [REP1-016] sets out the extent of application of the New Roads and Street Works Act 1991 ("the 1991 Act") to street works under the dDCO. The general requirements as to execution of street works under the 1991 Act apply and include an obligation on the undertaker to avoid unnecessary delay or obstruction.</p>

It is accepted that a road closure of Laporte Road for two to four weeks would result in a 3.5 mile diversion for traffic from East Gate to PDPS. Typically, this would only add approximately 10 minutes to journey time. Other traffic from the East Gate would be less affected because their typical routes are less direct than for PDPS.

Temporary Access off Laporte Road

2.8 to 2.11

Response

As stated in the Applicant's response to ExQ1.13.3.1, submitted at Deadline 1 **[REP1-034]**, the Laporte Road Temporary Construction Area (Work No. 9) will be required for approximately three years, being the full duration of Phase 1 of construction of the Project.

It is intended that the Laporte Road Temporary Construction Area (Work No. 9) will be used for materials/equipment storage and car parking for the East Site (Work Nos. 1 to 6). Large abnormal loads (and, wherever practicable, other items) will be transported directly to the final location and not to the Work No. 9 laydown area. Work No. 9 is not intended to be used as a Temporary Construction Area for Work No. 7.

Table 6 of the **Outline Construction Traffic Management Plan [REP1-006]** confirms that only 59 Heavy Goods Vehicles per day (less than six per hour) are forecast to use Laporte Road (and therefore the Queens Road/Laporte Road junction). In addition, it is forecast to accommodate access for 447 construction worker movements per day (**Table A-2** in **Appendix A** of the **Outline Construction Traffic Management Plan**). Peak hour flows will be less than 70 vehicles. These will predominantly be movements from Queens Road (S) to Laporte Road (W) or vice versa and will therefore have no impact on queuing inbound to the port or on safety or operation of adjacent access for PDPS.

Clearly, given these very low flows and limited impact, there can be no justification or requirement to limit the use of Work No. 9 in traffic impact terms.

The Applicant notes that these figures represent peak construction levels. The averages over the three-year period will be significantly lower.

Proposed Culvert

2.12 to 2.15

Response

As stated in the Applicant's response to 2.2 to 2.7 above, the design of the culvert (Work No. 4) is not yet finalised and, as such, the construction methodology not yet defined. However, the construction of the culvert (Work No. 4) will be carried out in accordance with the **dDCO [REP1-016]** and relevant control documents such as the **Outline Construction Environmental Management Plan [APP-221]**.

As noted by PDPS in its representation, the Applicant has confirmed that once the culvert has been installed, the road will be of similar strength to the rest of the public highway.