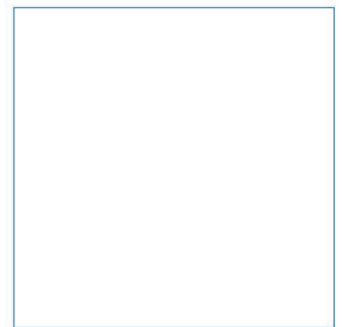
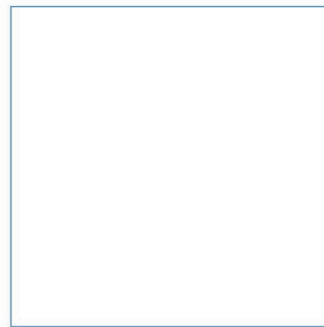


# Associated British Ports

## Immingham Eastern Ro-Ro Terminal

### Preliminary Environmental Information Chapter 4: Need and Alternatives

January 2022



Innovative Thinking - Sustainable Solutions

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# Immingham Eastern Ro-Ro Terminal

## Preliminary Environmental Information Chapter 4: Need and Alternatives

January 2022



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## 4 Need and Alternatives

### 4.1 Introduction

4.1.1 This chapter of the Preliminary Environmental Information Report (PEIR) falls into two parts. First, it sets out why Associated British Ports (ABP) believes that there is, in summary, a need for additional roll-on/roll-off (ro-ro) freight facilities within the Humber estuary. Second, the chapter then explains why ABP believes that the Immingham Eastern Ro-Ro Terminal best meets that need and why, albeit at this preliminary stage, it is believed that there are no alternative solutions which could satisfactorily meet the identified need.

### 4.2 Need considerations

4.2.1 The need that has been identified – and which is set out further in the concluding paragraphs of this section - arises from a number of different national imperatives, objectives and matters as explained in the following paragraphs.

#### **The need to ensure that the United Kingdom has sufficient ro-ro freight capacity**

- 4.2.2 Trade is of critical importance to the United Kingdom (UK) economy. It is a major driver of global economic growth, provides access to cheaper imports and services for consumers and households and enables lower prices and increased choice. Trade allows businesses to benefit from wider access to inputs to the production process and to greater numbers of potential consumers and buyers. The Government's ambition is to strengthen the UK's position as a trading nation and as an island economy.
- 4.2.3 Ports are an enabler of trade in goods, ensuring the supply of energy, food and commodities. They facilitate the most efficient form of carrying imports and exports to and from the rest of the world.
- 4.2.4 One of the key means by which trade is handled through UK ports is in the form of ro-ro freight cargo – cargo which is wheeled on and off vessels. The ro-ro market can be split into different types, however, the freight segment (both accompanied and unaccompanied freight) is one of the key ro-ro segments and is fundamental to the UK's short sea trade with Europe and the near continent.
- 4.2.5 Ro-ro freight is a form of unitised cargo (i.e. cargo that is transported in some form of identifiable unit). In recent times, the shipping and logistics industries have developed different forms of unitised or modular cargo transportation. This has greatly assisted in the more efficient transport of cargo in comparison to the historic form whereby general cargo was moved on multi-purpose vessels and required a laborious and time consuming



process to load and unload which itself required large areas of quayside and warehouse space.

- 4.2.6 Perhaps the most well-known form of such unitised cargo is the shipping container. Measuring either 20, 40 or 45 feet, containers now dominate the way in which goods are moved around the globe. The key strength of this form of cargo unitisation is that standardised equipment can be designed and used for its handling, with the full knowledge that the containers can be loaded off or on a ship anywhere in the world.
- 4.2.7 In general terms, containers tend to be used for moving goods and cargo over longer routes with ro-ro units more commonly being used to move goods and cargo throughout Europe where a direct door-to-door service is required. The use of ro-ro cargo is particularly seen of benefit in terms of the 'just-in-time' delivery solution which the logistics industry has developed over recent years. The key strength of the ro-ro sector lies in the relatively short distances that need to be covered involving direct delivery road journeys coupled with short sea crossings. In Europe, and particularly on short sea crossing routes, the ro-ro unit has, therefore, also become a vital means by which goods and cargo is moved.
- 4.2.8 UK Port Freight Traffic 2019 Forecasts suggest that the growth rate for unitised ro-ro freight (both in terms of tonnage and units) will increase by an average of 2.5 % per year between 2016 and 2050 (Department for Transport (DfT), 2019). By 2050 there is forecast to be an approximate 130 % increase in both ro-ro tonnage and units in comparison to the position in 2016. From 99.73 million tonnes in 2016 to 229.92 million tonnes in 2050 and from 7.94 million units in 2016 to 18.2 million units in 2015.
- 4.2.9 It is clearly, therefore, imperative that the UK has sufficient ro-ro freight capacity to meet both current and future demand.

### **The need to ensure that sufficient ro-ro freight capacity is in a location where it is required**

- 4.2.10 The National Policy Statement for Ports (NPSfP) highlights that the UK ports industry is market led, specifically making it clear that it is the Government's policy to,
- “allow judgements about when and where new developments might be proposed to be made on the basis of commercial factors by the port industry or port developers operating within a free market environment.”  
DfT (2012).
- 4.2.11 The NPSfP further makes clear that the overall demand for port capacity includes ensuring that port capacity is located where it is required. It is stated that capacity must be in the right place if it is to effectively and efficiently serve the needs of import and export markets. It is also made clear that capacity needs to be provided at a range of facilities and locations, to provide the flexibility to match the changing demands of the market.

- 4.2.12 In this respect the Government also makes it clear that it does not want to dictate where port development should occur, but rather this is something to be left to the market as the best mechanism for getting right.
- 4.2.13 Within the UK, the largest share of the ro-ro freight market is currently moved through routes across the short straits corridor. The short straits ro-ro freight market is predominantly one which handles accompanied Heavy Goods Vehicles (HGVs) (where the driver and cab travel with the trailer unit) and is the corridor which has best benefited from the UK historically being part of the European Single Market. Its market share has been based upon the corridor being the shortest route between the UK and the continental mainland of North-West Europe, and its ability to offer competitive door-to-door freight transport costs with short lead times and high levels of journey time reliability, benefiting from ‘turn up and go’ services suited to ‘just in time’ production and retailing systems.
- 4.2.14 This position has been enhanced through the availability of Iberian and eastern European haulage, with relatively low operating costs, and the ability for such hauliers to undertake further freight journeys once they are within the UK. This has encouraged the use of freight routes that involve longer road distance moves, both in the UK and on the continent. This has resulted, for example, in a situation where a significant proportion of international freight traffic to and from the large distribution centres in the Midlands pass through Kent and around the M25, even though there may be an alternative ro-ro freight facility in closer geographical proximity.
- 4.2.15 The next largest share of the UK ro-ro freight market is moved through routes across the north-sea, with flows across this corridor largely consisting of cargo taken through facilities located within the Humber estuary at Hull, Immingham and Killingholme. The services to and from the Humber estuary are largely unaccompanied ro-ro services, albeit that there are some volumes – mainly associated with fresh foods – that are moved by accompanied means.
- 4.2.16 Unaccompanied ro-ro freight is the transport of wheeled freight without the driver and cab. The freight is dropped at the port of departure by an HGV, loaded onto and unloaded off the vessel by the vessel operator and picked up at the arrival port by a different HGV. Accompanied freight is where the driver and the cab stay with the vehicle on the vessel.
- 4.2.17 Ro-ro freight movements require journey time reliability and certainty. A constant and consistent timetabling of vessel sailings to and from continental Europe is important in this regard. A crucial factor is the ability for a crossing to be made in an acceptable timeframe. An overnight sailing timeframe is viewed by the logistics industry as acceptable when built in to a ‘just in time’ logistics model.
- 4.2.18 In terms of location, the Humber estuary, is a locational ‘sweet spot’ for the handling of ro-ro freight. This is for a number of reasons, including:



- i. The natural deep channels of the Humber estuary offer capacity for ro-ro vessels to arrive and depart at all states of the tide, with Immingham and Killingholme in particular – due to the alignment of the deep-water navigable channel and the provision of ‘in river’ berths – being able to offer berthing solutions for the size of vessels needing to be operated at all states of the tide. This is an important consideration that means that ro-ro services can operate to their own defined timetable ensuring that customers have certainty over the length of time it takes to deliver or receive goods.
  - ii. The estuary is located on the eastern sea board of the UK within an overnight sailing time of key European ports on the western sea board of mainland Europe, enabling daily timetabled ro-ro liner services to operate. As already indicated, this is important in terms of journey time reliability and certainty.
  - iii. The estuary is located such that it can service a large in land area of the UK. It is particularly well located to serve large distribution centres and centres of populations in the Midlands and North of the UK.
  - iv. It benefits, in general terms, from good inland road transport connections. This is especially the case for the South Humber Bank where direct access is provided by the motorway network. In the case of the Port of Immingham dual carriageway access from a dock gate to the nearby motorway network is available.
  - v. As a consequence of these strategic road links, and its geographical location, the Humber estuary forms part of the ‘land bridge’ that links Northern Ireland and Ireland with Europe.
  - vi. There are significant existing ro-ro facilities and operations in existence, meaning that necessary support services and expertise exist within the locality, which is, therefore, ‘geared up’ for supporting such activities and operations.
- 4.2.19 The current position in respect of ro-ro freight facilities within the Humber estuary is that the existing facilities, whilst certainly being efficiently operated, have only a limited ability to provide for additional growth in demand.
- 4.2.20 Looking at the characteristics of the east coast of the UK, and its ability to provide connectivity to the major entry points along the western sea board of Europe in Belgium and Holland, there are only a small number of options available other than the Humber estuary.
- 4.2.21 In summary, viable locations for ro-ro facilities need to provide sufficient marine access, an overnight sailing time to / from the continent along with marine journey time reliability and certainty, good inland connectivity and a good geographical location in respect of major urban centres and distribution hubs.

- 4.2.22 In addition to the Humber estuary, the only potential locations on the east coast able to provide sufficient marine access are the large estuaries of north-east England (the Tyne, Wear and Tees), the Harwich, Felixstowe and River Orwell area in Suffolk, the Thames Estuary and the familiar cross channel Kent ports.
- 4.2.23 All of these locations already have established port infrastructure, and to a greater or lesser extent, already have ro-ro service offerings. They do not, however, offer the in land connectivity and locational advantages to relevant parts of the UK that the Humber does.
- 4.2.24 Furthermore, the locations to the south do not benefit from the Humber's proximity to key inland distribution points on the north/south and east/west motorway connection points.

### **The need to ensure that the UK has resilient and competitive ro-ro freight capacity**

- 4.2.25 The NPSfP makes clear that in addition to meeting overall demand and ensuring that capacity is located where it is required, the total need for port infrastructure also depends upon the need to ensure effective competition and resilience in port operations.
- 4.2.26 In terms of competition matters, the NPSfP highlights that this is important because 'competition drives efficiency and lowers costs for industry and consumers, so contributing to the competitiveness of the UK economy'.
- 4.2.27 Effective competition is further identified as requiring '*sufficient spare capacity to ensure real choices for port users*'. In this context it is further indicated that effective competition 'requires ports to operate at efficient levels, which is not the same as operating at full physical capacity'.
- 4.2.28 In terms of resilience matters, the NPSfP highlights that spare capacity also helps assure the resilience of the national infrastructure. It is made clear that:
- "Port capacity is needed at a variety of locations and covering a range of cargo and handling facilities, to enable the sector to meet short-term peaks in demand, the impact of adverse weather conditions, accidents, deliberate disruptive acts and other operational difficulties, without causing economic disruption through impediments to the flow of imports and exports".
- 4.2.29 Given the large number of factors involved, the policy makes it clear that the Government believes resilience is provided most effectively as a by-product of a competitive ports sector.
- 4.2.30 The analysis and explanation provided within the NPSfP is clear. The need for port infrastructure capacity is not simply about ensuring that there is enough capacity or ensuring that the capacity is in the right location.

- 4.2.31 Recent supply chain events within the UK – in particular the supply chain vulnerabilities exposed by Brexit and COVID – have highlighted the need for the country to have resilient and competitive trading options, as discussed further in the following section.
- 4.2.32 On the Humber it is considered that there is currently little contingency in the event that existing ro-ro infrastructure is damaged, blocked or otherwise becomes unusable for whatever reason. When a cluster of similar infrastructure builds up, the sum of all traffic handled by that collective infrastructure has greater significance than its individual components, and the issue of lack of spare capacity in the event of inoperability of one or more facilities can become an issue. Having additional ro-ro capacity, capable of handling some of the largest ro-ro vessels transiting the North Sea, would assist in ensuring overall resilience for those cargoes that pass through the Humber estuary.

### **Matters that will influence the demand for ro-ro freight capacity in the future**

- 4.2.33 There are considered to be a number of matters that will influence the demand for and location of ro-ro freight capacity in the future that are of direct relevance to the future provision of such capacity within the Humber estuary. These are in addition to the overall predicted increase in UK ro-ro capacity demand that has already been referred to and include:

#### ***The lack of sufficient ro-ro facilities on the Humber to enable the continuation of existing services***

- 4.2.34 Stena Line, one of Europe's leading ferry and ro-ro companies, requires a new long-term facility from which to operate services from the Humber to mainland Europe.
- 4.2.35 These services are existing and heavily utilised. They play a key role in meeting existing ro-ro freight demand on the Humber estuary. There is a need to identify a location on the Humber estuary from which these critical ro-ro services can continue to operate in the long term. Stena is further of the view that there will be significant business growth in the future, such that additional berthing capacity over and above that required to serve their existing services from the Humber will be required in the short to medium term.
- 4.2.36 Furthermore, as ro-ro vessels operating out of the Humber increase in terms of length overall and beam, there is a general concern amongst the industry that existing ro-ro facilities within enclosed docks will become less useable as the new generation of vessels are unable to access them.

***The implementation of the Government's levelling up agenda:***

- 4.2.37 The 'Levelling Up' agenda is a fundamental policy of the UK Government. This policy aims to reduce the imbalances, primarily economic, between areas and social groups in the UK, without any consequential detriment to existing prosperous parts of the UK.
- 4.2.38 Government has indicated the levelling up can only be achieved with a strong and dynamic economy.
- 4.2.39 One of the key demonstrations so far of the levelling up agenda can be seen in the establishment of 'Freeports' – special areas within the UK's border centred on a sea port or an airport where different economic regulations apply. The Government suggest that freeports will play a crucial part in the nation's post COVID recovery indicated that, at its core the freeport model has three objectives, namely:
- (a) Establishing freeports as national hubs for global trade and investment,
  - (b) Creating hotbeds for innovation, and
  - (c) Promoting regeneration.
- 4.2.40 One of the early Freeport sites to be approved is one centred on the Humber Estuary that incorporates the various existing port complexes located along the estuary.
- 4.2.41 In addition to the specific Freeports initiative, the levelling up agenda is considered likely to result in further economic development occurring within the Midlands and the North of the UK. Such development will help achieve the Government's objective of a strong and dynamic economy across all of the UK which will inevitably lead to further global trade.
- 4.2.42 As a result of the levelling up of the UK economy it is considered that there will be increased demand for the facilities and infrastructure which enable the UK to trade with the rest of the world within the north of the country.
- 4.2.43 North-East Lincolnshire Council (NELC) has identified the need to allow ports within the area to grow and develop in order to promote economic prosperity. In an area with some significant areas of deprivation, and where ports and logistics activity underpin a significant proportion of the local economy, giving ports the ability to grow is seen as important for the local area. In addition, NELC have invested significantly in putting in place the right conditions for, amongst other things, port-related value added services on the South Humber bank between Immingham and Grimsby via the South Humber Industrial Investment Programme.

***A move away from reliance upon the short straits for the handling of ro-ro freight***

- 4.2.44 It is considered that there will be a move away from some ro-ro freight being transported across the short strait corridor to such freight transiting the North Sea routes as a result of:

- Resilience issues associated with the short strait facilities resulting from the UK's exit from the European Union (EU). Since leaving the EU, the ability to move seamlessly and without checks between the UK and the EU is no longer the case, making the short straits corridor less attractive. In addition, the need for additional checks and documentation can often lead to congestion - with associated journey time reliability issues – at the UK's departure points.
- An increasing recognition that the short strait corridor requires additional HGV miles and driver time for freight to be moved to / from the North and the Midlands in comparison with the North Sea routes. This is becoming a significant issue having regard to HGV driver shortage issues. The need to try and reduce HGV journeys, but also to try and better manage the work / life balance of HGV drivers is increasingly leading to a different approach being considered.
- An increased recognition that the road route to and from the short strait corridor – which more often than not involves HGV vehicles using the M25 around London - is highly susceptible to disruption and congestion.
- A move away from a 'just in time' delivery model to a 'just in case' model which incorporates a greater degree of contingency and accepts longer, but potentially more reliable, transport and distribution times.
- The recognition of the need to reduce road travel from a greenhouse gas emissions perspective, the drive towards net zero being, arguably, one of the current key objectives of the UK Government.

In respect of port activities, greenhouse gas emissions can be removed or reduced by implementing technological changes (i.e., changing the means by which vehicles and vessels are powered) and also by undertaking changes to the way in which activities are undertaken (i.e., using port facilities that require less road miles to be travelled).

Cutting down on HGV miles by utilising ro-ro facilities that are closer to the source or destination of the freight is seen as a key-way in which supply chains can reduce their carbon footprint.

- The continuing development of trade with Eastern Europe, which does not necessarily require the short access connection to North-West mainland Europe provided by the short straits corridor.
- The continued development of the 'land bridge' system from Europe to Ireland, which is most appropriately served by facilities within the Humber area.

4.2.45 In addition to the overall growth in the amount of ro-ro freight that is predicted, the above demonstrates that there is specific and on-going demand for further ro-ro freight capacity within the Humber Estuary.

## The statement of need

4.2.46 Against the preceding contextual background, the following statement of need has been defined for the purposes of this PEIR:

“There is an imperative need to provide additional appropriate ro-ro freight capacity within the Humber estuary in order to meet the growing and changing nature of demand and thereby retain and strengthen the estuary’s contribution to an effective, efficient, competitive and resilient UK ro-ro freight sector”.

## The objectives which a solution should meet

4.2.47 To assist in providing the appropriate solution to meeting the identified need, the following objectives – which arise out of the statement of need and the background context to it – have been identified. The objectives which have been defined at this stage and which will be developed as the case for the need for the Project evolves, are to provide the Humber estuary with the ability to:

- (i) meet the needs of an existing ro-ro freight operator – Stena Line - with an established customer base;
- (ii) meet predicted 2050 requirements for the ro-ro freight sector;
- (iii) continue to contribute effectively to UK ro-ro port infrastructure flexibility and resilience;
- (iv) continue to provide competitive ro-ro freight services and routes to and from existing and new markets;
- (v) make efficient and effective use of existing established land and water transport connections and infrastructure.

4.2.48 Having regard to the contextual background to the statement of need and these objectives, it is considered, at this preliminary stage, that the solution to meeting this need within the Humber estuary can only be met via the provision of sufficient additional berthing and landside storage capacity in a location that benefits from good landside connectivity.

## 4.3 Preliminary consideration of alternatives

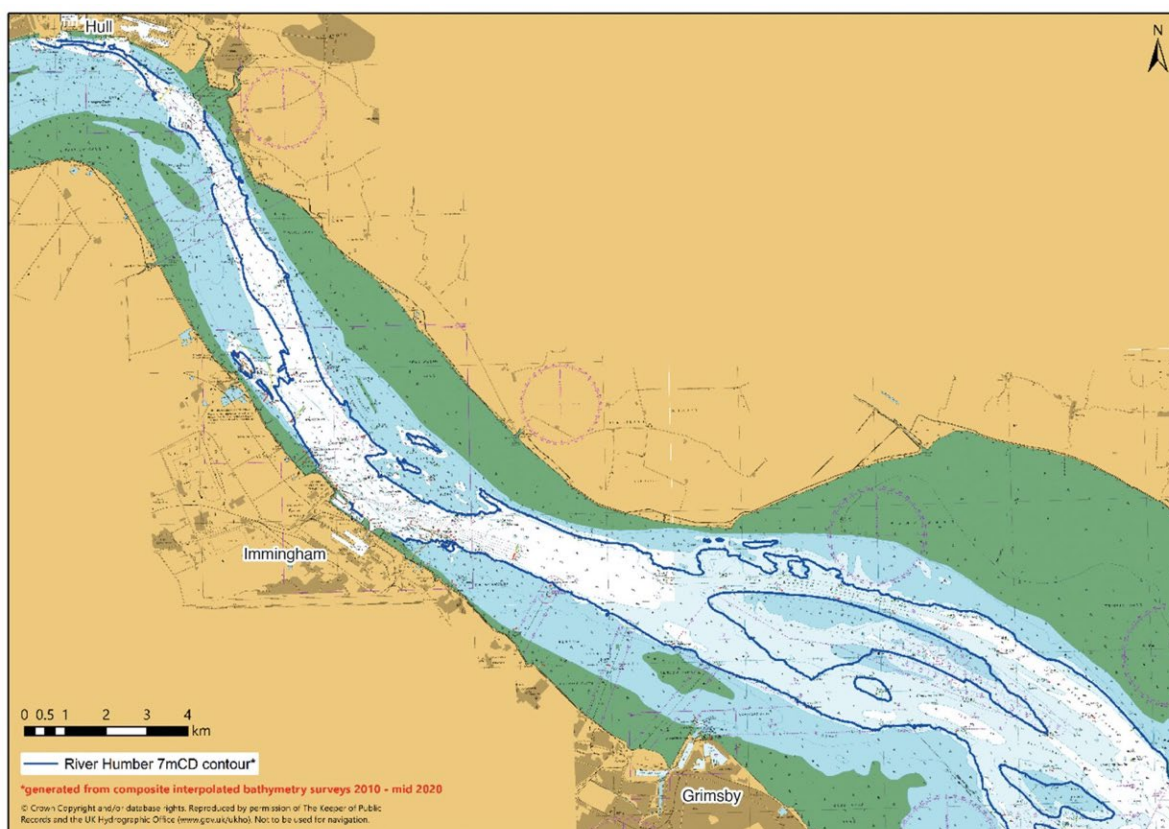
4.3.1 The following paragraphs provide a summary of the preliminary consideration of potential alternative solutions to meeting the need which has been undertaken to date.

4.3.2 From the preceding analysis it can be concluded that the need which has been identified can only be met somewhere within the Humber estuary. This is the only broad option available to meeting the need which has been identified.

4.3.3 Furthermore, having regard to the size of vessels needing to be accommodated and the type of services to be accommodated, the solution to meeting the need in the form of additional ro-ro freight capacity has to be in a location that has, or would be able to be provided with, appropriate and unconstrained deep-water marine accessibility.



- 4.3.4 When considering viable locations within the Humber for additional ro-ro infrastructure, the starting premise from a marine accessibility point of view is prevailing water depths. The Humber is an estuary with a tidal range that varies from approximately 6 to 7 m. It also has natural and stable deep-water channels which have largely dictated the locations where port facilities have been developed within the estuary.
- 4.3.5 Having regard to the type of ro-ro vessels in service on the Humber, a consistent water depth of around 7 m below chart datum is considered to be necessary to berth and sail ro-ro vessels at all states of the tide – a critical requirement if sailing time reliability and consistency is to be achieved.
- 4.3.6 A review of the bathymetry of the estuary demonstrates – as shown in Image 4.1 – that there are very few options for the location of ro-ro infrastructure which meet this marine access requirement.



**Image 4.1 Admiralty Chart showing the location of water depths of 7m below Chart Datum**

- 4.3.7 From the preliminary analysis undertaken in this regard, the conclusion reached is that the potential locations for the provision of a solution are limited to:
- A location along the river frontage at the Port of Grimsby – assuming a capital dredge would be possible.
  - A location along the river frontage at the Port of Hull.
  - A location along the river frontage between Killingholme and Immingham.

- 4.3.8 A river frontage location is necessary because the size of the type of ro-ro freight vessels that operate from the Humber are increasingly unable to access a location within the enclosed docks that exist at some of the above locations. This is a situation which the industry considers will become more common in the future.
- 4.3.9 Having considered these locations further, the following preliminary conclusions have been reached.

### **A Port of Grimsby river frontage location**

- 4.3.10 A significant capital dredge within the Humber European Marine site (consisting of the Humber Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site) would be required to provide the necessary marine access to a potential river frontage solution at the Port of Grimsby. Along with the lack of sufficient landside space at the Port of Grimsby needed to support such additional marine capacity, ABP, which is the owner and operator of the Port, has concluded that this general location would not be able to provide a solution to the need which has been identified.
- 4.3.11 Although no detailed modelling or calculations have been undertaken, a preliminary estimation is that a capital dredge within the approaches to the Port of Grimsby to provide the necessary marine access would alone require the removal of some 3 to 4 million cubic metres of material. Once created, a channel of the kind of depth and length required would, furthermore, probably be difficult to maintain.
- 4.3.12 In environmental terms it is likely that such a capital dredge would generate an adverse effect on the integrity of the Humber Estuary European Marine site.

### **A Port of Hull river frontage location**

- 4.3.13 The Port of Hull is owned and operated by ABP. Whilst it may be possible to provide a new river frontage marine facility at the Port of Hull – albeit with some dredging and construction required within the Humber Estuary European Marine site - there would be insufficient suitable land available in or around the port estate to provide the necessary supporting landside facilities.
- 4.3.14 An adverse effect on the integrity of the Humber Estuary European Marine site could not be discounted in respect of marine development in this location.
- 4.3.15 Furthermore, the traffic likely to be generated by any such new ro-ro development at the Port of Hull would need to pass through the City of Hull to reach the wider national highway network. In addition, it should be noted that in terms of marine accessibility, the Port of Hull is a further approximate one and a half hours sailing time further up river from Immingham / Grimsby.

4.3.16 For the reasons summarised above, ABP is of the view that the Port of Hull would also not be able to provide a solution to the need which has been identified.

### **A Killingholme / Immingham river frontage location**

4.3.17 Land located between the existing C.Ro Terminal at Killingholme and the Port of Immingham is either in existing port related use – for example, the Exolum fuel import facility and the Immingham Gas Jetty and storage caverns – or has consent in place to be developed as a marine energy park.

4.3.18 This latter development – known as the Able Marine Energy Park (AMEP) – was consented for reasons of overriding public interest related to offshore renewable energy, with the consent being restricted to that trade only.

4.3.19 As a result of these matters, the preliminary conclusion reached is, therefore, that the land between the C.Ro Terminal and the Port of Immingham would not be able to provide a solution to the need which has been identified.

4.3.20 At its facility at Killingholme, C.Ro already accommodate some of the largest vessels operating in the North Sea ro-ro sector. The facility has six berths, three of which, it is understood, can also be used to handle automotive trade vehicle ro-ro traffic.

4.3.21 It is understood that a number of North Sea ro-ro operators are anticipating business growth moving forward. Whilst existing ro-ro facilities within the Humber estuary may well secure a proportion of the future growth in the ro-ro freight sector – something which ABP considers is likely to be required in any event – on the basis of current information ABP considers that such facilities do not have sufficient available capacity to be able to meet the specific need which it has identified.

4.3.22 The Port of Immingham is the only other river frontage area to be considered. Whilst the lock and enclosed dock basin continue to be used for short sea general cargoes, breakbulks and container movements, a variety of 21 different riverside berths have been constructed to enable the port to accommodate larger vessels (associated with growth in trades) than can be accommodated within the dock basin. The development of the port over time in this regard has been an iterative process.

4.3.23 Having considered the current layout and use of the Port of Immingham, ABP considers that the only potential location for additional ro-ro capacity would be in the eastern part of the port estate.

4.3.24 Within this part of the port, there is a clear gap in river frontage infrastructure. This is located just east of the existing Eastern Jetty. There is also sufficient port land within close proximity to this area which is either vacant or which can be repurposed to support additional marine infrastructure in this location.

- 4.3.25 As it currently stands, these land holdings would not be intensively used as common-user storage areas, simply because at the moment they are quite remote from any quay side or berths. However, by providing additional marine berthing infrastructure in the location identified brings these currently peripheral areas of the port estate close to a working quayside.
- 4.3.26 In respect of marine accessibility, placing new marine infrastructure further to the east of the Port of Immingham – for example, to the east of the Immingham Oil Terminal - would be unlikely to be viable as the deep-water channel moves away quite sharply from the river frontage areas between Immingham and Grimsby. Whilst on the face of it the estuary frontage to the east of the Port of Immingham appears to be developable, the subtidal area is shallow meaning that the provision of any marine infrastructure would require significant jetty approaches to reach the deeper water, or a large capital dredging programme in order to berth vessels closer to the shoreline. Development in this location would be disproportionately expensive and have environmental implications. This area has, therefore, been discounted for these reasons and because there is a solution on the Port of Immingham frontage with much less dredging involved, and which also benefits from associated adjacent and nearby port operational land which can be readily repurposed.
- 4.3.27 In respect of the Port of Immingham, ABP has concluded that it would be possible to provide a solution to meeting the need it has identified at a location within the eastern extent of the port estate. Within this part of the port estate it is possible to provide both the necessary marine infrastructure and landside facilities.

## Preliminary conclusions

- 4.3.28 From the analysis which it has undertaken to date, the preliminary conclusions reached by ABP is that the only solution to the need which has been identified is the provision of new ro-ro freight capacity within the eastern extent of the Port of Immingham.
- 4.3.29 Through the design and assessment work that has been undertaken to date, further preliminary details of the proposed solution have been worked up. The solution as it is currently envisaged at this preliminary stage in the pre-application process is the scheme which is described in this PEIR document (Chapter 2 Proposed Development). Through ongoing design and assessment work, and the consultation exercise being undertaken, ABP envisage that the design of the solution will be iterated further in advance of the submission of the application for development consent.

## 4.4 References

Department for Transport (2019). UK Port Freight Traffic 2019 Forecasts, January 2019.

Department for Transport (2012). National Policy Statement for Ports, January 2012.

## 4.5 Abbreviations/Acronyms

<b>Acronym</b>	<b>Definition</b>
ABP	Associated British Ports
AMEP	Able Marine Energy Park
COVID	Coronavirus
DfT	Department for Transport
EU	European Union
HGV	Heavy Goods Vehicle
NELC	North-East Lincolnshire Council
NPSfP	National Policy Statement for Ports
PEIR	Preliminary Environmental Information Report
Ramsar	Wetlands of international importance, designated under The Convention on Wetlands (Ramsar, Iran, 1971)
ro-ro	roll-on/roll-off
SAC	Special Area of Conservation
SPA	Special Protection Area
UK	United Kingdom

Cardinal points/directions are used unless otherwise stated.

SI units are used unless otherwise stated.

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