



## National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

From: Divisional Director  
Operations Directorate  
Highways England.  
North East Region

To: [REDACTED]  
**North Lincolnshire Council – Dean Watson**

CC: [REDACTED]

**Council's Reference: PA/2023/421**

**Location: VPI Power Station, Rosper Road, South Killingholme, DN40 3DZ**

**Proposal:** Planning permission for the construction and operation of a post-combustion carbon capture plant, including carbon dioxide compressor and metering, cooling equipment, stacks, substations, internal roads, partial ditch realignment, new and modified services, connections, accesses, maintenance and laydown areas.

**National Highways Ref: NH/23/04269**

Referring to the consultation on a planning application discovered **December 18 2023** referenced above, in the vicinity of the M180/A160 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);**
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B ~~is~~/is not relevant to this application.<sup>1</sup>

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<sup>1</sup> Where relevant, further information will be provided within Annex A.

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk) and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to [PlanningYNE@nationalhighways.co.uk](mailto:PlanningYNE@nationalhighways.co.uk)

**Signature:**

**Date: January 16 2024**

**Name: Simon GP Geoghegan**

**Position: Planning and  
Development**

**National Highways, 2 City Walk, Leeds LS11 9AR**

### **Standing advice to the local planning authority**

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 74 and 109 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 108 and 114 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

## **Annex A National Highway's assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

### **Recommended Non-Approval**

It is recommended that the application should not be approved until **May 9 2024**.

#### **Reason**

This review has highlighted the need for further information as follows:

1. A daily profile of operational trip generation should be presented and subject to the impact in peak periods, capacity assessments of SRN junctions may be required;
2. Justification for the construction peak period trip generation assumptions should be presented for review;
3. We would consider that capacity assessments are necessary for the construction phase, due to the forecast number of trips, and would expect to see capacity assessments undertaken for the following junctions:
  - a. A160 / Humber Road / Manby Road junction [Manby Roundabout];
  - b. A160 / Eastfield Road Junction;
  - c. A160 / Ulceby Road / East Halton Road / Habrough Road [Habrough Roundabout];
  - d. A180 / A160 [Brocklesby Interchange]; and
  - e. M180 / A15 / A18 [Barnetby Interchange].

However, to confirm the requirements, we would request that the impact during SRN peak periods is presented for review for all SRN junctions within the study area.

4. Committed developments should be confirmed with the LPA;
5. Further, the Applicant should identify the relationship between the proposed carbon capture developments and the emerging gathering networks, including identification of any cumulative impacts during the construction or operational phases.
6. Clarification should be provided on the variances in trip generation between the ES, TA, and CTMP.

7. TM proposed on the SRN should be agreed with the relevant National Highways team and be designed in accordance with relevant policies and design guidance;
8. Temporary signage should be agreed with the relevant National Highways team and be designed in accordance with relevant policy;
9. The National Highways Abnormal Loads Team should be consulted regarding any AIL deliveries well in advance to ensure the suitability of the route(s).
10. The construction staff numbers in the CWTP are not consistent with those presented in the CTMP and clarification should be provided.

This notwithstanding, JSJV would suggest that the following Condition be imposed on any planning consent, should the LPA be minded to approve:

*“Unless otherwise agreed in writing by the Local Planning Authority in consultation with National Highways (or its successors) decommissioning of the development hereby approved shall not commence unless and until a Decommissioning Traffic Management Plan has been submitted to and approved in writing by the Local Planning Authority in consultation with National Highways (or its successors). Thereafter unless otherwise approved in writing decommissioning shall be undertaken in accordance with the approved plan.”*

**Reason:** This ensures that any effects from the decommissioning phase are to be reviewed and agreed upon by National Highways immediately prior to decommissioning.

Our ref: TA 165 181  
Your ref: PA/2023/421

North Lincolnshire Council  
Church Square House  
30-40 High Street  
Scunthorpe  
North Lincolnshire  
DN15 6NL

National Highways  
Planning and Development  
2 City Walk  
Leeds  
LS11 9AR

Tel: 0300 470 2420

**FAO: Dean Watson**

**January 16 2024**

Dear Dean,

**Planning permission for the construction and operation of a post-combustion carbon capture plant, including carbon dioxide compressor and metering, cooling equipment, stacks, substations, internal roads, partial ditch realignment, new and modified services, connections, accesses, maintenance and laydown areas | VPI Power Station, Rosper Road, South Killingholme.**

National Highways has reviewed the documentation accompanying the planning application and we offer the following comments.

#### Trip Generation

A daily profile of operational trip generation should be presented and subject to the impact in peak periods, capacity assessments of SRN junctions may be required.

With regards to construction traffic generation, the Transport Assessment [TA] notes that:

*“In order to derive an anticipated AM and PM peak hour flow of vehicles, it has been assumed that 30% of staff will arrive in the AM peak and 10% will depart. It is also assumed that 10% of staff will arrive during the PM peak and 30% of staff will depart. In terms of HGVs, it is assumed that these arrivals and departures are spread uniformly across the daytime period (7am to 7pm).”*

Justification for the construction peak period trip generation assumptions should be presented for review.

This notwithstanding, we would consider that capacity assessments are necessary for the construction phase, due to the forecast number of trips, and would expect to see capacity assessments undertaken for the following junctions:

1. A160 / Humber Road / Manby Road junction [Manby Roundabout];
2. A160 / Eastfield Road Junction;
3. A160 / Ulceby Road / East Halton Road / Habrough Road [Habrough Roundabout];
4. A180 / A160 [Brocklesby Interchange]; and
5. M180 / A15 / A18 [Barnetby Interchange].

However, to confirm the requirements, we would request that the impact during SRN peak periods is presented for review for all SRN junctions within the study area.

This notwithstanding, clarification should be provided on the variances in trip generation between the Environmental Statement [ES], TA, and Construction Traffic Management Plan [CTMP].

### Committed Development

Committed developments should be confirmed with the LPA and evidence of correspondence presented to National Highways. Further, the Applicant should identify the relationship between the proposed carbon capture developments and the emerging gathering networks, including identification of any cumulative impacts during the construction or operational phases.

We are also aware of other emerging development which is forecast to require improvements to the M180 / A15 / A18 junction. These developments and associated mitigation scheme should also be considered in any assessment of operational capacity and road safety.

### CTMP

Traffic Management proposed on the SRN should be agreed with the relevant National Highways team and be designed in accordance with relevant policies and design guidance. Further, temporary signage should also be agreed with the relevant National Highways team and be designed in accordance with relevant policy.

The National Highways Abnormal Loads Team should be consulted regarding any Abnormal Indivisible Load [AIL] deliveries well in advance to ensure the suitability of the route(s).

The construction staff numbers in the Construction Worker Travel Plan [CWTP] are not consistent with those presented in the CTMP and clarification should be provided.

### Decommissioning

We would request that the following Condition be imposed on any planning consent, should the LPA be minded to approve:

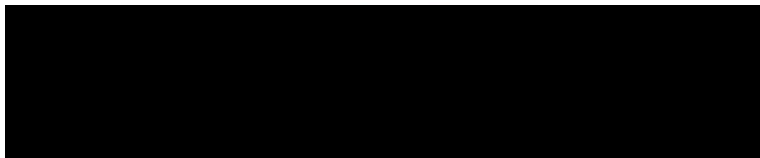
*“Unless otherwise agreed in writing by the Local Planning Authority in consultation with National Highways (or its successors) decommissioning of the development hereby approved shall not commence unless and until a Decommissioning Traffic Management Plan has been submitted to and approved in writing by the Local Planning Authority in consultation with National Highways (or its successors). Thereafter unless otherwise approved in writing decommissioning shall be undertaken in accordance with the approved plan.”*

Summary

Given the need for further information, I enclose the National Highways formal NHPR 22-12 response recommending a period of non-determination.

I trust this response is helpful, but should you require any further information please do not hesitate to contact me.

Yours sincerely



**Simon GP Geoghegan**  
**Planning and Development**

# AA.23.19.26 VPI Carbon Capture Facility, Rosper Road, South Killingholme

Prepared for: Simon Geoghegan  
Prepared by: Joshua Bell  
Date: 15<sup>th</sup> January 2024  
Case Reference: DevHU0164  
Document Reference: AA.23.19.26 TM  
Reviewed/approved by: Terry Dale

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## Introduction

In March 2023, VPI Immingham LLP [the Applicant] submitted a planning application [ref. PA/2023/421] for:

*“Planning permission for the construction and operation of a post-combustion carbon capture plant, including carbon dioxide compressor and metering, cooling equipment, stacks, substations, internal roads, partial ditch realignment, new and modified services, connections, accesses, maintenance and laydown areas”*

For context, the application site is VPI Power Station, Rosper Road, South Killingholme; the Local Planning Authority [LPA] and Local Highway Authority [LHA] is North Lincolnshire Council [NLC]. Further, the applicant’s planning consultant is AECOM.

The Jacobs SYSTRA Joint Venture [JSJV] has reviewed the planning application on behalf of National Highways and would offer the following comments.

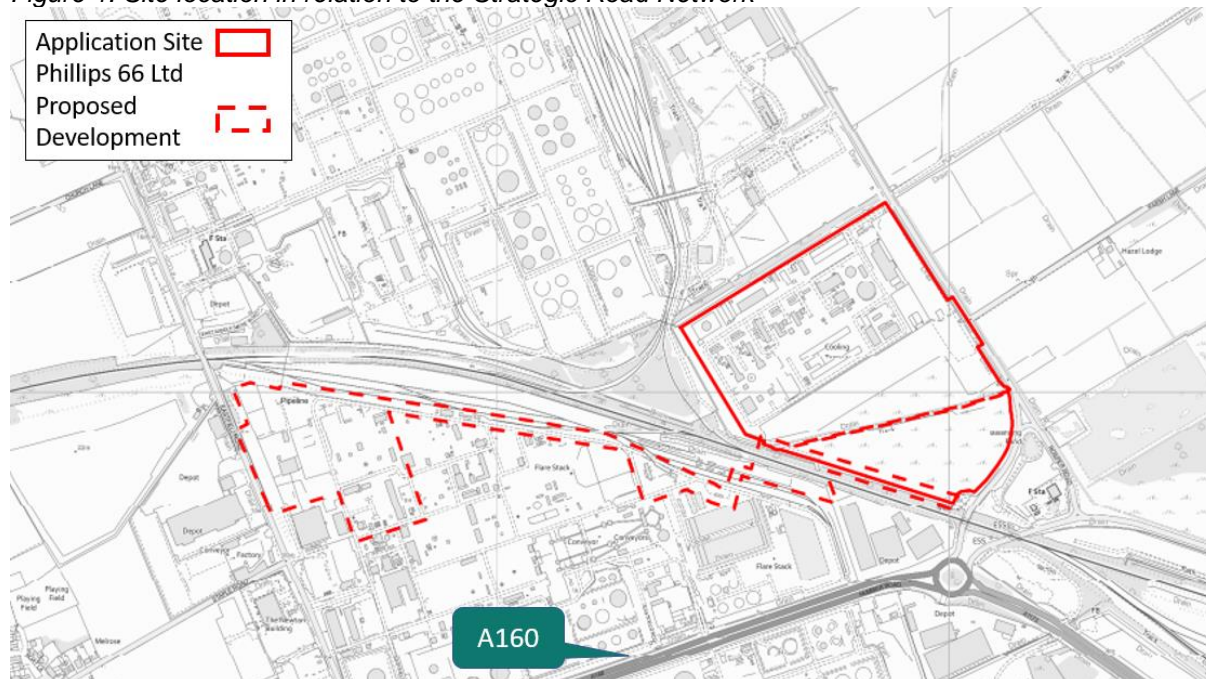
## Background

JSJV notes that the planning application was submitted, and validated, in March 2023; further, the consultation period ended in June 2023. Nonetheless, National Highways has tasked JSJV to review the planning application with consideration to its potential impacts on the Strategic Road Network [SRN].

## Existing Situation

The location of the application site is presented in **Figure 1**. As indicated, the application site is situated 150m to the north of the A160 / Humber Road / Manby Road junction [Manby Roundabout]. At this location, the A160 forms a section of the SRN.

**Figure 1** also presents the location of the Phillips 66 proposed development; JSJV reviewed the planning application [ref. PA/2023/422] for the Phillips 66 proposed development in January 2024 [AA.23.19.25]. JSJV understands that the two proposed developments are linked and form part of the ‘Humber Zero’ project; as such, several documents accompanying both planning applications are consistent.

Figure 1. Site location in relation to the Strategic Road Network<sup>1</sup>

## Technical Review

This Technical Memorandum will set out our review of the information accompanying the planning application which includes, but is not limited to:

- Environmental Statement Transport Chapter, produced by AECOM;
- Outline Construction Environmental Management Plan [oCEMP], produced by AECOM;
- Transport Assessment [TA], produced by AECOM;
- Design and Access Statement [DAS], dated February 2023;
- Planning Statement, dated February 2023;
- Construction Worker Travel Plan [CWTP], produced by AECOM; and
- Construction Traffic Management Plan [CTMP], produced by AECOM.

## Proposed Development

JSJV understands that the proposed development comprises “*comprises a PCC Plant within the existing VPI Combined Heat and Power (CHP) Plant*”. It is important to note that the DAS states that:

*“For the avoidance of doubt, the ‘Proposed Development’ in this document corresponds precisely to the ‘Proposed VPI Development’ in the Humber Zero Environmental Statement, which reports on the findings of the combined Environmental Impact Assessment carried out for the ‘Proposed VPI Development’ and also the ‘Proposed Phillips 66 Development’. The latter comprises a Post Combustion Carbon Capture (PCC) Plant for the existing Fluid Catalytic Cracker stack at Phillips 66 Limited’s Humber Refinery and is subject to a separate planning application promoted by Phillips 66 Limited”.*

<sup>1</sup> Extract from ‘Sites Location Plan’, produced by AECOM. 7<sup>th</sup> February 2023.

JSJV notes that this review will concentrate on the VPI proposed development; however, as noted, the Phillips 66 proposed development was reviewed as part of JSJV task AA.23.19.25.

The Planning Statement notes that the proposed development will be operational 24 hours a day, seven days a week, which is consistent with the existing VPI Immingham CHP Plant. The Planning Statement also notes that:

*“There are two potential networks that the Proposed Development could be connected to: the proposed Viking Carbon Capture Storage (CCS) CO2 transportation and storage network (promoted by Harbour Energy) which is anticipated to commence in the southern part of the VPI Site, or the East Coast Cluster Humber Low Carbon Pipelines (HLCP), also known as Zero Carbon Humber (promoted by National Grid Ventures).”*

## Access

The DAS notes that the proposed development will be accessed from a new access point on Rosper Road. We note that Rosper Road forms a section of the Local Road Network [LRN] and, as such, the acceptability of this access point will be determined by the LHA.

## Trip Generation

The DAS notes that:

*“It is expected that only a limited number of vehicular trips associated with maintenance of the Proposed Development would be generated. These would be expected to occur at regular intervals in which there would be advanced scheduling of such movements to minimise likelihood of disruption to the highway network.”*

It is unclear how many trips constitute a “limited number of extra vehicular trips”, and this information should be presented for review, particularly for SRN peak periods. We have reviewed the remaining documents accompanying the planning application to understand any potential impacts and we note that the Planning Statement states that:

*“It is estimated that there will be circa 840 personnel contracted to work on the Proposed Development at the peak of construction.”*

Further, the Planning Statement also notes that:

*“Combining construction workforce vehicle movements with construction HGV movements over the entire construction programme for both Proposed Developments, the overall peak HGV movements will be approximately 480 per day (240 in and 240 out).”*

This is consistent with the information presented for the Phillips 66 proposed development.

JSJV notes that the ES Transport Chapter analyses the impact of the Phillips 66 proposed development and the proposed VPI development, and is consistent with that previously reviewed. This notwithstanding, for ease of reference our comments are repeated in this Technical Memorandum, where relevant.

We note that:

*“The methodology for assessing the impact of development-generated traffic is based on that outlined in Institute of Environmental Assessment’s (IEA, now*

*known as the Institute of Environmental Management and Assessment (IEMA))  
‘Guidelines for the Environmental Assessment of Road Traffic’ (January 1993).”*

In the interests of keeping this Technical Memorandum concise, the methodology has not been presented. It is noted, however, that *“the peak construction traffic flows have been derived by analysing construction traffic data and construction programmes provided by Phillips 66 and VPI”*. The peak construction flows for the proposed development [VPI] is anticipated to occur in 2026, whereas the peak for the Phillips 66 proposed development was identified to be 2025.

It is important to note that during the operational phase it is anticipated that *“10 HGV trips and 100 car / LGVs trips daily”* will generated. As this is lower than the anticipated construction traffic, an assessment of the operational phase has not been undertaken in the ES. It is noted that this was agreed during the Scoping Stage; JSJV is, nonetheless, unaware of any agreement with National Highways regarding the need, or otherwise, for an operational assessment. We would request, therefore, that a daily profile of trip generation is presented and, subject to the impact in peak periods, capacity assessments of SRN junctions may be required.

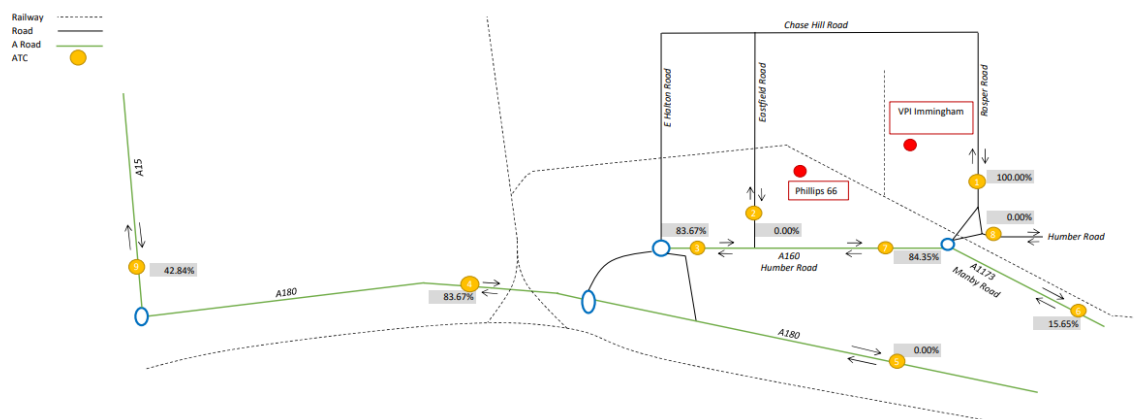
### Accident Data

The ES has not identified a road safety issue in the study area, which includes the sections of the A160 and A180. From a review of CrashMap, JSJV would be in agreement with this; there are no clusters evident.

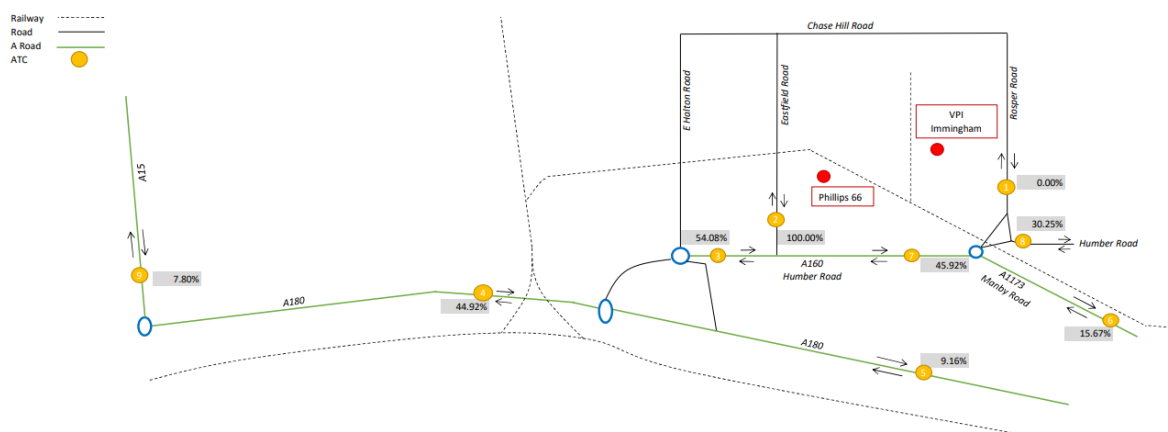
### Traffic Distribution

It is noted that a gravity model, based on population, has been utilised to derive a traffic distribution for staff and this was agreed in advance with the LHA. The distribution is presented in **Figure 2** for reference. As can be seen, 100% of trips are forecast to route via Manby Roundabout.

Figure 2. VPI Staff Traffic Distribution



The HGV distribution [**Figure 3**] was derived using a methodology based on HGV trips recorded at WebTRIS and DfT counters. As can be seen, over 75% of trips are forecast to route via Manby Roundabout.

Figure 3. VPI HGV Traffic Distribution<sup>2</sup>

### Residual Traffic Impacts

Mitigation measures are detailed in the ES, including a Construction Traffic Management Plan [CTMP], and Construction Worker Travel Plan [CWTP]. Following these measures, the impacts of the construction traffic has been classified as “Negligible (not significant)” or “Minor adverse (not significant)” for SRN links in the study area.

### Transport Assessment

The Transport Assessment [TA] is consistent with that reviewed for the Phillips 66 proposed development, however, for ease of reference our comments are repeated in this Technical Memorandum, where relevant.

### Policy

It is important to note that Circular 01/2022 has not been referenced in the policy section of the TA. We would, nonetheless, expect the TA to be developed in accordance with Circular 01/2022, particularly paragraphs 47 to 54 which relate to the assessment of development proposals.

### Traffic Generation

Notwithstanding the traffic generation presented in the ES, it is noted in the TA that during the peak construction month 1,766 two-way movements are anticipated, of which, 80 will be HGV movements and 1,686 will be car / LGV movements. The TA notes that:

*“In order to derive an anticipated AM and PM peak hour flow of vehicles, it has been assumed that 30% of staff will arrive in the AM peak and 10% will depart. It is also assumed that 10% of staff will arrive during the PM peak and 30% of staff will depart. In terms of HGVs, it is assumed that these arrivals and departures are spread uniformly across the daytime period (7am to 7pm).”*

No justification for these assumptions has been presented. JSJV would recommend, therefore, that this information be presented for review.

Nonetheless, the resulting anticipated traffic flows are shown in **Figure 4**. As can be seen, 343 two-way trips are anticipated in both the AM and PM peak hours.

<sup>2</sup> Extract from ‘Proposed Phillips 66 Development Application Boundary (the Phillips 66 Site)’, produced by AECOM. 24<sup>th</sup> March 2023.

Figure 4. Estimated Peak Hour Flows<sup>3</sup>

Site	Vehicle Type	Total Daily Vehicles	AM Peak Hour		PM Peak Hour	
			In	Out	In	Out
VPI (2027)	Cars/ LGVs	843	253	84	84	253
	HGVs	40	3	3	3	3
Phillips 66 (2025)	Cars/ LGVs	790	237	79	79	237
	HGVs	115	10	10	10	10

When applying the traffic distributions [Figures 2 and 3], as presented again in the TA, it is clear that a significant volume of trips is forecast to route via the SRN. We would note, however, that capacity assessments have not been undertaken for SRN junctions. National Planning Policy Framework [NPPF] [December 2023] paragraph 115 which states that:

*“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*

With consideration to NPPF, it is currently unclear if the impacts of these additional trips on the SRN will have an impact on road safety and / or capacity.

We would consider that capacity assessments are necessary and would expect to see capacity assessments undertaken for the following junctions:

- A160 / Humber Road / Manby Road junction [Manby Roundabout];
- A160 / Eastfield Road Junction;
- A160 / Ulceby Road / East Halton Road / Habrough Road [Habrough Roundabout];
- A180 / A160 [Brocklesby Interchange]; and
- M180 / A15 / A18 [Barnetby Interchange].

To confirm the requirements, we would request that the impact during SRN peak periods is presented for review for all SRN junctions within the study area.

### Committed Developments

Further, committed developments should be confirmed with the LPA; we would expect this to include as a minimum the Viking CCS CO<sub>2</sub> gathering network and the Humber Low Carbon Pipelines CO<sub>2</sub> gathering network which are both referenced in the Environmental Statement<sup>4</sup>.

It is recommended that the Applicant identify the relationship between the proposed carbon capture developments and the emerging gathering networks, including identification of any cumulative impacts during the construction or operational phases.

JSJV is also aware of other emerging development which is forecast to require improvements to the M180/A15/A18 junction. These developments and associated mitigation scheme should also be considered in any assessment of operational capacity and road safety.

<sup>3</sup> Extract from TA – Table 8A.17

<sup>4</sup> Paragraph 8A.4.7

## Construction Traffic Management Plan

The Construction Traffic Management Plan [CTMP] is consistent with that reviewed for the Phillips 66 proposed development, however, for ease of reference our comments are repeated in this Technical Memorandum, where relevant.

The key objectives of the CTMP are noted to be:

- *“Ensure that movements of people, plant and materials are achieved in a safe, efficient, timely and sustainable manner;*
- *Ensure that the impact to the local community is minimised;*
- *Ensure construction traffic levels do not exceed an acceptable level during the peak hours on the highway network;*
- *Minimise and control construction vehicle trips where practical;*
- *Ensure strategies and mitigation measures are implemented and adhered to through continued monitoring, review and improvement of the CTMP; and*
- *Limit the impacts of construction traffic on the Local Road Network (LRN) and Strategic Road Network (SRN).”*

The CTMP presents combined forecasts for two-way trips for the Phillips 66 and VPI proposed developments as follows:

- *“A peak of 350 two-way daily HGV movements (175 arrivals and 175 departures) occurring in 2026; and*
- *A peak of 1,984 two-way daily staff movements (992 arrivals and 992 departures) occurring in 2026.”*

We note that these forecasts are not consistent with those presented in the TA / ES.

As detailed, construction vehicles are anticipated to use the SRN, however, it is important to note that Circular 01/2022 states that:

*“The principal purpose of the SRN is to enable safe, reliable, predictable, efficient, often long distance, journeys of both people (whether as drivers or passengers) and goods in England between our:*

- *main centres of population*
- *major ports, airports and rail terminals*
- *geographically peripheral regions of England and...*”

It is noted that:

*“Traffic Management (TM) methods would be used to enhance safety conditions on the SRN and the LRN and where physical mitigation measures are impractical or cannot be accommodated during the construction period.”*

We would note that any TM proposed on the SRN should be agreed with the relevant National Highways team and be designed in accordance with relevant policies and design guidance. Further, the CTMP notes that temporary signage may be required to be erected on the SRN; we would again highlight that this should be agreed with the relevant National Highways team and be designed in accordance with relevant policy.

The CTMP presents a list of mitigation measures which includes the provision of wheel washing facilities to minimise the deposit of debris onto the highway. Further, it is noted that a Traffic Safety and Control Officer [TSCO] will be appointed for *“the duration of*

*the construction of each of the Proposed Developments*". It is noted that the TSCO will act as the main point of contact and will undertake the following duties:

- *"Check all TM drawings for compliance prior to issue;*
- *Ensure sufficient resource is available to maintain TM on site; and*
- *Monitor the TM schemes and layouts to ensure their effectiveness and safety to workers and public."*

It is also noted that a CTMP Management Group will be set up to monitor the CTMP and its mitigation measures. Further, the Management Group will *"hold regular update meetings with North Lincolnshire Council / National Highways and relevant stakeholders"*.

### **Abnormal Indivisible Loads [AIL]**

The ES notes that:

*"It is anticipated that an AIL report will be needed prior to commencement of construction to assess the delivery of large components, which will be supported by desk based swept path analysis and a record of consultation and agreement with North Lincolnshire Council (NLC)."*

We would recommend that National Highways is consulted in this process and any AIL routing via the SRN should be agreed well in advance of any delivery dates to ensure the suitability of the route.

Further, the CTMP notes that:

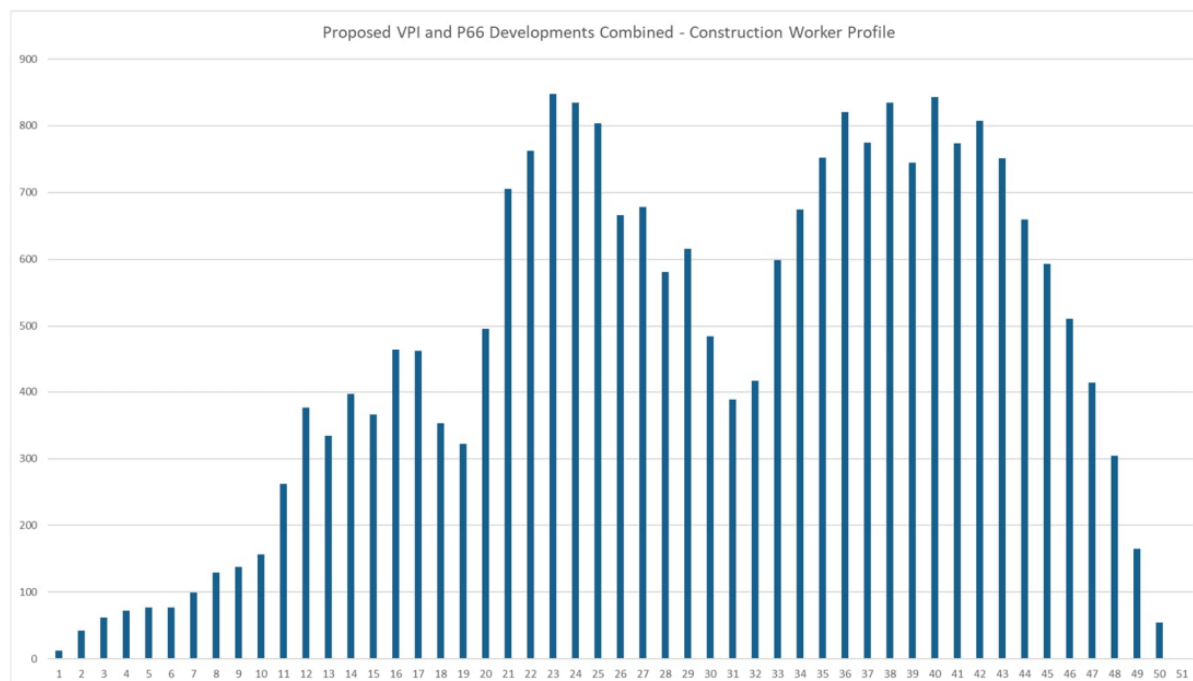
*"Temporary traffic management will be provided during AIL delivery where required, along with appropriate communications with the local community. Department for Transport Electronic Service Delivery for Abnormal Loads (ESDAL) system will be used for notifications."*

### **Construction Worker Travel Plan**

The Construction Worker Travel Plan [CWTP] is consistent with that reviewed for the Phillips 66 proposed development, however, for ease of reference our comments are repeated in this Technical Memorandum, where relevant.

It is noted that the CWTP is *"designed to promote and encourage the use of sustainable transport modes and reduce reliance on private car during the construction phases of the Proposed Developments which are expected to take up to four years"*. Further, it is noted that *"this document should be used as a starting point to guide production of the final CWTP"*.

The CWTP presents a combined construction worker profile for the Phillips 66 and VPI proposed developments [**Figure 5**]. As can be seen, a cumulative total of approximately 850 construction staff is expected during the peak construction periods. We note that these forecasts are not consistent with those presented in the CTMP and clarification should be provided.

Figure 5. Construction Worker Profile<sup>5</sup>

It is noted that the “CWTP will act to reduce impacts on the environment by reducing the number of trips made to and from the Sites by private car during the construction phase” and that the primary objectives are:

- “Ensure that an appropriate package of measures is employed to encourage sustainable travel behaviour;
- Reduce car usage (particularly single occupancy car journeys);
- Raise awareness of the sustainable transport measures serving the Sites; and
- Minimise the impact of traffic on sensitive locations.”

It is noted in the CWTP that a Travel Plan Co-ordinator [TPC] will be appointed to oversee the Travel Plan and the CWTP sets out their responsibilities which includes “acting as the key point of contact for issues related to construction traffic”. We would recommend that National Highways requests the TPC contact details.

The CWTP presents a range of measures for reducing single occupancy car use covering provision of minibuses, car sharing, cycling, and public transport.

The CWTP states that industry standards “suggest a typical vehicle occupancy of 1.35”. The CWTP presents a target of 2 workers per vehicle, which “would equate to 424 vehicles arriving and departing the Sites per day (e.g., 424 in and 424 out per day)”. JSJV welcomes this target, however, we would also recommend that the final CWTP is reviewed to ensure the acceptability of any targets.

Monitoring is referenced in the CWTP, it is stated that the TPC will be responsible for monitoring. Further, it is anticipated that monitoring will be undertaken on one day per month throughout construction. We also note that the CWTP states that:

*“An important part of the monitoring strategy will be obtaining feedback from construction workers, National Highways, NLC and local residents regarding any issues with construction worker traffic.”*

<sup>5</sup> Extract from CWTP – Plate 8C.1

## Decommissioning

The DAS notes that:

*“The Site access arrangements during the decommissioning phase are expected to be similar to the construction phase, with similar vehicle movements and highways safety considerations, and equal or less traffic generated.”*

This notwithstanding, JSJV would suggest that the following Condition be imposed on any planning consent:

*“Unless otherwise agreed in writing by the Local Planning Authority in consultation with National Highways (or its successors) decommissioning of the development hereby approved shall not commence unless and until a Decommissioning Traffic Management Plan has been submitted to and approved in writing by the Local Planning Authority in consultation with National Highways (or its successors). Thereafter unless otherwise approved in writing decommissioning shall be undertaken in accordance with the approved plan.”*

The inclusion of the Condition ensures that any effects from the decommissioning phase are to be reviewed and agreed upon by National Highways immediately prior to decommissioning.

## Summary and Conclusions

The Jacobs SYSTRA Joint Venture [JSJV] has reviewed the information accompanying the planning application and, on the basis of our review, the recommendation to National Highways in relation to this development proposals is:

**Holding Recommendation** – further information required (as identified below)

This review has highlighted the need for further information as follows:

- 1) A daily profile of operational trip generation should be presented and subject to the impact in peak periods, capacity assessments of SRN junctions may be required;
- 2) Justification for the construction peak period trip generation assumptions should be presented for review;
- 3) We would consider that capacity assessments are necessary for the construction phase, due to the forecast number of trips, and would expect to see capacity assessments undertaken for the following junctions:
  - a. A160 / Humber Road / Manby Road junction [Manby Roundabout];
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  - c. A160 / Ulceby Road / East Halton Road / Habrough Road [Habrough Roundabout];
  - d. A180 / A160 [Brocklesby Interchange]; and
  - e. M180 / A15 / A18 [Barnetby Interchange].

However, to confirm the requirements, we would request that the impact during SRN peak periods is presented for review for all SRN junctions within the study area.

- 4) Committed developments should be confirmed with the LPA;

- 5) Further, the Applicant should identify the relationship between the proposed carbon capture developments and the emerging gathering networks, including identification of any cumulative impacts during the construction or operational phases.
- 6) Clarification should be provided on the variances in trip generation between the ES, TA, and CTMP.
- 7) TM proposed on the SRN should be agreed with the relevant National Highways team and be designed in accordance with relevant policies and design guidance;
- 8) Temporary signage should be agreed with the relevant National Highways team and be designed in accordance with relevant policy;
- 9) The National Highways Abnormal Loads Team should be consulted regarding any AIL deliveries well in advance to ensure the suitability of the route(s).
- 10) The construction staff numbers in the CWTP are not consistent with those presented in the CTMP and clarification should be provided.

This notwithstanding, JSJV would suggest that the following Condition be imposed on any planning consent, should the LPA be minded to approve:

*“Unless otherwise agreed in writing by the Local Planning Authority in consultation with National Highways (or its successors) decommissioning of the development hereby approved shall not commence unless and until a Decommissioning Traffic Management Plan has been submitted to and approved in writing by the Local Planning Authority in consultation with National Highways (or its successors). Thereafter unless otherwise approved in writing decommissioning shall be undertaken in accordance with the approved plan.”*

The inclusion of the Condition ensures that any effects from the decommissioning phase are to be reviewed and agreed upon by National Highways immediately prior to decommissioning.