

**From:** [REDACTED]  
**To:** [Stallingborough CCGT](#)  
**Cc:** [REDACTED]; [REDACTED]; [REDACTED]  
**Subject:** RE: Your Ref EN010161-000013 - Stallingborough CCGT Scoping Opinion Comment - FAO Alison Down (Our Ref DM0164/24/DCO)  
**Date:** 18 March 2024 12:19:09

---

You don't often get email from [REDACTED].

Dear Alison,

Many thanks for giving North East Lincolnshire Council (NELC) the opportunity to comment on the scoping opinion submitted and apologies for the delay in responding.

The following comments are as a result of consultations with various departments within the Council. Please note the applicant has been copied into this email.

In the opinion of NELC the scoping opinion submitted represents a thorough consideration of the potential receptors and issues which need to be assessed as part of the EIA. Nonetheless it wishes the following additional points to those already stated by RWE to be considered as part of any EIA document.

#### Air Quality (Section 6.1)

- Any such assessment should identify the level of exposure through the change in pollutant concentrations at relevant receptors, including cumulative impacts of committed developments, arising from the proposal, during both construction and operational phases. Mitigation measures should be identified and modelled where practicable.
- Base line and predicated impacts on air quality and therefore health should also be undertaken at Kings Road, Immingham due to potential increase in HGV movements to and from Immingham Dock through areas where residential properties adjoin the highway. In addition, Haborough Road and Stallingborough Road Immingham for contractors' traffic, should be considered in a similar manner.

#### Heritage (Section 6.3)

The scoping report has set out an appropriate initial stage of assessment but should also need to fulfil the additional aims set out below.

- The information in the heritage assessment/EIA needs to provide sufficient evidence to understand the impact of the proposal on the significance of any heritage assets and their settings, sufficient to meet the requirements of paragraph 200 of the NPPF.
- The EIA should contain a full archaeological evaluation report which explores in the first-place non-intrusive evaluation of the site, and, if this suggests that further information is required, we expect intrusive evaluation in the form of trial trenching to further inform the heritage impact statement as to presence/absence/ location, depth, survival and significance of any remains. This should inform a suitable mitigation strategy for the impact.
- In addition to the underground remains we would expect a report on the potential impact on the historic landscape. North East Lincolnshire has had a Historic Landscape

Characterisation undertaken and this should be consulted.

- Regarding setting issues, potential impacts on the settings and significance of designated and non-designated heritage assets which would experience visual change should be evidenced using accurate visual representations. Viewpoints, including views of, from, and across heritage asset receptors as well as general intervisibility, all have historic context and need to be assessed properly to determine the contribution of the setting of the heritage asset and the potential impact upon it by development or proposed mitigation measures. In addition, the views and the setting of Grimsby Dock Tower a Grade I Listed Building should be considered.

#### Landscape and Visual (Section 6.6)

- Consideration should be given to the impact of the development, during construction and operation, on the wider Lincolnshire countryside in particular views from the upper topographical areas of the Riby Road/ A1173 / Limber Road areas ( Limber Road crosses the A1173 and extends almost parallel to the coast). From these areas clear views of the proposal and development site is possible.
- NELC will look forward to discussing receptors with the applicant. It is recommended that viewpoints considered in EN010107 – South Humber Bank Energy Centre are used as a starting point for consideration.

#### Water Environment (Section 6.8)

- 6.8.6.5 - Many developments to Energy Park Way do not have main foul sewage connections (most factories having their own private foul sewage and treatment works). If investigations have not already been undertaken, they should assess the extent of the actual network. Discharge into the Humber even with treatment is not usually promoted.
- 6.8.6.9 – Flood Risk Assessment – Any assessment should include a detailed warning and evacuation plan.

#### Highways (Section 6.10)

- Consideration should be given to the construction quality of South Marsh Road east of Hobson Way – pre and post construction assessment of the road should be considered to identify whether construction traffic damages the road and any mitigation measures required (including repairs).
- 6.10.24-25 - Please note South Marsh Road to the west of Hobson Way is a Bridleway only and is not available to passing vehicular traffic.
- It is not clear if construction traffic is anticipated from the A180 to the off site lay down area via the Pyewipe and Westgate roundabouts? If they are ATC should be undertaken at these locations and accident data collected due to the congested nature of these roundabouts.
- Consideration should be given to impacts of HGV traffic on Kiln Lane rail level crossings and any other rail crossings (bridges or level crossing) in terms of suitability, impacts and safety. Early consultation with Network Rail is strongly advised.
- The Highway Authority will need a comprehensive Transport Assessment with Travel Plan to include all relevant committed developments and junction assessments that will be impacted by 30+ two-way trips in a network peak.

Given the level of applications and permissions, including other DCO's in the Borough, we need to ensure that the committed developments list is fully reviewed.

Noise (Section 6.12)

- It is not wholly clear why noise impacts on residential properties are being screened out from specific assessment due to their temporary nature relying only on the CTMP limitations.

In addition to this the Council's Ecology Manager seeks the following issues to be considered:

Any assessment should address relevant existing pressures and priorities as identified in Natural England's Site Improvement Plan including: water pollution, coastal squeeze, changes in species distribution, invasive species, disturbance, noise, visual and vibration, fisheries, fish stocking, commercial marine and estuarine, direct land take from development, air pollution impact of atmospheric Nitrogen deposition and direct impact from third parties. It is also noted that a HRA will be required to assess the above and impact pathways on the designations both during construction and operation. An Ecological survey of the site is required, carried out at the appropriate time and a Biodiversity Assessment and baseline to fulfil the Biodiversity Gain requirement.

North East Lincolnshire Council would be grateful for these points to be taken into account within the formulation of the EIA.

Kind regards

Jonathan

**Jonathan Cadd**

Senior Town Planner  
Development Management Services  
Places & Communities – NEL

[Redacted]

Tel. [Redacted]

Mob. [Redacted]



[Redacted]

Municipal Offices, Town Hall Square,  
Grimsby, North East Lincolnshire, DN31 1HU

---

Reduce your environmental footprint, please do not print this email unless you really need to.

**North East Lincolnshire Council** - This e-mail and any files transmitted with it contains information from North East Lincolnshire Council which may be privileged or confidential. The information is intended solely for the use of the individual(s) or entity named above. If you are not the intended recipient be aware that any processing of this email and its attachments is strictly prohibited. If you have received this e-mail in error, please send it back to us immediately and permanently delete it. Do not use, copy or disclose the information contained in this message or in any attachment. The North East Lincolnshire Council email system, including emails and their content, may be monitored for security reasons and to ensure compliance with council policy. Emails and attachments may be recorded for the effective operation of the organisation and for other lawful business purposes. We cannot guarantee that this email or its attachments are virus free or has not been intercepted and amended. We therefore recommend you carry out your own anti-virus checks before opening any email or attachments. North East Lincolnshire Council will not accept any liability for any errors or omissions in the contents of this email or its attachments, or any damage or loss caused by computer viruses coming from this email or its attachments.