

**THE PROPOSED ASSOCIATED BRITISH PORTS (EASTERN RO-RO TERMINAL)
DEVELOPMENT CONSENT ORDER**

DEADLINE 2

Response on behalf of the Harbour Master, Humber

to the Examining Authority's written question BGC 1.11 issued on 7 August 2023

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1. Introduction

1.1. This is a written submission made on behalf of the Harbour Master, Humber (**HMH**) in response to the Examining Authority's written questions (**ExQ1**) issued on 7 August 2023.

1.2. The question addressed in this submission is:

1.2.1. BGC. 1.11 - Inter-active effects consequent on "stemming" of waiting shipping traffic

2. BGC. 1.11 - Inter-active effects consequent on "stemming" of waiting shipping traffic

2.1. In paragraph 5.2 of its Relevant Representation, DFDS asserts that the navigational simulations show that the proposed new berths will:

- (i) cause significant interference with the existing agreed vessel waiting areas as shown in Notice to Mariners SH22;
- (ii) reduce overall capacity at the Port;
- (iii) cause delays for existing services;
- (iv) become a barrier for growth at the port.

2.2. DFDS states that the manoeuvres shown on the navigational simulations show that the existing stemming areas will be unusable during every vessel arrival and departure at the new terminal and that vessels will be required to wait 20 nautical miles east of the current locations, resulting in longer waiting periods, increased fuel consumption and emissions.

2.3. Paragraph 5.4 of the DFDS Relevant Representation asserts that delays in tug availability are already common and that towage requirements for the new terminal will worsen this.

2.4. The Harbour Master, Humber (**HMH**) not expect the proposed development to be a barrier to further growth at the port. The proposed development itself represents potential growth. It follows that a busier port involves more vessel movements, and they can be accommodated. Historically, there have been periods when the port has been busier than it is now.

2.5. The forecast increase in vessel movements associated with the operation of the Proposed Development and maintenance dredging is set out in paragraphs 10.8.84 and 10.8.85 of Chapter 10 of Volume 2 of the Applicant's ES:

"10.8.84 The operational phase will see an increase in Ro-Ro vessel arrivals with a maximum of three vessels a day which is an additional six vessel movements. This equates to a maximum total of 2,190 additional movements per year. In addition, these vessels may occasionally require tugs (at a maximum estimate of two tugs for a vessel using the outer finger berth, representing, on a worst case basis, four additional tug movements per day) or 1,460 additional movements per year. There will also be an increase in line handling/mooring vessels as required.

10.8.85 In addition, maintenance dredger movements have been estimated based on estimated volumes of material from maintenance dredging. An estimated total annual maintenance dredge volume of 120,000 m³, assumed split over four dredge campaigns, gives four volumes of 30,000 m³ annually. Each campaign would require 32 hopper loads, giving a total dredge time per campaign of 144 hours total. Within this period, dredger and hopper would be moored onsite for 4 hours, then the hopper would transit to and from the disposal site over 0.5 hours, with the cycle repeating until the end. In

terms of vessel movements, for one campaign, 32 hopper loads equate to 64 movements, an additional increase of 256 movements per year.”

- 2.6. HMH notes that congestion and/or impacts on waiting were not reported as likely significant impacts of the proposed development and he does not consider that the reported level of increased traffic to and from that development is likely to cause significant interference with existing vessel waiting areas, although there may be some reduced flexibility on occasion. There is capacity for increased traffic volumes, but vessels cannot all arrive and depart at the same time. This is no different from the current position in the Estuary. Tug and pilotage services are generally planned in advance to manage arrivals and departures and avoid prolonged waiting.
- 2.7. HMH does not consider that the navigational simulations suggest that existing stemming areas will be unusable during vessel arrivals and departures at the new terminal and does not recall this being raised at the sessions he attended, or otherwise with him. The existing waiting areas are not encroached on by the proposed development and in reality (as happens now) vessels would be moved around to accommodate one another. DFDS's suggestion that the simulations demonstrate that, in practice, vessels will inevitably have to wait at a distance from the usual location is incorrect. Whatever the overall number of vessels, those vessels using the new facility will be part of the overall management of traffic in the same way as existing Immingham Outer Harbour traffic; that is, in accordance with both Notice to Mariners SH 22 and further adaptive planning (for vessels not subject to Notice SH22) and in a manner that avoids or reduces delays whilst not negatively affecting navigational safety. It is worth mentioning that SH22 (which prescribes stemming arrangements for vessels awaiting entry to the dock) does not apply to other vessels such as DFDS vessels accessing the Immingham Outer Harbour facility.
- 2.8. DFDS's concerns ignore the fact that VTS Humber and the Immingham Dockmaster will adapt to the new traffic and flows, just as they have done for the Immingham Outer Harbour. The new facility will have its own procedures based on safety requirements. Vessels using the new facility will not have automatic priority when shipping movements in the area are being planned.
- 2.9. Further, the time taken for vessels to arrive at and depart from the new facility will be less than it would take to put a similar vessel into the dock and to prepare the lock for the next vessel. To the extent that vessels use the proposed development rather than entering the port, there would be shorter waiting periods for any vessels that do need to go through the lock.
- 2.10. With regard to DFDS's comments regarding tug availability, a new standing requirement for tugs may actually result in more tugs on the river and greater flexibility overall but this is commercially driven. If IERRT is authorised, there will be new commercial opportunities for tug operators and pilots to expand their existing operations.