

## IMMINGHAM EASTERN RO-RO TERMINAL DCO APPLICATION

### PINS REFERENCE TR030007

#### SUMMARY OF WRITTEN REPRESENTATION FROM DFDS

##### *DFDS' operations at Immingham*

1. The Written Representation (WR) sets out DFDS' operations at Immingham, describing it as a 'port within a port' with its own controlled access gates. Its 2023 forecast is to move 550,000 freight units and 210,000 wheeled units. There are peaks in import traffic between 0500 and 0800 and 1400 and 1800 on weekdays and in export traffic between 1500 and 1900 on weekdays. Most DFDS traffic uses the West Gate, and the increase in traffic will cause congestion there, at the East Gate and also within the port.

##### *The complex navigational environment*

2. The navigational environment at Immingham is complex, being busy with a fast tidal current. The introduction of the proposed project between the Immingham East Jetty and the Immingham Oil Terminal will unacceptably increase the vessel congestion in the area and the risks of collision and allision. The inner waiting, or 'stemming', areas will become less usable or unusable, requiring more use of more remote areas.

3. Tugs are used frequently in vessel manoeuvres. A tug barge appears to have been omitted from the navigational simulations. The Applicant has not used the most obvious source of wind data, instead using the Immingham Marine Control Centre and Humberside Airport in different instances. Dredged materials are proposed to be deposited close to the navigation channel, which may cause increased siltation.

##### *History of engagement*

4. DFDS has repeatedly brought its concerns to the Applicant since the project first became public, with a long history of meetings and correspondence with the Applicant since 15 July 2022. A schedule of correspondence is provided with the correspondence itself, and an explanation setting out where and when each issue of concern was raised.

5. In some cases the Applicant has undertaken to provide stakeholder engagement meetings which have never been arranged or have been cancelled at short notice.

##### *Navigational simulations and Risk Assessment*

6. The Applicant conducted navigational simulations, and DFDS was invited to and attended those in November 2021 and April 2022. DFDS has multiple serious concerns with the way in which the simulations were conducted:

- a. only one simulation carried out for the most inaccessible berth, Berth 3;

- b. the vessel used was unrepresentatively manoeuvrable;
- c. the level of tug use was unrepresentatively high with tugs used in potentially dangerous situations;
- d. the possibly accidentally omitted tug barge;
- e. classification of some aborted simulations as successful and some failures as marginal;
- f. excessive use of bow thrusters to achieve success; and
- g. the tide flowing at the wrong angle.

7. Each one of the above issues serve to make the risks appear less than they would actually be; in combination, they cause a very serious underestimate of risk.

8. The NRA produced by the Applicant using these simulations then uses a heterogenous methodology that does not give a clear indication of how risks were deemed to be tolerable and the process by which the Applicant's Harbour Authority and Safety Board decided they were such. The data used for wind modelling is not benchmarked against anemometer readings at Immingham and therefore not representative of the conditions at the proposed development location.

9. Because of these concerns, DFDS has commissioned its own Navigational Risk Assessment from Nash Maritime and Bishop Marine Consulting, which is submitted at Deadline 2. It notes shortcomings with the Applicant's NRA. With the introduction of six identified mitigation measures, the risks can be managed; two of these involve installing IOT impact protection and moving at least two of the IOT berths further away.

#### *Vessel congestion*

10. Aside from the navigational risks, the increased infrastructure and number of vessels will slow down the time it takes for existing vessels to enter and leave the area, particularly by reducing lock productivity affecting all inner dock users, potentially adding delays of over three hours and more in bad weather. This will have unacceptable impacts on DFDS' operations at Immingham and its services to its customers.

#### *Vehicular congestion*

11. Finally, the increased numbers of vehicles in the port and surrounding highway network will lead to congestion for existing users. The Applicant has not assessed whether either the port or the West Gate can accommodate the additional traffic it predicts. It has assumed that 85% of new vehicles will access the port via the East Gate and 15% via the West Gate, however there is no evidence for this, no proposed measures to encourage use of the East Gate, and no mitigation or assessment of what happens if that split does not happen. There is also insufficient evidence of the level of tractor-only movements and accompanied versus unaccompanied freight. Finally, DFDS consider that the impacts on five nearby junctions will be over capacity by 2032.

#### *Conclusion*

12. In conclusion, DFDS considers that the application should not be granted in its current form unless and until the serious shortcomings identified are dealt with.