

Lily Robbins
Case Manager
National Infrastructure Planning
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Our Ref
JZH/ADW/204604.0001
Date
11 September 2023

Dear Ms Robbins

DFDS submissions for Deadline 3 - Immingham Eastern Ro-Ro Terminal DCO

We act for DFDS Seaways plc (DFDS) who, as an Interested Party, have been assigned the reference IMRO-AFP007.

We write to outline DFDS's submissions at Deadline 3 in the Immingham Eastern Ro-Ro Terminal (IERRT) DCO examination, matching the list of items requested for Deadline 3 in the Rule 8 letter.

DFDS makes the following submission with this letter:

Comments on WRs, responses to the ExQ1 and other D2 submissions (combined into a single document)

Updates with respect to the preparation of SoCG and the position with respect to any IPs' PADs from the Applicant and IPs, as relevant – although the Applicant's SoCG tracker [REP2-006] says that a draft SoCG will be shared with DFDS in advance of Deadline 2, DFDS did not, and has still not, received such a draft;

Any further information requested by the ExA under Rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010 – not applicable.

Requests by Interested Parties to attend the Accompanied Site Visit (ASI) on 26 September 2023 – DFDS has already conveyed the individuals who will attend the ASI;

Requests by Interested Parties to be heard at Issue Specific Hearing 3 (ISH3) and Issue Specific Hearing 4 (ISH4) – DFDS wishes to appear at ISH3 and ISH4 and the following will appear in person:

- Isabella Tafur, of Counsel
- Angus Walker, BDB Pitmans
- Andrew Byrne, Managing Director, DFDS Immingham

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- Matt East, GHD transport consultants,
- Jesper Hartvig Nielsen, Head of Fleet Management, DFDS (noting that he can only be available on 27 September),
- Brocque Preece, Nash
- Captain Mykola Timofyeyev

(All may appear at ISH3 and just the first three at ISH4)

The following intends to appear remotely:

- Jonathan Bush, pilot and maritime consultant (noting that he can only be available in the afternoon of 27 September)

DFDS would also wish to reiterate its request for cross-questioning, this time at ISH3:

- Andrew Firman, the Harbour Master, Humber – this is to ensure adequate testing of his Written Representation, in particular his current views on the direction of current used in the simulations and his participation in the risk assessment of the IERRT project, which have not been fully explained, the effect of the IERRT on stemming operations, and the details and impact of the Selin S incident;
- Michael Parr- HR Wallingford - this is to ensure adequate testing of the Applicant's case in terms of the conduct of the simulation exercises, in particular whether all simulations of Berth 3 have been reported;
- Simon Tucker, DTA Transport Planner - this is to ensure adequate testing of the Applicant's case that the terminal can handle 660,000 units per year and what would happen if it could not, and the status of the provision of signage.

Any further information requested by the ExA under Rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010 – not applicable.

Comments on any further information/submissions previously accepted by the ExA – DFDS has no further comments.

Yours sincerely

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BDB Pitmans LLP

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