

IMMINGHAM EASTERN RO-RO TERMINAL



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1. Introduction

1.1. This document provides the Applicant's response to the written representation submitted by the Marine Management Organisation (MMO) at Deadline 2 [REP2-016].

2. Summary

- 2.1. The comments made in the MMO's Written Representation [REP2-016] have been, and continue to be, discussed in detail and constructive dialogue remains ongoing between the Applicant and the MMO.
- 2.2. As such, the Applicant notes that a number of comments identified by the Marine Management Organisation in its relevant representations [RR-014] are now considered resolved.
- 2.3. The Applicant welcomes the MMO's comments that positive discussions are ongoing and that they are: '*confident that all outstanding matters will be resolved prior to the close of the examination*' [REP2-016, paragraph 4.2.1].

3. MMO Responses to ExQ1

3.1. The Applicant has provided its responses to Section 1 of the MMO's Written Representation in **document 10.2.35- Applicant's Response to ExQ1 Submissions by IPs** submitted at Deadline 3.

4. MMO Comments on Relevant Representations

- 4.1. This section addresses the comments provided in Section 2 of the MMO's Written Representations [REP2-106], being the MMO's response to the Applicant's comments on the MMO's Relevant Representation [RR-014].
- 4.2. The Applicant notes that a number of comments originally identified by the Marine Management Organisation [REP1-013] are now considered resolved and it is noted that the further clarifications provided by the Applicant have been accepted as sufficient to satisfy the respective concerns. The Applicant welcomes the MMO's confirmation that such matters are now resolved.
- 4.3. Further clarification on the status of the potential effects of underwater noise and the respective mitigation measures will be provided to the MMO to address comments raised in respect of Reference 4.2.8, 4.2.9, 4.2.10, 4.2.11, and 4.4.6. This will be in the form of a technical signposting document capturing:
- a) Further justification with respect to the proposed mitigation measures, noting that these will need to be tailored to the specifics of the IERRT project. This includes details of the locality, consideration of the proportionality of the scale of effects and the implications for the overall construction programme.

- b) Further clarification on the use of vibro piling within the construction programme.
- 4.4. In the context of coastal processes and comments made under Reference 4.3.1, the MMO reiterate points made within [REP1-020] in that they do not have any immediate or definite concerns that the development impacts on coastal processes will, in themselves, result in significant coastal process change.
- 4.5. With respect to Reference 4.3.2, 4.3.3, 4.3.4, 4.3.5 and 4.3.6 in Table 2 of [REP2-016], the Applicant understands that the MMO is now satisfied with the conclusions of the in-combination coastal processes assessment [APP-056]. This is based on a meeting held with the MMO, and Cefas as their technical advisors, on 30 June 2023 and a signposting document on physical processes. The Applicant will seek to further clarify this position through ongoing dialogue with the MMO.
- 4.6. With respect to Reference 4.2.5, the Applicant can confirm that land-based piling below the water has been considered within the underwater noise assessment and modelling. As such, it is understood the MMO has no further concerns on this point regarding the number of piling rigs assessed.

5. MMO Comments on the draft Development Consent Order

- 5.1. The Applicant thanks the MMO for its comments in respect of the draft Development Consent Order provided at Section 5.6 of its Written Representation.
- 5.2. The comments provided have informed the updated **document 3.1 Draft Development Consent Order** submitted by the Applicant at Deadline 3 and the Applicant will continue to work with the MMO to settle any outstanding comments.