



CONSOLIDATED NOTE ON CLdN PORTS KILLINGHOLME

Introduction

This note contains information in response to a request from the Examining Authority at Issue Specific Hearing 3 (ISH3) as follows:

- Part 1 – commentary of the ASI alongside a plan showing the route of the tour, including information on operations;
- Part 2 – existing and future capacity at Killingholme;
- Part 3 – existing berth capacity;
- Part 4 – Brexit impacts; and
- Part 5 – offers made to Stena.

PART 1: SITE VISIT

This section describes the route taken during the Accompanied Site Inspection on 26 September 2023 (ASI). The route and corresponding points of interest are shown on Figure 1.

Glossary

Tugmaster: port tractor unit used to tow trailers and translifters;

Translifter: high tech rear wheel steer/ride height adjustable/self levelling trailer reverses under cassettes & moves to vessels;

Cassettes: flat steel, inverted-U, platform used to carry container or tanks;

Clip-on Trestles: support frame for trailer. Tugmaster backs under the trestle and attaches it. The trestle travels with the trailer and is locked to the vessel deck increasing stability and safety;

Double stacks: multiple containers placed on one cassette or mafi for efficiency;

Mafi: old style “dumb” wheeled platform used to move containers. Travels with vessel but needs securing and is not as stable; and

Reachstacker: mobile container handler capable of lifting loaded containers and reaching across multiple rows of a stack.

Route description

Yellow route: from Visitor Centre to Vessel berths;

Red route: around main trailer/container storage plus exam facilities/border control points (BCP);

Blue route: around compounds currently in use for car storage;

White route: around recently expanded compound and development land; and

Purple route: from the development land to the end of the site visit.

Figure 1: ASI Route



Route Description / Key Features

Key	Area	Note
A	Visitor Centre	Issue gate passes to contractors and visitors away from the main cab-high freight check ins to reduce queuing & delays. Open Monday-Friday.
B	Main Freight Gates	In/out lanes are staffed 24x7 (overnight can reduce to contraflow for efficiency). Cab high check-in for freight (similar process to Dover & Eurotunnel). More efficient than a driver parking up and then walking to an office. Special camera system captures the condition of trailer/container on delivery to reduce damage claims (occurs in/out at all CLdN Ports UK & Europe). Pin Codes known only to the haulier are required to collect CLdN shipped trailers for security.
C	Railway Siding	Connection to the Killingholme Branch Line (Network Rail). No current rail freight movements. On port rail sidings would need to be reinstated prior to operating rail freight but the connection is retained under a Sidings Agreement [paragraph 4.8 of REP2-031] .
D	Container Stacks	Tanks (6m and 9m) stored separately from boxes (12m & 13.5m) to maximise utilisation of space.
E	Sheds	Seven sheds of varying size. 1-3 are used by CLdN Automotive Ltd (carry out Pre-Delivery Inspections (PDI); install addons, carry out paint spraying, convert interior of vans, add decals); 4 is Border Force until they move to the BCP late 2024/mid-2025; 5 is for transshipment of cargo arriving from other ports; and 6-7 currently store petcoke but will be vacated end 2023.
F	Storage	Major trailer compound. Trailers are block stowed (put close together in one long block of up to 80) to enable rapid loading of vessels (because they are close). Ground also strengthened for containers.
G	ISPS / Security Search	Boundary of ISPS Restricted Area. Random searches of trailers/container/visitors conducted here.
H	Pontoons / berths	Clockwise from letter "H" Berth 1 Berth 2 Berth 5 (fitted to accept Quarter Ramp vessels e.g. car carriers) Berth 6 Berth 4 Berth 3 1/2/3 all share the large main pontoon and causeway; 5 and 6 are accessed via a separate causeway and pontoon; and

		<p>4 has a separate ramp from part way down the main causeway onto a dedicated pontoon.</p> <p>See separate section for details of berths.</p>
I	Storage	<p>Closest compound to vessels. Hauliers often directed to drop export trailers here (reduces distance the ports tugmasters have to travel to load vessels). Also strengthened for containers and can be used to hold double stacks on cassettes.</p>
J	Containers	<p>Holds a mix of refrigerated units plugged into shoreside power and double stacked containers on cassettes. Empty cassettes are laid out here to enable rapid loading of export containers from offload bays (L).</p>
K	Storage	<p>Split level trailer storage.</p>
L	Container offload	<p>Hauliers bring export trailers here to one of 3 bays (each 2 lanes). Port reachstackers remove the delivered unit and place directly onto cassettes ready for shipment. Area can also hold a stack (4 high) of empty boxes to save space during peak periods or if no cassettes are available.</p>
M	Container loadout	<p>Hauliers collect containers/tanks. Port reachstacker driver has 2 in-cab screens. One shows a list of containers available to load and their location. Second screen shows the registration plate of the haulier being loaded to validate correct combination of haulier/container.</p>
N	Border Control Post	<p>Second largest UK BCP after Sevington (Government built/operated facility near Ashford for Dover/Eurotunnel).</p> <p>Constructed under Government instruction in 2021 with grant aid plus CLdN money and land. Cabinet Office delayed introduction into service of all BCPs (5th delay now until 30th April 2024).</p> <p>Includes BCP and UK Border Force inspection facilities plus parking and driver welfare facilities, as well as UK Border Force detention facility for holding and interviewing clandestines found on vessels/in port.</p> <p>Bays 01-07 built for Port Health (primarily foodstuffs);</p> <p>Bays 08-22 built for APHA (primarily plants, and scaled larger for Stena traffic);</p> <p>and</p> <p>Bays 23-26 are Border Force/Customs. These are already in use.</p> <p>Office suites for all inspection authorities behind bays.</p> <p>Number / split of bays designed based on UK Government data for number of inspections estimated in 2021. Updated inspection regime foresees significantly lower level of inspections. As a result, the facility is over-sized according to Government.</p>
O	Storage	<p>Cars. Installation of concrete pads for storage of trailers can be carried out to enable flexible use or more significant works for heavy use.</p>
P	Storage	<p>Flexible compound currently switched between cars and trailers according to need. Also strengthened for container storage.</p>

		Port Engineering Workshop maintaining over 100 heavy plant / vehicles plus c50 light vehicles.
Q	Storage	Cars. Installation of concrete pads for storage of trailers can be carried out to enable flexible use or more significant works for heavy use.
R	Storage	Cars. Installation of concrete pads for storage of trailers can be carried out within a few weeks if required.
S	Storage	Export cars. Also has concrete pads to enable storage of trailers.
T	Storage	Trailers. Also strengthened for containers.
U	Development land	Part A: Partially developed for cars in 2023. Remainder currently a construction site but will revert to temporary/overflow storage end 2023. Part B: allocated for car storage (Planning Consent ref: PA2020/1483) not currently required.
V	Storage	Cars. Increased capacity in 2023 by extending fenceline and surfacing more land.
W	Storage	Cars. Increased capacity in 2023 by extending fenceline and surfacing more land.
X	Development land	Ex power station land. Owned by CLdN group company. Also, the agricultural field between this site and main CLdN terminal. Available to CLdN when required. Not identified by ABP. Separate / dedicated access from public road.

Safety/Flexibility

CLdN vessels are designed to accept double stacked containers plus have a mix of fixed cars decks and/or multiple lowerable mezzanine decks to handle layers of cars instead of trailers.

CLdN mostly uses translifters & cassettes to move containers with few mafis because they:

- a) are safer (more stable);
- b) use ground and deck space more efficiently;
- c) can be block stowed together on board, increasing deck utilization and reducing lashing on board vessels; and
- d) are high tech (rear axles are steerable and ride height can be adjusted by driver to improve accessibility on ramps).

CLdN vessels also use clip-on trestles for trailers.

Stevedoring and Storage Operations

Vessel arrival

Mooring gangs are timed to move from one vessel to another tying up as vessels arrive then switch to driving tugmasters. Should a vessel be delayed, priority goes to the vessel on schedule (CLdN or Stena).



Vessel unloading/loading

All unaccompanied freight units arriving to/departing from CLdN Ports Killingholme are loaded/unloaded on to CLdN or Stena vessels by CLdN Ports Killingholme.

Tugmaster drivers are not dedicated to a specific ship, but switch vessels dynamically e.g. they may take a trailer to a CLdN ship then pick one up from a Stena ship. This reduces dead legs (running empty/with no trailer) and waiting around for cargo.

CLdN cassettes are pre-loaded for export with 1-4 containers/tanks. This means one driver/towed unit can move up to 4 containers/tanks to/from a ship. These are all referred to as double stacks. Few containers are handled for Stena but they would be on mafis.

Cars are driven off the vessels individually. Drivers are relayed back to the vessel via minibus.

CLdN's vessels incorporate deck adjustment features, allowing mezzanines to be lowered for sailings accommodating higher volumes of car shipments, or raised to accommodate more trailers/containers. Stena does not carry cars.

Containers are stored and handled in the compounds closest to ships (because they are the heaviest/hardest to move). Trailers are further away as they are more mobile. Car storage is in the compounds furthest from the vessel as they are easiest to move.

All compounds are multi-user between shipping lines, meaning that freight from one line will be stored next to freight from another line. This avoids one line having no space whilst the other has unused space. In CLdN's experience this is much more efficient than providing each line with their own delineated space.

Most compounds can be switched from storage of one traffic type to another. Those compounds that cannot be switched immediately could be converted. Conversion works depend on the cargo type: CLdN typically installs concrete pads into existing car compounds to allow for flexible trailer storage. Container storage conversion works are more involved as additional ground strengthening is required.

Storage is actively managed to require customers to minimise dwell times and remove freight that is dwelling too long. CLdN does not impose penalties. After a specified period, storage charges apply but these are not routinely paid because cargo is moved off the terminal. There is no upside in allowing charges to become payable because occupation of the ground slot impacts on throughput.

Differences between Killingholme and Immingham

Immingham is a multi-user port owned by Associated British Ports (ABP) containing multiple operators, including roll-on/roll-off (RoRo), bulk and oil terminals and other businesses. ABP does not operate RoRo facilities itself at Immingham. This is done by the operators on dedicated land who carry out their own stevedoring.



Killingholme is a dedicated RoRo port owned and operated by CLdN, which provides check-in, stevedoring, storage services to the shipping lines. Shipping line operations are not allocated specific land, as explained above.

The ownership of the terminal and expansion land (or arrangements with affiliated companies) gives CLdN the ability to expand and optimize the terminal. CLdN manages the maintenance and operation of the terminal and investment directly in the berths and storage areas for the handling of RoRo freight. Killingholme is not constrained by other port operators/operations, as is the case at Immingham where RoRo operators sit within the wider port estate.

CLdN Ports Killingholme is a fully contained facility surrounded by a perimeter fence. There are no public roads or accesses or other users on the terminal area (except for one limited petcoke operation which ceases at the end of 2023).

CLdN Ports Killingholme is a statutory harbour authority. It is also the customs wharf approval holder for the port.

CLdN Ports Killingholme has customs / immigration and sanitary and phytosanitary checks (SPS) inspection facilities within the terminal customs area. It is the second largest such facility in the UK. It was designed specifically to handle large numbers of self-drive cargo carrying plants on the Stena Hoek service. Self-drive units will drive directly to the BCP for inspections. Unaccompanied units arriving in KGH will be moved to and from the BCP by CLdN tugmasters.

Immingham has a common-user BCP for all operators located outside of the East Gate. This is outside terminal operating areas. CLdN is not able to comment specifically on stevedoring operations at Immingham.

DFDS Seaways Plc handles similar RoRo freight on the Rotterdam routes it operates – as does Stena - but also handles bulk and other goods originating from the Baltic, as well as operating significant warehousing.

Killingholme handles automotive import/export and storage and carries out pre delivery inspection (PDI) and vehicle enhancement for certain customers.

PART 2: EXISTING AND FUTURE COMPOUNDS

Compounds

Figure 2A shows existing compounds at Killingholme as well as identified expansion land. This supplements the plan submitted with CLdN's written representation at Deadline 2 [Appendix 3 of REP2-031] (the WR Plan) and an explanation of the compounds in paragraph 1.8 and 2.24 of that document. For ease of reference, the WR Plan is reproduced below at Figure 2C.

Landside storage use at Killingholme is dynamic. As explained in the section above and in the following table, compounds are already multi-use or they can be upgraded to handle all types of cargo if there is market demand or to meet operational requirements. A key function in efficiency is the proactive management of dwell times, which is a standard operational protocol for CLdN. This ensures that storage is optimised to enable maximum throughput of cargo.

The use of these existing compounds is shown according to the following:

- Red** primarily containers;
- Blue** primarily trailers;
- Green** primarily cars; and
- White** land with benefit of planning consent or available for development; BCP.

Figure 2B explains the current use of each compound, including flexibility and potential for conversion.

For ease of reference, the areas shown on the plan at Figure 2A relate to the WR Plan, shown at Figure 2C, as follows:

WR1 Plan (Figure 2C)	Figure 2A	Area (m2)	Area (Ha)
Grey land	Red Blue and Green compounds White land marked "Sheds"	830,000 (excluding jetties causeway and pontoon)	83
Yellow land	White land comprising		
	BCP	-	-
	2 nd Site	130,000	13
	Centrica	91,000	9.1
Blue land	Centrica	102,000	10.2
Total development land area		323,000	32.3
Green land	C.Gen (not available development land)	-	-
Total		1,153,000	115.3

Comparison with IERRT

To put the size of Killingholme in context, with 6 berths Killingholme has a total of 83 Ha of port operational land (storage and operations) compared with IERRT's 38 Ha for 3 berths.

Of IERRT's 38 Ha, the actual storage land area at IERRT is approximately 28 Ha. Approximately 10 Ha appears to be areas for self-drive/accompanied parking and marshalling. The total available development land at Killingholme (at 32.3Ha) exceeds what appears to be the unaccompanied RoRo storage at IERRT. Even if the areas identified for self-drives / accompanied units is less than 10Ha, Killingholme's available development land is equivalent to the total size of IERRT.

Development land (white)

Part of this land has the benefit of planning permission for car storage, shaded orange on the WR Plan. As seen on the ASI (and explained above) there are surfacing works being carried out to a small part of this land – on the white area overleaf titled 2nd Site.

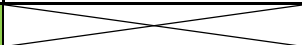


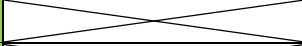
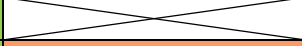

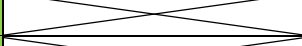
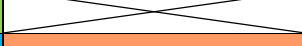







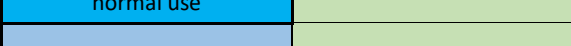
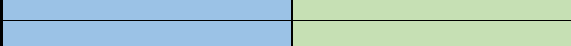
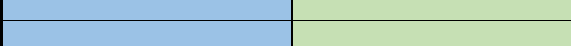




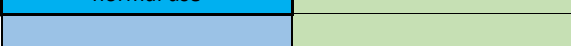
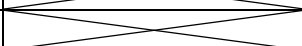
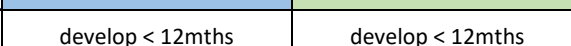
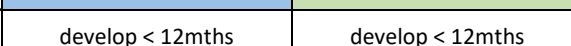

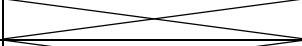
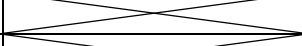


The planning consented is being implemented, so it can be banked to be built out if needed.

The blue land on the WR Plan does not have planning consent for port uses. It is brownfield land and would be available if required in future. At this time there is no requirement to develop out additional storage on this scale. For the purposes of understanding how capacity at Killingholme could be increased in future, car storage could be displaced to the orange and blue land shown on the WR Plan to enable expansion of RoRo freight (trailers and containers) into existing car compounds.

Figure 2A: Existing and Future Compounds



Figure 2B: explanation of current use, flexibility / future use

Compound / use	option for containers	option for trailers	option for cars
A		develop < 12mths	normal use
B		normal use	
C		develop < 12mths	normal use
D		develop < 12mths	normal use
E			normal use
G		develop < 12mths	normal use
HC			normal use
HT		normal use	
HSB		normal use	
J		develop < 12mths	normal use
K		normal use	
L	normal / cassettes		
M	normal / stacks		
N		develop < 12mths	normal use
Q		normal use	
BCP			
Sheds		develop < 12mths	develop < 12mths
Humber WB		develop / 24mths	develop / 24mths
2nd Site		develop / 24mths	partial
Cgen		develop / 24mths	develop / 24mths
Centrica		develop / 24mths	develop / 24mths

Key








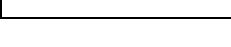
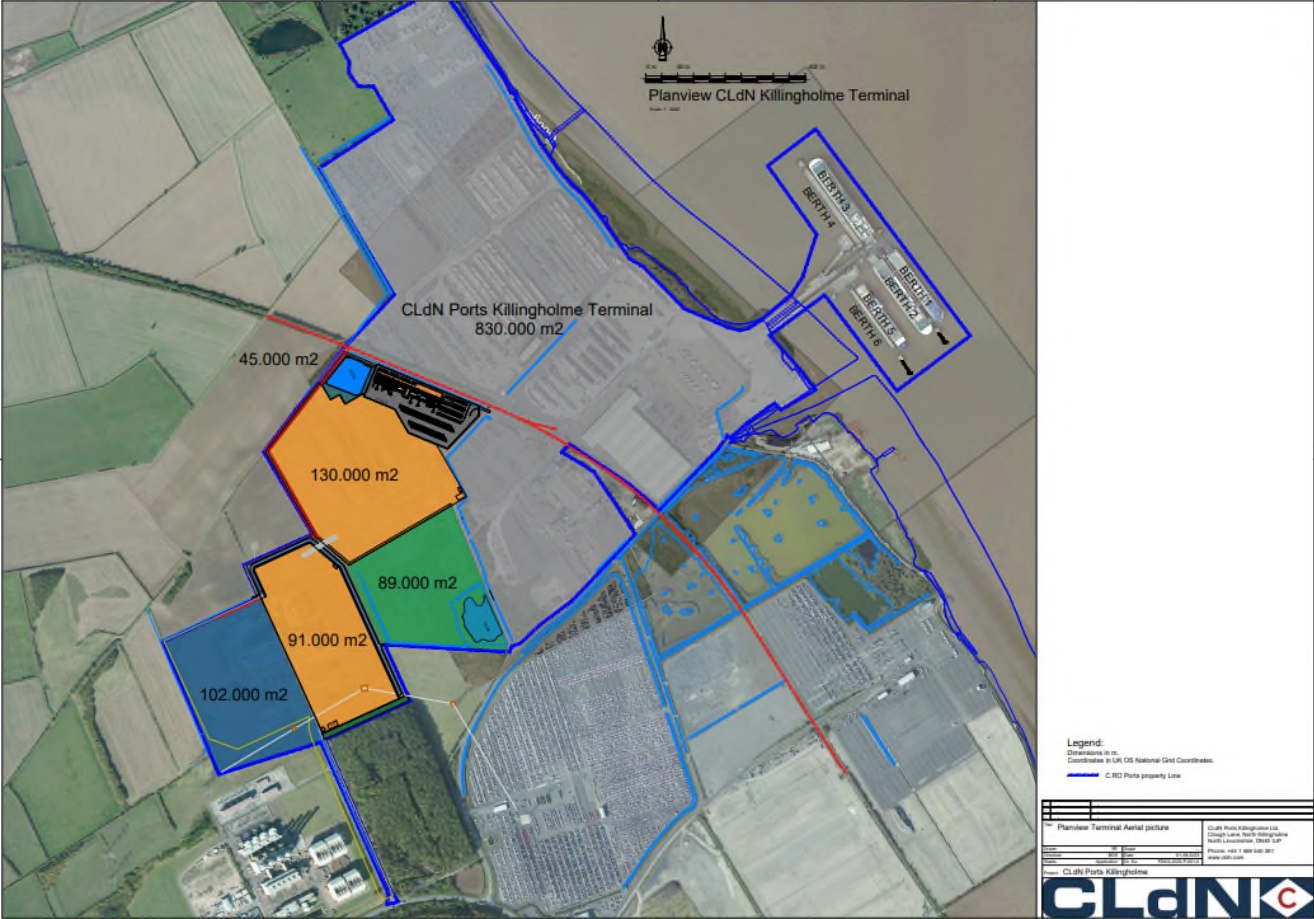
	can neither store, nor easily be adapted to store, this type of cargo
	designed to store containers if required
	stores containers today
	designed to store trailers if required
	stores trailers today
	designed to store cars if required
	stores cars today
	can be developed within this timescale to store cargo of this type

Figure 2C: The WR Plan



PART 3: EXISTING AND EXPANSION CAPACITY

Capacity

The Volterra Report at **Appendix 1 of REP2-031** (Volterra Report) explains the actual capacity at Killingholme, correcting the assumptions made in the Application (including in the Market Study **[APP-079]**). As stated in the Market Study, the assessment of capacity at Killingholme by ABP was based on a google maps review, without any understanding of how a RoRo terminal operates. In particular, it did not account for flexibly used compounds or container stacking efficiency.

For ease of reference, Table 4.1 of the Volterra Report is reproduced below. This is an accurate and factual analysis of existing and future capacity.

Table 4.1 Revised storage capacity calculations for Killingholme (total units)

Factor	Applicant	Correct figures provided by CLdN							
	All years	2021		2023		2024		2025	
		Min	Max	Min	Max	Min	Max	Min	Max
Trailer bays	1,790	940	950	1,176	1,176	1,481	1,481	1,700	1,700
Container ground slots	220	602	602	893	893	893	893	893	893
Container unit slots	660	1,805 ⁸	1,805	1,879	1,879	1,879	1,879	1,879	1,879
Stack efficiency	0.6	0.8	0.8	0.8	0.8	0.8	0.8	0.8	0.8
Total container units static capacity	396	1,444	1,444	1,503	1,503	1,503	1,503	1,503	1,503
Total static capacity ⁹	2,186	2,394	2,394	2,679	2,679	2,984	2,984	3,203	3,203
Multiply by days per annum	797,890	873,810	873,810	977,908	977,908	1,089,233	1,089,233	1,169,168	1,169,168
Average dwell days	2.25	1.5	1.25	1.5	1.25	1.5	1.25	1.5	1.25
Peak multiplier	1.25	1.25	1.25	1.25	1.25	1.25	1.25	1.25	1.25
Total storage capacity	283,694	466,032	559,238	521,551	625,861	580,924	697,109	623,556	748,268

Source: Information provided by CLdN and applying the same methodology as is used in the market study. Note figures are not rounded.

Flexibility

Essential to assessing existing and future capacity at Killingholme is an understanding that Killingholme is a highly flexible operational port that can adapt storage functions to accommodate future growth in freight volumes.

Containers are stored both in traditional stacks and pre-loaded as 2 or 4 on cassettes.

There are a number of car compounds at Killingholme that could be re-purposed for mixed storage. CLdN looks to maximise operational efficiency: highly mobile cargo such as cars can be stored in multi-deck car facilities as is the case at CLdN's ports in Purfleet (London), Zeebrugge and Rotterdam. Car decks can increase car storage by up to 400% compared to equivalent level ground storage.

There are no current plans to do so at Killingholme, but it is important to recognise that car storage can be accommodated in a number of ways that would increase storage capacity for trailers and containers (by re-purposing compounds).

Similarly, container stacking operations can be consolidated using rubber tyred gantries (RTGs) or rail mounted gantries (RMGs) operating container stacks. If freight growth and throughput demands these efficiencies, the terminal can accommodate such an increase in freight volumes. This would increase container stacking from the current 3-high to 4- or 5-high continuous stacks. CLdN Ports operates RTG/RMG stacks at Purfleet (London), Rotterdam and Zeebrugge.

As identified above, a number of compounds are already designed to be multi-purpose and can be dynamically switched from one cargo type to another. Other compounds can be adapted relatively quickly with minimal civils works to enable multi-function use if freight volumes demand this.

Significant areas of development land are available, which are controlled by CLdN or its affiliated companies. Development of these areas (most likely for car storage) is feasible including the land subject to planning consent (ref: PA2020/1483). There is no existing requirement to develop these areas. The availability of this land demonstrates that CLdN has the capability to reallocate and expand storage if future demand requires it. It is CLdN's view that current freight volumes overall do not justify the development of this land now, speculatively. However, relevant planning consents are being implemented so that if they are required in due course they can be built out.

Most capacity enhancements at Killingholme can be achieved using permitted development rights under the scope of the Harbour Empowerment Order [RR-007]. In the event that express planning consent is required (due, for example, to the limitation on the exercise of most permitted development rights where EIA is required), CLdN does not consider there would be any impediment to obtaining planning permission given that all works would occur on existing port land or brownfield sites. Significantly CLdN's two Harbour Orders do not impose a limit on the capacity or throughput of the terminal, which is sized to accommodate the six berths authorised under the Harbour Empowerment Order and Harbour Revision Order.

PART 3: BERTH CAPACITY

Killingholme has six RoRo berths.

Figure 3A below shows existing berth dimensions.

Figure 3A: Berth Dimensions

Berth	Current length
1	246m
2	246m
3	262m
4	208m
5	230m
6	unused

The six berths combined at Killingholme are able to accommodate vessels of all existing length and draft currently used by RoRo operators on the North Sea, or on order in shipyards.

The largest vessels (8000 lane metres/234 m length overall (LOA)) are restricted to Berth 3. These are the G9s operated by CLdN: the MV Celine and the MV Delphine. Vessels of this size are specific to CLdN's operations only at the current time. There are only two such large vessels in the world. CLdN is not aware of any intention by other unaccompanied RoRo operators to use vessels of this size, including by placing orders at shipyards. CLdN's next largest vessels are the H5s at 217m LOA. These do not currently call at Killingholme. Stena's Hoek van Holland vessel is 212m LOA. The berths are well-sized to accommodate the mix of RoRo vessel types in use.

There is an extant MMO licence for dredging (L/2016/00242/2) for all berths. This includes Berth 6, although this berth is not currently dredged as there is no requirement for use. All berths can be dredged to accommodate the draft of all existing RoRo vessels in operation worldwide.

Figures 3A and 3B show the availability of berth capacity based on percentage of hours in use. This is derived from real data from September 2023 (excluding Stena, although similar graphics are available including Stena Hoek service on berth 1) and demonstrates significant spare capacity in berth use, which can be accommodated by terminal operations.

Red shows hours vessel on berth

Green shows unused berthing hours

Figure 3A

Utilisation of Berthing Hours Excluding Stena Line
(Thursday 14th September 2023)

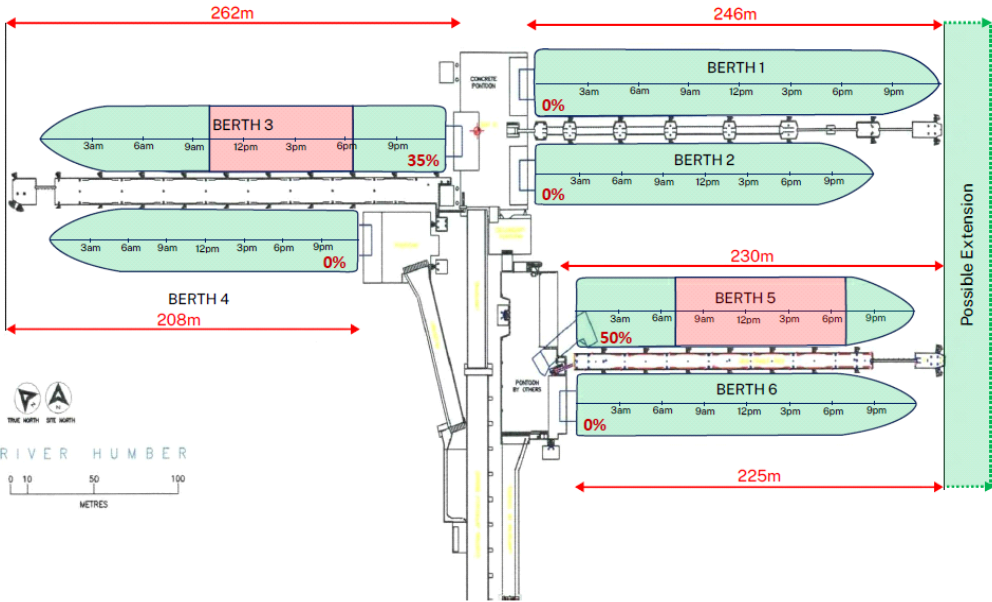
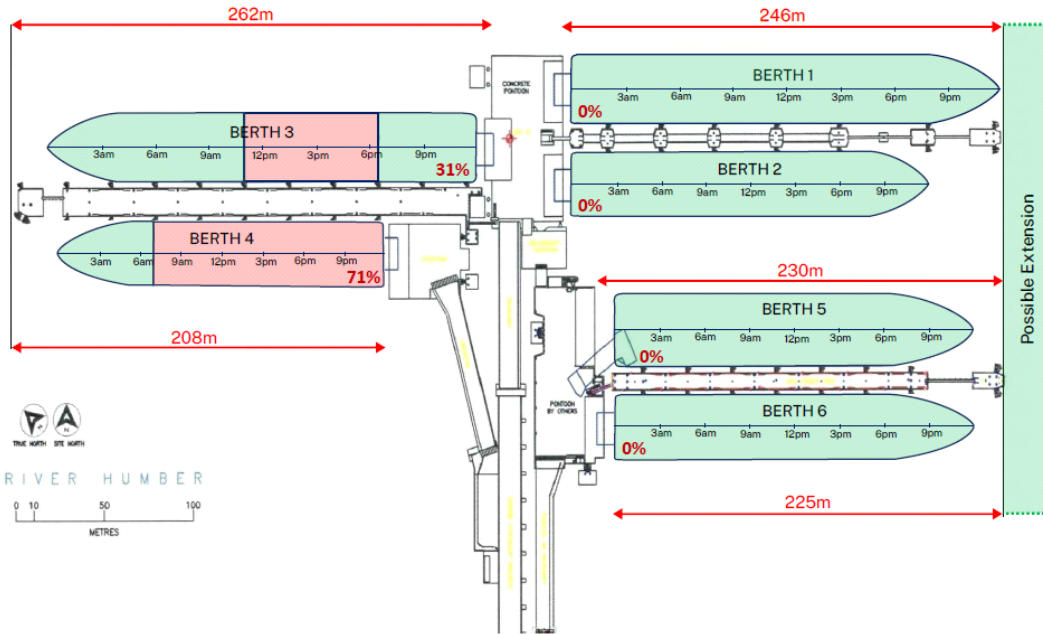


Figure 3B

Utilisation of Berthing Hours Excluding Stena Line
 (Sunday 17th September 2023)



Berth flexibility

As explained above, the existing berths at Killingholme are able to accommodate the range of RoRo vessels currently in use worldwide, including the largest vessels at 8000 lane metres, the G9s operated by CLdN.

Stena's largest vessels, on the Hoek van Holland route, are 212m LOA.

There is currently no identified need to adapt the berths at Killingholme to make adjustments for different vessel types or a mix of types given that the berths can accommodate all types of RoRo vessels. However, it is technically and in engineering terms feasible to install one or more additional piles to the end of existing berths to extend berth lengths. This would increase the length of Berths 1 and 2 from 246m to 262m, matching the existing length of Berth 3. Such works would enhance flexibility, allowing an option for which berth a G9-sized vessel uses as well as operational resilience. Berth 5 could be adapted in the same way. Works would be subject to the necessary consents – however this illustrates that existing infrastructure can be effectively adapted with minimal engineering if in future there is market demand.

PART 4: BREXIT IMPACTS

CLdN has provided observations on Stena's response to the ExA's question in section 3 of **REP3-020**. This explains that the space limitations experienced around Brexit were exceptional, and which required active management of dwell times and capacity between line customers. This was done on an equitable and fair basis – CLdN refers to its Post Hearing Submissions for ISH3, specifically in relation to Agenda Item 2(b), for details of these communications. Both Stena and CLdN recognised that the period was a challenging one for operations.

The key factor in capacity constraints during that period was not higher volumes of freight arriving: it was that cargo was dwelling too long because of other factors (delays in customs clearance, COVID and the availability of HGV drivers). Excessive dwell times on cargo meant that – if uncontrolled – it would not be possible to unload vessels because there would be no space. CLdN's active management of the terminal ensured this did not happen.

Since that time, CLdN has been able to install increased trailer capacity. One of the issues at the time of Brexit was that because the terminal was already operating at high volumes, there was not space to vacate compounds to carry out the works required. As explained in section 3 of **[REP3-020]**, at that time Killingholme had 950 trailer bays. By 2022 this had increased to nearly 1200, and will further increase to nearly 1500 by the end of 2024. Additional capacity could be brought online if required. If similar circumstances arose in future, Killingholme has enhanced resilience. However, CLdN Killingholme maintains an operational efficiency requirement for cargo not to dwell longer than 1-1.5 day on average and actively manages this.



PART 5: STENA

CLdN notes that it had, in fact, agreed commercial terms on a new deal with Stena, before the application for a Development Consent Order for the Immingham Eastern Ro-Ro Terminal was submitted by ABP, but a contract was never agreed.

To supplement this point, attached to this note at Appendix 1 is a letter to the Examining Authority from the CEO and COO of CLdN containing details of Killingholme's capacity and the offers made to Stena.



APPENDIX 1
LETTER FROM THE CEO AND COO OF CLDN



The Examining Authority
IERRT DCO Examination
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

09 October 2023

Dear Sirs

Immingham Eastern Ro-Ro Terminal (IERRT) – Application for a Development Consent Order by Associated British Ports Limited – Further Information from CLdN Ports Killingholme Limited (CLdN)

We understand that, in relation to the ongoing examination of the above application, you have asked for information about Roll-On, Roll-Off (**RoRo**) freight capacity at the Killingholme terminal and offers made by CLdN to Stena Line Limited (**Stena**).

Confirmation of existing and future RoRo freight capacity at Killingholme has been provided to the examination by CLdN at Deadline 2 **[REP2-031]** via its Written Representation and in a further note that is being submitted at Deadline 4 on 09 October 2023. We confirm on behalf of the board of directors of CLdN that the information and assessments provided to you are factually correct. The assessment in the IERRT application is incorrect: the Killingholme terminal is not operating above capacity and there is a significant amount of spare capacity (including on the berths), as well as options to increase capacity to meet future expected growth in RoRo freight.

Capacity constraints during the Brexit process were exceptional. CLdN – both at Killingholme and elsewhere – has never experienced these before and we do not foresee them happening again. They were the result of extreme pressures on the RoRo freight sector common at many RoRo ports across the UK and EU. They were exacerbated by COVID and a shortage of HGV drivers. Additional storage capacity has been brought online since and further enhancements can be enabled to meet future market demands. Killingholme has the capacity to meet reasonable forecasts.

CLdN has made two offers to Stena for its Hoek van Holland and Europoort services to remain at Killingholme. These offers were very competitive, with offered rates being significantly lower than the existing rates. The first of these offers was made in March 2022, for a period until 2045. The second was made in January 2023, in response to a request from Stena for a contract extension, and was for a period until 2050 with an option for Stena (but not CLdN) to break

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without significant penalty on short notice. Discussions progressed between the two parties following the January 2023 offer, but ultimately Stena decided not to enter into a contract with CLdN.

CLdN is always willing to discuss providing stevedoring services to any shipping line that wishes to operate its services at Killingholme. The capacity to accommodate such services exists now and into the future.

Yours faithfully



Florent Maes

CEO, Director CLdN Ports Killingholme Ltd



CLO, Director CLdN Ports Killingholme Ltd