

Lily Robbins
Case Manager
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our Ref
JZH/ADW/204604.0001
Date
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Dear Ms Robbins

DFDS submissions for Deadline 5 - 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 5 in the Immingham Eastern Ro-Ro Terminal (IERRT) DCO examination, matching the list of items requested for Deadline 5 in the Rule 8 letter.

DFDS makes the following submission with this letter:

Comments on Deadline 4 submissions with appendices and a selection of images and explanatory text regarding manoeuvres at the Immingham Outer Harbour as discussed by DFDS representatives at ISH3.

The Applicant contacted DFDS on the afternoon of Friday 20 October in relation to ISH3 Action Point 17 (agreeing scope of further simulation studies). This has not provided DFDS with sufficient time to fully consider and respond to the Applicant's proposal by Deadline 5. DFDS will consider the Applicant's proposal regarding further simulations and will respond in due course.

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 notes that the Applicant submitted a cover letter and a number of revised navigational simulation documents (AS-021 to AS-024) which were published on the Planning Inspectorate website on 5 October 2023. The cover letter states that seven runs had a disparity in current direction.

Registered Office

One Bartholomew Close
London
EC1A 7BL
DX 339401 London Wall

50/60 Station Road
Cambridge
CB1 2JH
DX 339601 Cambridge 24

The Anchorage
34 Bridge Street
Reading, RG1 2LU
DX 146420 Reading 21

Grosvenor House
Grosvenor Square
Southampton, SO15 2BE
DX 38516 Southampton 3

T [REDACTED]

W www.bdbpitmans.com

It is not at all clear what has changed, and further explanation should be provided. Were the simulations run again or have new images just been substituted? If the latter, is there any assurance that the result of the simulations remains valid? Version 2 of Part 1 of Appendix 10.2 [AS-022] (part 1 of the navigation simulation study) is 41 pages longer than the previous version [APP-090] and Version 2 of Part 2 of Appendix 10.2 [AS-023] is 42 pages shorter than the previous version [APP-091], why? Without a tracked change version and/or a more detailed explanation, with page references, of what has changed, it is unduly onerous for Interested Parties to establish what has changed.

Then, on Friday 20 October, a notification of four proposed changes was submitted by the Applicant that (main report [AS-027]) is now the subject of a consultation that ends on 19 November, with the change application to follow, which will be less than two months before the end of the examination. The fourth change is to add – optionally – further impact protection to the end of the IOT finger pier, which is different to that proposed on 28 September by the Applicant and agreed in principle with IOT Operators [AS-020].

At paragraph 2.31 of AS-027 the Applicant states that “*the Duty Holder has neither seen nor has it been presented with any information or evidence that would suggest it should alter its original position*” (i.e. the application as originally applied for), which seems an extraordinary statement given what has happened during the examination so far.

Summary of position

Given that it is roughly halfway through the examination, we thought it would be helpful to summarise what of DFDS’ concerns remain outstanding.

The project being examined

What the project now consists of is not currently clear – the Applicant promised to submit changes to the Application in a letter of 11 July [AS-012], promised further changes in a letter of 28 September [AS-020] and has now submitted a proposed change request that contains different changes. It may yet be making further highway changes (see below) and further marine infrastructure changes should it – apparently reluctantly – decide to accept the IOT Operators’ concerns. It is not clear if the project currently being examined is to survive in its current form and whether further consideration of it is fruitful. If the Applicant does not reach agreement with IOT Operators then will it continue to promote change no. 4 or will it fall back on the original application (possibly with the other proposed changes and any further highway changes), the former of which has not been examined and the latter of which DFDS and IOTT have serious concerns about.

The navigation impact of the project

Whether or not the riverside elements of the project change, the impacts on navigational safety and vessel congestion have not been properly assessed and will continue not to be if the same process is followed for any changed project. If the project does change in the area of impact protection following agreement being reached between the Applicant and IOTT or the Applicant’s change no. 4 going forwards unilaterally, then that will mean a significant amendment to the marine environment that will require all navigational data collection and assessment to be re-run, and this will take time. It is unlikely that any such analysis has already taken place given that change no. 4 appears new and an agreed

version of the changes has not yet emerged. DFDS had serious concerns with multiple aspects of the original risk assessment and simulation exercises (current direction, wind data, choice of vessel, excessive use of tugs and bow thrusters, omission of the tug barge, effect on stemming, categorisation of simulation results, paucity of Berth 3 simulations, omission of assessment of delays) that cumulatively throw serious doubts on the results of the assessment.

The highway impact of the project

Following several fruitful meetings of transport consultants once the examination had started, the Applicant's consultants now generally agree with those of DFDS and CLdN, and the implications of this are likely to be the need for improvements to at least two highway junctions. DFDS has identified a material error within the Applicants Transport Assessment regarding the PCU conversion factor, leading to incorrect results being presented. The Applicant needs to address and revise the Transport Assessment accordingly so all parties can make decisions and representatives regarding the project against accurate information. While this may or may not be acknowledged by the Applicant at Deadline 5, any changes will need to be developed or lack of change in the light of the corrected assessments justified. This is a further symptom of the Applicant initially stonewalling and then having to make corrections and/or concessions that may require the development of further mitigation later in the examination, giving less time for what will eventually become the application to be properly examined.

The governance around navigational safety

Through the Applicant's written submissions and its behaviour at the navigational hearings that formed parts of ISH2 and ISH3 (i.e. who spoke on navigational safety matters), the level of independence of those developing the project, those assuring its safety and those with ongoing responsibility for ensuring a safe environment remains worryingly limited. Given this and the navigation simulation issues, DFDS is not at all assured that the project is being developed safely and is capable of being introduced into the busy Immingham environment without either reduced safety or increased journey times with unacceptable commercial impacts. While DFDS accepts that the Harbour Master is responsible for the management of vessel movements in the Humber, the ExA needs to be satisfied that the project is at least capable of being operated safely without undue impacts on other users. The Harbour Master has belatedly suggested requiring tugs when wind speeds exceed 20 knots or tidal speeds exceed 2.5 knots, and (not explicitly) closing the berths when wind speeds exceed 30 knots, but the implications of this on other port users has not been worked through.



DFDS has expressed additional less significant concerns but the above three are the main ones.

The project remains in a state of flux, the clock is ticking on the examination and the Applicant has a long way to go to propose an acceptable project that has been properly assessed, and even if it does, it increasingly appears to be the case that there will not be sufficient time for it to be properly examined by the ExA and Interested Parties. These issues are of the Applicant's own making as interested parties including DFDS have been making these points and provided evidence to back up its concerns for well over a year and the Applicant has denied – and continues to deny – that there is anything wrong with their application and its assessment despite clear evidence to the contrary.

Yours sincerely



BDB Pitmans LLP



E AngusWALKER@bdbpitmans.com

IMMINGHAM EASTERN RO-RO TERMINAL DCO APPLICATION

PINS REFERENCE TR030007

COMMENTS ON DEADLINE 4 SUBMISSIONS BY DFDS

Introduction

1. This document consists of comments on various documents submitted at Deadline 4 (9 October 2023) for the above application. The documents commented upon are:

- a. The Applicant's ISH3 case summary [[REP4-009](#)]
- b. The Applicant's ISH4 case summary [[REP4-010](#)]
- c. The Applicant's Response to ExQ2 [[REP4-008](#)]
- d. The Applicant's Response to DFDS's Deadline 3 submissions [[REP4-012](#)]
- e. Harbour Master, Humber's Summary of Case ISH3 [[REP4-027](#)]
- f. Harbour Master, Humber's note in response to Action 2 from ISH3 [[REP4-029](#)]
- g. Harbour Master, Humber's response to ExQ2 [[REP4-033](#)]

The Applicant's summary of case for ISH3 [\[REP4-009\]](#)

2. Row 14 - As indicated in the summary, the ExA asked a question of the Dock Master (Humber) and Harbour Master (Humber), both of these being statutory duty holders. However this question, and others, were answered by Commander Paul Bristowe, who acts on behalf of the Applicant and is also the line manager to both these statutory duty holders. This reinforces DFDS's position that the lack of separation between Applicant and Harbour and Port Authority is cause for serious concern. It would appear the Applicant exerts control over all aspects of decision making on the Humber both commercial and regulatory and is effectively judge and jury on estuarial development and safety. The ExA queried whether the Dock Master (Humber) should have independent representation and DFDS supports that and that both statutory duty holders be allowed to answer questions directed toward them. Both parties are experienced Master Mariners with decades of experience on the Humber and should be able to act in an independent and robust manner when questioned as part of this process.
3. Row 17- Question 1 – As described within Appendix 1 of [REP4-025](#), DFDS remain in disagreement with respect to application of the principle of ALARP to a navigation risk assessment – being related to the clear distinction between (a) risks that are within the port's current level of risk acceptability through its baseline embedded risk controls without requiring any additional risk controls, and (b) risks that will require additional risk controls over and above the baseline embedded controls in order to be acceptable. The obscure reference to driving a car is, in DFDS's opinion, completely obsolete. Seatbelts, as a legal obligation and therefore would not be an additional risk control. This example of how they have incorrectly applied the principle of ALARP reinforces one of the key concerns that DFDS has in relation to the Applicant's NRA – that it fails to adequately assess risks and provide a robust risk assessment process. As highlighted throughout DFDS's Appendix 1 of [REP4-025](#), the Applicant has repeatedly shown a lack of understanding of the foundations of a robust, stakeholder-led (and consensus-backed), qualitative navigational risk assessment, as required by the PMSC.
4. Question 2 – DFDS have addressed this question in Appendix 1 of [REP4-025](#) and consider that the discussion around risk controls as a means of achieving ALARP is one that involves local stakeholders. DFDS maintain that the Applicant's failure to involve stakeholders in their determination of tolerability to establish an "appropriate standard of acceptability", as required by the PMSC, is aggravated by tolerability not being shown or explained to stakeholders during the HAZID Workshops.
5. Question 3 – DFDS have addressed this question in Appendix 1 of [REP4-025](#) and do not wish to reiterate the various objections to the Applicant's response here. DFDS would refer the ExA to Appendix 1 of [REP4-025](#) for a more comprehensive coverage of this question and the differences between the Applicant's and DFDS NRAs.
6. DFDS does; however, make note of the Applicant's statement that '*...one cannot and should not try to equate an event such as an oil spill to the risk of injury or death*' when equating these is ultimately an unavoidable eventuality when defining tolerability. Furthermore, similar to the example used in the

Applicant's response to Question 1, the Applicant has used an overly simplified "example" of the risk of a pilot drowning while boarding. This is not an example of a hazard but is instead a consequence of a hazard (to the People receptor) which does not provide any context to any relevant example hazard that would, invariably, have an impact to the other receptor groups (Property, Environment and Port business). Considering this consequence in isolation, this would automatically cause the scoring to fall into the "tolerable if ALARP" region which would then require additional risk controls before it could be considered tolerable – it would not simply be "hidden".

7. Question 4 – DFDS agrees with the Applicant's statement that '*Risk is best assessed in a way which can be easily understood.*' However, DFDS disagree that the Applicant's approach and methodology has allowed risks to be easily understood by the stakeholders, nor how these risks were considered in the context of what is acceptable or not by the Applicant. DFDS contends the Applicant's loose likelihood descriptors, without any indication on the frequency of occurrence of an event (that is, how regular it can be expected to occur), do not make the assessment of likelihood "easily understood" but instead highly subjective and confusing. The Applicant in [REP4-008](#), NS 2.37, also indicates the likelihood descriptors used can equally apply to other durations; however, this is not the interpretation of the stakeholders which only serves to make the risk assessment more difficult to understand and impossible to obtain an objective consensus. Probability-based return periods for event likelihoods are standard practice for NRAs and the Applicant appears to underestimate stakeholders' ability to understand what a once a year, 10 year, 100 year, 1000 year event is (especially given that storm events are regularly categorised by return periods such as these). DFDS also reiterate that their continued safety concerns, together with other stakeholders' safety concerns, had not previously been taken into consideration by the Applicant. DFDS therefore disagree with the suggestion that the Applicant's stakeholder consultation process was undertaken effectively.
8. Row 19 - It is DFDS's contention that the use of simulations from a previous study of an entirely different terminal design is not acceptable. For example, the orientation of the berths and number of berths had changed since those 2021 simulations were carried out by the time the application was made (and the proposals are changing again). The Applicant's reliance on these indicates the Applicant's simulation process has been inadequate. Furthermore, the Applicant's 2021 simulations were conducted without the involvement of any other stakeholders. DFDS has made numerous requests for the Applicant to address this issue and conduct adequate simulations of manoeuvres on and off berth 3 using the proposed design of the terminal.
9. Without prejudice to that view, DFDS notes that the Applicant stated at ISH3 that it '*has this data and will submit this data in due course*', it does not appear that the Applicant has yet submitted this data to the Examination. DFDS notes in the Applicant's response to ISH3 Action point 16 (page 39-42 of REP4-009) the Applicant states: '*The navigation simulations conducted as a feasibility assessment for the 4-berth scheme (which also had a significantly different orientation) have no bearing on this DCO application, the Navigational Risk Assessment or the final design to be considered. These simulations were undertaken as part of a feasibility study, and informed the Applicant that a berth orientated Northwest to Southeast (~330°) was not operationally feasible due to the direction of the tidal stream making the berth more challenging than it needed to be and provided additional challenges.*' Can the Applicant please

clarify if the reference to simulations undertaken as part of a feasibility study is reference to the 2021 Simulations discussed by HR Wallingford's witness at ISH3, and whether or not the Applicant intends to submit this data to the Examination as indicated at ISH3?

10. Row 20 - The Applicant has suggested that tide data on Admiralty Nautical Charts, and by extension ABP charts, publications and guidance will change due to the data gathered by the AWAC buoy deployed as part of the design process. DFDS would like to know what data has been gathered north of IOT as this is the location of the tidal diamond to which DFDS referred in their written submissions and highlighted in answer to ExA questions. Is the Applicant suggesting that, without data north of IOT, it intends to advise the Admiralty to change the published data for such? DFDS also requests that the Harbour Master, Humber (HMH) provide information regarding what changes he proposes to The Pilot Handbook, Notices to PECS and Pilots, Notices to Mariners and Standing Notices To Mariners to reflect these changes that the Applicant's simulation experts have identified.
11. Row 22 - DFDS notes from the Applicant's letter of 20 October 2023 regarding ISH Action 17, the Applicant is now proposing to undertake further simulations in relation to Berth 3 at the session on 7 and 8 November which DFDS welcomes. DFDS reserves the right to comment on the outcome of these simulations once the simulation report is provided.
12. Row 23 - Whilst DFDS agree that the manoeuvres for both IOH and the proposed terminal are challenging, it is the outcome when the challenge proves too great that is of concern to DFDS. As Captain Mykola, on behalf of DFDS, explained at the ISH3 hearing vessels manoeuvring for IOH have multiple options when aborting a manoeuvre for the Outer Harbour due to the space to the north of the entrance to IOH and the final manoeuvre being considerably simpler given the still water conditions of the IOH. To state that the manoeuvres for both terminals is comparable again underlines the Applicant's lack of understanding of the risks inherent to the Proposed Development and is the reason why the Applicant is now being forced to make changes to its proposal to mitigate these risks.
13. Row 24 - The Applicant answered a question directed to the statutory duty holder (the Dock Master) and once again failed to answer it. DFDS have repeatedly asked what limits the relevant parties are proposing. Given that the Applicant has repeatedly stated that the simulations were designed to 'establish the limits' they have yet to inform Interested Parties or the ExA what these limits would be.
14. Row 31 – DFDS will consider the newly-proposed mitigation for the IOT finger pier, assuming it does not change further, by the deadline of 19 November, and hopes that the change request indicates the new design, the engineering timeline, the intended simulation process and revised NRA. DFDS note that according to Action 13 from ISH3 [\[EV6-011\]](#), the Applicant was expected to submit indicative scaled drawings for the proposed impact protection measures and alterations to the IOT Finger Pier at Deadline 4, however, these have only just been provided (20 October) and DFDS has not had time to consider them.

15. Row 34 - see our comments above in relation to row 19.
16. Row 35 – DFDS note this is linked to Action 17 of ISH3, the Applicant contacted DFDS on the afternoon of Friday 20 October to note its proposed further simulations to take place in early November and provided its suggested list of what further simulations it would carry out. DFDS will consider the Applicant's proposal and will respond in due course.
17. Row 36 – The Applicant's expert appears to contradict himself here. First stating that the simulations do not inform the Applicant and statutory authorities as to the limits for the Proposed Development but then asserting that the simulations will '*provide indicative limits*'. DFDS again request clarity on this matter and detail on what the indicative limits are.
18. Rows 42 and 43 - DFDS draw attention to the fact that Mr McCartain, an ABP Board Director, is currently acting as the Designated Person which undermines his answer regarding the independence of this role.
19. Row 45 – As indicated the person responsible for '*...driving forward the IERRT project*' is the Regional Director, Simon Bird. Mr Bird is the direct manager of Commander Paul Bristowe who in turn is line manager for both the Harbour Master (Humber) and Dock Master (Humber) once again underlining the lack of independent oversight in this Project. DFDS struggle to see how commercial interests can be kept separate from decisions by the statutory duty holders in light of this governance structure.
20. Row 49 – It is DFDS's view that if the governance structure was genuinely independent and robust, the Designated Person should have been invited to the HAZID meetings to allow him, in his independent role, to decide whether or not to attend. DFDS believe that only by attending such meetings could the Designated Person (who at the time was not an expert on the Humber) fully appreciate the issues and concerns of the Interest Parties with the Proposed Development, so as to make an informed decision. Indeed, it is unclear what knowledge the Designated Person had of the Proposed Development and what, if any, information he had been provided with during the course the Applicant preparing its designs and application, other than the fact he is listed as attending remotely by Teams the final HASB Board meeting on 12 December 2022. To rely only on information provided by the Applicant's consultants undermines the concept of independent oversight.
21. Row 50 – based on the minutes of the HASB meeting of 12 December 2022 (Appendix 4 of REP4-009) DFDS are concerned that the representation made by the Project Sponsor, Port Director Humber Mr Simon Bird was misleading as it clearly is not representative of the experience and opinion of key stakeholders. It appears the HASB were satisfied with the Proposed Development without the inclusion of impact protection measures now being discussed by the Applicant and APT. It would also appear the Harbour Master (Humber) was also satisfied the impact protection was not required. DFDS would therefore like to know why impact protection measures are only now, in this late point in the process, being considered by the Applicant and have concerns

that there is insufficient time to conduct these complex discussions in a manner appropriate to such a critical piece of risk mitigation. The fact that stakeholders had expressed grave reservations with the proposals does not appear to have been conveyed to the HASB, undermining the validity of its decision-making.

22. Row 52 - DFDS have reviewed the technical note produced by the Applicant's transport consultant and have noted errors in the calculations provided within the technical note. A list of errors found was provided to the Applicant's transport consultants on 17 October 2023; DFDS await a response.
23. Row 53 - The Applicant has stated that average volume would be 25% lower than the peak volume. This is inconsistent with previous statements from the Applicant which indicated that peak volumes are 125% higher than the average or the average is 20% lower than the peak (the use of a 125% peaking factor is repeatedly noted throughout several of the Applicants submissions, one such reference is Item 53 of REP4-009). We expect that the 25% figure is in error and rather, the Applicant meant to state 20%. Can the Applicant please clarify.
24. Row 59 – Refer to our response to TT.2.03 and TT.2.06 in Item 50 of this document.
25. Row 60 - This statement is counter to the Applicant's response to ExQ2 TT.2.03 in REP4-008, in which the Applicant identify that as way finding is not secured under the DCO, its benefits should not be assessed. We agree with the approach that the benefits of modifications to way finding (apart from the sign at the exit of the terminal) should not be considered in respect of the assessment of the East versus West Gate assignment.
26. Appendix 1 – DFDS notes in Figure 1 the Applicant has indicated the distance from the bow of a Ro-Ro vessel to a jetty is 130metres, it appears to be making a comparison to different infrastructure than from that noted by both CLdN, the owner of that Port and DFDS. CLdN note in REP4-020 '*the petrochemical jetty at Thurrock and the CLdN Ro-Ro facility at Purfleet is 1.32km*', DFDS notes in REP4-023 '*the largest Port in UK is London. 7Mt pa of Ro-Ro cargo is handled at terminals in Port of Tilbury and CLDN's dedicated Ro-Ro operation at Purfleet. London handles c13Mt pa of Liquid Bulk traffic at a number of facilities. These operations are located at least 1000 metres from the closest Ro-Ro terminals.*'
27. Appendix 2 – Please refer to our response on BGC.2.08 in Item **Error! Reference source not found.** of this document.
28. Appendix 5 – DFDS is surprised to note that in the papers presented to the HASB on 12 December 2022, in Appendix B, the 'people tolerability matrix' indicates the risk of multiple fatalities at both 'rare' and 'unlikely' likelihoods is considered a tolerable risk. It is hard to understand how such can be considered a tolerable risk.
29. Appendix 6 - Please refer to our response to TT.2.01 in Item **Error! Reference source not found.** of this document.

The Applicant's summary of case for ISH4 [\[REP4-010\]](#)

30. Generally, a large number of things has been promised by the Applicant at D5 (under paragraphs 5, 6, 8, 10, 12, 17, 19, 21, 22, 24, 26, 27, 28 and 29); it is hoped that these will be provided (and be clearly marked as to which paragraphs they correspond to) so that they can be considered and responded to as soon as possible.
31. Paragraph 6 – Article 22 – The statement that the berth would not be for the exclusive use of Stena underlines the need for navigational simulations to use a wider range of vessels that are contemplated as using the new facility as well as Stena's vessels (and even those have not been simulated).
32. Paragraph 11- Article 21 –DFDS maintains its view there should be a daily limit or modifications are required to the annual throughput stated in the DCO, or the daily peak flow stated within the Transport Assessment (refer Item 23 of REP3-020).
33. Paragraph 29 – Schedule 2, Requirements 18- DFDS support the ExA's suggestion that the appropriate authorising body to approve the design of the Impact Protection Measures in Requirement 18 is the Secretary of State for Transport.
34. [Paragraph 29 – Schedule 2, Requirements 18- the Applicant claims that impact protection measures only needs to be in place at the time operations commence rather than before construction starts. DFDS's view is that such protections should be in place before construction commences.]

The Applicant's Response to ExQ2 [\[REP4-008\]](#)

36. BGC.2.02 - DFDS maintains its view that the Proposed Development does not comply with paragraph 3.3.3 of the Ports NPS on the basis that the proposed infrastructure is not well designed in light of the safety risks it poses and likely implications on the commercial operations at the Port of Immingham.
37. BGC.2.08 - DFDS note that the Applicant has presented the ratio of accompanied versus unaccompanied and LoLo freight as a function of weight, however the data has been presented in terms of 'traffic'. Traffic is usually represented as unit as the weight and size per container or trailer can vary between one import and the next. It would be better for the Applicant to refer to the percentage of units rather than weight. This would show a 20% distribution of RoRo units are accompanied and it would appear that the 2021 is reporting similar levels to pre pandemic periods. DFDS' position on accompanied versus unaccompanied is currently being agreed with the Applicant with outcomes being recorded within the Transport Statement of Common Ground (SoCG).
38. NS.2.05 – DFDS refutes the Applicant's assertions that:
- a. *'in producing purported alternative NRAs which have not been made subject to the requisite engagement with the relevant bodies, the IPs are pursuing their own commercial agenda.'* - DFDS commissioned the production of an NRA [\[REP2-043\]](#) to highlight the safety concerns and flaws in the Applicant's approach to its NRA.
 - b. *'Those NRAs have not been the subject of consultation which of itself necessarily reduces any chance of achieving consensus. In many respects they largely follow the same format as the Applicant's own NRA – save for the insertion of individual judgements by these other commercial stakeholders in relation to tolerability which rather predictably support the stakeholders' own commercial objectives but – without any consideration given to the views of the SHA which actually has the statutory duty safely to manage the Port.'* - Please see paragraph 28 of [REP4-024](#), which responds to the Applicant's criticism.
39. NS.2.07 - The Applicant states *'The fact remains that the DFDS operations at the Immingham Outer Harbour and the Ro-Ro operations into and out of the lock all present their own challenges, none of which are fundamentally different in nature to those for the Proposed Development and which simply require safe operating procedures to be adopted.'* DFDS has set out in paragraph 3.6 of [REP4-025](#) why it considers the Proposed Development and IOH are fundamentally different.
40. NS.2.08 *'The ExA will be aware that at ISH3 the Applicant has asked the operators of the Outer Harbour RoRo berths to produce any recent navigational simulations undertaken in relation to vessel access and departure from the Inner Dock.'* DFDS is not aware of this and it is not listed as a hearing action. At ISH3 DFDS provided verbal explanation of live tracks of some of DFDS' vessels manoeuvring onto and off the IOH berths and agreed to submit these

to the Examination. These have been provided as part of DFDS's Deadline 5 submissions. These live tracks were for manoeuvres into and out of the IOH, not the Inner Dock.

41. NS.2.29 – The Applicant's response fails to answer what happens if a tug is unexpectedly delayed. Such delays are commonplace when tug assisted manoeuvres for other vessels take longer than anticipated or when tugs are delayed leaving the inner docks. This then requires the vessel to wait within the river until the tug becomes available. This is generally not a problem for Ro-Ro vessels bound for IOH or HST given the room surrounding the terminals, but this is not the case at the Proposed Development.
42. NS.2.35 - DFDS remain unconvinced by the tide as indicated north of the IOT in the simulations and remain of the opinion this is an important element of any manoeuvre to terminals within the Immingham area. It is noted that in the Applicant's response it states: '*HR Wallingford have every confidence in the validity of the flows between the end of the IOT pier and the bell mouth.*' This appears contrary to what was said by the HR Wallingford expert, Mr Parr at ISH2, as noted in paragraph 126 of DFDS's Written Representation [\[REP2-040\]](#). At ISH2, Mr Parr explicitly notes the tidal flow shown in the simulation for north of the IOT do not represent flows as Pilots experience them (see the hearing recording [EV3-008](#) circa 29:30 minutes into the recording and from row 428 of the hearing transcript [EV3-009](#)).
43. NS.2.36 - DFDS are disappointed that once again the Applicant refers to DFDS' genuine safety concerns as '*commercial objections*' and DFDS refutes this allegation. It is demonstrable of the Applicant's dismissive approach to safety concerns raised regarding the Proposed Development and the Applicant's unwillingness to engage with Interest Parties regarding their concerns. As noted in paragraph 4 above, DFDS consider the use of simulations conducted to a completely different design of terminal should not be relied upon by the Applicant in regard to manoeuvres to and from Berth 3. The Applicant references the DFDS NRA [\[REP2-043\]](#) with regard to risk of the Eastern Jetty; however, the Applicant does not recognise the requirements for effective and comprehensive mitigation measures surpassing what the Applicant has assumed necessary in their own NRA [\[APP-089\]](#). The appropriate level of mitigation (and restrictions) requires a comprehensive understanding of that actual risk through simulations of the actual Berth 3 which present the highest risk to the Eastern Jetty.
44. NS.2.37 - DFDS have also addressed this question in Appendix 1 of [REP4-025](#). DFDS recognise there are no prescriptive requirements in relation to the risk descriptors and this is because risk assessment methodologies are designed to be flexible and adaptable to the specific circumstance of its application. In relation to a qualitative navigation risk assessment, specifically, the PMSC, there is an onus on the risk assessment to use appropriate risk descriptors that give stakeholders an aligned perspective on likelihood, consequence (and therefore the risk) and to provide clarity on the relationship between risk and tolerability. Without this, a clear objective stakeholder consensus cannot be reached. The Applicant fails to recognise this as a fundamental component of

a qualitative risk assessment and their use of likelihood descriptors are purely subjective without any indication of how frequent the events may be expected to occur, other than within a 50 year period – the lifetime of the terminal.

45. The Applicant states that the risk assessment and management of risks is an iterative process; however, changes to the fundamental components that define the risk (the likelihood or consequence) results in changes to the level of risk. There is a distinct difference between the risk assessment being iterative and the risk assessment being a live working document. The latter requires consistency in risk descriptors to allow understanding of the evolution of risk which can be benchmarked against a stable system of comparison – being the port's baseline NRA. As it stands, the Applicant's NRA [APP-089] does not facilitate consensus, nor does it allow integration into the baseline NRA, and changes to the risk descriptors during any future iterations ultimately defeats the purpose of attempting to reach a consensus in the first place.
46. The Applicant states that *'the fact that the NRA [APP-089] does not specifically define that the risks are only assessed up to 50 years but instead the frequency is described as the potential for a risk to occur.'* DFDS rejects the assertion that by not including definitions around the duration therefore means they are applicable to all durations. Principally, the only reference to a duration in the Applicant's loose likelihood terminology (termed "word pictures" at ISH3) are in relation to 50 years, and stakeholders are inherently using this as a frame of reference when discussing perceived risk. If stakeholders were asked to recalibrate their scores for a duration that was 50% longer, or 100% longer, they may determine that the likelihood could be higher as the hazard could occur more regularly in the given duration, and time of exposure is longer.
47. DFDS consider the Applicant's response gives the impression of one that endorses redefining the goalposts which undermines the entire stakeholder consultation process and defeats the primary purpose of the HAZID workshop – which is to facilitate group consensus on risk. This is yet another example of the broader critical issue that stakeholders views are not being adequately considered and continue to be disregarded.
48. NS.2.38 – DFDS and the ExA have not been provided with any evidence or modelling to substantiate the Applicant's assertion that the Proposed Development will not lead to additional congestion. The Applicant failed to hold the planned Commercial Workshop and Senior Safety Managers meeting, which it offered to DFDS at the request of its CEO and in which DFDS planned to address these issues. DFDS requests the data and modelling to substantiate the Applicant's claims regarding congestion is submitted to the Examination.
49. NS.2.39 – DFDS requests the HMH share the data and modelling on which he relies to substantiate his position that the Proposed Development will not lead to additional congestion and requests guarantees that it will not impact on either its inner dock or outer harbour operations.
50. TT.2.01 - DFDS note the updated table. The Applicant has not stated if this data, or any of the other transport data submitted during Deadline 4, is inclusive of the revised PCU conversion factor and therefore the results presented may still be inaccurate. It is DFDS' position that, for clarity, the Applicant produces

a revised Transport Assessment that presents all calculations and assessment with the revised PCU conversion factor applied and corrects the other errors that DFDS' transport consultants have noted.

51. TT.2.02 - A review of committed development and background assumptions adopted in the Transport Assessment ([AS-008](#)) has been undertaken between the Applicant and Interested Parties, and outcomes have been recorded within the Transport SoCG. The appropriate inclusion of the Able Marine Energy Park is currently under review by the Interested Parties following provision of additional information from the Applicant.
52. TT.2.03 and TT.2.06 - The Applicant has stated that inclusion of amendments to the strategic road network signage (i.e. on the A180) will not form part of the Application and that the benefits of such should not be assessed. DFDS' view therefore remains that behavioural aspects of drivers (i.e. preference for the A160 due to existing behaviours for entering the Killingholme port facilities for volumes which will be transferred, as well as existing road signage leading drivers to the West Gate on the A160 and presence of logistics facilities in the local area) as stated in paragraph 4.8 (including all sub paragraphs) of [REP4-024](#) will lead to higher volumes of drivers using the West Gate for access. In the development of the Transport Statement of Common Ground, the Applicant has agreed to run analysis considerate of higher volumes to the West Gate, however the ratio has yet to be confirmed. It is DFDS' view that an easier approach would be for the Applicant to review the capacity of the network in its current configuration, as well as within a configuration considerate of any mitigations proposed, and identify the level of traffic assigned to the West Gate that would result in congestion of junctions and the gatehouse. Outcomes of this assessment can then be compared against various views of East and West gate assignment, combined with variations in other design parameters to determine if further discussions and analysis through the next meeting of the Transport Working Group (and identifications of mitigations if necessary) are required.
53. TT.2.05 - The Applicant has agreed to assess the impact of a higher volume of tractor only units in combination with other amendments to the Transport Assessment input parameters. CLdN has advised that they are able to provide an assessment of Stena's current tractor only ratio at Killingholme which indicates a value of nearing 40%. DFDS reserves the right to comment on this matter until after the provision of revised assessment completed by the Applicant with consideration of CLdN's gatehouse data.
54. TT.2.10 - As ANPR is not secured as part of the DCO, the benefits (in terms of processing time of staff vehicles) should not be considered within the gatehouse capacity assessment.
55. Appendix 5 - Tug operator SMS Towage state '*We are also seeking a level playing field to allow usage of the eastern berths at Immingham on the outside. This would be for 4 tugs and save enormous amounts of crew working time and fuel burn by not having to lock in and out to tow ships.*' Can the Applicant explain how SMS Towage intend to berth 4 tugs on the east jetty tug barge? Is the barge to be extended to allow for greater tug capacity so that

4 Svitzer and 4 SMS tugs can berth at this facility? If so, why has this not formed part of the Applicant's assessment both for risk and in terms of simulation?

The Applicant's comments on DFDS's Deadline 3 submissions [\[REP4-012\]](#)

56. Item 2.5 - Please refer to our response to TT.2.01 in paragraph **Error! Reference source not found.** of this document.
57. Item 2.6 - DFDS agree with the majority of this statement, however would clarify that the unaccompanied / accompanied freight unit split variations have limited (rather than no) material impact. This clarification is necessary as the small influence the unaccompanied / accompanied split ratio has could be influential when considered alongside other variations in design parameters (i.e. East versus West Gate assignment, and tractor only numbers).

Harbour Master, Humber's Summary of Case ISH3 [REP4-027]

58. Paragraph 11 - DFDS acknowledge that a wind speed of 20 knots cannot be described as 'benign' and withdraw that assertion. It does not however, explain how a senior pilot with considerable experience in the area found himself in a position in which his vessel almost struck a mooring buoy, nor has it addressed how such issues will be prevented in the future when the Proposed Development lies in this position. It is clear the pilot, master and bridge team never intended to find themselves in this position so what measures will be introduced to prevent such an incident occurring again in the future?
59. Paragraph 14- *'HMH explained that he considered that 20knots or 25knots of wind and 3 or 2.5 knots of tide would be a working hypothesis on current knowledge for when tugs might be required. He explained that, in practice, it would start with daylight, slack water and would make sure that any assumptions are correct in a cautious manner.'* The HMH is proposing that the Proposed Development starts life with an operating window of *'...daylight, slack water...'* can the Applicant confirm this is the intended initial limits for the terminal? How long these limits will be in place for, and that the Applicant and Stena are content with these operational limits given the scheduled liner service they intend to operate from these berths?
60. Paragraph 15 – *'HMH confirmed that he was content with the potential amendments to the DCO to include impact protection measures for IOT and its finger pier. He noted that the value of them had been noted in the NRA. HMH confirmed that his position should be protected on the detailed design through the protective provisions.'* Can the HMH clarify if he has requested the impact protection? Since he is 'content' with their inclusion and notes their 'value' would he reconsider his position should the Applicant and IOT operators fail to agree upon a design for such protection, which is currently the situation?

Harbour Master, Humber's note in response to Action 2 from ISH3 [REP4-029]

61. In all the diagrams the vessel in the lock is inbound, could the HMH indicate where vessels are to wait when the vessel in the lock is outbound? This is circumstance where DFDS believe the congestion and conflict issues could arise Could the HMH also indicate how the east and west jetty stemming areas are used when vessels are manoeuvring for the IOH and IERRT simultaneously as this is a likely scenario given the similar scheduled liner services DFDS and Stena operate?

Harbour Master, Humber's response to ExQ2 [\[REP4-033\]](#)

62. NS.2.29 – *'For the avoidance of doubt, the tug requirements set as a result of the work to establish operating parameters for the IERRT would not be relaxed if tugs are unavailable for some reason.'* DFDS notes the HMH's response and is pleased to see this would be the case.
63. NS.2.34 and NS.2.35 - The HMH has previously indicated that the tidal data north of IOT in the simulations is not as HES would have expected, see paragraph 26 of [REP2-054](#), paragraphs 3.7-3.9 of [REP2-061](#) and paragraph 4.6 of [REP3-024](#). It would now appear that both have changed their opinions on this matter. DFDS believe we can no longer continue without absolute clarity on this point and certainty on where the Applicant, HMH and the Port Authority stand in terms of the tidal flow in the Immingham area. The submissions by the Applicant and their representatives [\[REP4-008\]](#) indicates they believe the tidal flows they have included in the simulations are correct and thus at odds with the practical experience of mariners, numerous published datasets and a myriad of published guidance documents, in many cases by these self-same institutions and duty holders, over the last 50 years or more and that the published tidal data 'may' have to change to reflect the new data acquired as part of this Application.
64. DFDS's position has been clear, consistent, and unequivocal on this point throughout the process. DFDS have never claimed to know the tidal flow in the exact position of the Proposed Development, DFDS does however have decades of experience of the tide north of the IOT, in the Immingham Bellmouth area and through our consultants' years of experience of tidal flows at the IOT finger pier and eastern jetty. This real-world experience has always correlated with the decades of published guidance by the Port Authority in pilot training documentation, notices to mariners, PECS and Pilots and published charts (by the both the Admiralty and HES). All of this data and the decades of real-world experience of literally hundreds of mariners has confirmed that in the Immingham Area the tide runs roughly 135°/315°. This has been confirmed by, but not limited to, the following published documentation:
- Admiralty Chart 3497 [\[AS-025\]](#)
 - Humber Estuary Services Annual Survey Chart (see Appendix 1)
 - Humber Estuary Services Pilot Handbook 2017
 - Page 107 'Arrival IOT' (see Appendix 2)
 - Page 115 'Arrival to IOT 6 & 8' (see Appendix 2)
 - Page 118 Image of tidal flow in Immingham Area (see Appendix 2)
 - Page 135 'Arrival East Jetty' (see Appendix 2)
 - Page 138 'Arrival West Jetty' (see Appendix 2)
 - Page 141 Image of tidal flow in Immingham Area (see [REP2-038](#))
 - Page 147 'TIDE at IBT' (see Appendix 2)

- Humber General Notice to Pilots & PECS
 - Pilots 16/2008, PECs 12/2008 (see Appendix 3)
 - Pilots 06/2015, PECs 05/2015 (see Appendix 3)

65. We would also draw the ExA's attention to the 'Fast Ann' incident 19 January 2010 (the MAIB's summary is provided on e-page 75 of **REP4-023**). In this incident a vessel which had been beached at New Holland Breakers yard for decommissioning parted her moorings on the ebb tide in dense fog. She was carried downriver by the tide and despite the best efforts of local tugs eventually had an allision with the IOT trunk way in the vicinity of the barge passage. Her path clearly shows that the tide has taken her in a direction roughly consistent with the previously accepted 135° direction of tidal flow, see Figures 1 and 2 below.
66. Figure 3 below shows an image taken from the radar of a DFDS vessel bound for IOH in August 2022 passing IOT 1 in dense fog (and therefore no wind), which clearly shows the vessels heading of 262° (solid white line) and a course over the ground (dotted white arrow) of 285° which can only be caused by the impact of the flood tide acting in a direction greater than 292° (line of IOT).
67. NS 2.40 – The HMM states '*The 2003 figures can be compared with the equivalent movements in 2022 and 2023 to date...*'; however, does not reference the point previously identified in Applicant's NRA (section 5.4.8 of APP-089) and the DFD NRA (section 3.4 REP2-043) that although vessel numbers have reduced, the tonnage throughput has not, indicating the vessel sizes have increased. The vessel numbers of the scenario of 20 years ago cannot therefore be simply related to confirm the commercial capacity of a future scenario.

Figure 1- Indicative illustration of the movements of the Fast Ann on 19 January 2010

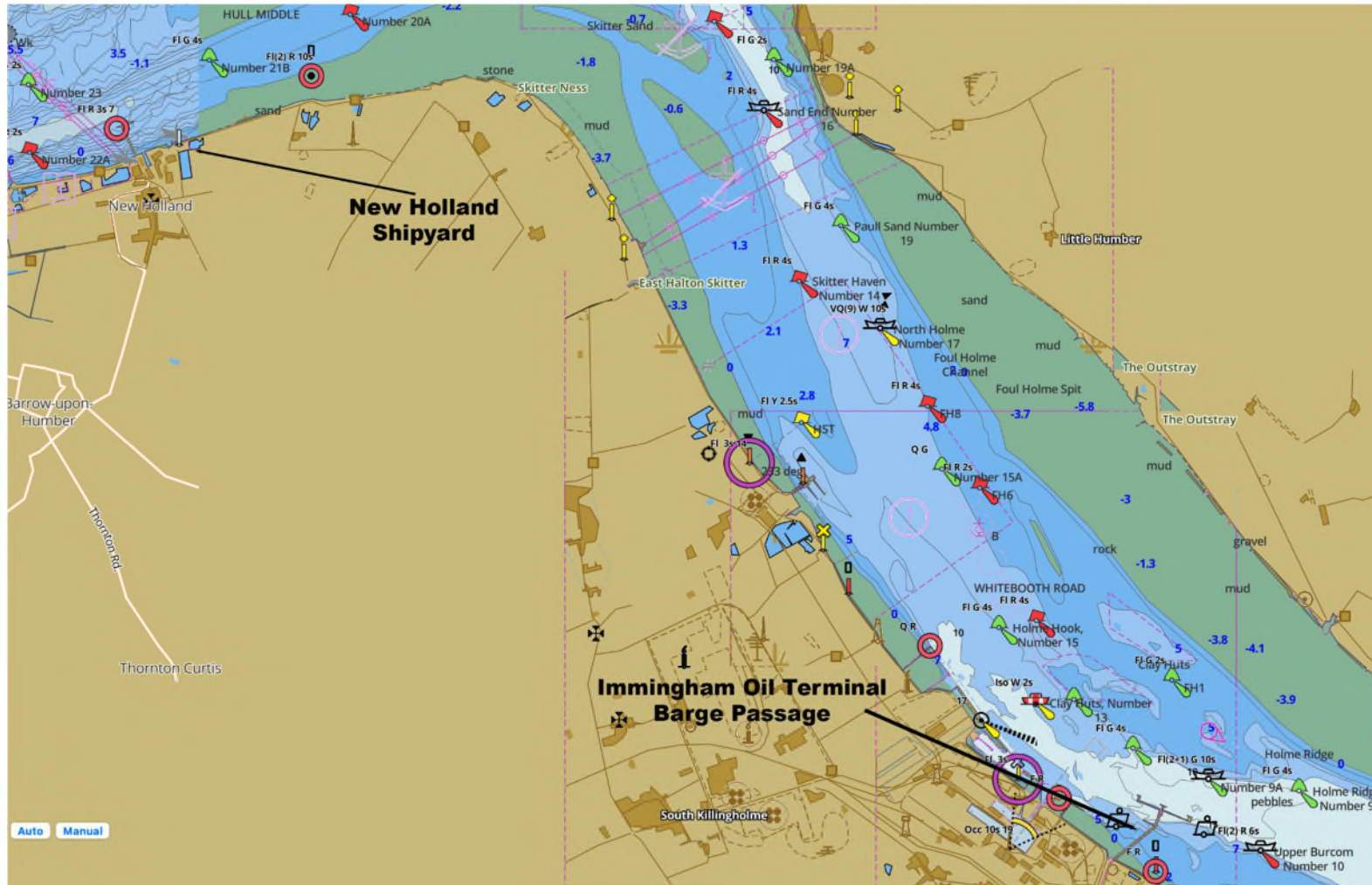


Figure 2- Indicative illustration of the movements of the Fast Ann on 19 January 2010

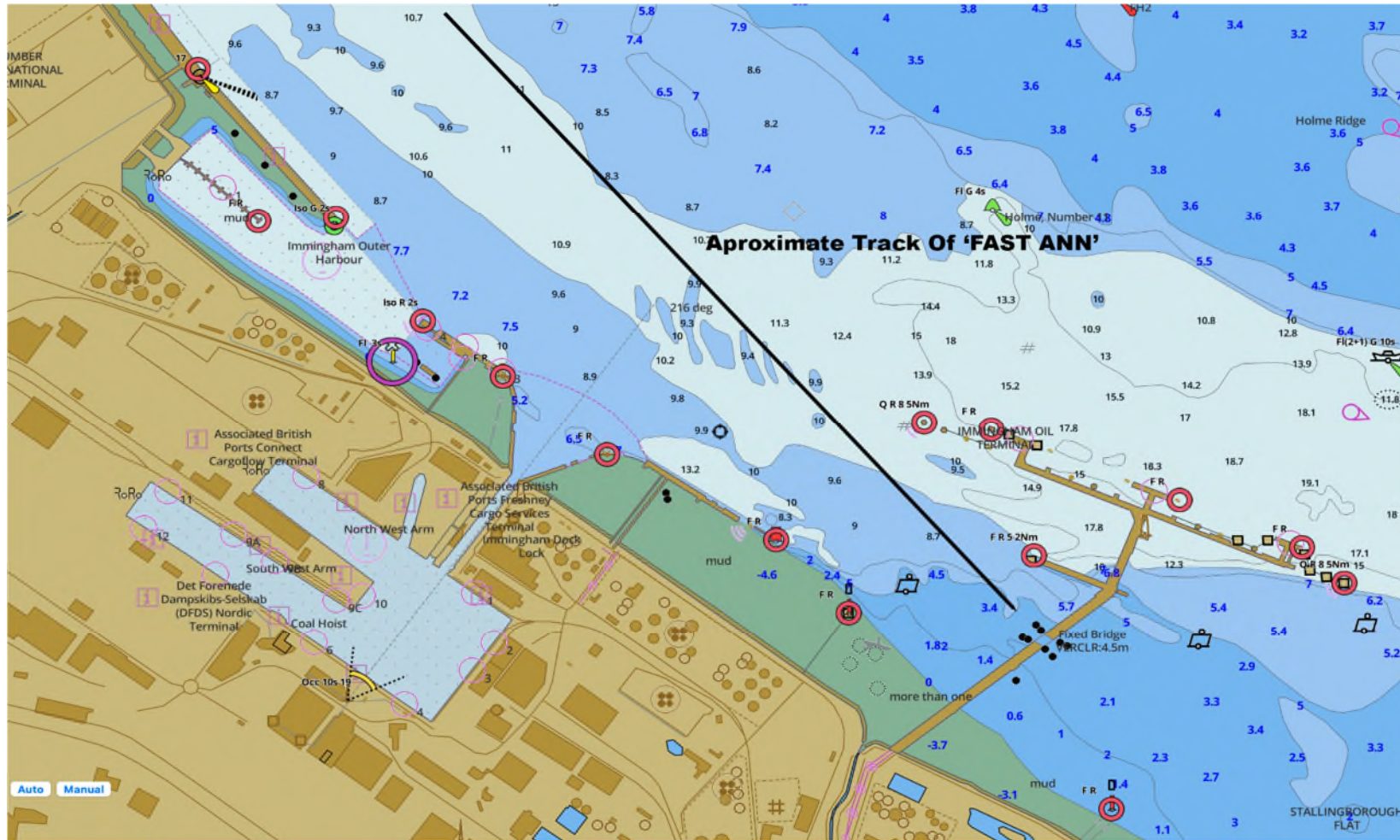
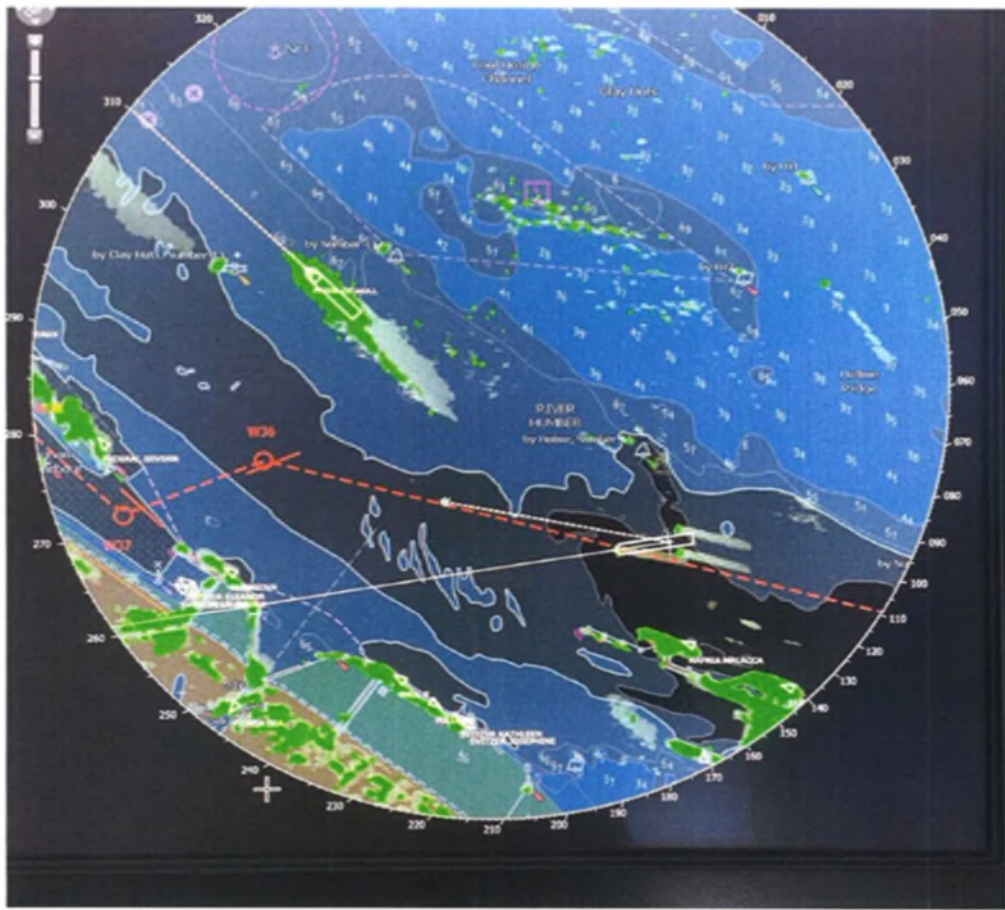


Figure 3 – Radar image from DFDS vessel bound for IOH in August 2022 passing IOT 1 in dense fog.



DFDS Comments on Deadline 4 Submissions

Appendix 1



COURTAULDS CHIMNEYS

RIVER HUMBER

SPURN to BARTON HAVEN

ASSOCIATED BRITISH PORTS
2019

DEPTHS IN METRES

SCALE 1 : 25 000

Depths are in metres and decimetres reduced to the Chart Datum given below
Underlined figures are drying heights in metres and decimetres above Chart Datum
Overhead clearance heights are above Highest Astronomical Tide

TIDAL LEVELS AND CHART DATUM

PLACE	Heights in metres above Chart Datum					Chart Datum and remarks
	H.A.T	M.H.W.S.	M.H.W.N.	M.L.W.N.	M.L.W.S.	
SPURN HEAD	7.7	6.9	5.5	2.7	1.2	3.9 m below O.D. (Newlyn)
GRIMSBY	7.8	7.1	5.7	2.6	1.1	3.9 m below O.D. (Newlyn)
IMMINGHAM	8.0	7.3	5.8	2.6	0.9	3.9 m below O.D. (Newlyn)
HULL (East of Albert Dock)	8.4	7.6	6.0	2.5	0.7	3.9 m below O.D. (Newlyn)
HUMBER BRIDGE	8.0	7.2	5.4	1.9	0.3	3.3 m below O.D. (Newlyn)

Being approx. L.A.T.

Projection: Transverse Mercator. National Grid references are given along borders of chart.

- For the River Humber above Barton Haven, the latest Bi-Monthly chart published by Associated British Ports should be consulted.
- Vessels must not anchor in the prohibited areas shown on the chart. In addition, unless compelled by stress of weather, fog or other emergency, vessels must not anchor in the channels or fairway of the River Humber. The designated anchorages shown on the chart should be used by vessels of appropriate size and draught.
- The depths in the following areas are particularly subject to change and the Harbour Master, Humber, should be consulted for the latest information:- Spurn Light Float, Sunk Dredged Channel (not the main channel in this area), Grimsby Middle, Foul Holme Channel, Halton Middle and the channel above Hull.
- Light stars without legends represent two fixed lights displayed vertically and are seen as red to port and green to starboard when proceeding upriver (I.A.L.A Maritime Buoyage System - Region A).
- The depths in dock entrances and river berths vary owing to dredging. The respective operators should be consulted for the latest information.
- The Tetney Monobuoy is used by large tankers, which should be given a wide berth when secured to it or manoeuvring in its vicinity. When the buoy is not in use, a floating pipeline, marked by quick flashing yellow lights, may extend up to 290 metres from it.
- Gas pipelines contain flammable natural gas under high pressure. Any ship damaging the lines would face an immediate fire hazard. Mariners must not anchor in the vicinity of the lines.
- Vessels entering the Bull anchorage from sea should do so between the Bull Light Float and the Hobo Buoy. (See Standing Notice to Mariners SH13)
- Eddies, which may be hazardous to small craft, may be encountered between the inshore waters of Spurn Head and southward of the Binks.
- Care should be taken in navigating the estuary when the wind is against tide. A short choppy sea can rise quickly and prove dangerous to small craft.
- For details of the Recommended route for small craft and windfarm transfer vessels please visit the Humber Estuary Services website at: www.humber.com

Whilst every care was taken in the preparation of this Chart, which is intended to provide Mariners with the data which Associated British Ports possessed at the time of its preparation, ABP gives notice that thereafter, on account of the quickly shifting character of the river bed, no warranty is afforded that such data can be relied upon and, further, no responsibility can be accepted by ABP for any inaccuracy in the Chart or omission therefrom.

SATELLITE - DERIVED POSITIONS

Positions obtained from satellite navigation systems, such as the Global Positioning System (GPS), are normally referred to the World Geodetic System 1984 Datum. Such positions can be plotted directly on this chart.

NATIONAL HORIZONTAL DATUM

Positions read from this chart must be adjusted by 0.02 minutes SOUTHWARD and 0.10 minutes EASTWARD before plotting on documents referred to Ordnance Survey of Great Britain 1936 (OSGB 36 Datum).

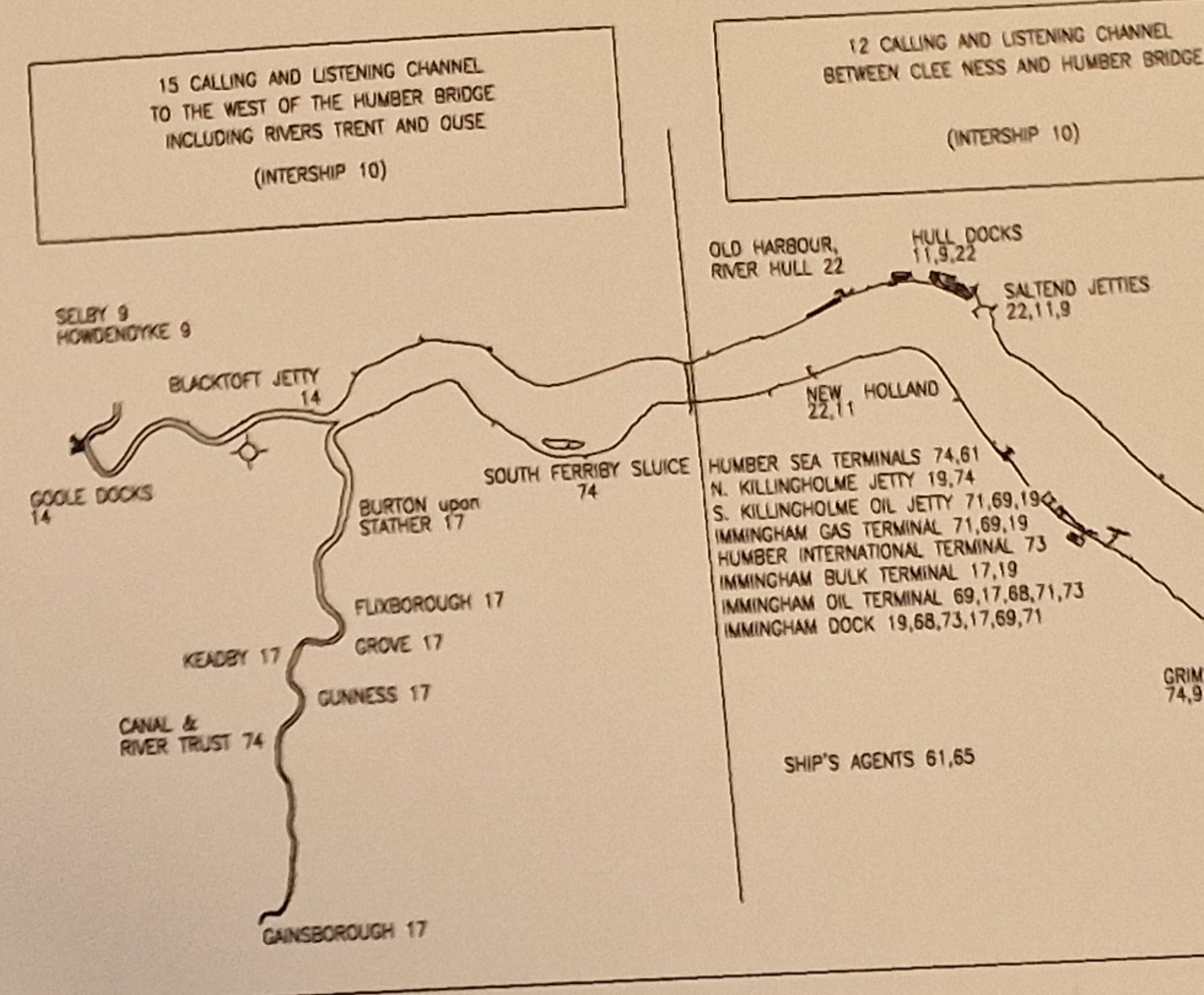
Example:
Position on chart 53° 37'.50N, 000° 10'.50W
lat/long adjustments 0'.02S 0'.10E

OSGB 36 position 53° 37'.48N, 000° 10'.40W



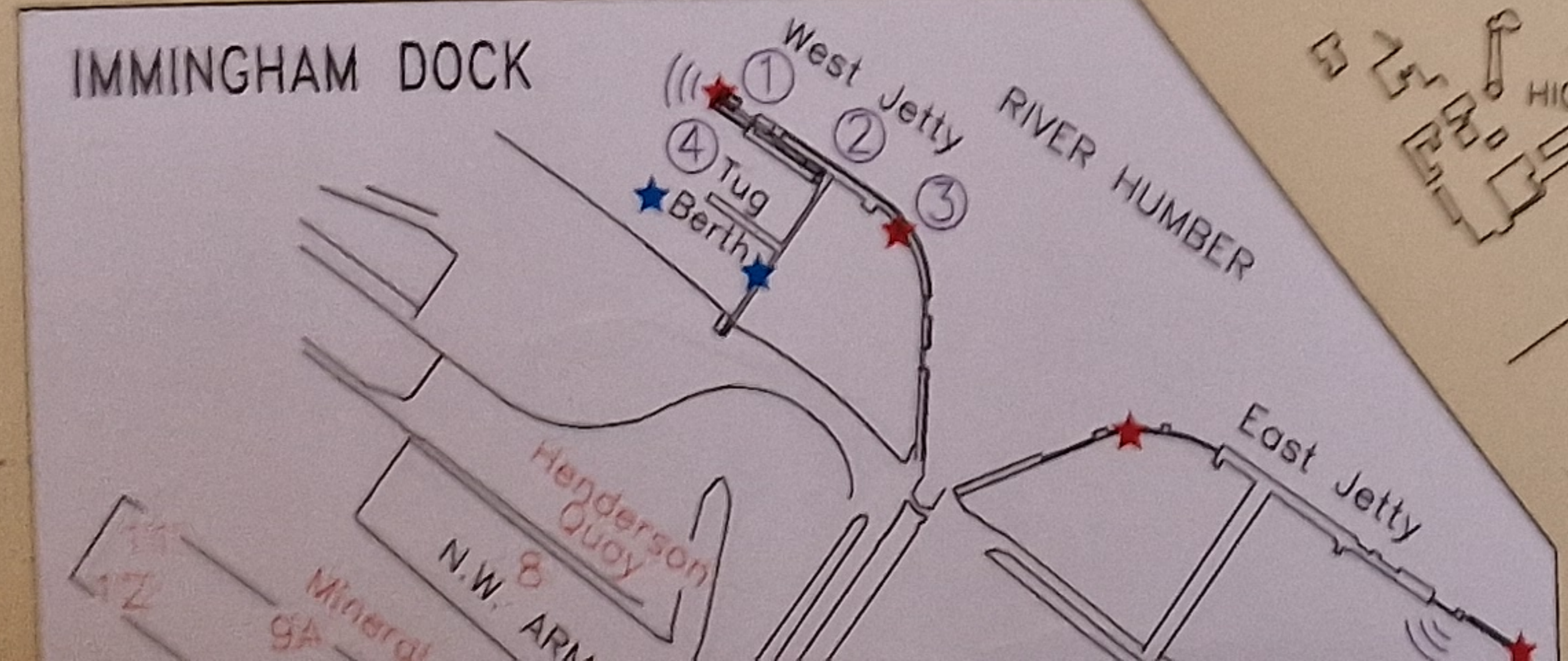
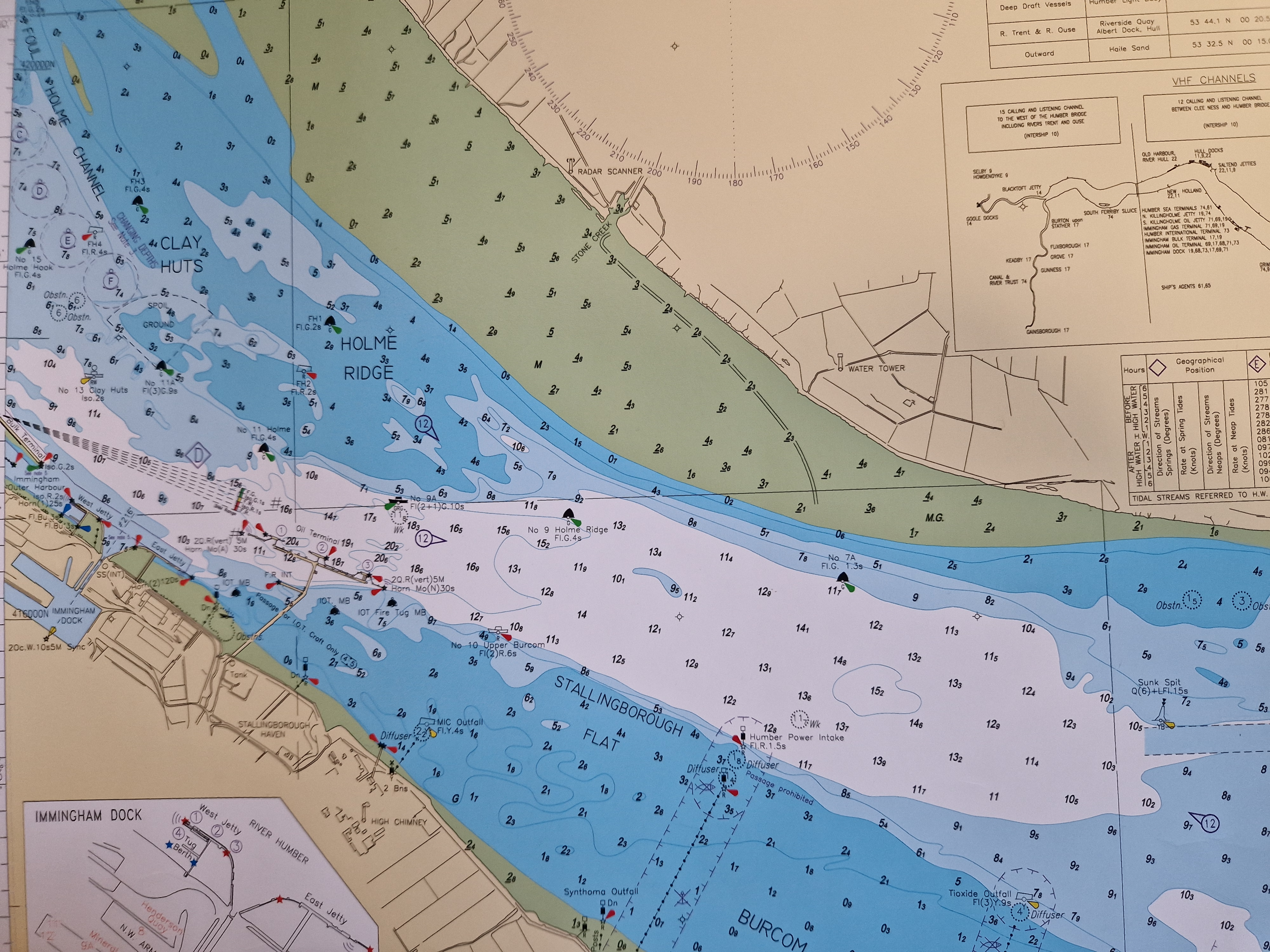
Deep Draft Vessels	Humber Light Buoys	
R. Trent & R. Ouse	Riverside Quay Albert Dock, Hull	53 44.1 N 00 20.5
Outward	Haile Sand	53 32.5 N 00 15.0

VHF CHANNELS



Hours	Geographical Position	E
BEFORE HIGH WATER		105
AFTER HIGH WATER		281
		277
		278
		282
		286
		081
		09
		102
		099
		10

TIDAL STREAMS REFERRED TO H.W.




DFDS Comments on Deadline 4 Submissions

Appendix 2

IOT

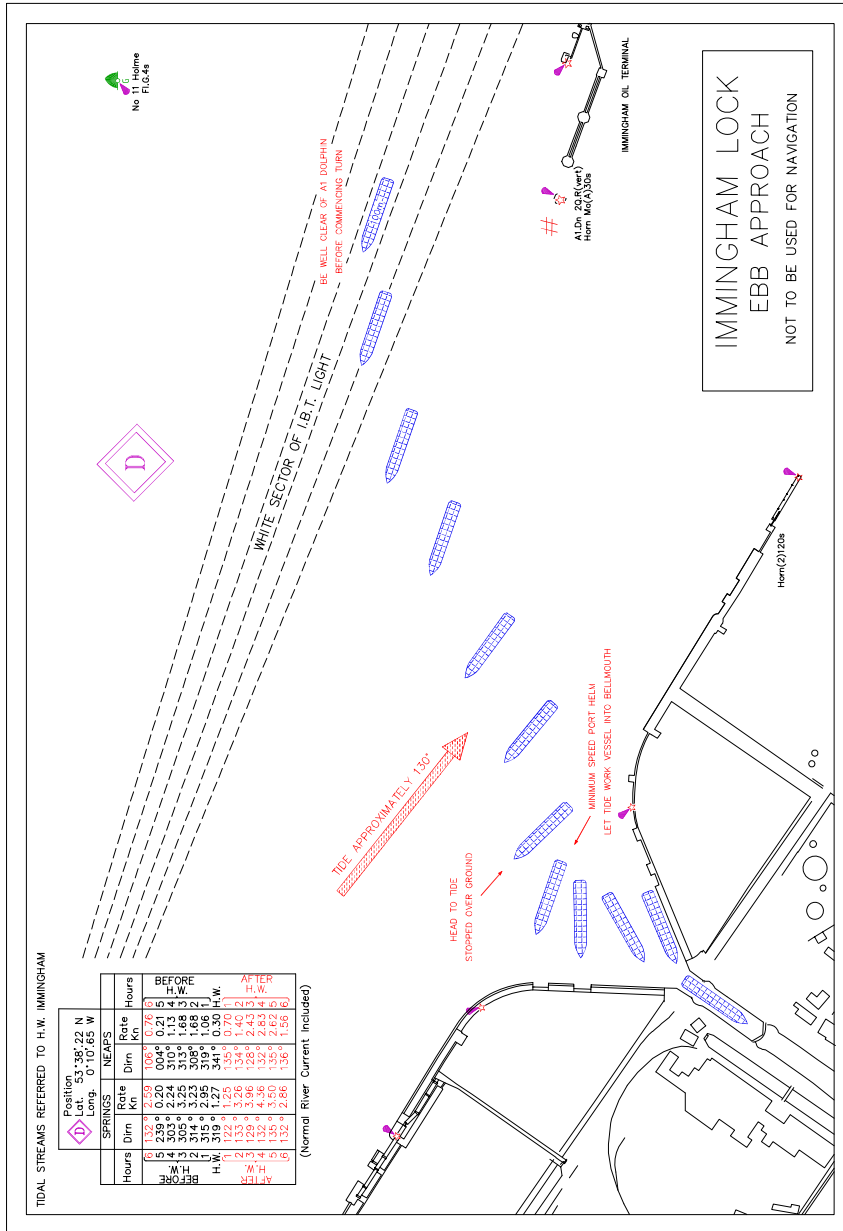
OPERATOR	APT BERTHING MASTER XXXXXXXXXX		
CHARTS	Stallingborough to Skitter Haven - Annual Survey IOT Shoal		
VHF	69 "Oilbase", 71,73,17 (with B.S.C.)		
MAX.VESSEL	Min. Dwt	Max. Dwt	Draft
	No.1	12190t	284480t
	No.2	4570t	284480t
	No.3	2000t	80000t
RESTRICTIONS	Up to 9000t Dwt none 9000 - 40000t Dwt. HW / LW Immingham +/-1.5hrs, depending on draft 40000t + Dwt. - subject to passage plan. VLCC's, vessel over 150,000 Dwt not berthed when the following ebb tidal range is greater than 6m. Wind restrictions		
ARRIVAL	Flood	Strong set off Swing off bell mouth & steam back to the berth. Watch for shoal patch, lights in line/lock open or swing off the No. 10 Upper Burcum Buoy and drop back with the tide until abeam of the berth. Once alongside, lines out ASAP to stop vsI setting off. Preferably use a tug to keep vessel alongside whilst mooring.	
	Ebb	Strong set on , be aware when slowing down passing Sunk Spit.	
DEPARTURE	Flood	Head West, swing to port off berth ensuring bow will safely clear the berth	
	Ebb	Head west, leave on last ebb & either swing off the Bellmouth or to Stbd. off berth. If too early, tide will pin you onto the berth. Head East, if leaving on the ebb make sure the vessel is well clear of the berth before proceeding down river, as there is a strong set onto both the berth and the Upper Burcom LF.	
NOTES	Two incidents have occurred recently during a period of strong north-easterly winds when berthing at high water. The vessels involved have been well-found and, under normal circumstances, do not take the services of a tug. However, on these occasions the wind has set the vessels strongly toward the berth and engine		

Immingham Finger Piers

OPERATOR	APT BERTHING MASTER	
CHARTS	Stallingborough to Skitter Haven - Annual Survey	
VHF	69 "Oilbase", ,71 ,73 ,17 (with IBT.)	
MAX. VESSEL	Max Displacement	Length
No.6	<i>see notes)</i>	104m
No.8	<i>(see notes)</i>	104m
No.7		61m
No.9		61m
	Normally Berths 7 and 9 are used by vessels of less than 750 tonnes S.Dwt.	
	Vessels with a S.Deadweight in the range 750-1,000 tonnes may use these berths when vessels are berthed at 6/8 respectively subject to APT regulations.	
RESTRICTIONS	Arrival	Flood tide only. Between LW Imm + 45 min TO HW Imm
	Departure	Same as arrival
	Above restrictions apply to vessels over 1300 dwt.	
ARRIVAL	No. 6 - set off. Head for knuckle & when close, allow vessel to set north & get a forward spring out. If a Southerly wind, consider running a heaving line from aft to get a sternline on. Have tug ready to push amidships.	
	No.8 - set on. As above but head slightly south and then allow to be set flat alongside.	
DEPARTURE	Prior to letting go, pilots should call Immingham Dock on Ch 19 for an update on lock traffic.	
	No. 6 - Have the tug pushing full to keep the vessel alongside whilst unmooring.	

Finger Pier Tug

A small tug is available 24 hours a day at IOT. The tug will be in attendance during all movements on and off the Finger Pier Berths for use at the discretion of Master



Immingham East Jetty

OPERATOR	ABP	[REDACTED]	
VHF	19 68 71 73		
MAX. VESSEL	Length 213m	Beam	Draft 10.36m
ARRIVAL	Flood	HW - 5hrs to HW, set off jetty . Swing off the bellmouth and make a standard approach. If southerly wind, consider dredging an anchor.	
	Ebb	HW to HW - 5hrs set onto jetty . Watch out for the strong set on to the A1 Dolphin. Standard approach, however water shoals off Eastern end so do not approach the end at too shallow an angle. May be some cushioning affect from mud behind when exposed.	
DEPARTURE	Ebb	If head East, single up to fore spring and Breast aft to control stern. Spring off and back into tide. Once clear of berth proceed out. Do not come round too soon as the tide sets onto the berth. Unless the vessel is extremely manoeuvrable and then with caution, wait until first of flood. In all cases have the starboard anchor ready. If head west, spring off aft and steam upriver before turning. May need to wait for tide to ease rather than leave mid-ebb (set onto jetty rapidly).	
	Flood	If head East. Single up to headline and springline aft. Use the spring to angle of the jetty. Once clear steam away from jetty. Flood tide will set the vessel off. If head West. Single up to springline fwd. As the vessel sets off the berth use astern movement to clear the berth. Once clear proceed to a safe position before swinging,	
CHART	Stallingborough to Skitter Haven - Immingham Roads Examination Stallingborough to Skitter Haven - Annual Survey		
Notes	Be aware of shallow water close to E. jetty and do not get south of line to the bargehole. Pilots should not proceed to vessels on either the East or West jetties without the permission of the jetty operator. It is incumbent on all pilots to report to the Tower, Immingham prior to proceeding to either the East or West Jetty. They will make		

Immingham West Jetty

OPERATOR	ABP	Dock master - 01469 570506	
VHF	19 68 71 73		
MAX. VESSEL	Length 213m	Beam	Draft 10.36m

BERTHS 1, 2 and 3

ARRIVAL	Flood	HW - 5hrs to HW, set off jetty . Swing to port around Clay Huts and watch set onto the BSC when approaching No.1, which is set behind its line.
	Ebb	HW to HW - 5hrs, sets onto jetty . Round A1 dolphin, then head for BSC. Do not allow v/l to set too close in until approaching the berth. If long and for No. 1 BM may take line passing No.2.
DEPARTURE	Ebb	If head East, single up to fore spring and Breast aft to control stern. Spring off and back into tide. Once clear of berth proceed out. Do not come round too soon as the tide sets onto the berth . Always have the starboard anchor ready. If head west, spring off aft and steam upriver before turning. May need to wait for tide to ease rather than leave mid-ebb (set onto jetty rapidly).
	Flood	If head East. Single up to headline and springline aft. Use the spring to angle of the jetty. Once clear steam away from jetty. Flood tide will set the vessel off . If head West. Single up to springline fwd. As the vessel sets off the berth use astern movement to clear the berth. Once clear proceed to a safe position before swinging,

WEST JETTY No. 4 (Immingham Outer Harbour) - For all vessels except river barges

RESTRICTIONS	<p><i>For Tide range (Immingham) of 4.8m or less.</i> Restricted to the period LW Imm + 30 mins to HW Imm + 20 mins (Flood tide period)</p> <p><i>For Tide range (Immingham) of 4.9m or greater.</i> The window will remain the same. Restricted to the period LW Imm + 30 mins to LW Imm + 2 hrs (i.e. first 1.5 hrs of flood tide) and HW Imm - 1hr 40 mins to HW Imm +20 mins (i.e. last 2 hrs of flood tide).</p> <p>This does not include bunker barges.</p> <p>Vessels on West Jetty No. 4 Berth will always berth port side.</p>
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Immingham Bulk Terminal (IBT)

OPERATOR	ABP	01469 571300
VHF	17 & 19	
JETTY	Length 500m	Line 315/135
	Depth at Datum (occasionally dredged)	14m
	Max Draft (from Jetty Superintendent 27th May 2000)	14m
	Subject to limitations of Sunk Dredged Channel and the Chequers Shoal.	
TIDE	Runs true to Jetty	
CHARTS	Stallingborough to Skitter Haven - Annual Survey	
	Stallingborough to Skitter Haven - Immingham Roads Examination	
	Stallingborough to Skitter Haven - IBT Shoal	
	IOT Shoal	

Details of Operator Responsibility

ABP Immingham is the Statutory Harbour Authority.

ABP owns the structure of the Immingham Bulk Terminal.

Corus Ltd. (part of Tata Steel Europe Limited), lease the terminal area from ABP and are responsible for the operation and security of the Terminal.

All river movements are coordinated by Associated British Ports through Humber Estuary Services.

Allocation of Berths

IBT consists of two berth No 1 Berth (Ore working berth or BSC berth) and No 2 Berth (Lay-by Berth or NCB berth)

IBT berths are operated by Corus Ltd, who allocate all berthing.

When allocating a berth the following factors are among those considered:-

- a. Available space
- b. Ship's Draft
- c. Vessel requirements
- d. Cargo requirements
- e. Ship's length

DFDS Comments on Deadline 4 Submissions

Appendix 3



GENERAL NOTICE TO PECS No 12/2008

**ALSO ISSUED AS GENERAL NOTICE TO PILOTS NO.
16/2008**

Also issued as Notice to VTS No. 04/2008

TURNING SHORT ROUND OFF THE I.O.T.


Gentlemen

In a recent incident a vessel from up river bound for Immingham Dock on the ebb tide was swung to stbd in the vicinity of No. 11 buoy. She was overcome by the tide and set quickly down towards the IOT, unfortunately her port quarter made contact with the bulbous bow of a moored tanker on IOT No. 1. Prior to the swing the pilot had made VHF contact with a ferry inwards bound for the IOH and agreed a green to green passing, expecting to pass in the vicinity of No. 11 buoy. This was a flawed plan especially given the direction and strength of the tide.

Turning short round towards the IOT, especially on the ebb, except for the purposes of berthing or to avoid collision, should be avoided. Pilots are advised to carefully plan the swing for Immingham when approaching from up river on the ebb. If, due to traffic, it is not considered prudent to swing above the bell mouth, then vessels should continue past the IOT and swing when clear to do so downstream of the jetties.

Capt P J Pannett
PILOTAGE OPERATIONS MANAGER

1 July 2008





GENERAL NOTICE TO PILOTS

NO. 16/2008

GENERAL NOTICE TO PECS No 12/2008

Also issued as Notice to VTS No. 4/2008

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Capt P J Pannett
PILOTAGE OPERATIONS MANAGER

1 July 2008





GENERAL NOTICE TO PECS

NO. 05/2015

Also Issued as: General Notice to Pilots No. 06/2015

Gentlemen,

ENTRY TO IMMINGHAM DOCK - For non tidal vessels.

Recent incidents of entry into Immingham Lock on both the flood and ebb tide have resulted in extensive damage to both the port infrastructure and the vessels.

This has highlighted the need for basic principles of manoeuvring in the approach to be adhered to at all times, irrespective of the vessels capabilities.

Whilst investigating each incident a common fault has contributed to all cases. Each vessel has failed to be stopped over the ground, head to tide, under full control (with minimum power applied), before a final approach is made.

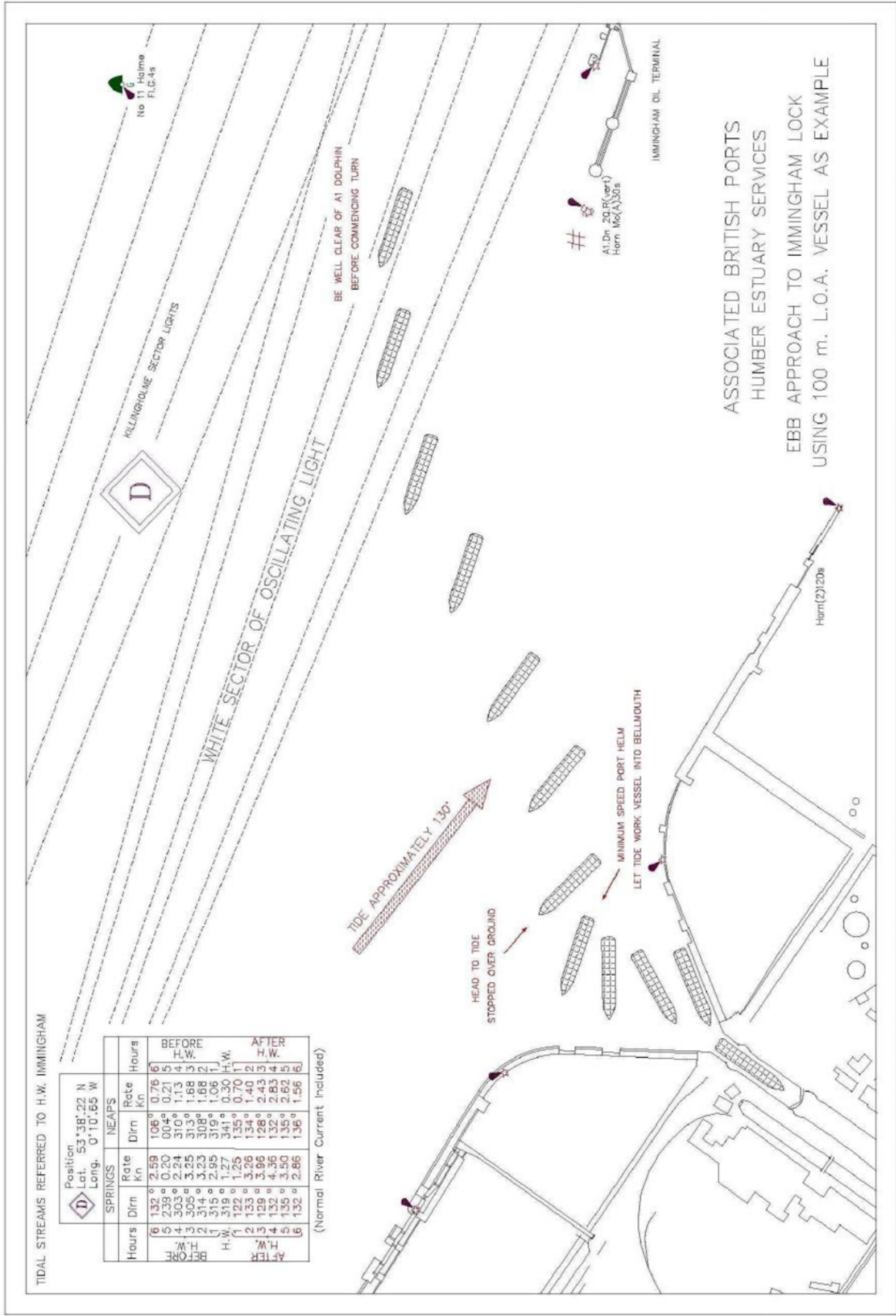
By accomplishing this basic principle, it removes the momentum from the start of the planned approach.

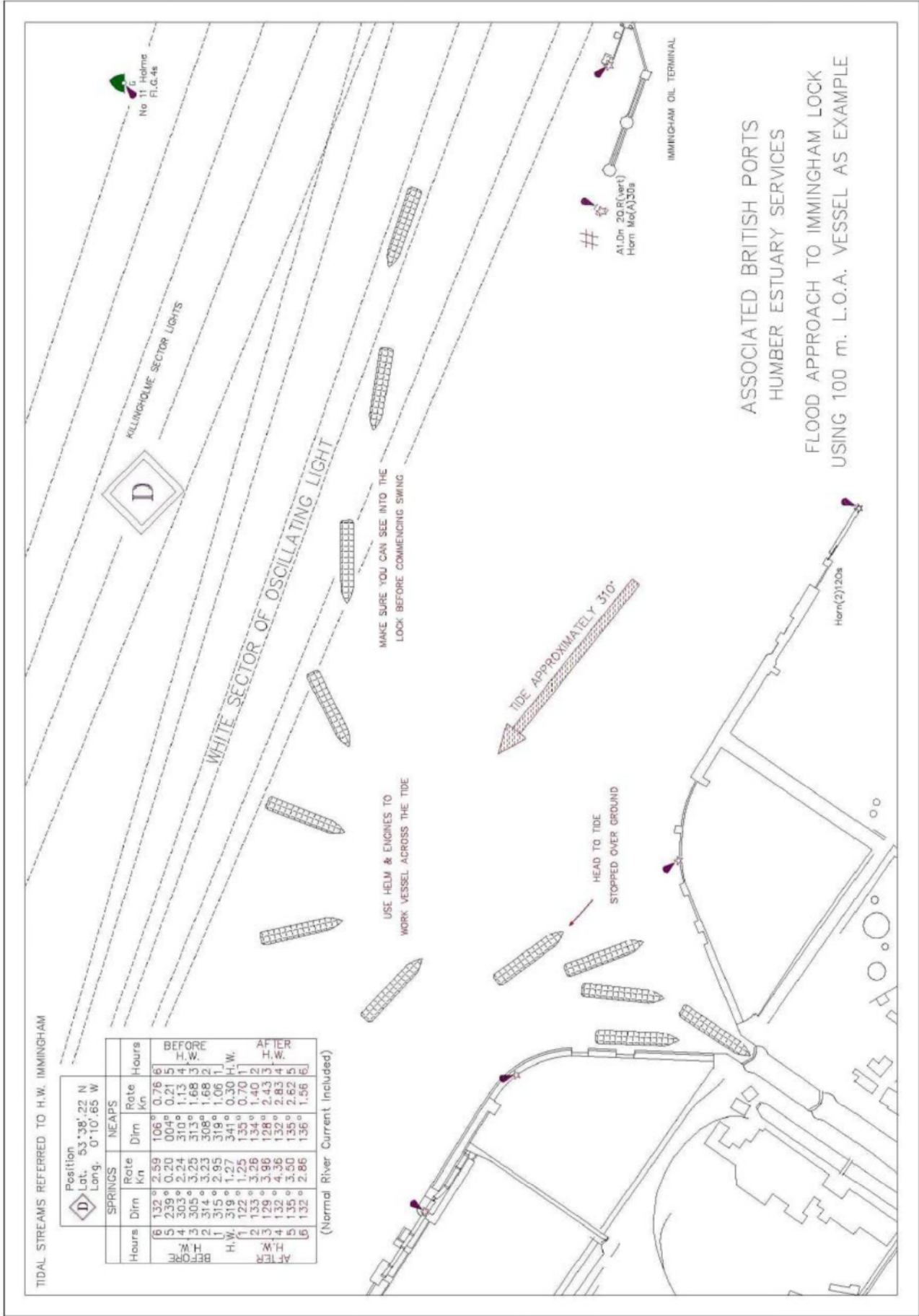
This puts the PEC holder in the best possible position to determine the effect of wind and tide on the vessel before the final approach is made.

PEC Holders are reminded that entry into Immingham Lock must be a least a two stage manoeuvre.

Andrew P Swift
PILOTAGE OPERATIONS MANAGER HUMBER
21 May 2015









GENERAL NOTICE TO PILOTS

NO. 06/2015

Gentlemen,

ENTRY TO IMMINGHAM DOCK

For non tidal vessels.

Recent incidents of entry into Immingham Lock on both the flood and ebb tide have resulted in extensive damage to both the port infrastructure and the vessels.

This has highlighted the need for basic principles of manoeuvring in the approach to be adhered to at all times, irrespective of the vessels capabilities which cannot always be guaranteed.

Whilst investigating each incident a common fault has contributed to all cases. Each vessel has failed to be stopped over the ground, head to tide, under full control (with minimum power applied), before a final approach is made.

By accomplishing this basic principle, it removes the momentum from the start of the planned approach.

This puts the pilot and master in the best possible position to determine the effect of wind and tide on the vessel before the final approach is made.

Both pilots and masters are reminded that entry into Immingham Lock must be a least a two stage manoeuvre.

If a master is manoeuvring the vessel and the pilot is concerned he is not going to stop the vessel over the ground, head to tide, prior to commencing the approach, the pilot must be pro-active in preventing such a manoeuvre in sufficient time to abort and inform the Dock Master and VTS. **The Dock Master or VTS may then refuse permission for the vessel performing the berthing or unberthing.**

Andrew P Swift

PILOTAGE OPERATIONS MANAGER HUMBER

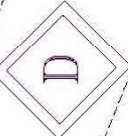
11 May 2015

TIDAL STREAMS REFERRED TO H.W. IMMINGHAM

Position
D Lat. 53°38'.22 N
 Long. 0°10'.65 W

Hours	SPRINGS		NEAPS		Rate Kn	Dirn	Hours
	Dirn	Rate Kn	Dirn	Rate Kn			
6	132°	2.59	106°	0.76	BEFORE H.W.	6	
5	239°	0.20	004°	0.21		5	
4	303°	2.24	310°	1.13		4	
3	305°	3.25	313°	1.68		3	
2	314°	3.23	308°	1.68		2	
1	315°	2.95	319°	1.06		1	
	H.W.	319°	1.27	341°	0.30	H.W.	
	1	122°	1.25	135°	0.70	1	
	2	133°	3.26	134°	1.40	2	
	3	129°	3.96	128°	2.43	3	
	4	132°	4.36	132°	2.83	4	
	5	135°	3.50	135°	2.62	5	
	6	132°	2.86	136°	1.56	6	

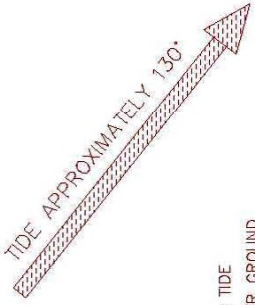
(Normal River Current included)



KILLINGHOLME SECTOR LIGHTS

WHITE SECTOR OF OSCILLATING LIGHT

BE WELL CLEAR OF A1 DOLPHIN BEFORE COMMENCING TURN



HEAD TO TIDE
STOPPED OVER GROUND

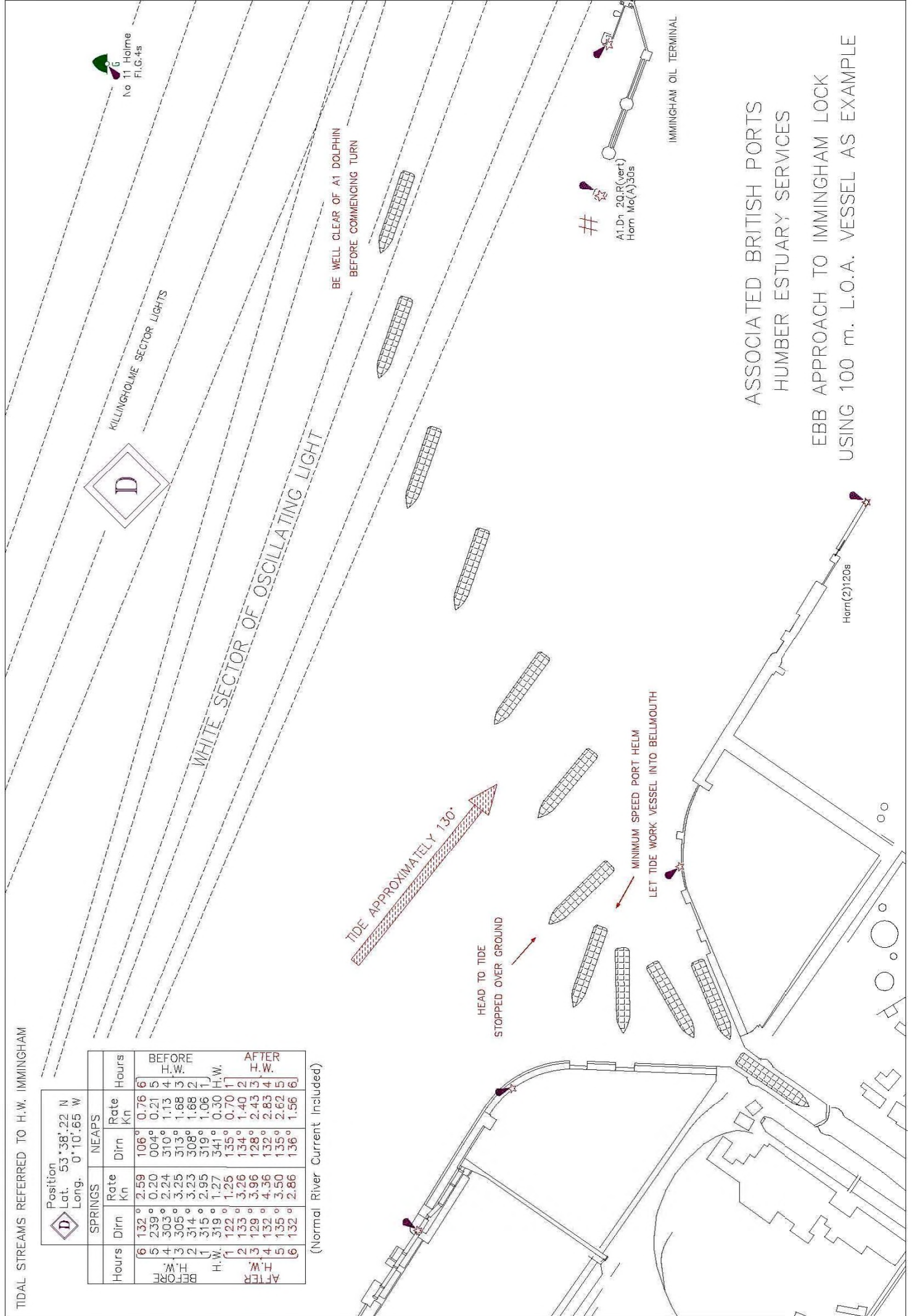
MINIMUM SPEED PORT HELM
LET TIDE WORK VESSEL INTO BELLMOUTH

A1.Dn 2Q.R(vert)
Horn Mc(A)30s

IMMINGHAM OIL TERMINAL

Horn(2)120s

ASSOCIATED BRITISH PORTS
 HUMBER ESTUARY SERVICES
 EBB APPROACH TO IMMINGHAM LOCK
 USING 100 m. L.O.A. VESSEL AS EXAMPLE

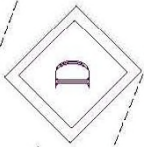


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2	314°	3.23	308°	1.68		2	1.68	
1	315°	2.95	319°	1.06		1	1.06	
					AFTER H.W.			

(Normal River Current Included)



KILLINGHOLME SECTOR LIGHTS

WHITE SECTOR OF OSCILLATING LIGHT

MAKE SURE YOU CAN SEE INTO THE LOCK BEFORE COMMENCING SWING

USE HELM & ENGINES TO WORK VESSEL ACROSS THE TIDE

TIDE APPROXIMATELY 3/10

HEAD TO TIDE STOPPED OVER GROUND

No 11 Holme
 FIG.4s

 A1.Dn 20 R(vert)
 Horn Mo(A)30s

IMMINGHAM OIL TERMINAL

Horn(2)120s

ASSOCIATED BRITISH PORTS
 HUMBER ESTUARY SERVICES
 FLOOD APPROACH TO IMMINGHAM LOCK
 USING 100 m. L.O.A. VESSEL AS EXAMPLE

