

Immingham Eastern Ro-Ro Terminal

## **Deadline 5 Appendix**

**Associated Petroleum Terminals (Immingham) Limited and  
Humber Oil Terminals Trustee Limited**

Planning Inspectorate Ref: TR030007

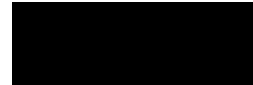
23 October 2023

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QUEENS ROAD  
IMMINGHAM  
N E LINCOLNSHIRE  
DN40 2PN



Date: 16 October 2023

Ref: APT

Dear Associated British Ports,

**IMMINGHAM EASTERN RO-RO TERMINAL DEVELOPMENT**

**Background**

- 1.1 We write with reference to Associated British Ports' ("**ABP**") application for the proposed Immingham Eastern Ro-Ro Terminal Development ("**IERRT**") and to the ongoing DCO Examination. Where relevant we have referred to document references from the IERRT DCO Examination Library.
- 1.2 As you will be aware, Associated Petroleum Terminals (Immingham) Limited and Humber Oil Terminals Trustee Limited (together the "**IOT Operators**") have significant concerns regarding the potential navigation and shipping effects of the IERRT on the Immingham Oil Terminal ("**IOT**"). These have been set out in various consultation responses and correspondence to ABP [REP2-063] and in the Written Representation [REP1-062] and shadow Navigation Risk Assessment ("**sNRA**") [REP1-064] submitted to the Examination on behalf of the IOT Operators. These concerns primarily relate to the Navigation Risk Assessment ("**NRA**") submitted by ABP [APP-089] and the risk control measures proposed as part of the IERRT application.
- 1.3 Recent discussions between the IOT Operators and ABP led to a letter being submitted to the Examining Authority on 28 September 2023 [AS-020]. This set out that (while each party notional retained its position on the NRA) ABP intended to make a request to amend the DCO application in order to enable the delivery of mitigation measures required by the IOT Operators. The letter also stated that ABP would ensure that protective provisions substantially similar to the IOT Operators' amended protective provisions [REP1-039] would be included in the DCO. In light of the letter being submitted, the IOT Operators agreed not to engage in detail with navigation and shipping matters and NRA issues during



Issue Specific Hearing 3 (“ISH3”) on 27 and 28 September 2023 and these discussions were accordingly curtailed by the ExA.

- 1.4 Since ISH3, the IOT Operators and ABP have been in ongoing discussions regarding the risk control measures which are required by the IOT Operators. The purpose of this letter is to set out what is required by the IOT Operators along with a clear justification for why such measures are needed.

**Risk Control Measures**

- 1.5 As set out in previous submissions (including the Written Representation and sNRA) and in the letter submitted on 28 September 2023, the IOT Operators require the following to ensure that the IOT can continue to operate safely in the event that the IERRT is constructed:

- (a) The IOT finger pier must be amended to accommodate two Coastal tankers to berth on the northern side of the finger pier and two barges to berth on the southern side of the finger pier.

This will need to provide for two Coastal tankers of up to 105m in length with an additional 25m for bow / stern lines and 50m for bow and stern lines together on the northern face of the Finger Pier. On the southern face of the finger there will need to be two barge berths of up to 60m in length and 10m for bow and stern lines. As part of these measures, the accommodation works identified in the Appendix are also expected to be required to enable the revised IOT finger pier arrangement to operate.

- (b) Adequate impact protection should be delivered by ABP to protect the IOT from vessels using the IERRT.

The IOT Operators require vessel impact protection islands to be provided to arrest errant vessels using the IERRT in order to protect the IOT finger pier and trunkway. The vessel impact protection should include a barge passageway with 25m navigable width. There should be no connection between the impact protection and the IOT finger pier to ensure that the finger pier remains operable if an impact occurs. The impact protection should be able to withstand the maximum vessels that will visit IERRT (which is understood to be vessels with a displacement of 48,431 tonnes) travelling at impact speeds of up to 4 knots speed over the ground which correlates to the assumed maximum tidal velocity experienced in the vicinity of the IERRT. In addition, there should be roller fendering on the north east corner of the IOT finger pier and fendering to the impact protection itself for barges.

- (c) The IERRT itself should be constructed with adequate impact protection and will be sufficiently resilient to ensure that any vessel impacting the IERRT will not impact the IOT. The IERRT



should therefore be able to withstand the same specification of vessel displacement and speed as identified above at 1.5(b).

- 1.6 ABP will need to make a request to amend the DCO application in order to enable the delivery of these mitigation measures to the standard required by the IOT Operators. As set out in ABP's letter of 28 September 2023, the final design of the amended finger pier, impact protection and the offshore aspects of the IERRT will require the prior approval of the IOT Operators. Similar provisions are included in paragraph 5 of the protective provisions as amended by the IOT Operators [REP1-039] and is essential to ensure the measures adequately protect the IOT.
- 1.7 Should any of these measures result in any additional environmental effects to those assessed in ABP's Environmental Statement submitted with the IERRT application, ABP will need to submit additional environmental information to the Examination to confirm that such measures will not lead to any additional significant environmental effects (as the ExA itself highlighted during ISH3).
- 1.8 In addition to these measures, the IOT Operators require a Marine and Liaison Plan to be developed by ABP in conjunction with the IOT Operators and other applicable stakeholders to cover the construction and operational phase of the IERRT.
- 1.9 The need for a Marine and Liaison Plan for the construction phase is included in paragraph 5(2)(a) of the protective provisions as amended by the IOT Operators [REP1-039]. This confirms that the plan should be developed by ABP in consultation with the IOT Operators to set out details of the construction methodology and schedule of works for the IERRT. This should be delivered prior to commencement of the offshore works.
- 1.10 The IOT Operators also consider that a Marine and Liaison Plan should be developed for the operational phase of the IERRT to develop and manage procedural controls related to the IERRT development. It is envisaged that this control measure will bring together several procedural controls, for the operational phase of the IERRT identified during the hazard workshops including berth limits, towage requirements and operational deconfliction. These procedural controls are necessary to ensure that the eventual use of the IERRT during the operational phase is consistent with the design parameters used to inform the measures set out in paragraph 1.5 of this letter. The required procedural controls are set out in further detail in paragraph 1.34 of Section F of the IOT Operators' Deadline 4 submission [REP4-025]. The IOT Operators therefore consider that the protective provisions should be amended further to include the productions of a Marine and Liaison Plan to cover the operational phase of the IERRT. A draft plan should be delivered and submitted prior to the end of Examination, to ensure that any procedural controls relied on by ABP are agreed prior to the end of the Examination process. A final plan should be agreed by APT prior to commissioning of any berth of the IERRT development.



- 1.11 In order to deliver these risk control measures it will be necessary for ABP and the IOT Operators to agree consequential changes to the existing licence to use the IOT, which would also need to be agreed and secured as part of any change request.

**Other measures**

- 1.12 The letter submitted by ABP to the Examining Authority on 28 September 2023 [AS-020] confirms that ABP will update the draft DCO to include protective provisions for the benefit of the IOT Operators substantially in the form included in REP1-039. Being in 'substantially' the same form as REP1-039 provides flexibility and enables appropriate amendments to be made to the protective provisions to take into account recent discussions and the measures set out in the letter.

- 1.13 The protective provisions will include an obligation to deliver the measures listed above in consultation with and to the reasonable satisfaction of the IOT Operators with the final design of the measures being subject to the approval of the IOT Operators (see paragraph 5 of [REP1-039]). In addition, the protective provisions include the following measures which are required by the IOT Operators to ensure that the IOT and the refineries which rely on the IOT are not prejudiced by the IERRT development:

- (a) Vessels using the IOT should be given priority over vessels using the IERRT due to tidal constraints on vessels arriving and departing from the IOT. In addition to the Marine and Liaison Plan for the operational phase of the IERRT, the IOT Operators wish to reserve the right to make any approval of IERRT offshore works subject to requirements to ensure the IOT Operators do not suffer more interference than is reasonably practicable and to guarantee that vessels using the IOT are given priority over IERRT vessels. This is set out in paragraph 6 of the protective provisions as amended by the IOT Operators [REP1-039].
- (b) All offshore works forming part of the IERRT should only take place in accordance with the agreement of the IOT Operators (see paragraph 5(1) of [REP1-039]). In addition, details of any works to be undertaken in the vicinity of the IOT or that might otherwise adversely impact the IOT will need to be submitted to the IOT Operators for approval in advance of undertaking such works (see paragraph 4 of [REP1-039]).
- (c) The IOT Operators will need to be indemnified for any costs incurred or business losses suffered as a result of the IERRT development (see paragraphs 7 and 9 of [REP1-039]).

- 1.14 Furthermore, the IOT Operators have requested that all costs incurred to date and all future costs in relation to the IERRT application should be paid by ABP. This is on the basis that concerns on the navigation and shipping effects of the IERRT have been consistently raised since the IOT Operators' first consultation response dated 22 February 2022 and the mitigation measures now being offered by ABP are based on what was included in the OIT Operators' letter dated 25 July 2022. There has been no



## ASSOCIATED PETROLEUM TERMINALS (IMMINGHAM) LIMITED

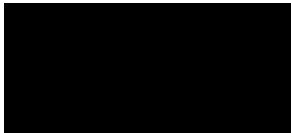
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material change in circumstances in the intervening period. Significant costs would have been saved had ABP engaged with the IOT Operators and offered the requested mitigation measures as part of the original IERRT DCO application and so avoided the need for the IOT Operators to participate in detail in the Examination.

### **Conclusion**

- 1.15 For the reasons set out in this letter, and consistently with the letter ABP presented to the Examination during ISH3, the IOT Operators invite ABP to confirm that they will make a request to amend the DCO application which will enable the delivery of the measures outlined above to the required standard. The IOT Operators should continue to be consulted on whether proposals are capable of meeting that required standard as the change request is prepared.
- 1.16 Should ABP consider that any of the measures are to be delivered in a way that departs from the standards set out above, ABP will need to provide a clear justification for why a different approach has been taken.

We look forward to hearing from you on the matters outlined in this letter.



**Matt Dearnley**  
**Terminal Manager**

**ASSOCIATED PETROLEUM TERMINALS (IMMINGHAM) LIMITED**



### **Appendix**

The following accommodation works are expected to be required to enable the revised IOT finger pier arrangement to operate, to include without limitation:

- Installation of 3 new 8" Marine Loading arms on the new Berth 6 and removal of the old loading arms from the existing Berth 6 on completion (removal needed due to obstructing revised operation). Arms control systems and hydraulic packs to be suitable for operating in ATEX hazardous areas.
- Installation of 2 new 8" Marine Loading arms on the new Berth 8 and removal of the old loading arms from the existing Berth 7 on completion (removal needed due to obstructing revised operation). Arms control systems and hydraulic packs to be suitable for operating in ATEX hazardous areas.
- Fire system and foam monitor additions / modifications.
- Berth communication hut repositioning to be compliant with ATEX hazardous area zone and Occupied Building Risk Assessment requirements.
- Modifications to gas oil and kero dye marker injection systems.
- Slops tanks addition and removal of old
- Product sampling (DOPAK) system
- Nitrogen purging piping modifications
- Bunkering hose modifications
- Rainwater sump collection modifications
- 16" firewater line modifications
- Berth 6 piping modifications / replacements for the following lines ranging from 8" to 12" in diameter, Fuel oil line 1, fuel oil line 2, CFO, Gasoil 1(G102), Gasoil 2 (kero), Gasoil 3 (AD10), Gasoil 4 (G102) Gasoil 5 (bunkers),Gasoil direct, Ballast slops, Motorspirit 1, Motorspirit 2, Motorspirit direct, noting all Gasoil lines are interchangeable.
- Berth 8 piping modifications / replacements for the following lines ranging from 8" to 12" in diameter, Gasoil 1(G102), Gasoil 2 (kero), Gasoil 3 (AD10), Gasoil 4 (G102) Gasoil 5 (bunkers),Gasoil direct, Ballast slops, Motorspirit 1, Motorspirit 2, Motorspirit direct, noting all Gasoil lines are interchangeable.
- All piping to be designed to ASME B31.3
- All instrumentation and dye pump skids to be designed for appropriate ATEX hazardous area zoning.
- Design temperatures, pressures, flowrates and materials of construction will be provided for each system (loading arm, piping, injection skid etc etc) in due course.





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Date: 23<sup>rd</sup> October 2023  
Ref: APT/IEERT/JB/201023

**PRIVATE & CONFIDENTIAL**

**Re. ExA Action Point 17**

Dear Josh

Thank you for your letter of 15:50 on Friday 20 October in relation to the ExA Action Point 17 which requires ABP to engage with APT to agree parameters for the undertaking of additional simulations.

I would first point out that this is a requirement for Deadline 5 which is 23:59 Monday 23 October (today), and so you have provided minimal time for APT to review the letter (and annex), and response accordingly.

Further I note that the simulation dates are in only 10 working days. In both counts we consider the notice provided unreasonable.

In the limited time available we APT has reviewed your proposal for additional simulations and have the following clarifications:

1. In your letter you have not included the full request from the ExA – for reference I have copied this below:

*“Action Point 17: Applicant and DFDS, with the assistance of CLdN and IOT Operators Applicant to engage with DFDS and CLdN and IOT Operators to agree parameters for the undertaking of additional simulations to address DFDS’ concerns with respect to the Proposed Development’s proximity to the Eastern Jetty, including the effects of current direction on the approach to the proposed berths 2 and 3. Applicant to submit not later than D5 a detailed brief and timetable for undertaking any additional simulations, further to discussions to be held with DFDS and CLdN and IOT Operators (see footnote\*). Deadline D5*

*\*Additional simulations should be based on what can reasonably be considered as normal operating conditions and vessel types for the Proposed Development and the Eastern Jetty.”*

The key omission is the foot note which clearly requires that *“simulations should be based on what can reasonably be considered as normal operating conditions and vessel types for the Proposed Development and the Eastern Jetty”*.

2. Vessel type: The vessel type chosen for the simulation is a Stena T Class RoRo, which is not the design vessel for the proposed IERRT development. The design vessel for the IERRT development is a vessel of 240m length overall (LOA), 35m beam and with a draught of 8.0m. Below is an extract from your IOT Impact Protection & Finger Pier - APT/ABP (Meeting Minutes) Presentation Slide 8 which provides

the parameters of the Stena T Class (3000-A) and also the “Future Vessel”, which is the proposed design vessel for IERRT.

## Stena Design Vessel Parameters

Stena T Class Vessel

Vessel Particulars		2000-A	3000-A	1500-A	Future Vessel
Deadweight (DWT)	(t)	12,300	8,423	8,600	-
Displacement	(t)	23,372	21,451	27,900	48,431
Length overall (LOA)	(m)	195.16	212.0	239.7	240.0
Length between perpendiculars (LBP)	(m)	-	194.8	227.7	225
Beam (B)	(m)	25.6	26.7	27.8	35.0
Draft, laden	(m)	7.5	6.3	6.4	8.0
Draft, light	(m)	6.6	4.7	5.1	-

Although the Stena T Class RoRo may be intended to operate initially, we understand this would only be a temporary stop gap (unless the design of the IERRT is changing), in the knowledge that exponentially larger vessels are on order. To best determine through life feasibility, practical operability and therefore risk, the RoRo model used for the simulations should be representative of the proposed IERRT design vessel, i.e.:

- 48,400 tonnes displacement, LOA 240m, moulded breadth 35m, draft 8.0m.
- Wheelhouse & accommodation either forward or aft as per design vessel specification.
- Design vessel wheelhouse height of eye and with the proposed ship's side windage area, including deck cargo, all correctly represented.
- Machinery in terms of twin or single propeller, HP, rudder type and thruster details to be as per design vessel proposal.

All these points are critical to achieving the purpose of the proposed demonstrations.

Further the design vessel for IERRT also has a significantly larger displacement than the DFDS Jingling vessel used for the first two rounds of simulation which was noted as having a displacement of 35,000t. As such APT do not consider that reverting to a DFDS Jingling vessel to be appropriate.

3. Runs: In Para 2 of Annex A makes assumptions as to what is required, part of which is that runs to berth 3 only are required. That is not how APT interpret the wording of ExA's text in point 17, which clearly states including the effects of current direction on the approach to the proposed berths 2 and 3. Manoeuvres to and from berth 2, for example, particularly in a strong NE'ly and ebb tide will result in the RoRo being very close to EJ vessel.
4. Eastern Jetty: Confirm that the port model of Eastern Jetty (EJ) includes the correct parameters of the berth and includes the tug pontoons with tugs alongside the eastern berths. This should include a tanker berthed in normal position on EJ (185m MR2 size)?
5. Gusts: The proposal states 'Gusts can be added by the simulation team if considered appropriate'. APT consider that gusts are essential and should be based on an analysis of wind parameters at the proposed IERRT or close to it. 'APT consider that the level and duration of gusting simulated during each of the 25-30 knot wind scenarios should be representative of that actually experienced during Force 7 winds from various quadrants in the proposed IERRT location.
6. Shading: the proposal states '*If requested, HR Wallingford can include a sheltering effect if required on some runs. However, their advice is that most manoeuvres are conducted assuming the full wind strength, as available space is the critical issue, and the advantage provided by sheltering may affect*

*the overall understanding of that issue'*. This proposal demonstrates a lack of understanding. Available space is obviously relevant, but it is how ships behave in that available space in various metocean scenarios which determines if space is sufficient or not. Therefore, as examples, if a ship is berthing on IERRT 3 in a SW'ly wind it would be appropriate to demonstrate that with a ship alongside on berth 2 (to minimise space) but wind shading would not be required as the berthing vessel is up wind. But if berthing on berth 3 in a NE'ly wind, this should be simulated twice; once with no ship on berth 2 so that the full force of the wind is experienced when berthing, and again with a ship on berth 2 to minimise space in which case wind shading should be enabled and therefore the sheering effect of the transition between wind and shelter experienced in that restricted space.

7. Change: We note that ABP is proposing four changes to the IERRT application, however it is not clear from your letter, whether the purpose of these simulations will be to characterise and address shipping and navigation factors associated with the proposed changes as follows:
- Operational impacts to tankers berthing at IOT Finger Pier from addition of impact protection located at the end of the Finger pier
  - Determination of impact protection parameters:
    - i. Finger Pier impact Protection
    - ii. IERRT Restraint dolphins
    - iii. IOT Trunkway impact protection
  - Enhanced navigational management controls

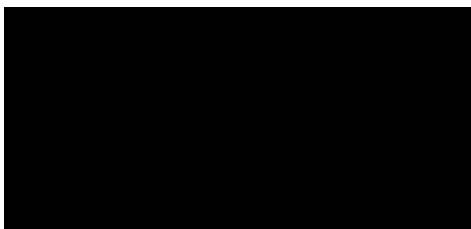
Please confirm that the simulations either will or will not address the changes proposed?

8. Manoeuvring policy and procedures: We require that the manoeuvring policy and procedures to be used for each run are provided prior to the simulations. Your letter says these will be presented by ABP Humber Estuary Services - please can these be provided as a written note of what they are in advance of the simulations.

Given the limited time till Deadline 5 (23:59 this evening), then please provide response to our queries by 14:30 today for APT to review and confirm they are acceptable by 17:00. I appreciate that these are tight time constraints, however, this is more "work" time than you have provided us in issuing your letter at 15:50 on Friday afternoon.

Finally, please can you confirm that ABP will cover APTs costs of attending these additional simulations?

Kind regards,



Matt Dearnley  
Terminal Manager  
**ASSOCIATED PETROLEUM TERMINALS (IMMINGHAM) LIMITED**

**ABP / APT / PHILLIPS 66 / IBT LIAISON GROUP**

**Minutes of Meeting held via Microsoft Teams  
On Thursday 04<sup>th</sup> August, 2022 at 10:30 hrs**

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**Present:** Andrew Firman - Harbour Master Humber, ABP  
Joe Smith - Pilotage Operations Manager, ABP  
Mark Collier - Dock Master, Grimsby & Immingham, ABP  
Neal Keena - Marine Superintendent, APT  
Chris Wilson - Petrovine  
Tim Wilson - Petrovine  
Andrew Murch - Marine Advisor, HST  
Tina Coffey - Marine Administration Assistant

**Apologies:** Martin Barker - P66  
Nick Pengelly - P66  
Shane Winterton - P66

***ACTION***

**1 WELCOME AND INTRODUCTIONS**

Joe Smith welcomed all to the meeting.

**2 APPROVAL OF PREVIOUS MINUTES OF MEETING**

Foul weather – change over. Pilot launches used.

TMB – adjusting pilot ladder. Vetting boarding/landing. Any doubts – do not board.

New pilot procurement.

Incident discussed. Body removal from passing ship.

**3 HES / PILOTAGE UPDATE**

3.1 As of 01<sup>st</sup> August 2022 we currently have 94 authorised pilots as below:

VLS - 20.25  
Class 1 - 32  
Class 2 - 22.75  
Class 3 - 19  
6 apprentices  
105 on payroll.

9 Joiners 2022  
2 leavers – September/October

3.2 NK expressed that due to low number of Pilots suffering delays. This had been discussed at Board level due to cost implications.  
AF explained difficult to maintain the number once up. Changes in peaks. Taking measures to change.

**4 UPDATE OF WORKS IN PROGRESS ON THE RIVER**

4.1 Foul Holme Channel re-design. Consulted on now with external & internal stakeholders. Depths deeper. No buoy moves carried out yet.

- 4.2 Able Marine – April trials at Shields. Possibly Siemens. Have lost their other investor and they are back out looking for another. Capital dredge campaign pushed back at least a year.
- 4.3 Immingham East RoRo terminal –Nav risk assessment and Haz ID workshop August 16<sup>th</sup>/17<sup>th</sup> & 26<sup>th</sup>/27<sup>th</sup>. Invite to follow once confirmed.
- 4.4 Redesigning outer reaches, traffic east of Spurn point. Consultation will go out.
- 5 **APT, IMMINGHAM OIL TERMINAL AND SOUTH BANK OIL JETTIES UPDATE – Update given by Neal Keena.**
- 5.1 New loading arm at SKJ operational with no problems reported. Currently with procurement for others to be changed.
- 5.2 Heavy maintenance ongoing. No parking on jetty. Taxi service up and running. Significant investment in to updating jetties.
- 5.3 Dredging at finger pier, berth 8 as some shallowing. Single beam survey carried out. MC to look at
- 6 **Tetney Monobuoy -**  
No representative present.
- 7 **Immingham Bulk Terminal - Update given by Chris & Tim Wilson**
- 7.1 Investment project to improve jetty to yard operation. New conveyor. Minimum 2-year project. Predicting a 10 day shutdown.
- 7.2 Replacing fenders. Never been done before.
- 7.3 The two new cranes not currently being used. Third crane in Germany – awaiting delivery schedule.  
The two old unloaders are main sources of work. End of Nov/Dec acoustic and visual checks to be carried out.  
NK added bollards at SKJ were also done.
- 8 **HST Update – Update given by Andrew Murch**
- 8.1 Works being carried out to fenders throughout the terminal, one at a time.
- 8.2 Query regarding Master not holding a PEC for a vessel but having a PEC for the same class of vessel. Confirmed advice as below:
  - Is required to complete 3 trips in/out of HST on our basic restriction and gain a PEC before being uplifted to his/her previous limitation for that class;
  - Normally, the Master would gain the PEC after completing 1 or 2 trips in/out & having a PEC assessment;
  - Once a PEC is granted, no Pilot is required however, the Master would still complete the 3 trips in/out on our basic tidal/tug restrictions only.
- 8.3 Marine Procedures Manual – issued Sept 2021.

- 9       **ABP Port Matters – Update given by Mark Collier**
- 9.1      East Side RoRo Terminal – Different working at GRT.
- 9.2      Increased boatage staff – 3 contract staff, now back to 6 on shift.
- 9.3      Mooring boat Pilgrim now gone.
- 10       **SNRC/VTS Matters – Update given by Andrew Swift**
- 10.1     Staff changes –  
Jonathan Grange ex Data Centre and Lisa Fee ex Immingham Radio Ops  
are both now V103 trained and live on the front desk.  
David Hall new starter in March has now left ABP.
- 10.2     I-Rams fitted to Launches – performance monitoring.
- 10.3     HLF new RACON fitted and on station.  
  
Experiencing network issues between HMCC & MRC.
- 10.4     Brough tide gauge renewable conversion ongoing.
- 10.5     Hardware refresh at HMCC & Port Office.
- 10.6     Relocation of GY river gauge complete.
- 10.7     PMIS discussed – agents online to look different. Engaging all parties to get  
the right balance. Project will be managed separately.
- 10.8     VTS technical issues – VHF intermittent East of Grimsby. Third party  
involved, priority to resolve.
- 11       **General Incidents and Near Misses Since Last Meeting**
- 11.1     01/02/22 – Shannon Fisher – Minor damage to wooden fenders at IOT  
No.6. No damage to vessel. Fender replaced.
- 11.2     11/02/22 – Rix Merlin – Engine failure attempting to depart IOT No.3.  
Anchor dropped; no assistance required.
- 11.3     18/02/22 – Celine – Mooring issues at HST during Storm Eunice. Good  
communication and cooperation with Svitzer Tugs.
- 11.4     01/03/22 – Amandine – Main engine failure passing middle burcom. Svitzer  
Josephine assisted.
- 11.5     19/04/22 – Aristos – Vessel shifted 2 meters due to slack head line. Fire tug  
called to assist. Incident free.
- 11.6     06/07/2022 – Ficaria Seaways – Main engine failure whilst passing IOT.  
Svitzer Castle and Valiant dispatched to vessel.
- 11.7     11/07/2022 – Opaline – Svitzer Kathleen parted tow line at HST No.5  
during manoeuvre. Svitzer Castle called out to assist. Queried Port quarter  
push/pull or make fast. Further discussions with Tug Companies.

- 11.8 28/07/2022 – Selin S – Contact with mooring buoy when departing IOT No.6. No damage occurred. DNA test carried out on Pilot.
- 11.9 Melusine – POB outside dredge limit. Didn't touch bottom, poor seamanship. 2 tugs used. Strong flood tide. South spurn light float survey done 7.7m to 6.6m has reduced in depth. Make PECs aware – Notice No.03/20. Reported 3 months late.  
Point End – Celine/Delphine often 8m, G5 7.2m. Notice to PEC reissued and available on Humber.com.
- 12 **Any Other Business**
- 12.1 Marine Management Restructure discussed – Now split in to 4 sections.
- Harbour Master – Fred – he will maintain his full range of competent and statutory harbour authority accountabilities and will line manage the pilot service.
- Harbour Control Manager – Matt Booth – VTS and Vessel Traffic Coordination (formerly Data Centre). Also accountable for the implementation of the Port Management Information System.
- Harbour Services Manager – Graham Cudbertson – Launch Crew and Hydrography. He will also retain accountability for PMSC/MSMS compliance, Marine KPIs/statistics, and liaison with Finance.
- Dockmaster Humber – Mark Collier – maintains his statutory accountabilities and will lead the merger of Management across all four Ports supported by his team of Deputy Dockmasters, Catherine Jefferson, Grant Fotheringham, 1 TBC.
- 12.2 Tug Update –  
SMS – 9 – 1 in dry dock – aiming for 10 as total fleet.  
Svitzer – 7 – purchasing 1 more.
- 12.3 NK – Fire tug issues – various limits of use. Agreed can now work GRT.  
JS - Knocked back working for Hull as too far away. Need to review how often it is being used and how we use it going forward.  
CW – IBT – not required a tug for some time.
- 12.4 MC – Discussed dredging – water injection successful at HIT/IBT. UKD building water injection dredger.
- 12.5 NK – Discussed incident regarding vessel more than 11 metres on a big tide. Raised a point regarding standby tug/pilot. Order in but no pilot available.  
JS/AF – ABP would have had input into the rules. No procedure change advised advanced notification. If demand was there for regular vessel visit of that size, could discuss change to the procedures.
- 12.6 NK – IGT – Dredge pocket from 10m to 11m. Check licensing and any engineering issues. MC to follow up.
- 12.7 NK – Incorrect ship information on system. Down as 1 tug assisting but requires 2. 24 hours lost due to discrepancy.
- 12.8 CW – Tug issues – Svitzer all laid up. Hours of rest re-occurring. No

towage arrangements. Large vessel due would require more hours worked.  
Certification issues – SMS/Svitzer to work together.

13      **DATE OF NEXT MEETING**

To be confirmed at a later date.



## **Appendix 1 – Examples of Port Layouts in the United Kingdom where Ro-Ro berths and fuel import/export berths have comparable siting relationships.**

*Give examples of any port layouts in the United Kingdom where Ro-Ro berths and fuel import/export berths have comparable siting relationships with what is being proposed for the Port of Immingham.*

1. No two ports or their operations are the same and so one would not expect to find direct equivalents with the same arrangements and topographical features. There are several examples of ports, however, where Ro-Ro ships manoeuvre in close proximity to fuel berths or other critical infrastructure.
2. In such cases, the proximity of the port to critical infrastructure (including oil/fuel transfer and storage facilities) means that the safe manoeuvring of vessels requires specific knowledge and expertise safely to berth the vessel. These manoeuvres occur regularly, and they do so without impacting the operations of the nearby facilities.
3. The examples given below are Purfleet, Milford Haven, and Portsmouth.
4. All vessel operations in these ports are well controlled within a tidal environment and are managed in a well-practiced and safe way. These facilities operate large vessels, moving close to important infrastructure and assets of a critically important nature for the UK.
5. The relevant Statutory Harbour Authorities maintain safety and manage this risk through Risk Assessment, using controls, procedures, and guidance to reduce the risk to ALARP.
6. All of these operations are different in terms of tidal flow, manoeuvring room, berthing manoeuvres and essential infrastructure. All, however, are managed similarly in terms of achieving a tolerable level of risk.



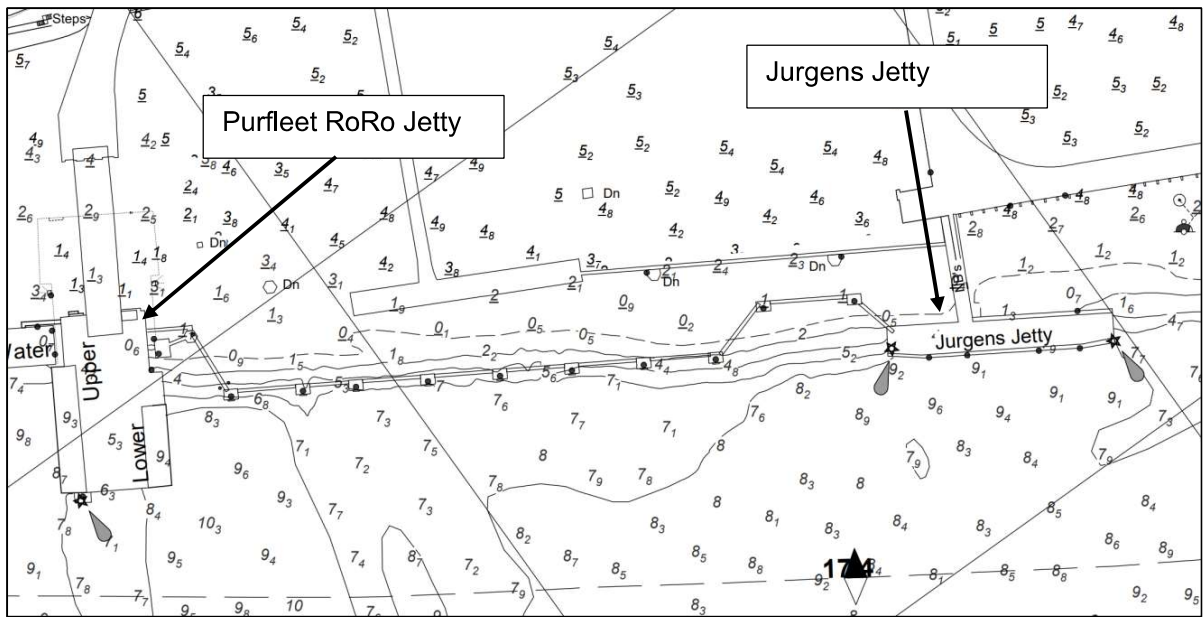
**Figure 1 – Purfleet Ro-Ro and Oil Terminals**

7. **Purfleet Ro-Ro Terminal** (as shown on **Figure 1**) on the North bank of the River Thames is located between Purfleet Oil Storage (COMAH) to the West and another smaller Oil Storage facility to the East. Both oil facilities have associated marine assets in the form of jetties and pipe discharge/delivery trunk ways. The bow of a Ro-Ro vessel using the Western linkspan of the Purfleet Ro-Ro berth is approx. 100m away from the eastern end of the Purfleet Oil Terminal jetty (when there is no ship on the jetty). The distance would be less if a tanker is berthed on the jetty.
8. On an ebb tide the Ro-Ro would have to manoeuvre adjacent to the berthed tanker/or jetty and then stern board onto the linkspan in the flow of the ebb. On a flood tide the Ro-Ro would undertake a similar manoeuvre but with the added complexity of the tide pushing the Ro-Ro towards the Oil Jetty/berthed tanker.
9. Leaving the Western linkspan (Ro-Ro) berth requires the Ro-Ro vessel to turn. This could be done on both an ebb or flood tide, or over slack water. This is undertaken daily on a fixed schedule and without incident – tug assistance is available as conditions require, and also under Port of London towage requirements. The normal berthing operations do not require tugs.
10. The Purfleet Eastern Ro-Ro linkspan with berth Ro-Ro vessel positions the bow of the berthed ship at a proximity of 70 metres to the jetty of the Oil Storage Site Jetty located to the East of Purfleet Ro-Ro Terminal. Both of these oil facilities have vessels berthing, transiting and manoeuvring in close proximity in all tidal states, none of these jetties or associated trunk ways have impact protection.
11. The berthing manoeuvre for vessels using both Ro-Ro berths would be similar and undertaken in all tidal states.

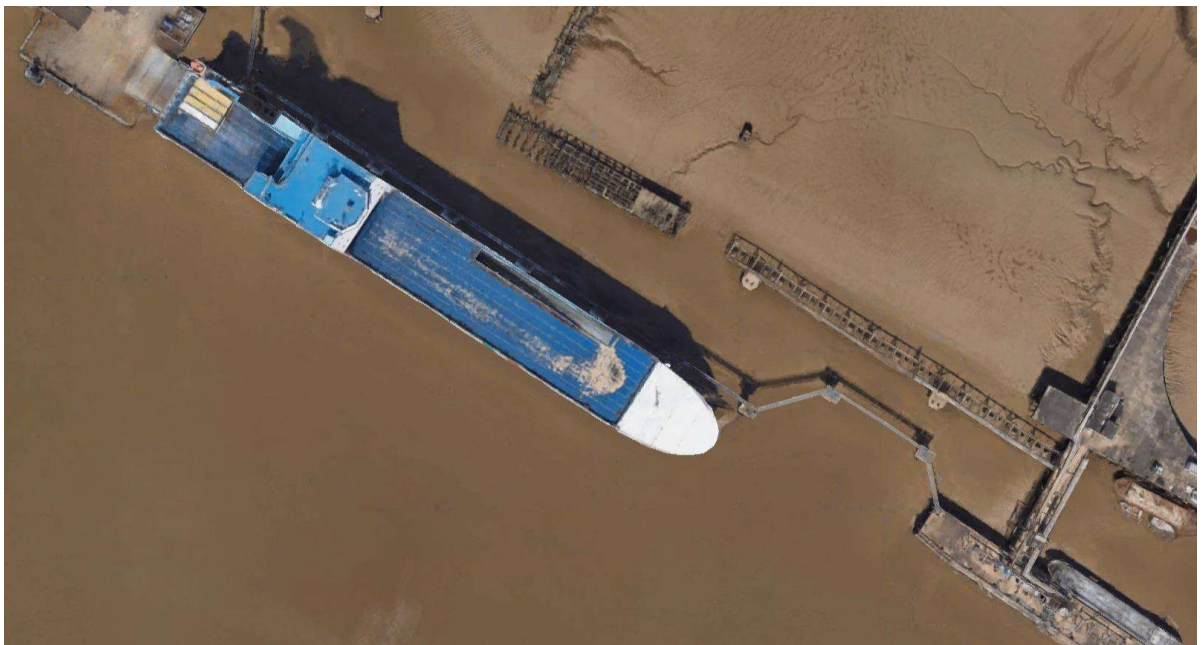
12. The Purfleet Ro-Ro and Oil Storage marine facilities are also located within 600m of the Dartford River Crossing and 900m of the Navigator Oil Terminal (Grays). The tidal flow in this area can reach 8 knots, dependant on tidal conditions.

**IOT Response:**

- a) On close inspection of the PLA nautical chart for CLdN Purfleet Ro-Ro Terminal and Jurgens Jetty (located immediate downstream), then it is evident that protection is afforded to the Jurgens Jetty Trunkway and jetty itself by provision of connected mooring piles / dolphins and the bathymetry located beneath the Jurgens Jetty Trunkway which means that errant Ro-Ro vessels bound to or from the Purfleet Ro-Ro Terminal would strike the mooring structure and then run aground prior to making contact with the Jurgens Jetty Trunkway at any state of tide. Note that Jurgens Jetty does not handle petrochemicals but imports vegetable oils only, for margarine manufacturing.
- b) Further, the Jurgens Jetty (comprising only one single vegetable tanker berth) is not a suitable comparison to the IOT and Trunkway which itself caters for all petrochemical commodities flowing to and from seven IOT berths and accounts for a significant proportion of UK oil refining imports and the export of refined products for UK-wide distribution. Also, it should be noted that the IOT Trunkway has all its pipework located on the upstream side closest to the proposed IERRT.
- c) Also, in the event that a Ro-Ro vessel has an engine failure either whilst berthing or departing the Purfleet Ro-Ro terminal the tide will naturally set the vessel either onto the Ro-Ro Terminal if the tide is flooding or past the Jurgens Jetty downstream if ebbing. For the IERRT however any failure during ebb tide situations mean IERRT vessels will set either directly onto the IERRT infrastructure (the ability of which to withstand an errant IERRT vessel impact has been questioned but has not been defined by the Applicant) or onto the IOT Finger Pier, or a tanker alongside the IOT Finger Pier or IOT Trunkway.
- d) Also evident from the PLA nautical chart is that fact that the nearby M25 Queen Elizabeth II Bridge has large and substantial impact protection for each of the bridge piers, which is as should be expected for a piece of significant national infrastructure and as should be the case for the IOT. Note that this impact protection also indirectly protects the VOPAK petroleum berths located downstream of the bridge.
- e) Further, in relation to upstream berth of the Purfleet Ro-Ro terminal then the closest berth is the **disused** Esso Berth 2 located at around 135m distance. With regard to Esso 1 berth, approximately 400m further upstream, it should be noted that this serves a small distribution terminal with imported refined products only. The Trunkway is located in bathymetry of very shallow water, and at a position in which an errant vessel is very unlikely make contact with the Esso 1 Trunkway. In any event, the trunkway serves only one berth which in turn serves one distribution site and there are many other distribution terminals along the Thames facilitating various redundancy options.

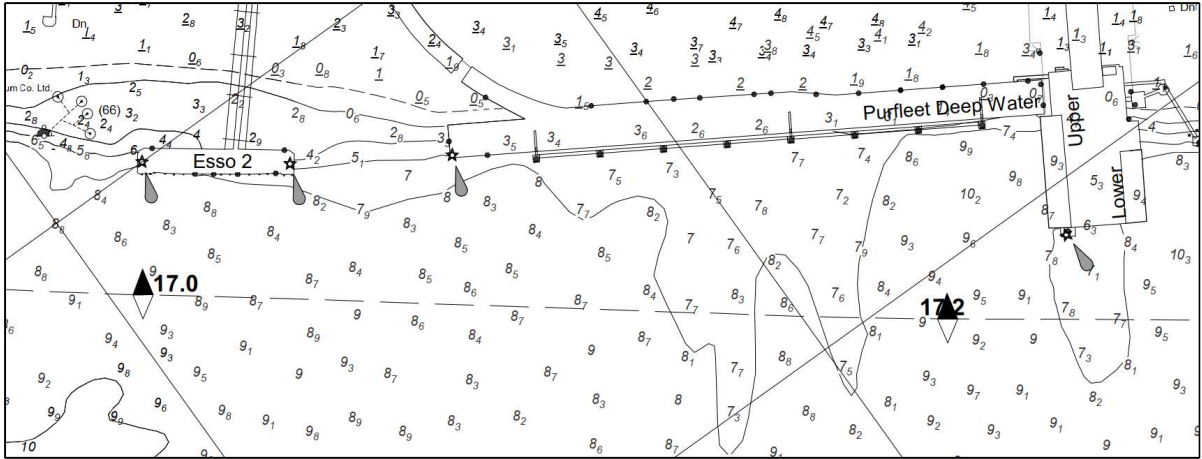


Extract from PLA Chart 332 (available from [332MS Print.swd \(pla.co.uk\)](http://332MS.Print.swd(pla.co.uk))).

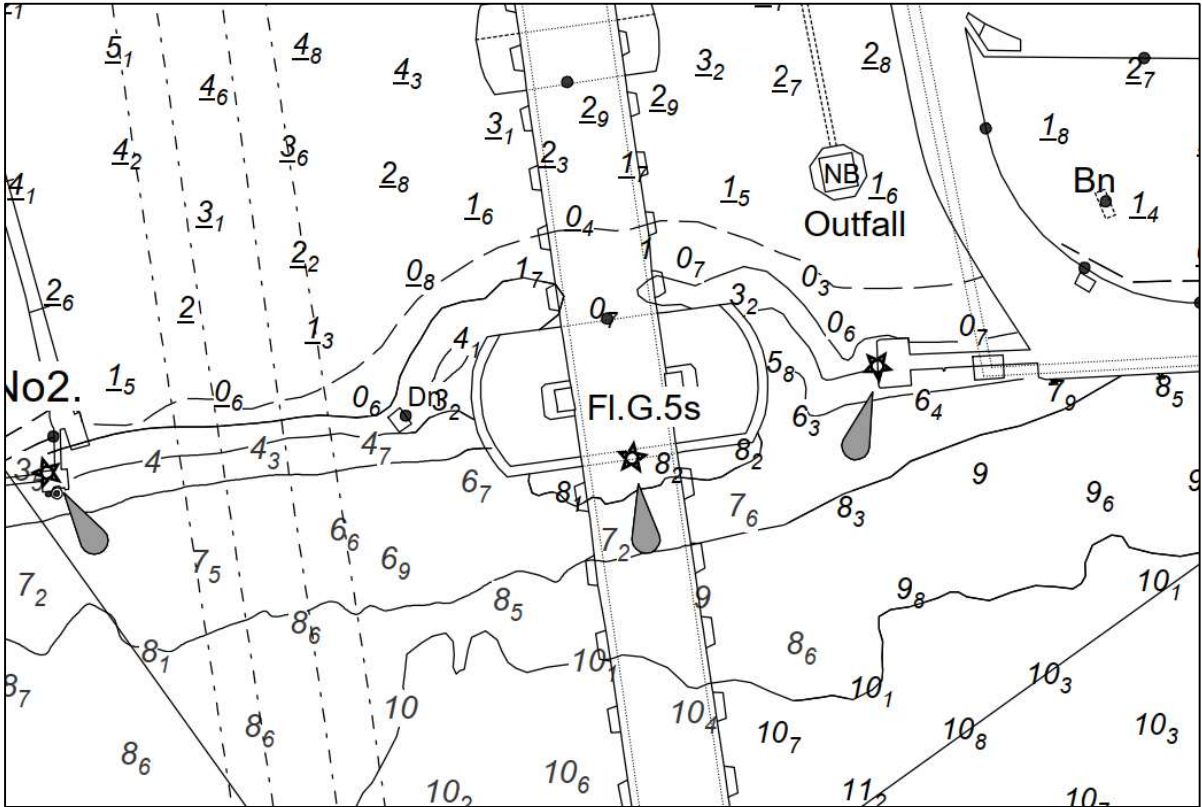


Google Earth image showing the piled protection to Jurgens Jetty Trunkway and shallow bathymetry.





Extract from PLA Chart 331 (available from [331MS Print.swd \(pla.co.uk\)](http://331MS.Print.swd(pla.co.uk))) showing the Purfleet Ro-RO terminal and Esso 2 berth.



Impact protection of Queen Elizabeth Bridge pier.

## Port of Milford Haven –COMAH berths and Ro-Pax vessel route



**Figure 2: Port of Milford Haven –COMAH berths and Ro-Pax vessel route**

13. **Figure 2** shows the Port of Milford Haven. Although the Ro-Pax Vessel 'Oscar Wilde' berths at Pembroke Dock, it transits in relatively close proximity to multiple COMAH berths. It also transits berthed discharging tankers on a regular ferry service that runs from Pembroke Dock to Rosslare (Ireland). The vessel carries a mix of public passengers, cars, accompanied and unaccompanied freight.
14. It should be noted that the Ro-Pax Ferry passes the berth in all states of tidal and weather conditions. In this example the SHA controls the operation using VTS and has procedures in place to ensure that the marine operations are kept within ALARP.

### **IOT Response:**

- f) The Valero Terminal at Pembroke is a multi-berth petrochemical terminal which imports crude oil and feedstocks, and exports refined products by road and sea, primarily serving Wales and Ireland. A single Pembroke – Ireland ferry undertakes a maximum of one round trip per day.
- g) Not dissimilar to passing river traffic at IOT (and Fawley, Southampton), vessels are required to pass at maximum practical distance from moored tankers, at reduced speeds of under 7 knots.
- h) Most importantly, unlike the proposed site of IERRT, vessels passing Valero Pembroke and Esso Fawley terminals navigate in safe water to seaward of the main jetties and not inside the line of the jetties. Hence at no time are vessels passing with a trajectory directly aimed at the trunkways. Furthermore, the water depth at chart datum inside the face of the main jetties on the western end of Valero is such that vessels would ground prior to reaching the western trunkway. Although there are two coaster berths inside the eastern end, the water similarly shallows prior to any substantial vessel reaching the eastern trunkway.
- i) As a further safety measure, it can be seen from satellite imagery of Valero Pembroke that the pipework affixed to the trunkways is on the eastern side of the western trunkway and the western side of the eastern trunkway, thus ensuring that all pipe runs are protected by the substantial physical concrete structures of the roadways themselves. ExA will be aware that pipework at IOT trunkway is upstream of the roadway and would be the first, highly vulnerable point of impact from a vessel progressing downstream.
- j) It should be noted that when an LNG import tanker is alongside the Milford Haven South Hook LNG Terminal close northwest of Valero, a large, underway station tug is available 24/7, communicating with and shadowing between every passing ship and the LNG tanker to act as immediately available floating impact protection.
- k) As noted by the Applicant the Pembroke Ferry berth is located some distance from the Valero terminal – 2.43nm (4.5km) and so during an errant ferries can not allide with the Valero termina. Finally the tidal velocities and directions within Milford haven, and particularly close the ferry terminal are significantly less than is the case at the IERRT.



### Portsmouth International Port – Ro-Pax Route Passing Oil Fuel Jetty, Ammunition Facility and MOD Assets



**Figure 3: Portsmouth International Port – Ro-Pax Route Passing Oil Fuel Jetty, Ammunition Facility and MOD Assets**

15. **Figure 3** shows the route of one of the many Ro-Pax Vessels using Portsmouth International Port (PIP) located within the Dockyard Port of Portsmouth. The Ro-Pax Vessel used to show the AIS track is the Mont Saint Michael, a large ferry on regular passage to St Malo (France) and PIP.

16. Ferry Services to and from PIP happen in all weathers, tidal conditions and times of day. Domestic Ro-Pax operations and high-speed ferry operations are also regularly undertaken to and from various terminals within Portsmouth harbour. Alongside the multiple Naval movements, this makes Portsmouth



Harbour's entrance the busiest body of water within any UK port. The movements are managed safely by using VTS, and other procedures and controls, which include stand-by tugs in certain weather conditions.

17. It will be noted that the ferry passes an MoD/Oil Pipeline Agency (OPA) Oil Fuel Terminal, both Aircraft Carriers (of strategic importance to UK defense) and an ammunition facility. Of relevance, is the fact that the ammunition facility (UHAF) does not restrict ferry operations to and from PIP.

## IOT Response:

- l) It is correct that Portsmouth International Port (PIP) is a compact, busy RoPax port, but fundamentally there are no critical national infrastructure vulnerable to errant Ro-Pax vessels when berthing within PIP. Although tidal flows are considerable at the constraint of Portsmouth Harbour entrance (2nm from PIP), flow rates are much reduced further into the Portsmouth harbour and minimal in PIP at the location of the Ferry Port. For numerous other reasons explained below Portsmouth is dissimilar, especially when comparing the mutual proximity and tidal regimes of IOT and IERRT.
- m) Of note is that Kings Harbour Master Portsmouth (KHM), as the SHA for both the Dockyard Port and PIP, in his towage guidelines only require one compulsory tug to stand by a RoRo/RoPax when wind conditions exceed 30 knots. One can assume, therefore, that KHM Risk Assessment determines these vessels to be sufficiently distant from hazards and of acceptable risk in lesser weather conditions as no towage is required.
- n) It is correct that, on occasion, an aircraft carrier can be alongside in the naval port. Rarely, two aircraft carriers may be alongside, however there is no enhancement to the RoRo towage requirement in these situations, so again KHM determines the routine risk as acceptable.
- o) The Upper Harbour Ammunitioning Facility is an isolated jetty structure without trunkway which, due to the nature of the ammunition handled, is purposely sited in a central position in Portsmouth Harbour and a safe distance away from RoRo/RoPax ferry routes (minimum distance is 1,437m) compared to the 95m the IERRT is positioned to the IOT.
- p) Where RoRo ferries manoeuvre and berth, there are no facilities of concern close by and there is minimal or no tidal flow, therefore the ferry terminal is wholly incomparable to IERRT as there is no tidal regime and no trunkway or oil terminal in the vicinity.
- q) Near Portsmouth Harbour entrance, exposed to tidal flow, is the MOD Fuel Jetty at Gosport. This single jetty facility infrequently imports gas oil and aviation fuel for the MOD in relatively small quantities, for storage in shore tanks and eventual distribution to warships by barges which are loaded further inshore. Recently, during a protracted period of some years when the shore tanks were condemned, storage was maintained afloat in a chartered commercial product tanker, proving that the facility itself, whilst convenient, is not strategically important given the proven redundancy contingency. Furthermore, the size, complexity and throughput is incomparable to IOT.