

**THE PROPOSED ASSOCIATED BRITISH PORTS (EASTERN RO-RO TERMINAL)
DEVELOPMENT CONSENT ORDER**

DEADLINE 8

Response on behalf of the Harbour Master, Humber

to Deadline 7A submissions from DFDS

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Author	Winckworth Sherwood LLP
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Arbor
255 Blackfriars Road
London
SE1 9AX
DX: 156810 London Bridge 6

T 020 7593 5000
F 020 7593 5099

www.wslaw.co.uk

Winckworth
Sherwood

**Solicitors and
Parliamentary Agents**

1. Introduction

1.1. In this document Harbour Master, Humber (**HMH**) responds to the submissions made at Deadline 7A by DFDS Seaways Plc. (**DFDS**).

1.2. The documents addressed in this submission are:

1.2.1. **REP7A – 001** – DFDS comments on the Application Changes 1,2,3 and 4.

1.3. The fact that HMH has not responded to any particular point does not mean that he agrees with it or accepts that it is correct. HMH has limited his responses to matters that are directly relevant to his areas of responsibility and where he thinks he can assist the Examining Authority.

2. Table of responses:

Document	Content	Response on behalf of Harbour Master, Humber
<p>REP7A – 001 – DFDS comments on the Application Changes 1,2,3 and 4.</p>	<p>Para 5.1.2: Instead, DFDS supports the ExA’s proposed requirement 18A, with amendments as suggested in its submission [REP7-046], whereby initial controls are required to be imposed. This is in addition to requiring the physical impact protection measures to be in place before construction or operation of the project – see below</p>	<p>HMH provided a detailed response to the Examining Authority’s proposed Requirement 18A in section 3 of HMH29 [REP7-061]. He notes that DFDS’s support of the ExA’s proposed Requirement 18A was provided without the benefit of seeing the Examining Authority’s further thoughts on, and amendments to, its proposed Requirement 18A and its draft text for an alternative provision (Requirement 18B). HMH has responded in detail to the Examining Authority in his response to ExQ4 DC).4.04 (see HMH38 submitted at D8).</p>
<p>Ditto</p>	<p>Para 5.1.3: In particular DFDS would support, as set out in its NRA, the implementation of enhanced navigational controls requiring the presence of a ‘dedicated standby tug’ (in addition to ordinary towage requirements) to prevent a vessel bound for IERRT Berths 2 or 3 alliding with a vessel berthed at Eastern Jetty or tug barge, such that this did not affect general tug availability nor costs for other river</p>	<p>HMH is of the opinion that the trials to date and Risk Assessment do not demonstrate a requirement for an extra tug to berths 2 & 3 in addition to what would normally be required.</p>

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	<p>users. Given the need for tug attendance as part of the operational controls proposed by the Applicant and more generally at the IERRT, DFDS believes that ABP should procure a dedicated additional tug for the IERRT, the cost of which should be borne exclusively by the Applicant and users of the IERRT. DFDS does not believe that it or other existing users of the port should either experience shortage of existing tugs or be required to meet any of the cost of providing additional tugs for the IERRT, pursuant to the 'agent of change' principle.</p>	
<p>Ditto</p>	<p>Para 5.5:</p> <p>Further simulations were conducted on 13-14 December to assess the movements of a ship of design vessel dimensions that had lost power, and Stena T vessels using berth 8 of the IOT with the impact protection in place. However, from this it was evident that the potential still remains for drifting and impact with IOT, and since this cannot be absolutely eliminated then the impact protection measures must be implemented before the project can operate.</p>	<p>This comment by DFDS ignores the other possible control measures that are available, such as reducing the operating parameters.</p>

Winckworth Sherwood LLP