

IMMINGHAM EASTERN RO-RO TERMINAL DEVELOPMENT CONSENT ORDER APPLICATION

PINS REFERENCE TR030007

DFDS' ANSWERS TO THE EXAMINING AUTHORITY'S FOURTH WRITTEN QUESTIONS

Question reference	Asked of	Question	Answer
DCO.4.09	Applicant and DFDS	<p>PPs in favour of DFDS</p> <p>In light of the submissions made by the Applicant about PPs in favour of DFDS, as included in [REP7-029]:</p> <p>a) For the Applicant – In summary form, identify the existing licence/lease arrangements that you consider would safeguard DFDS' interests when any of the proposed berths became operational, in the event of a DCO being made.</p> <p>b) For DFDS – Explain why it is considered PPs relating to the operational phase for the Proposed Development would be necessary rather than relying on the provisions of any existing licence/lease arrangements.</p>	<p>Currently the passage on the River is unimpeded other than the scheduled and regular river traffic. As has been explained during the hearings, DFDS operates a regular daily scheduled service into the Port of Immingham and the punctual arrival and departure of vessels operating on that service is critical to DFDS' business. If the Proposed Development is granted, once it becomes operational any berthing/sailing manoeuvres in the approaches to the IERRT may impact passage to the Immingham Outer Harbour and the Immingham inner dock, particularly if vessels approaching or departing the IEERT run into difficulties. Current berthing/sailing manoeuvres by DFDS vessels do not have to contend with a regular service schedule attempting to navigate to an area of the Port which is acknowledged by HR Wallingford in its simulation report to be very challenging.</p> <p>More significantly, the risk of vessels approaching and departing the IERRT alliding with the IOT facility does not currently exist and was never envisaged by DFDS. DFDS has set out at length during this examination its</p>

			<p>concerns that the risk of allision by vessels using the IERRT, given its proximity to the IOT, and the Applicant's view that no impact protection measures are needed means that there is a material risk to DFDS' operations from closure of all, or a material part, of the Port of Immingham. Although this risk exists today, it is increased very significantly if IERRT is built.</p> <p>The existing agreements in place between the Applicant and DFDS are over 15 years old and did not envisage the construction of IERRT or contemplate the need for protection against such a development which could materially impact existing port operations. Accordingly, the existing agreements do not provide any protection certainly in the case of DFDS. DFDS schedules are finely tuned to reduce CO2 emissions and any delay has significant impact on this. Again the approach to CO2 reduction has evolved significantly since those agreements were made and the change in the way in which DFDS operates to minimise its CO2 emissions means it has less resilience to time delays existing or entering the port.</p> <p>If the Proposed Development becomes operational it has the potential to be significantly disruptive when conditions are less than perfect. DFDS and its customers need to be assured that the sensitive cargo flows that are supported by DFDS routes will not be adversely affected by additional marine traffic using the Proposed Development.</p>
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NS.4.05	IOT	<p>Relevance of closure of an oil products facility in Scotland</p> <p>At the November hearings reference was made to the closure of an oil products facility in Scotland. Please provide further information of the closure of that facility and comment on any relevance that closure would have with respect to the need for and the operation of the IOT.</p>	<p>In November 2023, Petrolneos announced the closure of the Grangemouth oil refinery, Scotland's last oil refinery. From 2025 the facility will move from oil refining to a fuel import/export facility. The bulk of cargoes being exported from the IOT finger piers is bound for Scotland and given the news regarding the Grangemouth facility this means IOT's cargoes will be more significant in terms of the UK's energy security. Any interruption to the IOT finger pier operation could have significant implications for fuel distribution within Scotland and given the fragile nature of this logistics operation the effects of this would be manifest in a matter of days.</p> <p>The Applicant's muddled approach regarding the requirement for impact protection and ultimate decision to forgo comprehensive jetty protection puts in danger not only the safety of the Immingham area but the wider UK economy.</p>