

## IMMINGHAM EASTERN RO-RO TERMINAL DCO APPLICATION

### PINS REFERENCE TR030007

#### COMMENTS ON DEADLINE 7 SUBMISSIONS BY DFDS

##### Introduction

This document consists of comments on [REP7-031](#) (Part 1) and [REP7-032](#) (Part 2) submitted at Deadline 7 (11 December 2023) for the above application.

##### Applicant's Response to ISH5 Action Point 5 [\[REP7-031\]](#) Part 1 and [REP7-032](#) (Part 2)

1. As per Action Point 5 of ISH5, DFDS sent its view of a "most challenging" day at Port of Immingham to the Applicant on 4 December 2023 and a copy was provided to the Examination at Deadline 7 [\[REP7-055\]](#).
2. The request of the ExA at ISH5, Action Point 5 was to provide the "most challenging" day at Port of Immingham. The Applicant has not done this. It states that what it has provided is "a busier than average day". In the time period the Applicant has chosen of 1 year from 1 November 2022 to 1 November 2023, the average daily movements was 60 with a mean range of 41-79 and a highest recorded of 85. The Applicant has provided no explanation as to why it has chosen the day it has, other than because it is "a busier than average day", it is hard to understand why a day at the top end of the mean range of movements was not chosen but it is clear that the Applicant has not chosen "the most challenging day" for the Port of Immingham. DFDS can only assume that the Applicant has selected a day during this period which demonstrates what they would like to show, namely that the additional IERRT vessel movements would result in minimal disruption to existing vessel traffic.
3. DFDS believe that the relevant arrival and departure times should be included in the case study to highlight the more congested difficult periods within the 24 hours. DFDS also notes that there is no restricted vessel listed for arrival within the morning congested period, DFDS suggest that this should be included as these restricted vessels have a significant effect on vessel movements.
4. It is therefore clear that the Applicant has not done as requested, which was to provide "the most challenging day" scenario for the Port of Immingham. Instead it has chosen a "busier than average day" on the Humber as a whole which may not even have been a busier than average day for the Port of Immingham, let alone the "most challenging day".