

National Infrastructure Planning
Temple Quay House
2 The Square Bristol
BS1 6PN

DATE 15/01/2024

GROUP NETWORK
DEVELOPMENT

Dear Mr Gould

Planning Act 2008 (PA2008) and The Infrastructure Planning (Examination Procedure) Rules 2010 (as amended) – Rule 17
Application by Associated British Ports for an Order Granting Development Consent for the Immingham Eastern Ro-Ro Terminal Project
Response to Request to further information – Ref: TR 030007

VOLKSWAGEN GROUP
UNITED KINGDOM LTD
YEOMANS DRIVE
BLAKELANDS
MILTON KEYNES
MK14 5AN
TELEPHONE 01908 601601
FAX 01908 601704

Thank you for your letter dated 9 January 2024 relating to VWG's objection to the Proposed Development which, unfortunately, remains outstanding for the following reasons.

It is essential to the VWG business model to retain port facilities on the eastern coast of England for the following reasons.

- VWG supplies vehicles to over 600 dealerships throughout the UK.
- The new vehicle sales market is highly competitive with vehicle cost to purchasers being a significant factor in their decision to purchase.
- There is a need therefore for VWG to retain an import base on the east coast of the UK, as close as possible to manufacturer's export port so as to keep transportation costs to a minimum and thereby maintain price competitiveness with other vehicle manufacturers, in turn helping to ensure dealership job security.

REGISTERED OFFICE AS ABOVE
REGISTERED IN ENGLAND
REGISTERED No: 514809
A WHOLLY OWNED SUBSIDIARY
OF VOLKSWAGEN AG

Turning to the content of your letter, thank you for providing the extract from the Applicant's response of 11 December on the second page of your letter and I am pleased to be able to confirm that it set out the then position correctly but only in so far as it went. The Applicant could also have usefully made reference to VWG's response to the Applicant's request for a 'letter of comfort', as referred to in your paragraph spanning your pages 1 and 2, which response is now attached for your information. In summary, given the importance of Immingham to VWG's operation all that VWG sought was an assurance that:

- ABP will complete the lease in respect of Grimsby currently under discussion
- ABP will not require VWG to vacate Immingham until the additional land to be provided at Grimsby has been prepared to a state suitable for vehicle storage, i.e. equivalent to VWG's existing facility at Grimsby.
- The need for the assurance to be by deed being to ensure that the undertaking would be good against any successor in title to ABP in respect of the land in question.

To date the Applicant has maintained its position that it is unable to offer any such undertaking and the fact that despite the reasonableness of VWG's above request the Applicant will give no firm assurance with regard to the availability of Grimsby coinciding with the requirement to vacate Immingham leaves VWG in the position that it could be deprived of adequate land upon which to receive imported vehicles.

Furthermore, VWG did not receive confirmation of the alternative site location and plans from the Applicant until Friday 22nd December 2023. Consequently VWG were not able to progress negotiations for a site and location yet to be confirmed. VWG have responded with comments to the Heads of Terms on Wednesday 10th January 2024 and are awaiting a response from the Applicant.

For the above reasons therefore VWG has no alternative but to maintain its objection to the Proposed Development.

Yours sincerely

A black rectangular redaction box covering the signature of Nick Arden.

Nick Arden

For and on behalf of Volkswagen Group UK Ltd