

PROPOSED IMMINGHAM EASTERN RO-RO TERMINAL

PINS REFERENCE TR030007

RESPONSE TO STATUTORY CONSULTATION FROM DFDS SEAWAYS UK PLC

1. This is a formal response from DFDS Seaways UK PLC (DFDS) to the statutory consultation on the Immingham Eastern Ro-Ro Terminal (IERRT) DCO application proposed by ABP. The DFDS group of companies is the largest user of the Port of Immingham, employing several hundred staff.
2. DFDS is very concerned about the impact this project will have on its operations in several respects. As presented in the Preliminary Environmental Information Report (PEIR) and consultation documents, there is little or no mitigation proposed to address these impacts, and so as it stands, DFDS is strongly opposed to the project.

Business relocation

3. The PEIR does not mention this but to make way for the extensive trailer parks proposed to handle the IERRT within the port some existing port businesses are proposed to be relocated outside the port. One of these is Drury's Engineering and Port Equipment Ltd (Drury's), access to which DFDS depends upon multiple times a day for its smooth operation. It is understood that Drury's is to be relocated outside the East Gate, which means that the internal port vehicles DFDS currently use to travel to and from Drury's will no longer be able to be used. Instead, DFDS will need the services of an HGV driver and a tractor unit that can use the public highway.
4. Furthermore, vehicles operating on behalf of DFDS on this longer journey outside the port will come into conflict with the 2,200 or so additional HGVs that are expected to use the East Gate each day (see below) for IERRT. This would have a further unacceptable and serious impact on DFDS (and Drury's) operations.

Marine navigation

5. The introduction of vessel movements at the proposed IERRT will conflict with other existing vessels using the port, including those of DFDS, meaning that vessels are likely to be delayed and require more complex manoeuvres, as the approach areas will overlap. The PEIR only appears to consider effects on vessel safety rather than the effects of congestion on existing schedules.

Traffic and transport

6. DFDS principally uses the West Gate to the port but will increasingly use the East Gate from July 2022 once 3% of goods are required to be checked at the new Border Control Post there.
7. The PEIR predicts that the IERRT development will result in approximately 2,600 additional HGV movements per day. 85% of these are estimated to use the East Gate (2,203) and 15% the West Gate (389). The West Gate is already congested and even an additional 389 HGVs per day will cause additional queueing and delays, which will affect existing users of the port such as DFDS, whose operations are at the west.
8. In fact, DFDS is sceptical that such a split would be achieved, since traffic arriving from and going to the west is more likely to want to use the West Gate; and traffic servicing the IERRT

may also service parts of the port further west, including DFDS' facilities. This would make the effect on the West Gate, and hence DFDS' operations, even worse.

9. If somehow HGVs using the IERRT were encouraged or mandated to use the East Gate they are still more likely to leave the A180 at the A160 roundabout and drive through the town of Immingham causing congestion, noise and pollution there, rather than using the A1173 at Stallingborough. Even if HGVs do use the latter route, they will conflict with the new Pioneer Park development, the new Border Control Post and the existing Council Community Recycling Centre. Whatever happens, then, the substantial increase in HGV traffic will cause unacceptable impacts on port users as well as local residents and businesses.
10. If the anticipated number of additional HGVs is to be accommodated, the project must include upgrades to the surrounding road network to handle such a significant increase in HGVs and reduce the impacts on other road and port users to acceptable levels.

Environmental issues

11. The project would be built into the Humber Estuary Ramsar/SAC/SPA site and will therefore almost certainly have an adverse effect on the integrity of the site. Chapter 4 of the PEIR does not adequately demonstrate need for the project, rather setting out predicted demand for ro-ro traffic without examining whether existing capacity could meet it.
12. If the project is to go ahead in a Natura 2000 site, ABP must demonstrate that there are no alternatives to doing so, that there are imperative reasons of overriding public importance that it does so, and that compensatory land is provided. At present, none of these has been demonstrated to a satisfactory degree. In particular there are other installations on the Humber that could accommodate these works with less harm to the Natura 2000 site.
13. The impact on air quality and noise from HGVs travelling on local roads, particularly Queens Road where a 274% increase is predicted, has not adequately been assessed, and although biodiversity net gain is not yet a legal requirement for DCOs, it is still recommended but does not seem to have been addressed.

Conclusion

14. In summary, this project should not go ahead unless and until the significant impacts on DFDS and others at the Port and town of Immingham set out above have been addressed and mitigated. A further statutory consultation exercise should be undertaken on such proposed mitigation before the application is made.

DFDS Seaways UK PLC
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