

Immingham Green Energy Terminal

Deadline 1 Submissions

Response to WQ1

**Associated Petroleum Terminals (Immingham) Limited and
Humber Oil Terminals Trustee Limited
“The IOT Operators”**

Planning Inspectorate Ref: TR030008

13 March 2024

IOT Operators D1: Responses to WQ1



1 WRITTEN QUESTIONS 1

1.1 The IOT Operators have been asked to respond to several questions in the Examining Authorities' first set of written questions ("WQ1") [PD-008]:

- (a) **Q1.11.2.5** – regarding departure processes;
- (b) **Q1.11.2.8** – regarding mitigation measures; and
- (c) **Q1.12.3.3** – regarding the Completion of Safety Studies and Compliance with the COMAH Regulations.

2 DEPARTURE PROCESSES

2.1 The Examining Authority has asked the IOT Operators to explain what the process would be with regards to preventing concurrent departures from the IOT and IGET (Q1.11.2.5).

2.2 This process would be managed by Vessel Traffic Services Humber although both the IOT and the proposed IGET will need to order pilots and tugs for any vessels berthing and departing.

2.3 The specific order time to sail a vessel would initially be communicated by the respective terminal to the ship's agents who then liaise with the Tugs & Port Authority to ensure that there are assets available to complete the movement order before formally placing the order.

2.4 Similar to the larger vessels at the IOT, the IGET tankers (classed as Very Large Gas Carriers) will be Passage Plan Vessels for the purposes of the *Humber Passage Plan*¹ and would therefore be required to adhere to a strict tidal window for arriving and departing from the terminal.

2.5 The exact size of the CO2 tankers is currently unknown. However, it is expected that these vessels would be considerably smaller and therefore would not be classified as Passage Plan Vessels. This understanding is yet to be confirmed at the time of writing.

2.6 Should there be a clash between two or more tankers departing from and/or arriving at the IOT and the IGET at the same time, the order in which tanker movements occur (either IOT or IGET) would depend on the tidal conditions (including the flow of the ebb and flood tides), as well as the size and draught of the vessel. This is in line with how simultaneous movements on the IOT berths are currently managed.

¹ Associated British Ports, '*Humber Passage Plan*' (Humber.com, 2021).

3 MITIGATION MEASURES

- 3.1 The Examining Authority has asked the IOT Operators to explain how and if the mitigation measures identified by the Applicant, including an extension to the 5-knot speed limit and an 150m exclusion zone for ships passing the proposed development, would impact upon the IOT's existing operations and ship movements (Q1.11.2.8).
- 3.2 These mitigation measures are already present at the IOT under *Notice to Mariners* No. S.H.34/2011⁽²⁾ and the *Humber Navigation Byelaws (1990)*³ at Byelaw 14(3). This prohibits approaching nearer than 150 metres from the face of the berths, imposes a maximum speed of 5 knots for vessels when approaching and passing any jetty when any vessel is mooring, moored or unmooring at a jetty, and requires vessels to have regard to the prevailing tidal and meteorological conditions. This is in place to prevent interaction of other vessels which is compounded by speed, placing extra forces on the moorings of vessels moored alongside the IOT.
- 3.3 Increasing the region of this exclusion area would have no effect on operations at the IOT as the vessels arriving or departing from the IOT are already operating at low manoeuvring speeds during this phase of their passage.

4 SAFETY STUDIES AND COMAH REGULATIONS

- 4.1 The Examining Authority has asked the IOT Operators whether, following submission of the necessary safety studies as required under the duties for upper-tier COMAH operators and satisfactory assessment by the competent authority (HSE and the EA), the IOT Operators would be content with the Applicant's overall proposal (Q1.12.3.3).
- 4.2 The Applicant's assessment of safety concerns in the Environment Statement refers to certain safety studies which needed to be concluded, and which may recommend additional mitigation measures which do not currently form part of the Applicant's DCO application.
- 4.3 The final results of all of these studies have not yet been made available and the IOT Operators have already identified specific concerns with the development as proposed which have not yet been adequately addressed by the Applicant. The Applicant and Air Products have acknowledged that those mitigation measures are necessary and

² Associated British Ports, '*Notice to Mariners No. S.H. 34: Passing Immingham Jetties*' (Humber.com, 16 August 2011).

³ Associated British Ports, '*The Humber Navigation Byelaws 1990*' (ABPorts.co.uk, Reprinted August 2022).

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appropriate. Any additional mitigation measures recommended in the safety studies will also need to be considered by the IOT Operators.