

Our ref: 12578580

15 August 2023

IERRT ISH2 Hearing – Response to Action Item 12

## 1. Introduction

Following the recent Issue Specific Hearing (ISH2) associated with the Immingham Eastern Ro Ro Terminal (IERRT) project, the Inspectors identified a number of actions for ABP (the Applicant) or Interested Parties to respond to<sup>1</sup>. Action Point 12 as published on the PINS website relates to the landside review of the application and requests that DFDS ‘Provide an explanation for the contention that a 10% allowance for tractor-only movements on the public highway is insufficient’.

This note provides the necessary information to respond to the request of the Examining Authority.

The opinions, conclusions and any recommendations in this note are based on conditions encountered and information reviewed at the date of preparation of the note.

The Applicant and their consultants are not to rely on, or utilise, the following information. The purpose of this information is to present a high-level review of the Applicant’s landside assessment and to provide some indications of potential methods for determining and refining the application details. It is the responsibility of the Applicant and their consultants to acquire the appropriate baseline data and undertake their own assessments and calculations to facilitate the provision of the DCO application.

## 2. Background

As part of the Applicant’s IERRT Environmental Statement (Volume 3, Appendix 17.1: Transport Assessment, Document Reference 8.4.17(a), March 2023 Version 2 [AS-008]), an allowance of 10% has been allowed for single deliveries – which are defined as a vehicle undertaking a single delivery trip and departing empty or undertaking a single pick-up trip and arriving empty. To replicate the occurrence of such activities, a factor of 1.1 has been applied to the total HGV movements.

The number of tractor-only movements is influential for the design of IERRT project, namely the port entrance gates, local road networks and internal port roads, as this duplicates a portion of the assumed movements, further increasing the demand (i.e. a truck and trailer movement entering and exiting the port is equivalent to a tractor-only movement, plus a trailer movement for entering the port, or plus a trailer movement leaving the port). The tractor-only movement may also be associated with movements to and from the IERRT waiting area for trucks that may wish to use external layby facilities, rest areas, services or other such amenities.

## 3. Tractor-only Movement Assessment

Unaccompanied freight units introduce a number of additional movements which the applicant has classed as ‘Single deliveries’ as detailed in section 5.2.3 of the Transport Assessment<sup>2</sup>.

<sup>1</sup> EV3-012 TR030007-000570-Action Points ISH2 ES.pdf (planninginspectorate.gov.uk)

<sup>2</sup> TR030007-000427-8.4.17(a)\_IERRT ES\_Vol3\_Appendix 17.1 Transport Assessment\_Redacted)

In the Traffic Assessment, single trips are defined as a vehicle undertaking a single delivery trip and departing empty or undertaking a single pick-up trip and arriving empty. The proportion of the movement where the tractor-only is moving without a trailer has been denoted as a 'tractor-only movement' by DFDS for the purpose of our assessment. To replicate the occurrence of such activities, the Applicant has assumed a factor of 1.1 that has been applied to the total HGV movements, i.e. that 10% of the total are tractor-only movements.

No evidence has been provided within the Transport Assessment to justify a 10% ratio. Therefore, to validate the Applicant's 10% tractor-only assumption, samples of survey data were collected by DFDS at both the East and West Gates. These survey results were analysed and are shown within Table 1. Data associated with these surveys have been provided as part of DFDS' response to Action Point 11.

**Table 1** Single Delivery – Wednesday 15<sup>th</sup>, June 2022

	HGV	HGV Empty	Total HGV	Solo HGVs	Total HGVs	HGV Empty + Solo HGV	Proportion of Solo HGV's
<b>Western Gate</b>							
07:00 - 08:00	334	28	362	47	409	75	18.34%
13:00 - 14:00	372	30	402	53	455	83	18.24%
15:00 - 16:00	405	31	436	79	515	110	21.36%
19:00 - 20:00	308	20	328	42	370	62	16.76%
<b>Total</b>	1419	109	1528	221	1749	330	18.87%
<b>Eastern Gate</b>							
07:00 - 08:00	50	4	54	8	62	12	19.35%
13:00- 14:00	60	4	64	6	70	10	14.29%
15:00 - 16:00	80	7	87	16	103	23	22.33%
<b>Total</b>	190	15	205	30	235	45	19.15%
<b>Total (East and West Gates)</b>							
Total	1609	124	1733	251	1984	375	<b>18.90%</b>

The above is for the current measured conditions at the Port of Immingham for June 2022 and does not include the forecasted influence of the IERRT project. As IERRT will be introducing further unaccompanied movements, it is possible that the proportion of tractor-only movements will further increase. The survey has identified a range of between 14% to 22% with an average of around 19%, nearly twice the Applicant's assumed 10%.

The above is only valid for movements entering or exiting the port via the two gatehouses. Further tractor-only movements would be expected between yards within the port which would add to port road network congestion. For example, a driver brings a trailer to DFDS facilities, however their next trailer may be located in the IERRT terminal. This would require a tractor-only movement from DFDS facilities to IERRT, further adding to movements within the port environment.

It is recommended that the Applicant reviews their distribution of tractor-only movements, providing evidence to justify the reduction in tractor-only movements in comparison to the values recorded by DFDS in June 2022 or re-assess using DFDS's figures (for assessment of the gatehouses), and with additional allowance for in port tractor-only movements (for assessment of internal port roads). Any amendments to

the distribution selected should then be cascaded throughout the remainder of the Transport Assessment where applicable.

## 4. Conclusion

The sample collected by DFDS identified that **18.9%** of HGV's serving the port are tractor-only movements rather than the 10% assumed by the Applicant. Applying this revised proportion to the ABP trip generation methodology would result in an additional 117 HGVs movements per day. The resulting uplift in daily HGV movements based on the numbers currently presented within the Applicant's Transport Assessment (note, DFDS' responses to other action points also query the validity of the current baseline and demand figures within the Transport Assessment) equates to an increase of around 6% of forecast IERRT traffic.

As such it is recommended that the Applicant:

- Completes the review of data provided by interested parties and provide commentary;
- Coordinates further discussions to enable the Applicant and Interested Parties to agree an appropriate range of distributions for tractor only movements;
- Provides evidence to support the assumption of tractor only movements or adopt the higher figure and re-assess; and
- Re-evaluates the Transport Assessment modelling where necessary where input parameters have been updated subject to the above.

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