

Our ref: 12578580

15 August 2023

## IERRT ISH2 Hearing – Response to Action Item 14

# 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 14 as published on the PINS website relates to the landside review of the application and requestes that the Applicant, DFDS and CLdN ‘*Endeavour to agree a ratio for accompanied and unaccompanied Ro Ro freight throughput for the purposes of assessing the Proposed Development’s effect on the operation of the public highway*’.

This note provides the necessary information to respond to the request of the Examining Authority for provision of data from DFDS. Note, as this request is to agree a ratio between the Applicant and Interested Parties, a meeting was held on 10 August 2023, convened by DTA on behalf of ABP, with DFDS and CLdN representatives in attendance.

This meeting discussed the distribution of accompanied versus unaccompanied freight units however did not confirm an agreed ratio. Rather, DTA requested the provision of data in line with Action Point 14, after which a further meeting between the applicant and interested parties will be held to discuss a suitable ratio. DFDS will provide an update regarding our assessment of the proposed distribution in our Written Representation, submitted as part of Deadline 2, following further meetings and discussions as necessary with the Applicant. The parties have therefore ‘endeavoured’ to agree a ratio as requested but have not yet agreed on one but may do so by Deadline 2.

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

Section 5.2.3 to 5.5.10 of the Applicant’s Transport Assessment<sup>2</sup> (hereby referred to as ‘the Transport Assessment’) presents the Applicant’s assessment of the traffic generation, including a split between accompanied freight units (those units that will have a truck head and trailer, accompanied by a driver, that will undertake the ferry journey) and unaccompanied freight units (those units where only the trailer will undertake the ferry journey, and a driver and truck head is required to deliver and retrieve the trailer from the port terminal).

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

<sup>2</sup> [AS-008TR030007-000427-8.4.17\(a\)\\_IERRT ES\\_Vol3\\_Appendix 17.1 Transport Assessment\\_Redacted](#)

The split identified as 'considered likely by the intended operator' is recorded in the assessment as<sup>3</sup>:

- Accompanied = 28%
- Unaccompanied = 72%

Obtaining an appropriate understanding of the split between accompanied and unaccompanied freight units is necessary for the terminal design, and for understanding the implications of traffic generation on the network.

Accompanied units create a higher peak hour volume impact as the vehicles tend to arrive at the port, or depart from the port, close to the vessel departure or arrival respectively. Therefore a high accompanied distribution would increase the peak hour demand. The period of time between vessel movements and freight unit arrival and departure is usually within an hour, and up to an approximate three (3) hour window, though this depends on driver behaviours.

Conversely, unaccompanied freight units tend to arrive over a longer period of time before departure, or after arrival. During the Issue Specific Hearing Two (ISH2), the Applicant indicated that the nominal dwell period for unaccompanied freight was in the vicinity of one and half (1.5) days. This tends to flatten the peak hour demands and spread the movement of vehicles across the day. However, unaccompanied freight units also generate movements whereby a truck head may only be dropping off the trailer or picking up the trailer from the terminal (refer to DFDS response to Action Point 12 for assessment of current percentage distribution of tractor only movements), therefore doubling the number of movements per freight unit for these instances.

As such, it is therefore critical to ensure that the values used within the Transport Assessment consider the potential variations in distribution of accompanied versus unaccompanied freight units.

### **3. Assessment of Accompanied versus Unaccompanied**

The Applicant's Transport Assessment only provides a singular view of the distribution between the accompanied and unaccompanied freight units as a percentage split. No evidence is provided to indicate how this split has been generated, whether this is a forecasted distribution for future volumes, or if this a representation of current distribution of the operator.

During a discussion held between the Applicant (represented by ABP and DTA), CLdN (represented by Royal Haskoning DHV) and DFDS (represented by DFDS and GHD) on 10 August, DTA confirmed that the distribution provided is intended to be representative of future volumes, and assumes the split is applicable to current volumes as well.

DFDS does not have specific values of the operators' current split and is unable to comment on the validity of the split being representative of current operations, however, CLdN (as per Action Point 8) are to provide this detail for Deadline 2 to the ISH2 action points<sup>4</sup>.

In contrast to the Applicant's view, DFDS does not agree with the assumption that the current distribution between accompanied versus unaccompanied units will remain static. The Department for Transport Freight Statistics for the UK<sup>5</sup> indicate that for the last 5 years, the percentage of unaccompanied units has been increasing from 43% of RoRo trade in 2018, to around 50% in 2022.

Due to the variations in impacts of accompanied and unaccompanied freight units, and the uncertainty of future freight unit modes (i.e. either accompanied or unaccompanied), it is our recommendation that a range of distributions is considered. This range of distributions should be established following evidence of historical operations from CLdN, with the implications of the distribution amendments flowing through to the Transport Assessment's Modelling.

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<sup>3</sup> Section 5.2.3, item d) of the transport assessment

<sup>4</sup> [TR030007-000570-Action Points ISH2 ES.pdf \(planninginspectorate.gov.uk\)](#)

<sup>5</sup> [Maritime and shipping statistics - GOV.UK \(www.gov.uk\)](#)

## 4. Conclusion

Without appropriate consideration of the distribution of accompanied to unaccompanied freight units, there is a risk that the Applicant's transport assessment may over or underestimate the implications of the IERRT project on the port's local road network, the gatehouses, and the strategic road network. Implications may be inclusive of unassessed congestion, potential impacts on existing users, as well as communities from additional traffic, noise and air pollution.

As such it is recommended that the Applicant:

- Completes the review of data provided by Interested Parties and provides commentary;
- Coordinates further discussions to enable the Applicant and Interested Parties to agree an appropriate range of distributions for accompanied and unaccompanied movements;
- Provides evidence to support the current forecasting distribution between accompanied and unaccompanied units;
- Establishes a range of distributions for accompanied versus unaccompanied freight units in accordance with current operations, future forecasts, and uncertainty around freight modes;
- Provides evidence to support the assumption of tractor only movements and how this is influenced by changes to the unaccompanied versus accompanied distribution (refer DFDS response to Action Point 12<sup>6</sup>); and
- Re-evaluates the Transport Assessment modelling where necessary where input parameters have been updated subject to the above.

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<sup>6</sup> IERRT ISH2 Hearing – DFDS Response to Action Point 12 – 15 August 2023