

Our ref: 12578580

15 August 2023

IERRT ISH2 Hearing – Response to Action Item 15

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 the Applicant or Interested Parties to respond to¹. Action Point 15 as published on the PINS website relates to the landside review of the application and requests that ABP (the Applicant), DFDS and CLdN ‘*Endeavour to agree a methodology for assessing the capacity of the Port of Immingham’s West Gate to accommodate vehicular traffic associated with the operation of the Proposed Development*’.

This note provides the necessary information to respond to the request of the Examining Authority for provision of data from DFDS. As this request is to agree a methodology 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 West versus East Gate distribution, however did not confirm an agreed methodology. Rather DTA requested the provision of data in line with Action Point 15, after which a further meeting between the Applicant and Interested Parties will be held to discuss a suitable approach. 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 methodology as requested but have not yet agreed one.

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 5.5.7 to 5.5.10 of the Applicant’s Transport Assessment² (hereby referred to as ‘the Transport Assessment’) presents the Applicant’s assessment of the distribution of traffic to each of the two main gates (East and West Gate). The Applicant has stated within sections 5.5.7 to 5.5.10 of the Transport Assessment:

“The facility is located in close proximity to the East Gate of the Port on the eastern side of the port estate. As described above the assignment of traffic locally from the port is a function of the destination of the vehicles. Both GIS [GPS] and Google Maps confirm the quickest route from the facility to the M180 west is via the East Gate.”

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

² [AS-008 TR030007-000427-8.4.17\(a\)_IERRT ES_Vol3_Appendix 17.1 Transport Assessment_Redacted](#)

However, the access route through the port (and via West Gate) is marginally shorter in terms of distance to the M180 and therefore it can be expected some traffic might chose that route, which will depend on matters such as day-to-day changes in flows and information provided by Satnav systems.

On this basis it is assumed that the majority of traffic (85%) will use East Gate, with a sensitivity assessment of 15% using West Gate. This is robust because it ensures that some assessment of impacts on the West gate exit and route to the A180 is assessed."

The premise of the Applicant's assumption that the majority of traffic will enter the port via the East Gate is based on:

- Proximity to the East Gate; and
- Driving time as provided by GPS and Google maps.

An allowance of an arbitrary 15% has been allowed for some vehicles using the West Gate, however no further justification has been provided in regards to the origin of this figure.

The Applicant's Transport Assessment does not propose any controls to direct IERRT traffic that are arriving from the West along the A180 specifically to the East Gate.

3. Driving Time

To validate ABP's statement that the quickest route from the proposed development is via the East Gate, a journey time assessment was undertaken using Google maps from a point in the middle of the new development to a point west of the A180/A160 roundabout. This showed that there are actually three main routes (as shown in the figure below) from the A180 West into the proposed IERRT development as follows:



- **Route 1:** through the West Gate and then via the A160: expected journey time is 13 minutes (6 miles);
- **Route 2:** through the East Gate and then via the A1173 Manby Road and A160. Expected journey time is 12 minutes (6.7 miles); and
- **Route 3:** through the East Gate then via the A1173 Kings Road and A180. Expected journey time is 12 minutes (7.1 miles).

The differences in journey times between the three routes indicate that whilst the East Gate is equal quickest, there are insignificant differences in journey times between the three available routes. It is DFDS's view that differences in journey time would, on their own, be unlikely to justify the heavy weighting towards

the use of the East Gate without the implementation of management controls which would essentially remove natural route choice and enforce the use of prescribed routes to the IERRT.

Driving time will also be highly influenced by congestion on the road network, particularly as there is only a minimum difference between routes. For example, during busy periods where passenger vehicles are entering or exiting the nearby business parks located on the A1173, the additional transit time will influence the GPSs route selection of the A1173 versus A160. DFDS staff members have tested this and found that GPS directions from Drury Engineering (located near the East Gate) tend to direct users via the West Gate when heading west along the A180 during busy periods.

Route selection by GPS also assumes all HGV drivers are consistently using and following Satnav directions.

4. Other Factors

Driver route choice is typically driven by a number of factors in addition to drive time. Though the IERRT project and planned new developments are located closer to the East Gate, a number of behavioural factors are likely to incentivise use of the West Gate, including:

- **Habits:** based on surveys conducted by DFDS in 2022³, 82% of HGV traffic to the Port of Immingham utilise the West Gate, with only 18% utilising the East Gate. This survey is inclusive of movements currently using the Stena dock terminal which is located on the eastern half of the terminal. In addition, the majority of initial movements to IERRT will be a relocation of current operations from Killingholme which use the A160 as the main access road to the CLdN terminal. This “habitual” behaviour may be difficult to shift, noting the following;
- **Direction of travel:** based on surveys conducted by DFDS in 2022 and from review of historical data, the vast majority (96%) of traffic flows from/to the west of the port, potentially creating the perception of the West Gate as a more “direct” route;
- **Wayfinding:** incoming traffic from the west encounters signage on the A180 that directs them to take the Immingham exit towards the West Gate via the A160; and
- **Suitability of carriageway** to accommodate increases in HGV traffic on the A1173 corridor, in terms of its highway design (A160 dual carriageway with two lanes in each direction vs A1173 single carriageway with one lane in each direction) and impact upon surrounding land uses (existing and future).

In addition to the above items, a major influence on route choice will be driver facilities. Locations of depots, refuelling stations and lorry parks are focused around the A160 as well as Kiln Road. Section 7.3 of the Transport Assessment identifies the existence of local HGV Parking and Off-site facilities, noting (in section 7.3.3) that one of these facilities (the Ulceby Truckstop) is located on the A160.

In addition to the considered sites, there are a number of other major depots, truck stops, refuelling stations and driver amenities located across the Immingham region, as shown in Figure 1.

³ Results of which are presented as part of response to ISH2 Action Point 11

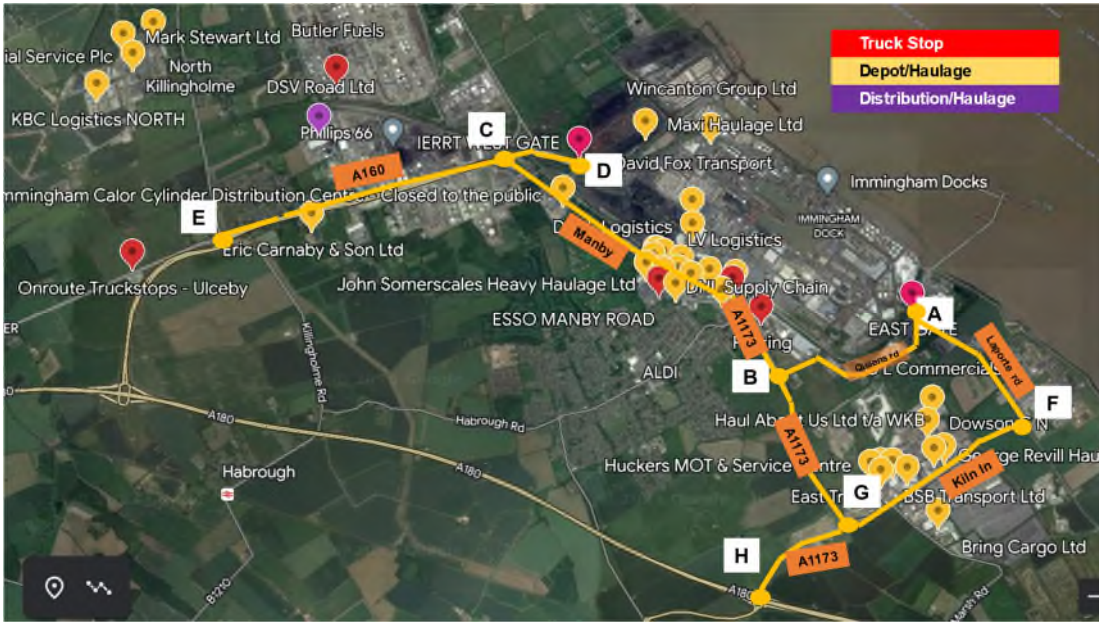


Figure 1 Off-site Freight Facilities

There are several major facilities on the A160, including DSV road limited depot and distribution centre, and DFDS Logistics depot and distribution centre. These two sites represent a large percentage of offsite capacity and are major contributors to trip generations. Due to their depot functions, a number of drivers will park their truck heads at these facilities before returning home via using their private vehicles. These drivers would then return at the start of the next shift to acquire the truck head, transfer to the port to acquire their first trailer and begin that shift operations. This type of behaviour can be seen in the heatmap presented in Figure 2, which show that the majority of the drivers arriving at the Port of Immingham in the morning begin from a distance of less than 50 km away.

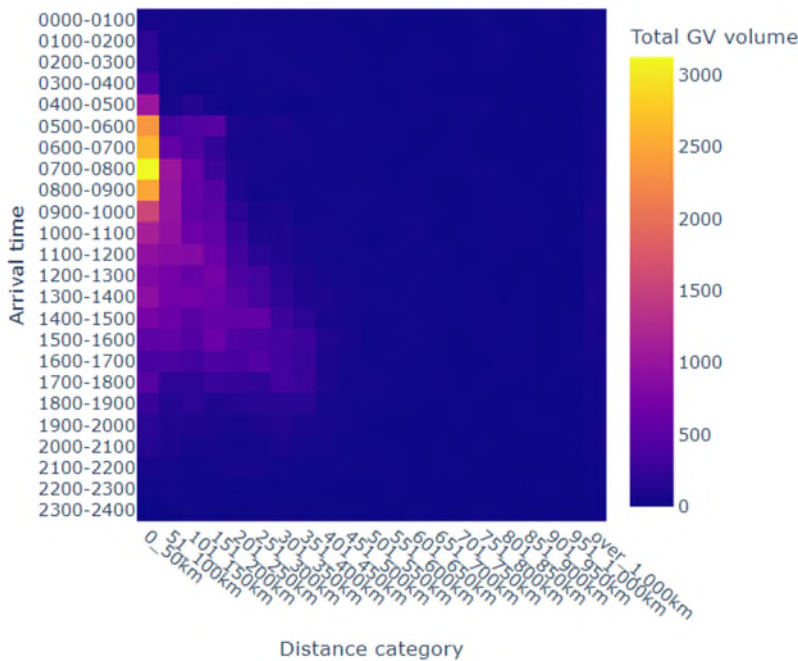


Figure 2 - Distance from last dwell to Port of Immingham – Source: GHD Freight Insights 2023

The presence of these facilities and the associated driver behaviours does not appear to be considered within the distribution assessment.

5. Conclusion

Without appropriate consideration of the distribution between the West and East Gates, there is a risk that the Applicant's Transport Assessment may over or under-estimate the implications of the IERRT project on the port's local road network, the gatehouses, and the strategic road network. Implications are unassessed congestion, and potential impacts on existing users.

As such it is recommended that the Applicant undertakes the assessment of determine the distribution between the two gatehouses utilising the following methodology:

- Complete the review of data provided by interested parties and provide commentary;
- Undertake an assessment of all freight facilities within the region rather than just a selection, with consideration of potential trip generation or termination;
- Coordinate further discussions to enable the Applicant and Interested Parties to agree an appropriate methodology for assigning the distributions to the East and West Gates;
- Establish a range of distributions for the West and East Gates in accordance with current operations, existing facilities, future facilities, and uncertainty of driver route selection. Due to the unknowns associated with driver behaviours, without controls it is DFDS' recommendation that a broad assessment is conducted that represent the potential worst-case scenario for each of the port gates, considering that:
 - All IERRT traffic potentially uses the East Gate, i.e. 100% of development traffic uses the A1173 corridor; and
 - The existing distribution of traffic between East and West Gates is maintained, i.e. 18% of all traffic utilises the East Gate, and 82% of all traffic utilises the West Gate;
- Identify a Business as Usual distribution between the two gates which may sit between the two above mentioned scenarios, providing commentary on how and why this differentiates between the worst-case scenarios as presented above, how this influences the gate house capacity, how this influences existing users, and how this level of distribution will be achieved;
- Consider the application of controls to achieve the desired routing, whilst also being considerate of conditions that may prevent controls from being followed; and
- Re-evaluate the Transport Assessment modelling where necessary where input parameters have been updated subject to the above, including assessment of impact on existing communities and committed developments.

During the discussion held on the 10 August 2023 between the Applicant, DFDS, CLdN and respective representatives, the parties have 'endeavoured' to agree a methodology as requested but have not yet agreed one. The recommended methodology presented in this note is intended to be reviewed by the Applicant and their consultants and discussed further with the Applicant at the next meeting as agreed at the meeting held on 10 August 2023.

Matt East
Sub Sector Lead

[REDACTED]@ghd.com

Nicole van der Merwe
Advisor

[REDACTED]@ghd.com