

IMMINGHAM EASTERN RO-RO TERMINAL



Applicant's Response to Interested Parties' Deadline 1 Submissions

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1. Purpose of this document

- 1.1 Following the Preliminary Meeting and Issue Specific Hearing 1 held on 25 July 2023 and the Issue Specific Hearing 2 held on 27 July 2023, the Examining Authority (ExA) issued its Rule 8 Letter dated 2 August 2023 'the Rule 8 Letter' which set down the Examination Timetable and procedure.
- 1.2 All parties were required to submit the following, (amongst other things) by 23:59pm on 15 August 2023 (Deadline 1):
 - (a) Comments on any updates to Application documents submitted by the Applicant prior to or at the PM (if relevant);
 - (b) Comments on Relevant Representations (RR), with summaries for any comments that exceed 1500 words;
 - (c) Post-ISH1 and ISH2 submissions, including: written submissions of oral cases made during those hearings; and responses to any action points arising from those hearings; and
 - (d) Comments on any further information/ submissions previously accepted by the ExA.
- 1.3 The Examination Timetable now requires Interested Parties ('IP's') to submit comments on relevant submissions received by Deadline 1 no later than 23:59pm on 5 September 2023 (Deadline 2).
- 1.4 This document contains the Applicant's comments on the Deadline 1 submissions. Each of the tables below references a specific IP, identifying the relevant submission/comment to which the Applicant is responding in Columns 1 and 2, before providing the response in Column 3.
- 1.5 A glossary of terms and list of acronyms can be found in Section 5 below.

2. CLdN

Table 1 – Applicant's responses to CLdN Ports Killingholme Limited ('CLdN')

CLdN Document and Paragraph	CLdN Submission	Applicant's Response
ISH1 Post Hearing Submissions [REP1-024] Item 3, Post Hearing Note	CLdN has suggested that the Applicant's DCO should include protective provisions for its benefit.	The Applicant has considered CLdN's suggested protective provisions but is of the view that none of the provisions outlined are required nor would they be appropriate for inclusion within the draft DCO. The ExA will be aware that the Port of Killingholme, operated by CLdN, lies some three kilometres upstream of the Port of Immingham. As such, ABP does not believe that the construction and operation of a new three berth Ro-Ro Terminal can have any impact on the Port of Killingholme's operations. This view will be formally conveyed to CLdN before Deadline 3 and the Applicant will be happy to discuss its views further with CLdN.
ISH1 Post Hearing Submissions [REP1-024] Item 3, Paragraph 3	Requirement 8 of the dDCO provides for compliance with a Construction Environmental Management Plan but there is no mechanism for the local planning authority or other body to approve the detailed plan, and only an outline document has been submitted with the application [APP-087].	The Construction Environmental Management Plan (CEMP) [APP-111] submitted as part of the DCO application, is not an outline nor is it a framework document that would require review and approval following the closure of examination and the commencement of construction. The control measures detailed in the CEMP [APP-111] for the mitigation of any construction impacts will be adopted by the appointed contractor.

ISH2 Post Hearing Submissions [REP1-025]

CLdN's Written Summary of Oral Submissions provided in respect of Item 2 – Need for the Proposed Development CLdN's written summary of its oral submissions made in respect of Item 2: Need for the Proposed Development. The Applicant provided a general summary of its Need case during ISH2 and a written summary, provided post-hearing comments on some aspects of CLdN's oral submissions made at ISH2 [REP1-009].

The Applicant has also provided, at Deadline 1, comments on CLdN's Relevant Representation [REP1-013] which reflects similar general points outlined in the post-ISH2 written summary now provided by CLdN [REP1-025].

Nothing now set out in CLdN's written summary of its ISH2 oral submissions materially alters the earlier points already made by the Applicant.

The Applicant again notes from CLdN's written summary of its ISH2 oral submissions [REP1-025] that, amongst other things:

- CLdN's submissions continue to remain very general in nature, with a lack of detail or evidence to support the assertions made. The Applicant will respond to CLdN's case in due course if and when it has been further formulated or explained.
- 2. CLdN's submissions gives an incorrect impression that the Applicant's application is silent on certain matters when it is clearly not.
- 3. CLdN's case is, at its core, a competitor objection which, highlights one of the many virtues of the Proposed Development that Government strongly seeks to encourage, namely the potential to generate competition.
- 4. CLdN's position on need wrongly interprets relevant policy contained within the NPSfP. Fundamentally, under the policy set out within the NPSfP there is no requirement for the Applicant to demonstrate a need for the Proposed Development to benefit form the presumption in favour of such development because a compelling and urgent need for the type of infrastructure that would be provided by the IERRT is already established in the NPSfP see NPSfP sections 3.4 and 3.5. As it happens, the Applicant has also separately demonstrated a need, even though there is no requirement to do so. That

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		 adds further weight to the clear presumption in favour of the development that already exists under the NPSfP. 5. CLdN has misunderstood the Applicant's approach to various matters in relation to need considerations and appears to be seeking to narrow need down to simply a consideration of overall demand for capacity to meet forecast growth which is a mistaken approach.
ISH2 Post Hearing Submissions	CLdN's written summary of its oral submissions made in respect of Item	As a matter of policy set out in the NPSfP and as a matter of law, there is no requirement for the Applicant to consider alternatives nor to demonstrate that there is an absence of any alternatives to what is being proposed.
[REP1-025] CLdN's Written Summary of	2: Need for the Proposed Development – in particular the summary provided relating to the consideration of alternatives.	The NPSfP (at paragraph 4.9.1) makes it clear that: "From a policy perspective this NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option."
Oral Submissions provided in		The NPSfP (at paragraph 4.9.2) then goes on to summarise what does need to be done in terms of alternatives, namely:
respect of Item 2 – Need for the Proposed Development – notably in		(i) comply with the duty relating to alternatives contained within the EIA Regulations – this relates to procedural requirement to set out what alternatives have been considered – something that has been done in IERRT ES, not a requirement to consider other alternatives; and
respect of the summary provided relating to the		(ii) comply with any legislative requirement relating to alternatives which is relevant to the project – for which there are none of relevance in respect of the Proposed Development.
consideration of alternatives		In addition, the Applicant has already identified that alternatives can sometimes be relevant in cases where substantial or significant harm is likely to be caused by the proposal (but where such principle arises from case law so is already

		within or akin to legislative requirement heading above) or where there is a specific relevant topic related policy requirement to consider alternatives. None of these situations arises or is an issue in respect of the Proposed Development. Paragraph 4.9.3 of the NPSfP – which the Applicant notes is the subject of ExA Question BGC.1.6 of ExQ1 [PD-010] – sets out, in circumstances where there is a legal requirement to consider alternatives (which as indicated above is not an
		issue for the Proposed Development), a series of principles to guide the decision-maker in deciding what weight should be given to alternatives. Those principles include the one which is summarised in ExA Question BGC.1.6.
		Without prejudice to these basic points and in any event, the Applicant has, within Chapter 4 of its ES [APP-040], considered alternatives and the absence of any alternative location for its development. It has demonstrated that there is no alternative to meeting the need which has been identified. The Applicant has also provided commentary on certain principles set out in NPSfP paragraph 4.9.3 within its Planning Statement [APP-019].
ISH2 Post Hearing Submissions [REP1-025]	CLdN's response to the ExA's ISH2 Action List [EV3-012] Item 5 which states:	The Applicant notes from CLdN's response that even though it criticised in its Relevant Representation [RR-007] (submitted in April 2023) the Applicant's considerations of future Ro-Ro growth, it is now acknowledging that – some four months later – it is still not yet able to provide any detail/data to support its criticism. It is suggested that such unsupported assertions are designed simply
CLdN Response provided to Post Hearing Note 2 relating to ISH2	"Provide CLdN's expectations for future demand on the Humber for Ro-Ro capacity	to engender confusion and delay and, if CLdN continues to fail to provide any concrete information to justify its criticisms, those assertions cannot be given any weight.
Action List Item 5	through to 2050 including the anticipated distribution between accompanied and	The fact that CLdN have conceded that it has only now 'appointed an independent market analyst' to assist it, supports the Applicant's view that CLdN's position is still being developed, presumably in the hope that it will be

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	unaccompanied RoRo freight [a draft by D1 and full version by D2]."	able to make a more tangible response at some later stage in the examination process. As made clear in the comments above and elsewhere by the Applicant, entirely in line with policy set out in the NPSfP, there is no requirement for the Applicant to demonstrate a need for the proposed development. This is because a compelling and urgent need for the type of infrastructure that would be provided by the IERRT development is already established in the NPSfP – see NPSfP sections 3.4 and 3.5.
ISH2 Post Hearing Submissions [REP1-025] CLdN Response provided to Post Hearing Note 3 relating to ISH2 Action List Item 7	For this action Item CLdN were asked to provide a plan for the port of Killingholme identifying its berth numbers.	The Applicant notes that CLdN have provided the plan requested. However, it is not clear from the plan or the text of the CLdN ISH2 Post Hearing Submission what the various shaded areas covering parts of the landside area of the Killingholme terminal represent. The Applicant would welcome clarification and a detailed explanation.
ISH2 Post Hearing Submissions [REP1-025] CLdN Response provided in respect of Item 3 – Effects on landside	This section raises various issues, including: - the ratio of unaccompanied to accompanied units;	Matters relating to the ratio of unaccompanied / accompanied units and the assignment of traffic between the East and West Gate are considered further in response to DFDS' Deadline 1 submissions provided in Table 2 of this document . In terms of peak assessment flows, the Transport Assessment [AS-008] confirms at paragraph 5.2.3 that the overall capability of the terminal (and therefore the maximum assessed within both the TA and ES) is 1,800 units per day (660,000 units per year).

transportation and effects for existing occupiers of the Port of Immingham unconnected with navigation and shipping	 the assignment of traffic between East and West Gate and the peak daily assessment flows adopted in the TA 	In practical terms, however, the efficient throughput of the terminal on a day-to-day basis is considered likely to be around 80% of that total capacity, which would result in an average of 1,440 units being handled per day (around 525,000 units per year). The assessed level of 1,800 units that has formed the basis of the assessment, therefore, allows a 25% uplift on the considered efficient throughput level to allow for assessment of potential peak days. The assessment presented in the TA is, therefore, robust and appropriate. Within this aspect of its summary, CLdN repeat the claim made at ISH2 that Chapter 3 of the ES [APP-039] (and in particular paragraphs 3.2.5 to 3.2.9 of ES Chapter 3): 'indicate that some freight will be directed to storage areas to the west of the development' (emphasis added). This represents a fundamental misunderstanding of what the ES says. References in the ES to a western storage area are to the storage area that forms part of the Proposed Development located to the west and labelled as such [APP-059].
ISH2 Post Hearing Submissions [REP1-025] CLdN Response provided to Post	CLdN's written summary of its oral submissions made in respect of Item 4: Designated Sites and response to ISH2 Action Point 20.	Intertidal habitat loss CLdN acknowledge that they had wrongly referenced intertidal habitat losses documented within the PEIR as opposed to the ES. However, the direct intertidal habitat loss quoted by CLdN in this response remains incorrect. The total direct intertidal loss arising from the IERR project is 0.012 ha (0.006 ha from the capital dredge and 0.006 ha from piling). This is

Hearing Note 7 in respect of Item 4 – Any effects for the integrity of the Humber Estuary Special Area of Conservation, Special Protection Area and Ramsar site (the designated sites) less than that stated by CLdN. The Applicant confirmed this in response to ISH2 Action Point 19 [REP1-009].

The Applicant does, however, agree with CLdN that the effect of this loss is negligible.

Cumulative and in-combination projects

The full assessment methodology that has been used to evaluate in-combination and cumulative effects is clearly set out in Chapter 20 of the ES [APP-056]. This includes details of how projects have been scoped in to and out of the assessment along with the associated rationale (see Table 20.4 of Chapter 20 of the ES [APP-056]).

CLdN have not articulated which projects they believe are missing from the assessment and as such the Applicant cannot provide a direct response to this concern.

Chapter 9 of the ES [APP-045]

Chapter 9 of the ES [APP-045] provides an assessment of potential effects of the Proposed Development on nature conservation and marine ecology. Incombination and cumulative effects have been fully assessed within Chapter 20 of the ES [APP-056] and the HRA [APP-115]. This includes consideration of both intra and interspecific effects and as such is consistent with PINS Advice Note 17 (Cumulative effects assessment relevant to nationally significant infrastructure projects, August 2019).

Cumulative and in-combination consideration of intertidal habitat loss from all relevant projects has therefore been considered. The predicted effects are not considered to compromise any conservation objectives, and it is concluded that there is no potential for AEOI on qualifying interest features either alone or incombination.

		Natural England Positive discussions regarding the Log of Key Issues submitted by Natural England [AS-016] remain ongoing between the Applicant and Natural England. Natural England has indicated that it is likely that all of the concerns raised can be addressed during the course of the Examination [REP1-022].
ISH2 Post Hearing Submissions [REP1-025] CLdN Response provided in respect of Item 5 – Navigation and Shipping	CLdN's written summary of its oral submissions made in respect of Item 5: Navigation and shipping effects	CLdN's summary seeks to justify the inclusion of protective provisions for its benefit within the DCO. This matter has been responded to above by the Applicant in its response to CLdN's ISH1 summary.

3. DFDS

Table 2 – Applicant's responses to DFDS Seaways Plc ('DFDS')

DFDS Document and Paragraph	DFDS Submission	Applicant's Response
ISH2 Summary of Case [REP1-028] Section 2: Need for the Proposed Development	DFDS written summary of its oral submissions made in respect of Item 2: Need for the Proposed Development	The Applicant notes that DFDS does not object to the proposed IERRT development in principle. The Applicant also notes the summary provided in respect of freight data and dwell time matters.
ISH2 Summary of Case [REP1-028] Section 3: Effects on landside transportation and effects for existing occupiers of the Port of Immingham unconnected with navigation and shipping	DFDS written summary of its oral submissions made in respect of Item 3: Effects on landside transportation and effects for existing occupiers of the Port of Immingham unconnected with navigation and shipping	The Applicant considers that it has addressed the comments raised by DFDS in this section of its written summary in its separate responses provided in the following entries of this table.
Response to ISH2 Action 11 [REP1- 029]	GHD's response on behalf of DFDS presents a number of	

DFDS Response to ISH2 Action 11 relating to the submission of road traffic data.

different data sets (Section 2) and seeks:

a) the justification of the use of 2021 data in the Applicant's assessment, b) clarification on whether the approach has been agreed with the relevant Local **Highway Authorities** and c) confirmation that the Applicant's TA has appropriately factored in committed developments.

The use of 2021 data

The justification for the use of the 2021 data is provided in the Applicant's response to **ISH2 AP10 (REP1-009)**. The additional survey work undertaken in 2023 confirms that the survey work adopted in the TA is robust and representative. Subject to some minor clarifications on the data (which the Applicant intends to submit at Deadline 3), this was agreed as being the position at a meeting on the 30th August 2023 with representatives of both DFDS and CLdN.

Furthermore, it is considered that no weight should be placed on the data provided by GHD for 2017 – 2018. Although now cancelled (but not replaced), the 2008 Guidance on Transport Assessment (produced by the DfT) confirmed that data used for Transport Assessment purposes should be collected "within the last three years" (paragraph 4.18 of the guidance). That would discount any data from before mid-2020.

As far as the assessment of the proposed development is concerned, historic data has understandably been affected by the COVID pandemic. Assessment of the scheme based on data from pre-pandemic years (in particular 2019) should, therefore, be treated with caution.

Notwithstanding that, consideration has been given to the changes in flows since 2019 (i.e. immediately pre-pandemic) with the 2021 flows used in the TA **[AS-008]**.

On behalf of the Applicant, DTA compared the 2019 traffic counts suggested by DFDS with the 2021 traffic counts which have been used in assessing the junctions within the TA **[AS-008]** to show the suitability of the 2021 data. This can be seen below -

TAG (Transport Analysis Guidance) Unit M2.2 paragraph 4.4.4 states that - "Practitioners should establish evidence on scale of changes to land use and demographic characteristics, transport networks, and travel patterns, with more attention given to the key movements in the model internal area, and use this evidence to assess the validity of 'old' data sources and their suitability for the intended use(s) of the model to judge their suitability for those use(s)."

The impact that Covid-19 has had on traffic demand is unprecedented with long lasting and permanent changes in travel behaviour. Of relevance to this is DfT analysis (National Road Traffic Projections 2022, DfT) which, in line with the TAG guidance stated above, considered the use of recent traffic counts over the 'older' pre-covid counts.

The DfT analysis showed that in February 2022, traffic nationally was 8% lower than 2019 traffic with car traffic changes causing this reduction and HGV and LGV traffic being higher than pre-covid levels (July 2022 levels are 15% and 24% above February 2020 levels, respectively). In the context of the DfT expectations for traffic projections a 5% net reduction in car vehicle miles has been applied to projections compared to projections without Covid-19, with no adjustment applied to HGV and LGV vehicle miles. Overall, the report suggests that "people have formed new habits and expectations [...] particularly around working from home and online shopping."

DTA have directly compared the 2019 traffic flows used by DFDS on the local network with the 2021 traffic flows used in the TA [AS-008]. This showed that on average, over the entire local network, traffic in total has decreased by up to 10%. In comparison, on average, over the entire local network, HGV traffic has increased by approximately 15% to 25%. This is in line with the analysis undertaken by DfT.

Considering the above, and the lack of significant change between the 2021 traffic flows in the TA and the 2023 updated traffic flows [REP1-019] the data would

suggest that the 'new normal' following Covid-19 has been reached on the local network and that 2019 traffic data is no longer suitable for assessment of the junctions.

This clearly confirms that the change in flows from 2019 to 2021 – 23 are as expected and consistent with national findings by the DfT.

Overall, it is confirmed that baseline data on which the Transport Assessment is based is appropriate data for the assessment and is robust.

Agreement of the Local Highway Authorities

The approach that the Applicant has adopted has been agreed with the Local Transport Authorities. National Highways have signed a comprehensive SOCG (to be submitted by the Applicant by Deadline 5) which confirms the approach to be both acceptable and appropriate for the proposed development.

Committed Development

The Transport Assessment **[AS-008]** at Annex I sets out the full details of the committed development assumed in the assessment, and this has been agreed with all the relevant highway authorities. In addition to specific sites, flows were factored up to the future year using TEMPro Factors (See Table 17 of AS-008) which represented a further 6-12 % increase (depending on the precise road location and status).

This assessment is transparent and clear for review. In contrast the suggested assessment of committed development by GHD (**Attachment 2 of REP1-029**) provides no details of what has been applied in respect of committed development and how it has been applied. It should be afforded no weight.

Response to ISH2 Action 12 [REP1-030]

DFDS Response to ISH2 Action 12 relating to 10% allowance for tractor-only movements DFDS has indicated that it has undertaken surveys in order to determine whether the 10% solo tractor movement assumption in the TA [AS-008] is accurate. The summary of the surveys received by DFDS showed that they considered the solo-tractor unit assumption should have been closer to 20%. They propose the use of 18.9% in the assessment.

The Applicant would point out that DFDS are not comparing like with like within the information they have provided. Their assessment of surveys includes both solo tractors relating to Ro-Ro operations and empty container HGVs.

The solo-tractor unit calculations undertaken by DFDS include two types of solo tractor movements;

- a) solo tractor units (tractor heads without a trailer) and
- b) "empty HGVs" (those without a container).

These are two different types of movement. At the DFDS operation, and elsewhere in the Port, there are container (lift-off lift-on services) which generate a significant proportion of the "empty HGVs movements" – i.e., HGVs with container trailers but no container. This is to be expected across the Port.

This does not, however, apply to the IERRT project which will have limited container movement capacity (likely to be around 2% of throughput). As a consequence, the proposed development will not generate these types of movements in any material number.

Applying the suggested DFDS assumption of 18.9% to the IERRT is simply unrealistic in terms of what is actually proposed and it is disappointing that DFDS have failed to acknowledge that fact.

Taking the DFDS (Table 1 data) and applying only solo HGVs the average rate is 12%. This is not materially different to the figures adopted in the TA **[AS-008]** and is also consistent with the data collected by DTA (**Appendix 1** to this document).

Changing the ratio from 10% adopted in the TA to 12% makes no material difference to the assessment as shown in **Appendix 2** to this document.

Response to ISH2 Action 14 [REP1-031]

DFDS Response to ISH2 Action 14 relating to unaccompanied / accompanied units

DFDS, in summary, suggest that 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.

A detailed sensitivity analysis of the implications of a different split of accompanied / unaccompanied units is provided at **REP1-009**. This concludes that the impact of changing the split (in terms of a sensitivity test) is marginal. In the highway peak hours, the change is negative (i.e., there is less traffic). The main affected hour is 09:00-10:00 when flows would increase by 37 vehicles and 19:00-20:00 when flows would increase by 13 vehicles. These additional vehicles are at times when baseline flows on the network are considerably lower than the highway peak periods and there would, therefore, be no material impact to the assessments or their conclusions provided in the TA.

With all other parameters being unchanged (i.e., throughput etc and the data arising from ISH2 AP6 being consistent) this conclusion was agreed at a meeting with representatives from DFDS and CLdN on the 30th August 2023.

For the purposes of checking the position taken within the TA, data for the first six months of 2023 (as required by ISH2 AP6) has been provided by Stena Line as set out below.

This confirms a total of 123,843 units were processed, of which 39,778 (32%) were accompanied and therefore 68% were unaccompanied. This correlates closely with the TA assessed assumptions (28% / 72%). The sensitivity test provided at ISH2 AP13 [REP1-009] and Appendix 7 of the Written Summary of the Applicant's Oral Case at ISH2 [REP1-009] remains robust as that tested a split of 38% accompanied and 62% unaccompanied.

Response to ISH2 Action 15 [REP1- 032] DFDS Response to ISH2 Action 15 relating to East Gate / West Gate Sections 1 to 3	DFDS in its response to action 15 set out journey times for the various options for access to the port. They suggest the difference in journey times between the West Gate and East Gate Option is only 1 minute.	This conflicts with the applicants own assessment of journey times as follows: The peak outbound generation is likely to occur between 09:00 and 10:00. As a consequence outbound traffic has been modelled at 09:30 as can be seen in Appendix 3 to this document. As can be seen above, routeing from East Gate is consistently the quicker route with the route showing a typically 12-16 minute journey time compared to a typically 14-18 minute journey if routeing through West Gate – as can be seen in Appendix 3 to this document. The peak inbound generation has been assessed as likely to occur between 18:00 and 19:00. As a consequence, inbound traffic has been modelled at 18:30 - as can be seen in Appendix 3 to this document. It is clear from the presented Figures that the inbound timings are very similar to the outbound timings with routeing into East Gate being consistently the quicker route with the route showing a typically 12-16 minute journey compared to a typically 14-18 minute journey if routeing through West Gate. This confirms that for all routes, given the location of the facility, the use of East Gate (and therefore Queens Road and A1173) is the most appropriate for the development.
Response to ISH2 Action 15 [REP1-	In chapter 4 of its response to action 15	Facilities
032]	under "Other Factors", DFDS claim	In response, the ExA should note that that DFDS Figure 1 does not actually show the correct location of the publicly available truck stops.
DFDS Response to ISH2 Action 15 relating to East Gate / West Gate	that the route choice of vehicles will be affected by various factors. Figure 1	The correct plan is as attached as Appendix 4 to the Applicant's Response to ExQ1 (Application Document Reference 10.2.21). The location of "Depot / Haulage sites" on the DFDS plan is noted. This confirms, as stated at the ISH, that

Section 4

provided by DFDS purports to provide a summary of local facilities.

the majority of haulage yards in the area are in fact located on or served from the A1173 corridor. Any vehicles that have a stop at those locations prior to entering or after leaving IERRT will clearly use the East Gate. This supports the assessment provided in the Transport Assessment **[AS-088]**.

As set out in the Transport Assessment, the proposed development will predominantly cater for unaccompanied freight. The majority of demand for those movements (as set out in the TA [AS-008] at Table 12) is longer distance movements and there is no reason why these movements would want (or indeed need) to stop locally. Driver time restrictions are such that most drivers arriving or leaving the port will seek to maximise their drive time immediately on exiting the port.

Notwithstanding this, applications that are currently pending for truck stop facilities to the west of the Stallingborough Interchange will increase the propensity of HGVs to stay on the A180 on their approach to the Port.

Existing Movements / Habits

The split of existing HGV movements (18% to East Gate) is noted and this is broadly consistent with the Applicant's own surveys. However, this reflects the existing use of the Port and in particular the location of DFDS at the western end of the port – furthest from the proposed development.

The ExA should note that there is in fact no correlation between DFDS operations which predominantly comprises unaccompanied freight and car importation and the proposed IERRT scheme.

Way Finding

As described in the TA [AS-008] at paragraph 7.4.6, ABP are in discussions with National Highways and the Council with a view to upgrading wayfinding to and from

the port generally – which it should be noted is not being taken forward as part of the Immingham Eastern Ro-Ro DCO application.

In tandem with this, however, there are opportunities to introduce operational management measures with drivers. As noted in the Applicant's responses to the ExA's questions [TT 1.2c] (**Application Document Reference 10.2.21**) all Stena Line customers (in common with most Ro-Ro operators) are pre-booked. Details of routing can be provided with booking confirmation (normally email) and supported by the Stena Line App which can provide routing directions. Outbound from the facility the scheme will provide signage within the port to direct all HGVs to East Gate.

West Gate Capacity

On the basis of the above, the assumption that 15% of movements could use West Gate is clearly robust and appropriate.

Notwithstanding this, consideration has been given to the sensitivity of this increasing. The operation of the Port Security "Gates" is set out in the TA at Section 6.4.10. The Port Gates are required so that inbound vehicles can be subject to security scrutiny if appropriate and required. This is an unavoidable and required function of the operation of the port and whilst security checks inevitably result in a degree of delay that is an inevitable feature of entry to a secure facility.

Across the port and separate from these proposals, the Applicant is also implementing an ANPR system for staff cars which will reduce queuing time by enabling those cars to pass more quickly through the Port Security gates.

The appropriate traffic test for the consideration of the proposed development is whether the proposals lead to unacceptable impacts in terms of highway safety or a severe impact in terms of congestion.

At East Gate, the capacity will be significantly enhanced by the provision of a second inbound security lane, which will effectively double capacity.

The distance from West Gate to the public highway network (on Rosper Road) is some 450m which equates to around 25 HGVs queuing distance. There are no checks on outbound traffic. Therefore, the only potential impact arising relates to inbound movements.

Previously, surveys have been undertaken at both East Gate and West Gate to consider existing queuing. This data is provided at **Appendix 1** to this document.

This data shows existing queuing averages around 6 vehicles and peaks at around 16 vehicles (recorded at 10.35). At the peak inbound flow for the proposal (between 1600-2000) little queuing was observed.

At West Gate, peak inbound movements from the facility will be in the order of 18 – 22 vehicles per hour – **Reference AS-008 Table 13** (i.e., an average of around one every 3 minutes). This is based on the Transport Assessment of 15% of traffic using West Gate between the hours of 1800-1900. On the day of the survey little queuing was observed during these times.

Even if that ratio doubled (to 30%) of total movements, the hourly movements would remain less than 1 per minute. This might, therefore, increase average queues from 6 to around 8 and peak queues from 16 to around 20 (if they occurred at times of peak usage). Such an increase, however, is not material, and remains well within available queuing distances without impact on the wider network in either operational or safety terms.

On that basis it is clear that the assessment in the Transport Assessment is robust and there will be no material impact on capacity at West Gate. In terms of the wider impact, it is clear that the conclusions of the operational assessments (Annex K of AS-008) remain robust (see response to REP1-029 and REP1-033). All of the junctions assessed on the A160 corridor are reported to have significant spare capacity and there would be no adverse impact arising from the addition of a further 20 - 30 vehicles per hour in the PM peak. DFDS have provided The assessment provided by DFDS is flawed and should be afforded no weight. Response to ISH2 -Action 17 [REP1details of their The reasons for drawing this conclusion are as follows -033] assessment of 1. As explained in the response to **REP1-029** the use of 2019 data is not junctions on the considered appropriate in terms of application to the proposed development. **DFDS** Response to network. This 2. The assessment includes a significant number of committed developments ISH2 Action 17 assessment is based which fall outside the agreed scope of the EIA and TA in terms of agreement relating to East predominantly on with the relevant highway authorities. **Gate / West Gate** 2019 counts from the North Killingholme 3. The scale of committed development traffic assumed is significantly higher **Power Project** than the level agreed in the TA [AS-008] and this therefore significantly (NKPP) Transport distorts the outcome of the assessment. Assessment (for a 4. The assessment provided does not provide a breakdown of the traffic flows non-material change associated with each individual committed development site through each to the DCO granted individual junction. At the meeting held on 10th August 2023 with DFDS's in 2014). traffic consultants, GHD confirmed data relating to traffic flows would be issued to DTA but information relating to the traffic flows associated with each committed development site has not been provided for DTA to review in detail. It is, therefore, not possible at this time to determine whether the traffic flows for each committed development site is correct or not. GHD have confirmed they will provide that information for review (meeting 30th August 2023).

		 The level of background (TEMPro) growth applied to the assessment is higher than that agreed with relevant transport authorities in respect of the TA [AS-008].
		Table 3 of the assessment does not correctly summarise the outcomes of the GHD assessment. A corrected version is provided at Appendix 4 to this document.
		Even if this data were taken at face value (which is not accepted), it demonstrably does not conclude that IERRT should be providing mitigation in terms of junction operation.
		For those junctions which GHD claim are operating over capacity (Reference Tables 10 – 16 of Attachment 2) the net change in delay or queuing as result of IERRT is minimal. In the context of the tests at NPPF paragraph 110 and 111, this change is not significant nor material to the point that it requires consideration of mitigation (paragraph 110d) and cannot therefore be considered severe (paragraph 111).
ISH2 Summary of Case [REP1-028] Section 5: Navigation and Shipping Effects	DFDS written summary of its oral submissions made in respect of Item 5: Navigation and Shipping effects	DFDS has continued to repeat the same points regarding the NRA methodology as referenced in its Relevant Representation. The Applicant has confirmed repeatedly that the NRA has not used mixed methodologies and has responded in detail to this point in the Applicant's Comments on the Relevant Representations [REP1-013].
	Paragraph 5.5 relates to the NRA	In addition, the Applicant has responded to the use of wind data in ISH2 Action Point 29 [REP1-009].
	methodology and wind data used in the NRA.	The Applicant notes that DFDS will produce its own NRA for Deadline 2 and would request that this is accompanied by a narrative explaining how DFDS and its methodology is fully compliant with the PMSC.

ISH2 Summary of	Paragraph 5.7 relates	The Applicant expects this NRA to be in a format applicable for a consent application rather than an operational risk assessment for port operations. The Applicant has provided a detailed response in relation to tidal current flow
Case [REP1-028] Section 5: Navigation and Shipping Effects	to the tidal direction data used in the simulations.	monitoring and it adopted modelling approach in its response to ISH2 Action Point 26. DFDS's suggestions to take new readings north of the IOT are unnecessary as explained by the Applicant in its response to ExQ1 NS.1.18. The comments
Paragraph 5.7		raised by DFDS relate to an area of the River that is already subject to continuous marine movements, navigation and shipping activities. There is no need for the Applicant to commission the collection of further data as the marine conditions are well understood and managed by both the Port and
10110 0		Humber SHA's, as well as the masters and pilots of vessels in transit.
ISH2 Summary of Case [REP1-028]	Comments on navigational simulations and aborted Run 59.	As the ExA will be aware, the simulation sessions were designed to test and demonstrate the practical feasibility of navigational operations. The simulations, therefore, focussed on scenarios that explored the limits of operational viability.
Section 5: navigation and Shipping Effects		The results from these simulations were then used to inform and provide initial guidelines for future operations noting that more detailed work would be required in preparation for actual operations. This is common and indeed good practice and inevitably results in a high proportion of aborted or failed runs as techniques
Paragraph 5.12		are trialled. During ISH2, DFDS seemed to be inferring that an aborted run should be recorded as a failed run – in other words some sort of catastrophic event such as a collision or allision. This is simply not correct.

As the Applicant in turn explained during the ISH2 examination hearing, categorising a run as aborted is merely an indication that the pilot had decided that the approach taken was not going to work. Rather than waste simulator time in correcting the vessel's position it is often easier, quicker and more practical, just to reset and retry.

The swept path analysis produced by the simulator for Run 59 records a premature turn to port. The pilot attempting the simulated manoeuvre was apparently testing an idea for approaching the proposed IERRT infrastructure in a different way.

Far from viewing Run 59 as a failure – the run serves to demonstrate the robustness of the simulation exercises. It would be far more worrying if there were no failed or aborted runs.

The purpose of these simulations exercises was to test the strengths - and the weaknesses – of berthing and departure manoeuvres in given scenarios.

In addition, these runs are generally undertaken in extreme weather conditions. Indeed, to do otherwise would rather miss the point of the simulation.

Thus, as noted above, a lack of aborted runs would raise questions as to whether the simulations had been undertaken correctly in that it would either indicate that the simulation model was not reflecting the severity of environmental conditions acting on the vessel or in the alternative, would infer that insufficiently robust testing of its operability had taken place.

In paragraph 5.12, DFDS have incorrectly alluded to the fact that it is not possible to stop a vessel as it is constantly moving. This view, which was repeated by a DFDS witness during ISH2 is disingenuous bearing in mind the fact that the vessel's master can deploy a vessel's anchors in emergency situations. As the ExA is aware, the effect of deploying an anchor will be to resist movement of the vessel and slow it or bring it to a stop.

	It is particularly disappointing that DFDS attempted to make this a point of amusement during the hearing bearing in mind that at the simulations undertaken by HR Wallingford in November 2022, that precise operation, namely the deployment of anchors for a vessel moving astern as it approached its berth, was
	simulated successfully – and representatives of DFDS were present at the time.

4. Immingham Oil Terminal Operators

Table 3 – Applicant's responses to Immingham Oil Terminal Operators ('IOT')

IOT Document and Paragraph	IOT Submission	Applicant's Response
ISH2 Written Submission of Oral Case [REP1-036]	IOT Operator's written summary of its oral submissions made in respect of Item 5: Navigation and Shipping effects. These paragraphs relate to the consideration	In response to paragraph 2.2, the IOT Operator's appear to be confused as to the core purpose of an NRA in the context of an application for development consent.
Paragraphs 2.2, 2.3, 2.10	of the effects of the IERRT and IOT Operator's commitment to producing its own NRA by Deadline 2	The sole purpose of the NRA is to provide a formal risk assessment of the navigational risks as part of the EIA for the development. Its purpose is not to consider risks for the wider port operations or functions.
		The Applicant is satisfied and confident that the Navigational Risk Assessment (NRA) [APP-089] has fully addressed all risks relating to navigation. On that basis, the "agent of change" principle has been fully addressed.
		The Applicant notes that the IOT Operators will produce their own NRA for Deadline 2 and would request that this is accompanied by a narrative explaining how the NRA and its methodology is fully compliant with the PMSC.
		The Applicant trusts that the NRA will be produced in a format applicable for a consent application rather than an operational risk assessment for port operations.

ISH2 Written Submission of Oral Case [REP1-036] Paragraph 2.4	IOT's written summary of its oral submissions made in respect of Item 5: Navigation and Shipping effects. This paragraph relates to the Port of Immingham MSMS.	The Applicant confirms that the required, but not all, sections of the Port of Immingham Marine Safety Management System (MSMS) are in the public domain and provide port users with information on port procedures, operations and policy. This is not contrary to the PMSC as suggested by IOT Operators. There is a lack of understanding as to the purpose and role played by an MSMS. For example, the MSMS cannot, and indeed should not, be available "online". The MSMS is not one single document. It comprises a number of operational processes, policies, assessments,
		guidance and risk controls which work in a systematic manner to facilitate the safe marine operation in the SHA and Port. The MSMS is effectively an ever evolving, moving process – not a static document.
ISH2 Written Submission of Oral Case [REP1-036] Paragraphs 2.5 - 2.6	IOT's written summary of its oral submissions made in respect of Item 5: Navigation and Shipping effects. Paragraphs 2.5 and 2.6 relate to scheme details and underlying data that supported the NRA.	The NRA considers the points raised by the IOT Operators in paragraph 2.5. The underlying data supporting the NRA was shared during the HAZID workshops, which the IOT Operators attended.
	INIVA.	As addressed by the Applicant in ExQ1 NS.1.17 , there is no known industry or government guidance which includes COMAH considerations when undertaking an NRA. The purpose of the NRA is to assess navigational risk.

		With regard to the proposed development, the Applicant has consulted with the Health & Safety Executive (HSE), who are well aware of the Land Use Planning Zones at Immingham and the COMAH sites operating there. In its letter of 28 June 2023, the HSE noted that it would not advise against the NSIP.
ISH2 Written Submission of Oral Case [REP1-036]	The IOT Operator's written summary of its oral submissions made in respect of Item 5: Navigation and Shipping effects.	The Applicant must stress that it is not up to stakeholders to define tolerability.
Paragraph 2.7	IOT reference that no attempt was made to reach consensus on the key issue of tolerability.	

5. Glossary and List of Acronyms

ABP	Associated British Ports
AEOI	Adverse Effect on Integrity
CEMP	Construction Environmental Management Plan
CLdN	CLdN Ports Killingholme Limited
dDCO	Draft Development Consent Order
DFDS	DFDS Seaways Limited
EIA	Environmental Impact Assessment
EM	Explanatory Memorandum
ES	Environmental Statement
ExA	Examining Authority
HE	Historic England
HOTT	Humber Oil Terminals Trustee Ltd
HRA	Habitats Regulations Assessment
IERRT	Immingham Eastern Ro-Ro Terminal (proposed development)
IOT	Immingham Oil Terminal
IOT Operators	Associated Petroleum Terminals (Immingham) Limited and Humber Oil Terminals Trustee Limited
IP	Interested Party
ISH	Issue Specific Hearing
LHA	Local highway authorities (North East Lincolnshire Council and North Lincolnshire Council)
MCA	Maritime and Coastguard Agency
MMO	Marine Management Organisation
MSMS	Marine Safety Management System
NE	Natural England
NELC	North East Lincolnshire Council
NLC	North Lincolnshire Council
NRA	Navigation Risk Assessment
NSIP	Nationally Significant Infrastructure Project
PA2008	The Planning Act 2008
PMSC	Port Marine Safety Code

Proposed	The proposed Immingham Eastern Ro-Ro Terminal
Development	
RIES	Report on the Implications for European Sites
Ro-Ro	Roll on roll off
RR	Relevant Representation
SAC	Humber Estuary Special Area of Conservation
SHA	Statutory Harbour Authority
SoCG	Statement of Common Ground
SPA	Humber Estuary Special Protection Area
WR	Written Representation

Appendix 1 – East and West Gate Traffic Counts

SITE: 4 LOCATION: QUEENS ROAD	SURVEYS LTD	DATE: 06/06/2023 DAY: TUESDAY
	2	
	Laporte Rd Lap	orte Rd Laporte Rd

JOB TITLE:

IMMINGHAM DOCKS

JOB NUMBER:

12384

MANUAL CLASSIFIED COUNTS

JOB REF: 12384

JOB NAME: IMMINGHAM DOCKS

SITE: 4

LOCATION: QUEENS ROAD



DATE: 06/06/2023

DAY: TUESDAY

05:00 21 05:15 36 05:30 59 05:45 39 H/TOT 155 06:00 16 06:15 38 06:30 52 06:45 44 H/TOT 150 07:00 31 07:15 69 07:30 79 07:45 87 H/TOT 266	1 3 3 8 15 3 5 8 7	0GV1 1 0 0 3 4 0 2	3 3 6 17 29	HGV TRACTOR WITHOUT TRIALER 4 3 4 10	0 0 0	MCL 0 2	PCL 0 1	TOT 30	CAR	LGV	OGV1	OGV2	HGV TRACTOR WITHOUT TRIALER	PSV	MCL	PCL	тот
05:00 21 05:15 36 05:30 59 05:45 39 H/TOT 155 06:00 16 06:15 38 06:30 52 06:45 44 H/TOT 150 07:00 31 07:15 69 07:30 79 07:45 87	1 3 3 8 15 3 5	1 0 0 3 4	3 3 6 17 29	TRIALER 4 3 4 10	0	0	0			LGV	OGV1	OGV2		PSV	MCL	PCL	тот
05:15 36 05:30 59 05:45 39 H/TOT 155 06:00 16 06:15 38 06:30 52 06:45 44 H/TOT 150 07:00 31 07:15 69 07:30 79 07:45 87	3 3 8 15 3 5 8	0 0 3 4 0	3 6 17 29	4 3 4 10	0			30					IKIALEK				
05:15 36 05:30 59 05:45 39 H/TOT 155 06:00 16 06:15 38 06:30 52 06:45 44 H/TOT 150 07:00 31 07:15 69 07:30 79 07:45 87	3 3 8 15 3 5 8	0 0 3 4 0	3 6 17 29	3 4 10	0			30				_	^	_		_	
05:30 59 05:45 39 H/TOT 155 06:00 16 06:15 38 06:30 52 06:45 44 H/TOT 150 07:00 31 07:15 69 07:30 79 07:45 87	3 8 15 3 5 8	0 3 4 0	6 17 29	4 10	-	2		40	6 8	1 0	0	0 2	0	0	0	0 0	7
05:45 39 H/TOT 155 06:00 16 06:15 38 06:30 52 06:45 44 H/TOT 150 07:00 31 07:15 69 07:30 79 07:45 87	8 15 3 5 8	3 4 0	17 29	10	U	1	1	48 74	12	0	0 1	5	1 0	0	1	0	11 19
H/TOT 155 06:00 16 06:15 38 06:30 52 06:45 44 H/TOT 150 07:00 31 07:15 69 07:30 79 07:45 87	15 3 5 8	4 0	29		0	1	1	74 79	18	1	0	3	0	0	0	1	23
06:00 16 06:15 38 06:30 52 06:45 44 H/TOT 150 07:00 31 07:15 69 07:30 79 07:45 87	3 5 8	0		21	0	4	3	231	44	2	1	10	1	0	1	1	60
06:15 38 06:30 52 06:45 44 H/TOT 150 07:00 31 07:15 69 07:30 79 07:45 87	5 8		ч	8	0	0	0	36	10	2	0	2	0	0	0	1	15
06:30 52 06:45 44 H/TOT 150 07:00 31 07:15 69 07:30 79 07:45 87	8		7	5	0	1	0	58	4	1	1	4	0	0	0	0	10
06:45 44 H/TOT 150 07:00 31 07:15 69 07:30 79 07:45 87		5	19	5	0	1	1	91	13	3	1	7	0	0	0	0	24
07:00 31 07:15 69 07:30 79 07:45 87		5	14	2	0	0	1	73	7	1	1	5	1	0	0	0	15
07:15 69 07:30 79 07:45 87	23	12	49	20	0	2	2	258	34	7	3	18	1	0	0	1	64
07:30 79 07:45 87	16	1	11	5	0	1	1	66	7	2	2	11	0	0	0	0	22
07:45 87	11	2	9	4	0	2	0	97	5	3	3	11	0	0	0	0	22
	10	7	15	2	0	1	1	115	4	1	2	12	0	0	0	0	19
11/707 266	17	3	6	5	0	0	1	119	4	1	2	10	1	0	0	0	18
H/101 200	54	13	41	16	0	4	3	397	20	7	9	44	1	0	0	0	81
08:00 60	10	4	14	2	0	2	0	92	6	4	0	19	0	0	0	0	29
08:15 49	10	5	16	5	0	0	0	85	21	14	6	9	0	0	0	0	50
08:30 35	14	2	6	3	0	0	0	60	2	5	3	13	1	0	0	0	24
08:45 34	16	4	3	3	0	0	0	60	18	7	1	12	0	0	0	0	38
H/TOT 178	50	15	39	13	0	2	0	297	47	30	10	53	1	0	0	0	141
09:00 20	14	2	12	1	0	0	3	52	17	10	4	8	1	0	0	0	40
09:15 11	6	4	18	3	0	0	0	42	12	4	0	13	1	0	0	0	30
09:30 12	12	5	7	0	0	0	1	37	13	8	4	6	1	0	0	0	32
09:45 8 H/TOT 51	10 42	3	8 45	<u>0</u>	1	0	0 4	30 161	9 51	13 35	5 13	17	3 6	0	0	0	47 149
H/TOT 51 10:00 2	7	14 1	11	1	0	0	0	22	16	12	4	9	0	0	0	0	41
10:00 2	8	3	15	0	0	0	0	33	7	7	2	7	0	0	0	0	23
10:30 4	13	2	12	1	0	0	0	32	18	8	5	9	1	0	0	0	41
10:45 8	11	3	11	1	0	0	0	34	4	13	2	14	1	0	0	0	34
H/TOT 21	39	9	49	3	0	0	0	121	45	40	13	39	2	0	0	0	139

MANUAL CLASSIFIED COUNTS

JOB REF: 12384

JOB NAME: IMMINGHAM DOCKS

SITE: 4

LOCATION: QUEENS ROAD

AUTO SURVEYS LTD

DATE: 06/06/2023

DAY: TUESDAY

					MOVEMENT 1 INBOUND									MOVEMENT 2 OUTBOUND				
TIME	CAR	LGV	OGV1	OGV2	HGV TRACTOR WITHOUT TRIALER	PSV	MCL	PCL	тот	CAR	LGV	OGV1	OGV2	HGV TRACTOR WITHOUT TRIALER	PSV	MCL	PCL	тот
11:00	10	3	3	19	3	0	0	0	38	17	10	4	12	0	0	0	0	43
11:15	16	7	4	10	1	0	1	0	39	5	10	3	13	2	0	1	0	34
11:30	18	11	4	8	1	0	0	0	42	15	7	2	13	1	0	0	0	38
11:45	9	11	5	8	0	0	0	0	33	20	8	1	7	1	0	1	0	38
H/TOT	53	32	16	45	5	0	1	0	152	57	35	10	45	4	0	2	0	153
12:00	5	9	2	14	0	0	0	0	30	15	9	5	11	0	0	0	0	40
12:15	6	3	2	7	2	0	0	0	20	24	10	2	10	0	0	0	0	46
12:30	17	9	2	9	0	0	0	0	37	10	6	2	11	0	0	0	0	29
12:45	10	10	4	13	0	0	0	1	38	10	10	1	15	2	0	0	0	38
H/TOT	38	31	10	43	2	0	0	1	125	59	35	10	47	2	0	0	0	153
13:00	20	10	2	7	0	0	0	0	39	8	6	4	9	1	1	0	0	29
13:15	15	8	1	11	1	0	0	0	36	24	9	2	5	2	0	0	0	42
13:30	6	11	2	7	2	0	0	0	28	12	6	5	7	1	0	0	0	31
13:45	8	9	3	14	2	0	0	0	36	22	7	4	15	1	0	0	2	51
H/TOT	49	38	8	39	5	0	0	0	139	66	28	15	36	5	1	0	2	153
14:00	9	10	1	14	2	0	0	0	36	21	7	4	14	0	0	0	0	46
14:15	4	6	5	8	0	0	0	0	23	7	5	1	11	1	0	0	0	25
14:30	4	7	1	13	1	0	0	1	27	20	12	5	17	2	0	0	0	56
14:45	5	3	3	12	2	0	0	0	25	19	7	5	13	1	0	0	0	45
H/TOT	22	26	10	47	5	0	0	1	111	67	31	15	55	4	0	0	0	172
15:00	9	6	7	9	1	0	0	0	32	27	8	1	14	4	0	1	0	55
15:15	8	3	4	16	0	0	0	0	31	24	9	3	12	2	0	0	0	50
15:30	9	4	0	12	2	0	0	0	27	19	15	6	14	1	0	0	0	55
15:45	2	8	3	16	1	0	0	0	30	22	11	3	15	4	0	0	1	56
н/тот	28	21	14	53	4	0	0	0	120	92	43	13	55	11	0	1	1	216
16:00	6	6	3	10	1	0	1	0	27	94	12	3	13	2	0	0	3	127
16:15	7	3	1	17	0	0	0	0	28	63	12	2	13	2	0	2	0	94
16:30	9	3	0	7	0	0	1	0	20	91	21	2	16	4	0	2	2	138
16:45	5	3	1	6	0	0	0	0	15	32	8	1	13	7	0	0	0	61
H/TOT	27	15	5	40	1	0	2	0	90	280	53	8	55	15	0	4	5	420
17:00	15	4	0	12	1	0	0	0	32	98	9	1	13	6	0	2	1	130
17:15	17	2	1	4	0	0	0	1	25	42	4	1	12	2	0	0	0	61
17:30	11	1	0	0	3	0	0	0	15	38	8	0	5	3	0	3	1	58
17:45	8	1	1	6	0	0	0	0	16	41	6	0	6	3	0	0	1	57
н/тот	51	8	2	22	4	0	0	1	88	219	27	2	36	14	0	5	3	306
18:00	2	1	0	4	0	0	0	0	7	29	1	0	6	4	0	1	0	41
18:15	14	4	0	3	1	0	0	1	23	9	0	0	10	2	0	0	1	22
18:30	5	1	0	2	1	0	0	0	9	26	1	0	6	4	0	0	0	37

JOB REF: 12384

JOB NAME: IMMINGHAM DOCKS

SITE: 4 DATE: 06/06/2023

LOCATION: QUEENS ROAD DAY: TUESDAY

					MOVEMENT 1 INBOUND				
TIME	CAR	LGV	OGV1	OGV2	HGV TRACTOR WITHOUT TRIALER	PSV	MCL	PCL	тот
18:45	3	1	2	2	0	0	0	0	8
H/TOT	24	7	2	11	2	0	0	1	47
19:00	4	0	0	1	0	0	0	0	5
19:15	3	0	0	3	0	0	0	0	6
19:30	5	2	0	2	0	0	0	0	9
19:45	1	0	0	0	0	0	0	0	1
н/тот	13	2	0	6	0	0	0	0	21
P/TOT	1126	403	134	558	105	1	15	16	2358

				MOVEMENT 2 OUTBOUND				
CAR	LGV	OGV1	OGV2	HGV TRACTOR WITHOUT TRIALER	PSV	MCL	PCL	тот
12	2	0	7	1	0	1	0	23
76	4	0	29	11	0	2	1	123
10	4	0	2	2	0	0	0	18
2	0	0	1	1	0	0	0	4
5	0	0	2	2	0	0	0	9
6	0	0	5	1	0	0	0	12
23	4	0	10	6	0	0	0	43
1180	381	122	576	84	1	15	14	2373

AUTO SURVEYS LTD

QUEUE LENGTHS

JOB REF: 12384



TUESDAY

DAY:

JOB NAME: IMMINGHAM DOCKS

SITE: 4 DATE: 06/06/2023

LOCATION: QUEENS ROAD

NOTE: Queue Lengths recorded by the number of vehicles queuing at each 5-minute interval, by lar

NOTE:	Queue Lengths re	corded by the numl	ber of vehicles qu	euing at each 5-mir	ute interval, by lan	e					
	QUEENS ROAD	QUEENS ROAD		QUEENS ROAD	QUEENS ROAD		QUEENS ROAD	QUEENS ROAD		QUEENS ROAD	QUEENS ROAD
TIME	LANE 1	LANE 2	TIME	LANE 1	LANE 2	TIME	LANE 1	LANE 2	TIME	LANE 1	LANE 2
05:00	2	0	09:00	2	0	13:00	1	0	17:00	3	0
05:05	1	0	09:05	5	0	13:05	2	0	17:05	0	0
05:10	4	0	09:10	5	0	13:10	0	0	17:10	2	0
05:15	0	0	09:15	4	0	13:15	0	0	17:15	1	0
05:20	3	0	09:20	1	0	13:20	2	0	17:20	1	0
05:25	2	0	09:25	0	0	13:25	3	0	17:25	2	0
05:30	2	0	09:30	1	0	13:30	1	0	17:30	1	0
05:35	3	0	09:35	2	0	13:35	2	0	17:35	0	0
05:40	4	0	09:40	5	0	13:40	1	0	17:40	3	0
05:45	3	0	09:45	3	0	13:45	1	0	17:45	2	0
05:50	5	0	09:50	2	0	13:50	1	0	17:50	2	0
05:55	4	0	09:55	4	0	13:55	2	0	17:55	2	0
06:00	2	0	10:00	1	0	14:00	1	0	18:00	1	0
06:05	1	0	10:05	3	0	14:05	2	0	18:05	2	0
06:10	3	0	10:10	1	0	14:10	2	0	18:10	2	0
06:15	1	0	10:15	2	0	14:15	1	0	18:15	2	0
06:20	1	0	10:20	1	0	14:20	1	0	18:20	3	0
06:25	3	0	10:25	2	0	14:25	1	0	18:25	2	1
06:30	1	0	10:30	0	0	14:30	0	0	18:30	2	0
06:35	3	0	10:35	2 2	0	14:35	3	0	18:35 18:40	2	0
06:40 06:45		0	10:40 10:45	2	0	14:40 14:45	0 2	0	18:40	1	0
06:45	6	0	10:45	4	0	14:45	1	0	18:45	4	0
06:50	4	0	10:50	1	0	14:50	2	0	18:50	0	0
07:00	0	0	11:00	0	0	15:00	4	0	19:00	1	0
07:05	2	0	11:05	0	0	15:05	1	0	19:05	1	0
07:10	3	0	11:10	2	0	15:10	3	0	19:10	1	0
07:15	1	0	11:15	3	0	15:15	1	0	19:15	0	0
07:20	10	0	11:20	0	0	15:20	3	0	19:20	2	0
07:25	4	0	11:25	0	0	15:25	3	0	19:25	2	0
07:30	10	0	11:30	0	0	15:30	3	0	19:30	1	0
07:35	2	0	11:35	1	0	15:35	1	0	19:35	1	0
07:40	5	0	11:40	2	0	15:40	3	0	19:40	3	0
07:45	5	0	11:45	1	0	15:45	3	0	19:45	1	0
07:50	6	0	11:50	0	0	15:50	2	0	19:50	0	0
07:55	5	0	11:55	0	0	15:55	2	0	19:55	1	0
08:00	6	0	12:00	0	0	16:00	2	0			
08:05	5	0	12:05	0	0	16:05	0	0			
08:10	4	0	12:10	0	0	16:10	1	0			
08:15	5	0	12:15	2	0	16:15	1	0			
08:20	3	0	12:20	1	0	16:20	0	0			
08:25	1	0	12:25	0	0	16:25	1	0			
08:30	2	0	12:30	1	0	16:30	2	0			
08:35	0	0	12:35	1	0	16:35	2	0			
08:40	0	0	12:40	0	0	16:40	2	0			
08:45	4	0	12:45	1	0	16:45	1	0			

SITE:		DATE:
1	SURVEYS LTD	06/06/2023
LOCATION:	THATTIC DATA EDICALECTION	DAY:
HUMBER ROAD		TUESDAY
		AND STREET, NO. 100 A. I. A.
		N A
Humb		
Humber Rd		
	3010	AL STATE
ABP Immingham Dock West Gate		The state of the s
	2 4 4 4 1 1 1 1 1 1 1 1 1 1	
•40		Humber Rd
		W Haven Way
	All the second	ay f

JOB TITLE:

IMMINGHAM DOCKS

JOB NUMBER:

12384

JOB REF: 12384

JOB NAME: IMMINGHAM DOCKS

SITE: 1

LOCATION: HUMBER ROAD



DATE: 06/06/2023

DAY: TUESDAY

TIME					MOVEMENT 1 INBOUND									MOVEMENT 2 OUTBOUND				
TIIVIE	CAR	LGV	OGV1	OGV2	HGV TRACTOR WITHOUT TRIALER	PSV	MCL	PCL	тот	CAR	LGV	OGV1	OGV2	HGV TRACTOR WITHOUT TRIALER	PSV	MCL	PCL	тот
05:00	9	0	3	13	6	0	0	0	31	3	0	0	24	0	0	0	0	27
05:15	35	6	1	22	12	0	0	0	76	8	1	0	16	1	0	1	0	27
05:30	29	7	1	31	8	0	0	0	76	7	1	1	13	5	0	0	0	27
05:45	18	3	1	44	10	0	1	1	78	13	0	3	15	5	0	0	1	37
н/тот	91	16	6	110	36	0	1	1	261	31	2	4	68	11	0	1	1	118
06:00	9	3	1	32	13	0	0	0	58	9	2	1	22	2	0	0	0	36
06:15	10	9	1	32	20	0	1	0	73	6	1	3	37	2	0	0	0	49
06:30	25	6	1	43	21	0	0	1	97	7	3	1	63	0	0	0	0	74
06:45	28	4	1	41	11	0	0	0	85	5	2	5	48	1	0	0	0	61
н/тот	72	22	4	148	65	0	1	1	313	27	8	10	170	5	0	0	0	220
07:00	17	6	2	32	16	0	0	0	73	2	1	2	56	1	0	0	0	62
07:15	23	7	0	37	20	0	0	0	87	3	2	3	54	4	0	0	0	66
07:30	45	16	4	46	12	0	1	0	124	3	2	2	53	3	0	0	0	63
07:45	43	11	4	44	13	0	0	0	115	2	1	2	55	1	0	0	0	61
н/тот	128	40	10	159	61	0	1	0	399	10	6	9	218	9	0	0	0	252
08:00	22	10	3	35	6	0	1	0	77	0	2	3	57	0	0	0	0	62
08:15	21	6	2	31	7	0	0	0	67	4	3	3	67	1	0	0	0	78
08:30	17	3	3	21	10	0	0	0	54	4	6	2	43	2	0	0	0	57
08:45	23	11	0	38	6	0	0	0	78	17	10	1	45	4	0	0	0	77
н/тот	83	30	8	125	29	0	1	0	276	25	21	9	212	7	0	0	0	274
09:00	17	9	1	35	6	0	0	0	68	22	8	3	45	1	0	0	0	79
09:15	15	9	6	34	6	0	0	0	70	6	4	4	38	4	0	0	0	56
09:30	8	9	2	39	0	0	0	0	58	22	7	1	41	1	0	0	0	72
09:45	14	5	2	34	3	0	0	0	58	23	7	2	36	1	0	0	0	69
н/тот	54	32	11	142	15	0	0	0	254	73	26	10	160	7	0	0	0	276
10:00	10	5	1	37	6	0	0	0	59	7	4	3	38	4	0	0	0	56
10:15	9	7	1	40	2	0	0	0	59	31	7	2	31	1	0	0	0	72
10:30	9	5	3	36	2	0	0	0	55	18	10	4	43	1	0	0	0	76
10:45	10	5	2	35	4	0	0	0	56	6	11	1	42	4	0	0	0	64
н/тот	38	22	7	148	14	0	0	0	229	62	32	10	154	10	0	0	0	268

JOB REF: 12384

JOB NAME: IMMINGHAM DOCKS

SITE: 1



DATE: 06/06/2023

LOCATION:	HUMBER	ROAD													DAY:	TUESDAY		
TIME					MOVEMENT 1 INBOUND									MOVEMENT 2 OUTBOUND				
THVIE	CAR	LGV	OGV1	OGV2	HGV TRACTOR WITHOUT TRIALER	PSV	MCL	PCL	тот	CAR	LGV	OGV1	OGV2	HGV TRACTOR WITHOUT TRIALER	PSV	MCL	PCL	тот
11:00	2	9	3	30	1	0	0	0	45	13	9	1	41	0	0	0	0	64
11:15	15	10	3	42	0	0	0	0	70	7	6	1	43	3	0	0	0	60
11:30	13	6	1	43	3	0	0	0	66	4	6	1	36	1	0	0	0	48
11:45	7	5	6	41	0	0	0	1	60	22	11	2	34	5	0	0	0	74
н/тот	37	30	13	156	4	0	0	1	241	46	32	5	154	9	0	0	0	246
12:00	8	6	3	32	4	0	0	0	53	11	6	1	37	5	0	0	0	60
12:15	11	7	2	40	2	0	0	0	62	26	7	3	43	7	0	0	0	86
12:30	9	8	1	43	6	0	0	0	67	32	9	0	31	6	0	0	0	78
12:45	13	4	4	43	3	0	0	0	67	27	7	2	33	8	0	0	0	77
н/тот	41	25	10	158	15	0	0	0	249	96	29	6	144	26	0	0	0	301
13:00	6	3	2	62	3	0	0	0	76	13	12	4	46	7	0	0	0	82
13:15	10	9	4	53	4	0	0	0	80	25	14	3	31	4	0	0	0	77
13:30	15	5	6	50	5	0	0	0	81	14	7	3	43	5	0	0	0	72
13:45	12	2	0	52	3	0	0	0	69	31	6	1	45	5	0	0	0	88
н/тот	43	19	12	217	15	0	0	0	306	83	39	11	165	21	0	0	0	319
14:00	7	3	2	56	9	0	0	0	77	29	10	2	47	3	0	0	0	91
14:15	8	3	1	52	3	0	0	0	67	13	7	1	55	13	0	0	0	89
14:30	1	7	0	64	8	0	0	0	80	5	6	1	28	9	0	1	0	50
14:45	2	4	0	49	3	0	0	0	58	10	9	2	51	8	0	0	0	80
н/тот	18	17	3	221	23	0	0	0	282	57	32	6	181	33	0	1	0	310
15:00	0	6	2	58	3	0	0	0	69	34	16	0	47	7	0	1	0	105
15:15	15	3	1	60	6	0	0	1	86	21	9	3	47	13	0	0	0	93
15:30	4	4	1	55	6	0	0	1	71	22	11	3	46	5	0	0	0	87
15:45	4	1	3	53	7	0	0	0	68	47	7	3	54	10	0	0	0	121
н/тот	23	14	7	226	22	0	0	2	294	124	43	9	194	35	0	1	0	406
16:00	7	1	1	57	5	0	0	0	71	68	10	4	49	15	0	0	1	147
16:15	7	3	0	62	3	0	0	0	75	41	7	0	49	7	0	0	0	104
16:30	5	1	1	34	4	0	0	0	45	30	7	0	48	17	0	0	0	102
16:45	7	3	1	46	5	0	0	0	62	27	6	2	44	8	0	1	0	88
н/тот	26	8	3	199	17	0	0	0	253	166	30	6	190	47	0	1	1	441
17:00	8	5	0	41	5	0	0	1	60	53	7	2	48	9	0	3	0	122
17:15	11	0	0	48	5	0	1	0	65	24	10	0	39	15	0	1	0	89
17:30	12	3	1	28	1	0	0	0	45	26	5	0	29	12	0	0	0	72
17:45	8	2	0	30	4	0	0	0	44	27	3	0	29	15	0	1	1	76
н/тот	39	10	1	147	15	0	1	1	214	130	25	2	145	51	0	5	1	359
18:00	1	1	0	23	4	0	0	0	29	25	2	0	23	13	0	0	0	63
18:15	7	0	0	22	3	0	0	0	32	11	4	0	19	6	0	0	0	40
18:30	4	0	0	15	4	0	0	0	23	8	3	1	22	11	0	0	0	45
18:45	1	0	0	24	2	0	0	0	27	8	1	10	22	4	0	0	0	45

JOB REF: 12384

JOB NAME: IMMINGHAM DOCKS

SITE: 1 DATE: 06/06/2023

LOCATION: HUMBER ROAD DAY: TUESDAY

					MOVEMENT 1				
					INBOUND				
TIME					HGV TRACTOR				
	CAR	LGV	OGV1	OGV2	WITHOUT	PSV	MCL	PCL	тот
					TRIALER				
н/тот	13	1	0	84	13	0	0	0	111
19:00	1	2	1	18	2	0	0	0	24
19:15	0	0	0	21	1	0	0	0	22
19:30	2	1	0	15	1	0	0	0	19
19:45	2	0	1	9	0	0	0	0	12
н/тот	5	3	2	63	4	0	0	0	77
P/TOT	711	289	97	2303	348	0	5	6	3759

				MOVEMENT 2				
				OUTBOUND				
				HGV TRACTOR				
CAR	LGV	OGV1	OGV2	WITHOUT	PSV	MCL	PCL	TOT
				TRIALER				
52	10	11	86	34	0	0	0	193
5	1	1	15	8	0	0	0	30
1	1	0	28	6	0	0	0	36
1	1	1	16	8	0	0	0	27
6	1	1	15	4	0	0	0	27
13	4	3	74	26	0	0	0	120
995	339	111	2315	331	0	9	3	4103

AUTO SURVEYS LTD

QUEUE LENGTHS

JOB REF: 12384

JOB NAME: IMMINGHAM DOCKS

SITE: 1 DATE: 06/06/2023

LOCATION: HUMBER ROAD / W HAVEN WAY DAY: TUESDAY

NOTE: Queue Lengths recorded by the number of vehicles queuing at each 5-minute interval, by lane

TIME		HUMBER ROAD		HUMBER ROAD	TIME			W HAVEN WAY	HUMBER ROAD	TIME	HUMBER ROAD		W HAVEN WAY	HUMBER ROAD	TIME	HUMBER ROAD	HUMBER ROAD		HUMBER ROAD
05.00	LANE 1	LANE 2	LANE 3	LANE 4	09:00	LANE 1	LANE 2	LANE 3	LANE 4	13:00	LANE 1	LANE 2	LANE 3	LANE 4	17:00	LANE 1	LANE 2	LANE 3	LANE 4
05:00 05:05	0	0	0	0	09:00	0	0	0	1	13:00	0	0	2	1	17:00	5	0	0	3
05:05	0	0	0	1	09:05	1	0	3	1 0	13:05	0	0	1	2	17:05	4	0	0	3
05:10	0	0	0	0	09:10	2	0	0	1	13:10	3	0	1	0	17:10	0	0	2	3
05:20	0	0	0	0	09:13	0	0	0	0	13:20	3	0	1	0	17:13	0	0	1	4
05:20	0	0	0	1	09:20	0	0	0	0	13:20	0	0	0	1	17:20	0	0	0	2
05:25	1	0	0	0	09:25	5	0	2	1	13:25	0	0	0	1	17:25	0	0	0	0
05:35	0	0	0	0	09:35	4	0	0	1	13:35	0	0	0	0	17:35	1	0	2	1
05:40	6	0	0	1	09:40	2	0	1	0	13:40	0	0	0	1	17:40	0	0	0	0
05:45	6	0	0	1	09:45	0	0	0	1	13:45	0	0	1	1	17:45	5	0	0	0
05:50	1	0	0	0	09:50	1	0	0	3	13:50	3	0	3	1	17:50	0	0	0	0
05:55	10	0	0	1	09:55	0	0	0	0	13:55	0	0	0	1	17:55	1	0	2	1
06:00	0	0	1	1	10:00	1	0	0	0	14:00	4	0	0	2	18:00	1	0	0	0
06:05	3	0	0	0	10:05	0	0	3	3	14:05	0	0	0	1	18:05	0	0	0	3
06:05	2	0	1	0	10:05	0	0	0	1	14:05	0	0	2	2	18:05	0	0	0	1
06:15	10	0	1	0	10:10	3	0	1	0	14:15	0	0	5	2	18:15	0	0	0	1
	3	0	2	0		7	0	0	1	14:15	0	0	3	0		4	0	0	0
06:20	0	0	0	1	10:20 10:25	3	0	4	2	14:20	3	0	1	1	18:20 18:25	0	0	0	0
06:25	6	0	2	1		1	0			14:25	1	0	1	2	18:25	2	0	0	0
06:30		0	2	-	10:30		0	0	1		_	-	0				0	0	0
06:35	0 5	0	2	1 2	10:35 10:40	16 8	0	0	1	14:35	4	0	-	1	18:35	0	0	0	0
06:40		0	0			_	-	-	1	14:40	-	-	1	0	18:40	-	0	-	
06:45	11	0	-	1	10:45	4 2	0	3	1	14:45	5	0	-	0	18:45	0	-	0	0
06:50	3 1	0	1	2	10:50 10:55	2	0	2	0	14:50	0	0	2	2	18:50 18:55	0	4	0	0
06:55	6	0	0	2		0	0	-		14:55	0	0				-	-	-	-
07:00 07:05	6	0	0	1	11:00 11:05	0	0	0	0	15:00 15:05	0	0	4	1	19:00 19:05	0	0	0	0
	5	0	0	1	11:05	7	0	3	0	15:05	0	0	0	2	19:05	0	0	0	0
07:10	6	-	0	0		,	0	1	1		8		0	3		0	0	0	0
07:15	4	0	0	0	11:15 11:20	3	0	1	2	15:15 15:20	0	0	1	3	19:15	0	0	0	0
07:20	7	0	0	0		0	0	1	1		0	0	2	3	19:20	0	0	0	0
07:25		-	1	-	11:25	_	-	_		15:25	-			-	19:25	-	-	-	-
07:30	4 6	0	0 2	0	11:30	2	0	0	1	15:30	0	0	0	1 2	19:30	0	0	0	0
07:35	3		2	1	11:35	0	0			15:35	-	0	1		19:35	0	0	0	0
07:40		0		3	11:40	_	-	1	0	15:40	0		1	2	19:40	0	-	-	0
07:45	0	0	1 2	2	11:45	3	0	1	0	15:45	0	0	4	2 3	19:45	1	0	0	0
07:50	11 2	0	0	2	11:50	4	0	1	0	15:50	0	0	1 3	2	19:50	0	0	0 1	0
07:55	3	-		0	11:55	I -	-	-		15:55	3	-	3	4	19:55	U	U	1	U
08:00		0	1		12:00	0	0	0	0	16:00	,	0							
08:05	0	0	2	1	12:05	0	0	0	1	16:05	0	0	0	0					
08:10	3 2	0	0	0	12:10	0 4	0	1	1	16:10	4	0	5	0					
08:15			1		12:15	_	0	6	0	16:15			1	1					
08:20	5	0	1	1	12:20	3	0	0	1	16:20	0	0	0	1					
08:25	5	0	1	0	12:25	3	0	1	1	16:25	0	0	0	3					
08:30	3	0	1	0	12:30	0	0	1	1	16:30	6	0	0	1					
08:35	3	0	1	0	12:35	0	0	3	0	16:35	3	0	0	1					
08:40	5	0	0	0	12:40	0	0	0	0	16:40	0	0	1	1					
08:45	3	0	0	2	12:45	0	0	0	0	16:45	0	0	1	3					
08:50	5	0	0	1	12:50	2	0	1	1	16:50	0	0	1	0					
08:55	0	0	1	1	12:55	4	0	4	1	16:55	0	0	0	0					

AUTO SURVEYS LTD

Appendix 2 – Sensitivity Test of 12 Percent

Appendix 2 - Sensitivity Test of 12% Solo-Tractor Units:

Time	T/	A (Table 8	3)	Sens	sitivity (1	2%)	I	Difference	е
Time	In	Out	Total	In	Out	Total	In	Out	Total
0	2	1	3	2	1	3	0	0	0
1	2	1	3	2	1	3	0	0	0
2	1	1	2	1	1	2	0	0	0
3	1	1	2	1	1	2	0	0	0
4	1	3	4	1	3	4	0	0	0
5	3	9	12	4	9	13	1	0	1
6	12	22	34	12	22	34	0	0	0
7	19	32	51	19	32	51	0	0	0
8	26	25	51	27	25	52	1	0	1
9	31	221	252	31	224	255	0	3	3
10	36	90	126	36	91	127	0	1	1
11	41	73	114	41	74	115	0	1	1
12	44	74	118	44	75	119	0	1	1
13	50	79	129	51	80	131	1	1	2
14	63	70	133	64	71	135	1	1	2
15	90	63	153	91	64	155	1	1	2
16	107	62	169	108	62	170	1	1	2
17	121	52	173	122	53	175	1	1	2
18	145	41	186	147	42	189	2	1	3
19	128	29	157	130	29	159	2	0	2
20	38	16	54	39	16	55	1	0	1
21	6	6	12	6	6	12	0	0	0
22	3	2	5	3	2	5	0	0	0
23	2	1	3	2	1	3	0	0	0

Appendix 3 – Journey Times

Appendix 3 - HGV Assignment

Figure 1 - Outbound from the Proposed Site Access

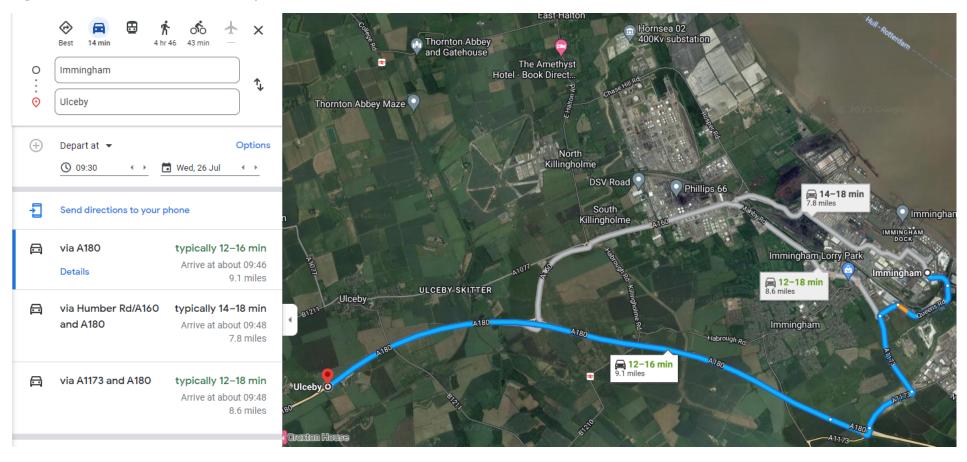


Figure 2 - Inbound to the Proposed Site Access via East Gate

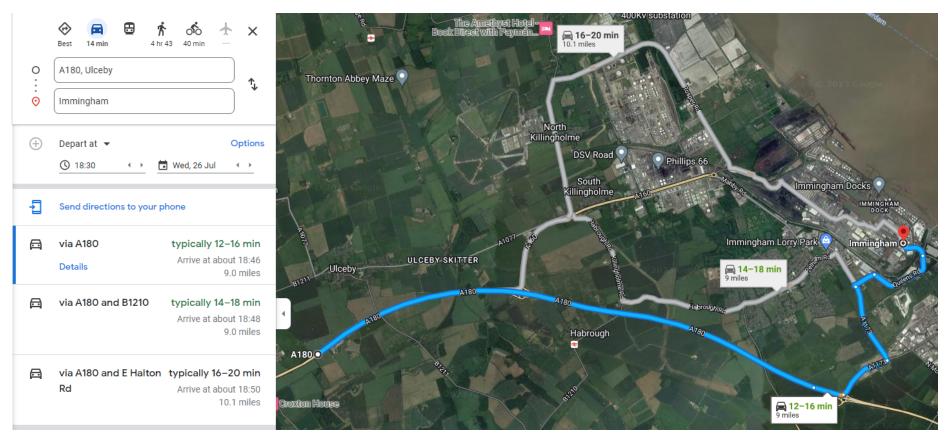
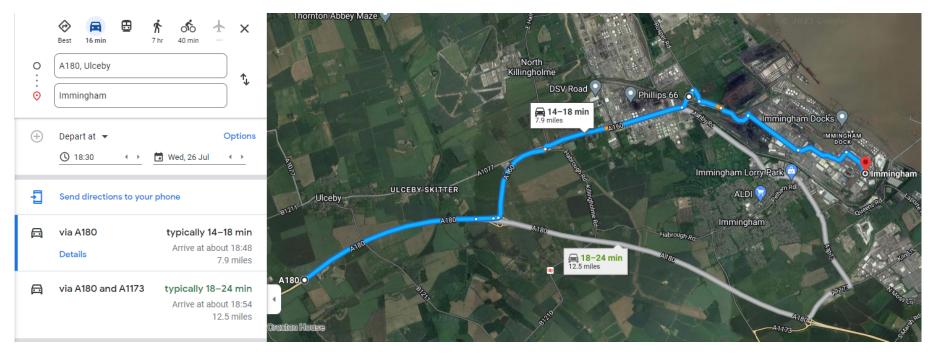


Figure 3 - Inbound to the Proposed Site Access via West Gate



Appendix 4 – DTA Review of DFDS Traffic Junction Assessment Reports

Appendix 4 - DTA Review of DFDS Traffic Junction Assessment Reports

No.	Junction	Sc.1:	2019		2023 + nitted		2032 + ed + ABP
		AM	PM	AM	PM	AM	PM
1	A160/Ulceby Road/ East Halton Road Roundabout (Habrough Roundabout)						
2	A160 Humber Road/Eastfield Road Signalised Junction						
3	A160 Humber Road/ A1173 Manby Road Roundabout						
4	A1173/ Kings Road Roundabout						
5	A1173/ Kiln Lane Roundabout						
6	A1173/ New Site Access Roundabout						
7	A180/ A1173 Roundabout						