

Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

Immingham Eastern RoRo Terminal DCO Application

Responses to Deadline 2 Submissions

on behalf of

CLdN Ports Killingholme Limited

1. INTRODUCTION

- 1.1 This document comprises CLdN Ports Killingholme Limited's (**CLdN**) Deadline 3 submissions to the Examining Authority (**ExA**) in relation to the examination of the application for a Development Consent Order (**DCO**) for the Immingham Eastern RoRo Terminal (**IERRT** or the **Proposed Development**), and is set out in the following order:
- 1.1.1 Section 2: Comments on any submissions received at Deadline 2;
 - 1.1.2 Section 3: Comments on responses to the ExA's First Written Questions (**ExQ1**); and
 - 1.1.3 Section 4: Comments on Written Representations.
- 1.2 At Deadline 2, CLdN submitted a report by economic consultancy Volterra Partners LLP (**Volterra**) at Appendix 1 to its Written Representation (the **First Volterra Report**) [**REP2-031**]. CLdN has commissioned a further report by Volterra dealing with specific submissions made at Deadline 2 by the Applicant, which is included at Appendix 1 to this submission (the **Second Volterra Report**).

2. COMMENTS ON ANY SUBMISSIONS RECEIVED AT DEADLINE 2

Submission Referred by the Applicant	Summary of Applicant's comments	CLdN Comments
Applicant's Response to Interested Parties' Deadline 1 Submissions – Table 1 [REP2-010]		
CLdN's ISH1 Post Hearing Submissions [REP1-024] Item 3 (<i>draft Development Consent Order</i>)	The Applicant considers that the Port of Killingholme is 3km upstream from the Proposed Development and therefore does not consider the protective provisions outlined by CLdN to be required or appropriate.	<p>Protective Provisions CLdN maintains its position that protective provisions are required for its benefit in the DCO, should it be made, to protect CLdN's undertaking from the potential adverse impacts of IERRT on CLdN's operations and business continuity, as set out in detail at Part 4 of its Written Representation [REP2-031]. CLdN continues to engage with the Applicant on this matter.</p>
CLdN's ISH1 Post Hearing Submissions [REP1-024] Item 3 (<i>draft Development Consent Order</i>)	With regard to Requirement 8, the Applicant asserts that the CEMP [APP-111] is not an outline document.	<p>Requirement 8 CLdN acknowledges the Applicant's response on this matter, which simply asserts that the CEMP [APP-111] <i>"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"</i>, yet in the very next sentence the Applicant confirms <i>"The control measures detailed in the CEMP [APP-111] for the mitigation of any construction impacts will be adopted by the appointed contractor."</i></p> <p>While the Applicant's CEMP may not have the words "Outline" or "Framework" in its title, it is clear that it does not contain the level of detail that is expected from a fully developed CEMP where it would be appropriate for it to be free of any further regulatory review or input. The CEMP expressly envisages the document, or aspects of it, being developed after the issue of development consent, or matters being agreed with the relevant statutory bodies.</p> <p>For example:</p> <ul style="list-style-type: none"> Paragraph 2.3.1 of the CEMP [APP-111] which purports to address construction traffic management, states (emphasis added) <i>"During construction, the appointed contractor will ensure that the impacts from construction traffic on the local community (including local residents and business and users of the surrounding transport network) are minimised, where reasonably practicable, by implementing the measures set out in a <u>detailed Construction Traffic Management Plan (CTMP) and the Construction Workers' Travel Plan (CWTP) both of which will be prepared by the contractor once the final construction</u></i>

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		<p><i>details are confirmed in accordance with this CEMP.</i>". In its own terms, it requires further detail of the appropriate mitigation to be prepared.</p> <ul style="list-style-type: none"> In Table 3.6, <i>Ground conditions including land quality</i>, the second row states (emphasis added) "<u>The <i>Outline Remediation Strategy</i> (ES Volume 3, Appendix 12.4, Application Document Reference number 8.4.12(d)) sets out the measures required to mitigate any significant/unacceptable contamination risks...A confirmatory GI has been undertaken which includes provision for ongoing monitoring works as is normal for a project such as the IERRT. A <i>final Remediation Strategy</i> will be prepared to take account of any relevant matters during the examination of the IERRT DCO and will incorporate appropriate mitigation measures as necessary, that are following receipt of the final factual report [sic], which will include the results of the final round of monitoring.</u>" In its own terms, it requires further detail of the appropriate mitigation to be prepared. A similar issue arises in relation to the row dealing with "Materials Management Plan". Table 3.6, <i>Ground conditions including land quality</i>, the row purporting to address the potential impact of "<i>Encounter of unidentified contamination</i>" states "<i>If, during development, any previously unidentified contamination is encountered, an appropriate investigation to allow sampling and testing of materials and risk assessment will be undertaken. Any actions resulting from the risk assessment will be agreed with the local planning authority along with any remedial measures in consultation with the Environment Agency, where risks to controlled waters are identified... Measures detailed within the Outline Remediation Strategy</i> (ES Volume 3, appendix 12.4, Application Document Reference number 8.4.12(d)) should be followed if unidentified contamination is encountered." <p>The above are examples of the shortcomings of the CEMP in its current form. As drafted it would envisage that the Applicant's contractor is simply left to develop the detail required with no further regulatory input or oversight. In other words, the Applicant is left to mark its own homework, without any oversight.</p> <p>Setting aside the concerns of the generally high-level nature of the contents of the CEMP, this approach raises concerning procedural issues. For example, the CEMP does not provide:</p> <ul style="list-style-type: none"> where a relevant statutory body is to be consulted:

Submission Referred by the Applicant	Summary of Applicant's comments	CLdN Comments
		<ul style="list-style-type: none"> ○ what information will be provided to it to assist it in developing its response; ○ minimum periods of time within which a response is required; or ○ what regard the Applicant's contractor is to have to such responses; or <ul style="list-style-type: none"> ● where a matter is to be "agreed" with a relevant statutory body: <ul style="list-style-type: none"> ○ what information will be provided to obtain that agreement; ○ the time period the statutory body is to be afforded to determine whether to supply its agreement; ○ the form such an agreement would take and how it would be accessible to members of the public; or ○ what would happen if such a body refused to supply its agreement. <p>The Applicant's CEMP is clearly outline in nature and is not suited to the pure "compliance-only" approach envisaged by the drafting of Requirement 8.</p> <p>A more appropriate approach, and one that is taken on the majority of development consent orders, is for the CEMP to be subject to approval as a pre-commencement requirement. It would also be appropriate, and consistent with established DCO practice, for the subject matter of the subsidiary plans referred to in this response above to be subject to their own requirements. Together this approach would ensure that there is appropriate regulatory oversight of the development of the detail of the mitigation measures so that there can be confidence that the Applicant's project stays within the envelope of its assessed environmental effects.</p>
<p>CLdN's ISH2 Post Hearing Submissions [REP1-025] Item 2 (<i>Need for the Proposed Development</i>) – CLdN's written summary of oral submissions</p>	<p>The Applicant considers CLdN's submissions general and a 'competitor objection'. The Applicant disagrees with CLdN's interpretation of the NPSP and has summarised CLdN's position on need as a mistaken attempt to narrow it down to 'overall demand for capacity to meet forecast growth'.</p>	<p>Need case The Applicant's comments on competition have been addressed at paragraphs 1.6 – 1.7 of the Second Volterra Report. CLdN further refers the ExA to paragraphs 2.46 to 2.47 of its Written Representation and paragraphs 3.13 to 3.15 of the First Volterra Report [REP2-031].</p> <p>CLdN has provided detailed analysis and commentary on the 'need case' for the Proposed Development in the First Volterra Report [REP2-031].</p> <p>Regarding the legal and policy basis for the need case, CLdN has further set out detailed commentary on the National Policy Statement for Ports (NPSP) and relevant case law at Part 6 of its Written Representation [REP2-031].</p>

Submission Referred by the Applicant	Summary of Applicant's comments	CLdN Comments
<p>CLdN's ISH2 Post Hearing Submissions [REP1-025] Item 2 (<i>Need for the Proposed Development</i>) – CLdN's written summary of oral submissions, particularly in relation to alternatives</p>	<p>Regarding alternatives, the Applicant considers that there is no requirement in law for the Applicant to consider alternatives. Nonetheless, they have considered alternatives in Chapter 4 of the ES [APP-040].</p>	<p>Alternatives CLdN refers the ExA to paragraphs 6.24 and 6.25 of its Written Representation [REP2-031] in which CLdN has set out the common law basis on which alternatives must be considered where there are clear planning objections, as there are with respect to the Proposed Development.</p>
<p>CLdN's ISH2 Post Hearing Submissions [REP1-025] Item 2 (<i>Need for the Proposed Development</i>) – CLdN's response to Item 5 of the ExA's ISH2 Action List [EV3-012]</p>	<p>The Applicant considers that CLdN has not provided the detail or data to support its position. The Applicant reiterated that it does not consider it necessary to demonstrate a need for the Proposed Development.</p>	<p>Regarding the Applicant's comments on CLdN's response to the ExA's ISH2 Action List Item 5 (<i>Provide CLdN's expectations for future demand on the Humber for Ro-Ro capacity through to 2050 including the anticipated distribution between accompanied and unaccompanied RoRo freight [a draft by D1 and full version by D2]</i>) CLdN refers to Part 2 of its Written Representation and the First Volterra Report [REP2-031] in which it provided a full response at Deadline 2, as requested.</p>
<p>CLdN's ISH2 Post Hearing Submissions [REP1-025] Item 2 (<i>Need for the Proposed Development</i>) – CLdN's response to Item 5 of the ExA's ISH2 Action List [EV3-012]</p>	<p>The Applicant sought clarification on the plan provided in CLdN's ISH2 Post Hearing Submissions [REP1-025].</p>	<p>As requested at Item 7 of the ExA's ISH2 Action List [EV3-012], CLdN provided a plan indicating berth numbers at the Port of Killingholme at the Appendix to its ISH2 Post Hearing Submissions [REP1-025]. CLdN has further provided an annotated plan indicating the layout of the Killingholme estate at Appendix 2 to CLdN's Written Representation [REP2-031]. The shaded areas indicate the utilisation of that part of the estate, as detailed in paragraph 1.8 of the Written Representation. Additional detail on the square meterage of each area is set out at paragraph 2.24 of the Written Representation.</p>
<p>CLdN's ISH2 Post Hearing Submissions [REP1-025] Item 3 (<i>Effects on landside transportation and effects for existing occupiers of the Port of Immingham unconnected with navigation and shipping</i>)</p>	<p>The Applicant distinguished the overall capacity of the Proposed Development (660,000 per year) from the day-today likely capacity (525,000). The Applicant understood CLdN's comment that "some freight will be directed to storage areas to the west of the development" to imply that the areas referred to did not</p>	<p>Capacity Regarding capacity at the Proposed Development and the 'day-to-day' value for the throughput of the Proposed Development introduced at Deadline 2 by the Applicant, CLdN refers the ExA to paragraphs 1.9 to 1.15 of the Second Volterra Report.</p> <p>Transport In relation to transport matters, CLdN notes the additional information supplied by Stena Line. CLdN is now satisfied that sufficient evidence has been provided in support of the Transport Assessment assumption in relation to unaccompanied and accompanied units. This position is, however, conditional on all other throughput parameters that would influence this metric remaining unchanged following the Deadline 2 submissions and in connection with CLdN's suggestions to the Applicant in the bullet points below.</p>

Submission Referred by the Applicant	Summary of Applicant's comments	CLdN Comments
	<p>form part of the Proposed Development.</p>	<p>CLdN considers that the Deadline 2 submissions from the Applicant do not substantiate annual and peak throughput, and therefore the assessment of a reasonable worst case scenario is not evidenced. CLdN requests that transparent calculations are submitted into the Examination which are subject to the use of key parameters (including storage capacity, dwell time and, crucially, seasonal and monthly profiles) to enable the reasonable worst case scenario for daily throughput to be clearly evidenced.</p> <p>CLdN's reference to the western storage area within the Proposed Development was simply to demonstrate the fragility of the Applicant's gate assignment assumptions – HGVs utilising the western storage area are more likely to use the Port West Gate, meaning the percentage (15%) assigned to that gate in the Transport Assessment by the Applicant is too low. In addition, as raised by CLdN in its Post Hearing Submissions for Issue Specific Hearing 2 [REP1-025], there are a number of parameters that could challenge the low number of HGVs assigned by the Applicant to the Port West Gate, including highway congestion, highway maintenance, availability of services, fuel and welfare facilities and driver perception.</p> <p>CLdN therefore believes that the Applicant must either:</p> <ul style="list-style-type: none"> • submit a transparent sensitivity test of gate assignment (and associated assessment of the highway network) into the Examination for scrutiny; or • commit to controls, secured by the DCO, to ensure that the assessed impacts are not exceeded. <p>CLdN considers that the gate assignments are a critical parameter which, if subject to change, would challenge the findings and adequacy of the Applicant's Transport Assessment and EIA.</p>
<p>CLdN's ISH2 Post Hearing Submissions [REP1-025] Item 4 (<i>Any effects for the integrity of the Humber Estuary Special Area of Conservation, Special Protection Area and Ramsar site (the designated sites)</i>) – CLdN's response to Item 20 of the ExA's ISH2 Action List [EV3-012]</p>	<p>The Applicant has commented that a full assessment methodology to evaluate in-combination and cumulative effects has been provided and the effects considered, and that discussions with Natural England are ongoing and likely to be addressed in the Examination.</p>	<p>CLdN has set out its position on marine ecology, biodiversity and protected habitats at paragraphs 5.1.3 and 5.1.4 of its Written Representation [REP2-031]. CLdN reserves its position until the final Habitats Regulations Assessment has been submitted.</p>

Submission Referred by the Applicant	Summary of Applicant's comments	CLdN Comments
CLdN's ISH2 Post Hearing Submissions [REP1-025] Item 5 (<i>Navigation and Shipping effects</i>)	The Applicant referred to its position on protective provisions stated in response to CLdN's ISH1 Post Hearing Submissions [REP1-024].	CLdN maintains its position that protective provisions are required for its benefit in the DCO, should it be made, to protect CLdN's undertaking from the potential adverse impacts of IERRT on CLdN's operations and business continuity, as set out in detail at Part 4 of its Written Representation [REP2-031]. CLdN continues to engage with the Applicant on this matter.

Summary of Submission	CLdN Comments
Applicant's Cover Letter at Deadline 2 [REP2-001]	
At Appendix 1 to the Applicant's Cover Letter submitted at Deadline 2, the Applicant provided 'Data on Ro-Ro Vessel Movements and the Distribution between Accompanied and Unaccompanied Freight Volume for Representative Months'.	CLdN has reviewed this data along with Volterra and has provided detailed analysis and commentary at paragraphs 1.1 to 1.5 of the Second Volterra Report.

3. COMMENTS ON RESPONSES TO THE EXQ1

Submission	Summary of Submission	CLdN Comments
Stena Line		
Stena Line's Responses to ExQ1 [REP2-065]	Stena has responded to question BGC.1.5 of the ExA's first written questions [PD-010] regarding Stena's operations at the Port of Killingholme.	<p>CLdN wishes to comment on three specific aspects of Stena's response to question BGC.1.5, which are addressed below. As a general point, CLdN does not consider that the history or details of commercial discussions between CLdN and Stena are relevant or will assist the Examining Authority on this matter and has therefore not produced details of these.</p> <ol style="list-style-type: none"> 1. Killingholme has, for many years, provided stevedoring services to competing shipping lines. In doing so, CLdN has always acted fairly and even-handedly between all its customers and will continue to do so. 2. The only example Stena has provided of a capacity restriction at Killingholme relates to events around the end of the Brexit transition period. This was an exceptional time for many UK ports, when the strains of unusually high freight volumes at that time were compounded by COVID and HGVs driver shortages. At that time, CLdN wrote to all of its customers (including its affiliated shipping lines) to impose strict storage limits, in order to maintain throughput at the terminal for all port users and to ensure cargo was not blocking throughput at the terminal. The steps CLdN took to manage the storage space by limiting the number of bays available to each customer (based on average dwell times and throughput) is standard market practice for port operators. As a result, at no point was Killingholme forced to shut, which occurred at other terminals. In

Submission	Summary of Submission	CLdN Comments
Stena Line		
		<p>addition, at that time Killingholme had 950 trailer bays, which had increased to 1200 by 2022 and will further increase to 1500 by the end of 2024. As a result, such issues as experienced in 2021 are not expected to occur again, particularly during normal operating conditions. CLdN has also constructed a border control post, which is capable of handling import inspections for all of Stena's cargoes.</p> <p>3. It is not clear to CLdN why Stena has endorsed the use of an average 2.25 day dwell time, as this does not reflect the actual average dwell time for Stena cargoes. Increasing dwell times for these cargoes to 2.25 days would mean a material deterioration in efficiency. CLdN also refers to its Written Representation [REP2-031], specifically paragraphs 2.34-2.42, for a complete assessment of its position on this point.</p>

4. **COMMENTS ON WRITTEN REPRESENTATIONS**

Submission	Summary of Submission	CLdN Comments
National Rail		
Written Representation [REP2-022]	Network Rail raised a number of concerns with the draft DCO and Proposed Development that it has sought a response from the Applicant on, including seeking appropriate protective provisions.	CLdN notes that Network Rail is concerned about the impact of the Proposed Development on its statutory undertaking and has attempted to engage with the Applicant on the inclusion of protective provisions in the draft DCO (Part 5 of Network Rail's Written Representation [REP2-022]). The Applicant has not responded. CLdN has raised similar concerns about the risks posed by the Proposed Development to its legal rights to connect its rail siding to the national rail network, and its own statutory interests (see Part 4, and particularly paragraphs 4.8 to 4.12 with regard to railway protections, of CLdN's Written Representation [REP2-031]). Although the Applicant has responded to CLdN's request for protective provisions, it has similarly refused to acknowledge the interests to which they relate and the need to protect those interests with appropriate provisions in the DCO, should it be made.
Natural England		
Written Representation [REP2-019] and summary table [REP2-020]	Natural England has provided an update on its position in relation to the Proposed Development.	CLdN notes that there is still a number of outstanding points of concern for Natural England including cumulative loss of habitat. As noted above, CLdN has set out its position on marine ecology, biodiversity and protected habitats at paragraphs 5.1.3 and 5.1.4 of its Written Representation [REP2-031]. CLdN reserves its position until the final Habitats Regulations Assessment has been submitted.

CLdN Ports Killingholme Limited

11 September 2023

APPENDIX 1
SECOND VOLTERRA REPORT

Response to the Applicant's Deadline 2 Submissions

Immingham Eastern RoRo Terminal
DCO Application

September 2023

Applicant's Cover Letter to PINS for Deadline 2 [REP2-001] – Appendix 1

Review of data provided in Appendix 1

- 1.1 As part of their response to Interested Parties' Deadline 1 submissions, the Applicant has provided data (at Tables 1-3 of Appendix 1 of their Cover Letter [REP2-001]) on accompanied and unaccompanied Ro-Ro units throughput from the period September 2022 to November 2022.
- 1.2 Table 2 shows that the distribution of Ro-Ro freight volumes at Immingham is very heavily focused on unaccompanied Ro-Ro, with a 98.03% proportion of unaccompanied Ro-Ro across all activities at Immingham as a whole across the three months.
- 1.3 This very high proportion of unaccompanied Ro-Ro is to be expected given that DFDS is known to carry almost exclusively unaccompanied Ro-Ro freight, and Stena's Europoort service is also focused on the same type of freight. In fact, Stena's Europoort ship is limited to 12 self-drive (accompanied) Ro-Ro units per shipping.
- 1.4 The Proposed Development (IERRT) will, however, also need to accommodate Stena's Hoek service if permitted. The Hoek service is much more focused on accompanied Ro-Ro units. CLdN possesses data on Stena's Hoek service given that this throughput is currently brought through the Port of Killingholme. The table below provides the equivalent data for Stena's Hoek service alongside Stena's Europoort service at Immingham for context.

Stena Line Ro-Ro freight data (Sept 2022 to Nov 2022) - units

Stena Line Killingholme (Hoek)	Total Ro-Ro Units	Total Accompanied	Total % Accompanied	Total % Unaccompanied
Sep-22	10,568	5,772	54.62%	45.38%
Oct-22	10,062	5,663	56.28%	43.72%
Nov-22	9,763	5,788	59.29%	40.71%
Stena Line Immingham (Europort)	Total Ro-Ro Units	Total Accompanied	Total % Accompanied	Total % Unaccompanied
Sep-22	8,777	194	2.21%	97.79%
Oct-22	8,341	164	1.97%	98.03%
Nov-22	8,740	202	2.31%	97.69%
Combined	Total Ro-Ro Units	Total Accompanied	Total % Accompanied	Total % Unaccompanied
Sep-22	19,345	5,966	30.84%	69.16%
Oct-22	18,403	5,827	31.66%	68.34%
Nov-22	18,503	5,990	32.37%	67.63%
Total	56,251	17,783	31.61%	68.39%

- 1.5 The table above shows that when considering Stena's Hoek service, which would also need to be accommodated at the Proposed Development, Stena's proportion of unaccompanied Ro-Ro falls from around 98% to 68%, with the remaining 32% of units being accompanied Ro-Ro. This compares to a targeted proportion of 28% accompanied Ro-Ro at the Proposed Development.

Applicant's Response to Interested Parties' Deadline 1 Submissions [REP2-010]

Table 1 – Need for the Proposed Development (Pages 3 to 4)

“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” (page 3)

- 1.6 In response to this, we would refer to paragraphs 3.12 to 3.15 of Volterra's Needs Case Review report submitted as part of the deadline 2 submissions made by CLdN. Within this, we discuss the topic of competition in the Humber's freight market. Whilst it is acknowledged that there is naturally competition between shipping lines (including CLdN's subsidiary and Stena) on the Humber, it is important to bear in mind that there is a distinction between competition between port and terminal owners and competition between shipping line operators on the Humber.

- 1.7 As stated in **paragraph 3.14** of our report, there appears to be substantially less competition between the port and terminal owners on the Humber than shipping lines, given that port ownership is competition between two parties – CLdN and ABP – compared to a larger number of shipping lines operators being present in the region. As a competing port owner, ABP already controls the majority of freight throughput in the Humber and, with particular relevance to the Proposed Development, owns 2 out of 3 existing Ro-Ro terminals. If the Proposed Development is permitted, this proportion would rise to ABP controlling 3 out of 4 Ro-Ro terminals (75%) on the Humber. The Government's National Policy Statement for Ports (NPSP) outlines an intention to welcome and encourage competition as 'Competition drives efficiency and lowers costs for industry and consumers', with the effect of enhancing resilience in the UK's port operations.¹ If the Proposed Development goes ahead an even greater degree of control of ports and terminals on the Humber is put in the hands of one owner – ABP. It is clear that this scenario does not deliver in accordance with the intention of the NPSP regarding competition, as it would not encourage further competition between ports and therefore would not make UK national infrastructure more resilient.

“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.” (page 4)

- 1.8 More detail is requested on what the Applicant means by this assertion. It is vague and is not clear what other matters they believe should be included in need considerations. If the Applicant provides more detail on what is meant by this statement then we will be able to respond accordingly.

Table 1 – Effects on landside transportation (Page 6 to 7)

- 1.9 On pages 6 and 7 of this document, the Applicant provides the following information:

“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).

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).”

¹ DfT, 2012. National Policy Statement for Ports

- 1.10 In light of this information, we have updated our analysis on the implied dwell time that this would require below, for two scenarios. Both of these scenarios demonstrate that the Applicant will still need to achieve a dwell time which is substantially below the 'average' 2.25 days they utilise to support their level of assumed throughput and the consequent economic benefits they rely on as part of their needs case.

Scenario 1 – Applicant's stated proportions of Ro-Ro freight

- 1.11 In **ES Volume 1 Chapter 3** paragraph 3.2.6, the Applicant states that it anticipates achieving a distribution of 72% unaccompanied Ro-Ro and 28% accompanied Ro-Ro.
- 1.12 By applying these proportions to the stated 525,000 units per year above, it is possible to estimate what dwell time the Applicant would need to achieve to accommodate a throughput of 378,000 unaccompanied Ro-Ro units (72% of 525,000) each year. The table at the end of this document sets this out ('Scenario 1'), demonstrating that a dwell time of 1.16 days on average would need to be achieved to accommodate this level of unaccompanied, far below the industry average of 2.25 days that the Applicant relies on to justify need for the Proposed Development.
- 1.13 Furthermore, in order to achieve 147,000 accompanied Ro-Ro units per year, Stena would need to provide 2 ships that each sail seven times a week and carry almost exclusively accompanied Ro-Ro. The table directly below demonstrates this, showing a maximum capacity of just over 147,000 (plus 8,500 additional accompanied units likely to be available on the Europoort service (where spaces are limited)).
- 1.14 This reliance on two ships to carry almost exclusively accompanied Ro-Ro units would be at odds with the Applicant's assertion that there has been a shift to unaccompanied Ro-Ro units:

“The service currently handles approximately 50% unaccompanied Ro-Ro cargo and 50% accompanied Ro-Ro cargo, although there is a continuing trend towards an increasing proportion of unaccompanied cargo on this service. This is a trend which Stena Line consider will continue to develop.” Paragraph 4.2.64 of ES Volume 1 Chapter

Stena Hoek Transit/Transport	Metric	Calculation
Lane Metres (A)	4,057	-
Space (metres) per accompanied unit (B)	17	-
Efficiency on the ship (C)	85%	-
Maximum accompanied units per ship (D)	203	(A*C)/B
Sailings per week (E)	7	
Ships (F)	2	
Sailings per year (G)	728	E*F*52
Max accompanied units	147,675	D*G

Source: Calculations provided by CLdN and verified by Volterra.

Scenario 2 – retaining Stena's existing levels of accompanied Ro-Ro

1.15

CLdN is of the opinion that there is no reason to believe that Stena's accompanied Ro-Ro throughput would increase above their best year of 75,000 units, which was in 2018 when Killingholme handled both Hoek and Europort services. Reflecting this belief, Volterra has tested what dwell time for unaccompanied Ro-Ro units the Applicant would need to achieve if they had an annual throughput of 525,000 units in total, of which 75,000 units were accompanied Ro-Ro. This shows that the dwell time required would be 0.97 (to 2 decimal places) days on average, again substantially below the supposed average of 2.25 days.

Revised dwell time calculations based on information provided by both the Applicant and CLdN

Assumption	Scenario 1	Scenario 2
Trailer bays	1,430	1,430
Container ground slots	40	40
Container unit slots (multiply by three)	120	120
Stack efficiency	0.6	0.6
Total container units static capacity (3 * slots * efficiency)	72	72
Total static capacity	1,502	1,502
Multiply by days per annum	548,230	548,230
Average dwell days	1.16	0.97
Peak multiplier	1.25	1.25
Total storage capacity	378,090	452,148
Assumed annual throughput (for context)		
Unaccompanied Ro-Ro units	378,000	450,000
Accompanied Ro-Ro units	147,000	75,000
Total Ro-Ro units	525,000	525,000

Source: Calculations provided by Volterra, 2023.



Contact Us

volterra.co.uk



020 4529 1736

Chester House
1-3 Brixton Road
London
SW9 6DE

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