

**Hinckley & Bosworth Borough Council  
Interested Party Reference Number:  
20039546**

**Relevant Representations  
Summary**

**Application by Tritax Symmetry (Hinckley)  
Limited for an Order Granting  
Development Consent for the Hinckley  
National Rail Freight Interchange**

**(ref. TR050007)**

## **1. Introduction**

- 1.1** In June 2023 Hinckley and Bosworth Borough Council (HBBC) submitted its 'Relevant Representations' in respect of the Hinckley National Rail Freight Interchange (HNRFI) proposal. In accordance with the requirement of [TBC Rule 8?] the Council has summarised its Relevant Representations in this document.
- 1.2** HBBC is an Interested Party and an Affected Person.

## **2. Need and Site Selection**

- 2.1** The proposed site is an open countryside location and its loss would be permanent. The Council is not persuaded that the applicant has sufficiently demonstrated the market need for the development of this site and that another suitable alternative is not available. The Council is concerned that in selecting this site the applicant has not evidenced a robust approach to the consideration of alternative sites by way of a comprehensive analysis of the comparative adverse impacts, for example, environmental, social, economic & traffic and the long-term adverse impacts.
- 2.2** The Environmental Assessment undertaken as part of the submission leaves doubt that the adverse local impacts of noise, emissions, landscape/visual amenity, biodiversity, cultural heritage, and water resources are fully understood and have been comprehensively considered. The significance of these effects on the nearby communities with the borough and the effectiveness of mitigation lacks certainty. Therefore, whilst the applicant has taken sufficient consideration there is doubt that it is fully in accordance with National Policy.

## **3. Landscape and Ecology**

- 3.1** The Council is concerned that the landscaping proposed to offset the wider visual impact of the development as set out in the Landscape and Visual Impact Assessment, is insufficient by year 15 to satisfactorily mitigate the impact of the development. The landscaping proposed is not considered sufficient to enable assimilation into the countryside setting. The scale of residual impacts indicate that the proposal is an overdevelopment of the site.
- 3.2** The Council disagrees with the applicant's assessment of the grading of importance given to habitats and species which appears to be based on their abundance within the order limits as opposed to their status or level of protection. The Council also disagrees with the assigning of value to ecological receptors which is heavily based on presence within order limits rather than based on national decline/legal protection.
- 3.3** There is a lack of consideration to habitat fragmentation during the operational phase, including the provision of only one relatively narrow corridor in a north-east/south-west direction. There is also a lack of consideration given

to the retention of existing hedgerows and features of note within the site area to minimise the displacement of fauna (including protected species).

#### **4. Socio – Economics**

- 4.1** The Council is concerned that there appears to be an anomaly in the calculation of the potential numbers of jobs created by the development which at one point is stated as 8,400 – 10,400 yet in the transport assessment appears to be in the order of 12,000. The applicant should make clear the correct number and provide assurances that the impacts of the numbers of employees in terms of adverse effects and related mitigation has been taken at the worst case scenario.
- 4.2** The Council has concerns that the impact of the number of employees associated with the development has not been satisfactorily and robustly tested in terms of the effect on the local housing market and crucially whether the extent of proposed future housing delivery supports the scale of the development.

#### **5. Traffic and Transport**

- 5.1** The Council has significant concerns that the scheme's transport and traffic related modelling, impacts and mitigation at both the strategic and local road networks is complete, accurate, comprehensive and robust. The consequence of this is that the applicant has failed to appropriately mitigate the proposal's impacts on both the strategic road network (SRN) and the local road network. Issues with congestion on the SRN have been consistently highlighted by those bodies with statutory responsibility but the mitigation has still not been agreed. This is wholly inadequate and inappropriate and does not enable the Council, nor its residents to fully comprehend the likely impact of the proposal and to be able to respond with certainty.
- 5.2** The Council is particularly concerned at the applicant's resistance to undertaking the proper assessment and implementing localised mitigation at junction 21 of the M1 and the resultant consequence that mitigation is dispersed over a wider geography of junctions on the local road network causing unnecessary disruption to local traffic movements.
- 5.3** The applicant's Sustainable Transport Strategy fails to provide sufficient interventions to create an acceptable degree of modal shift from reliance on the car to more sustainable transport alternatives. The applicant's reliance on providing additional funding for the x6 service has no justification and its reliance on demand responsive transport (DRT) is both inadequate to cope with the number of employees likely to require access to the site at the same time and is flawed as the existing DRT which the applicant relies upon only operates on a trial basis funded by the DfT; it has no guarantee of longevity.

#### **6. Environmental Effects**

- 6.1** A consequence of the concern over the employment figure anomaly referred to above casts doubt on whether the assessment of impacts relating to air quality, noise and vibration have been properly assessed using the worse case scenario and that the resulting mitigation is adequate.
- 6.2** The Council has concerns over the extent and proximity of acoustic fencing required to protect nearby residential properties and the impact this has on their visual amenity. It is symptomatic of the applicant's approach to the design and layout of the development and the inappropriateness of the site that it has to be screened by fencing of such a height that will appear alien in the context of the surrounding land uses. The inclusion of 4- and 6-metre-high acoustic fencing around the Aston Firs Caravan Site is of particular concern and considered inappropriate.
- 6.3** The working hours proposed in the Construction Environmental Management Plan and Construction Traffic Management Plan are not acceptable. Whilst 0700 to 1900 hours Monday to Saturday may be acceptable for certain phases, construction works or construction areas, across the site on a permanent basis it will have an unacceptable impact on sensitive receptors. The Council proposes the following hours Monday – Friday 07:30 – 18:00, Saturday 08:00 – 13:00 and no working on Sundays and Bank Holidays.

## **7. Energy and Climate Change**

- 7.1** As stated above the scheme's existing approach to sustainable travel is unacceptable and results in excessive climate related impacts.
- 7.2** The timescale for the construction of the project means that construction and energy targets will continue to be increased, leaving the development potentially lagging behind other proposals. As it will have a development lifespan to and beyond 2050, where the UK must operate at net zero, a failure to design a net zero capable development will make it impossible to operate in this manner without substantial retrofitting of technology. This creates an unnecessary and avoidable barrier to achieving the Country's net zero ambitions.
- 7.3** An artificial constraint to the ability to generate on-site renewable energy and be net zero in operation by capping energy generation at 49.9 Mw is a missed opportunity undermining the 'green credentials' of the proposal and the Council feels that on site energy generation should be maximised if it is available.

## **8. Summary**

- 8.1** HBBC does not support the development proposals as presented in the submitted DCO as there are considerable concerns about the range of adverse individual and cumulative impacts which have been identified by the applicant but which the Council does not consider having been adequately addressed in terms of the mitigation of impacts. For the reasons set out above

the Council urges the Examining Authority not to recommend the proposal to the Secretary of State for approval.