

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

**Local Impact Report**

**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. This Local Impact Report (LIR) is submitted by Hinckley and Bosworth Borough Council (HBBC) in response to the application by Tritax Symmetry (Hinckley) Limited (the Applicant) for development consent for the Hinckley National Rail Freight Interchange (reference TR050007).
  
- 1.2. The LIR has been prepared under section 60 of the Planning Act 2008 having regard to the guidance in the Planning Inspectorate's *Advice Note One: Local Impact Reports* (April 2012). It gives details of the likely impacts of the proposed development on this part of the borough.
  
- 1.3. Hinckley and Bosworth Borough Council is an Interested Party (Group A) by virtue of the presence of highway works sited within the borough boundary; as well as an Affected Person with land owned over which the applicant requires access to implement part of the proposed development. The Council has already submitted an Adequacy of Consultation response as well as Relevant Representations.

## **2. Site Description & Location**

- 2.1. The application site comprises 268 hectares of predominantly agricultural farming and grazing land to the north east of Hinckley lying to the west of the M69 and to the south of Elmesthorpe. The M69 joins the M1 further north at J21. To the east of the site lies the railway line which connects the Midlands to Felixtowe, the section adjacent the site being referred to as the Leicester to Nuneaton section. Highway works associated with the proposed development extend beyond the rail freight terminal and associated logistics warehousing to the west, to connect to the A47 but also to the north, east of the M69 and south.
  
- 2.1 The land is relatively flat and characterised by fields separated by hedgerows and mature deciduous trees, including a veteran tree (T486). There are a number of properties within the parameters plan, predominantly associated with agricultural holdings. Burbage Common Road runs through the site south from its junction with the B581 before it crosses the railway line and runs west to join the B4668.
  
- 2.2 Elmesthorpe village is located to the north of the site and is the closest settlement to the development. Beyond Elmesthorpe to the north lie the villages of Barwell and Earl Shilton. To the east of the M69 lie the villages of Aston Flamville, which is the closest, Stoney Stanton, Sapcote and Sharnford. To the

south west of the site is the built-up town of Hinckley with residential development in close proximity to the site, including part of the town known as Burbage, which gives its name to the common and woods which abut the south western boundary of the site.

2.3 Smithy Lane runs off the B4669 Sapcote Road just to the west of junction 2 of the M69 and gives access to the Aston Firs gypsy and traveller site and the Castlewood Park mobile home site.

2.4 A full description of the site and its location is provided by the applicant in document 6.1.2 (Chapter 2 of the Environmental Statement).

### **3. Details of the Proposal**

3.1 The proposal entails the construction of a rail port connected to the Leicester to Nuneaton rail line in the west of the site, capable of accommodating up to 16 trains a day of up to 750m in length. The rail port includes hard surfacing and cranes for the loading and unloading of containers from HGVs and for the storage of containers and parking for the HGVs. An additional lorry park and driver welfare facilities is also proposed.

3.2 Logistics warehousing buildings are proposed, some of which will be directly connected to the rail port, to the east of the rail port providing up to 650,000 square metres of floorspace footprint, with the capability of an additional 200,000 square metres of mezzanine floorspace giving a combined total of up to 850,000 square metres of floorspace.

3.3 An energy centre incorporating an electricity substation, battery storage and gas fired combined heat and power plant is also proposed, generating up to 5 megawatts of power which when combined with the potential energy generation from roof mounted photovoltaic cells means the total energy generation from the site could be as much as 47.4 megawatts.

3.4 New highway works are proposed at J2 of the M69 to add a southbound slip road for traffic joining the M69 and a northbound slip road for traffic leaving the motorway. A new link road is also proposed west from J2 of the M69 which is the sole point of vehicular access into the site, and which continues in a westerly direction over the railway line to join the B4668 which then gives access to the A47.

3.5 A variety of associated works are necessary to enable the development taking place including demolition of properties, re-modelling of land, stopping and diversion of public rights of way, diversion of watercourses, introduction of acoustic barriers, off site highways works, pedestrian rail crossings, drainage works and landscaping.

3.6 A full description of the proposal is provided by the applicant in document APP - 347 'Planning Statement'.

#### **4. Need and Site Selection**

4.1 The published joint authority evidence base document '*Warehousing and Logistics at Leicester and Leicestershire: managing growth and change*' (April 2021) provides the basis for the applicant to demonstrate that there is an unmet quantum of need for a SRFI facility as the study identifies a shortfall of rail served sites in Leicestershire up to 2041. The applicant has undertaken a 'Market Needs Assessment' (APP-357) which indicates that the location of the site is near to the business market it will serve and is well connected to key supply chain routes. The applicant has also submitted a Logistics Demand & Supply Assessment (APP-358) which concludes that there is a robust market need case for the development proposed.

4.2 There are the six main development zones proposed within the parameters plan and the rate of construction of the new floorspace will be dictated by occupier demand and for this reason the programme and phasing is indicative. The reasoning is that the project is subject to the demands of the property market and the detailed design stage being finalised will influence the pace of completion spread over a total period of ten years.

4.3 The Market Needs Case (APP - 357 section 6.10-11) and the Logistics Demand and Supply Assessment (APP - 358 section 3.3.5) makes it clear that very good access to the strategic road network is an integral part of the operation of a SRFI. The HRNFI site is particularly dependant on the M69 for this strategic access, particularly to the core market of Leicester, and that J21 of the M1 (J3 of the M69) is already over capacity, with no proposals for mitigation.

4.4 The applicant has evidenced the manner in which it considered alternative sites and the reasons for selecting the proposed site as set out in its document 6.1.4 (APP-113). However, there remain questions regarding the robustness and depth of analysis undertaken to arrive at the Hinckley site and the disregard of others. The option appraisal lacks much in the way of depth, or at least the information and data analysis on key criteria [rail, road, environmental and commercial] does not appear to be extensive.

4.5 In comparative terms the preferred option at Hinckley places particular emphasis on its location on the South Leicestershire main line with connection to the M69 and M6. However, no in-depth analysis has been undertaken to show how other sites might address connectivity across the trunk road network, over which most intermodal rail freight is currently moved through the UK. The railport users benefit from access to a mainline route with W10 loading gauge and capable of handling 775m length freight trains, but this key criterion for a SRFI site might conceivably be just as effective in other sites identified in the option appraisals.

#### **5. Planning**

5.1 The majority of the application site lies within the administrative area of Blaby District Council and therefore their response to the proposed development will set out whether there are any significant planning applications which affect the development as well as the current Development Plan and relevant policies. However, the administrative boundary between Blaby District and Hinckley and Bosworth Borough runs to the immediate west of the application site and part of the proposed highway works to join the proposed link road from J2 of the M69 to the B4668 lies within the boundary of Hinckley & Bosworth Borough Council and is therefore covered by the Council's adopted Development Plan.

5.2 In terms of planning applications directly affected by the proposed development application boundary, there is a currently undetermined retrospective application for *Change of use of land to 4 no. Gypsy and Traveller pitches, each pitch containing one mobile home, one touring caravan and one amenity block, together with laying of hardstanding, construction of driveway and associated landscaping (Retrospective)* (21/00560/FUL) at Land South-East Of Leicester Road Hinckley Leicestershire LE10 3DR where the access arrangements overlap with the proposed development.

5.3 Also worthy of mention because of their size and proximity to the north of the application site with traffic movements impacting on the A47 are two sustainable urban extensions (SUE) at Barwell and Earl Shilton and which are covered by the adopted Barwell and Earl Shilton Area Action Plan 2014. The AAP proposed sustainable urban extensions to the south east of Earl Shilton for up to 1600 homes and 4.5Ha of employment land (the site adjoins the A47 and relies on vehicular access from it to serve the majority of the development) and to the west of Barwell for up to 2500 homes and 6.2Ha of employment land. At the time of writing neither site has been brought forward for development, but both have applications awaiting determination.

5.4 At Earl Shilton there are three applications covering the SUE:

- 21/01511/OUT: Outline application to include up to 1,000 dwellings (C3) up to 5.3 hectares for employment uses comprising a mix of B2, B8 and E(g) uses, a primary school/education uses (F1), retail floor space (E) and hot food takeaway (Sui Generis) as part of a mixed use local centre/community hub (E/F1/F2/C3), two vehicular accesses from the A47, limited access from Breach Lane, vehicular access from Mill Lane, public open space including sustainable urban drainage systems and the provision of associated infrastructure and ancillary works and demolition of former girl guide building (outline - access only)(EIA development) | Earl Shilton Sustainable Urban Extension (SUE) Mill Lane Earl Shilton Leicestershire
- 23/00330/OUT: Outline application to include up to 500 dwellings, a primary school / education use (Class F1), retail (Class E), community hub (Class E/F1/F2), hot food takeaway (Sui Generis), accesses from Mill Lane and Astley Road and infrastructure including; public open space, SUDS, landscaping, the provision of associated infrastructure and ancillary works.

Outline - all matters reserved except for access (EIA development). | Earl Shilton Sustainable Urban Extension (SUE) Mill Lane Earl Shilton Leicestershire

- 20/01225/FUL: Residential development for 81 dwellings with provision of access, open space and associated infrastructure | Land West Of Clickers Way Earl Shilton Leicestershire

At Barwell there is a single application covering the SUE:

- 12/00295/OUT | Outline application including access for up to 2,500 new residential dwellings (use class C3), an employment zone for general industrial buildings (use class B2) and storage and distribution warehouses (use class B8) providing up to 24,800 sqm, sports pitches, pavilion building and changing rooms (use class D2), areas of formal and informal open space, children's play areas, landscaping, allotments and public realm works, provision of hydrological attenuation features, pedestrians and cyclists connections, new infrastructure and services as necessary to serve the development and a new community hub area comprising a primary school (use class D1), a local health care facility (use class D2) or, in the alternate, a family public house/restaurant (use class A3/A4) and local retail and commercial units (use class A1, A2, A3, A4 and A5) up to a maximum floor space of 1,000 sqm (EIA development) | Barwell Sustainable Urban Extension (SUE) Land West Of Barwell Ashby Road Barwell Leicestershire

5.5 The adopted Development Plan for the Hinckley & Bosworth Borough area is the Local Plan 2006 – 2026 and comprises the Core Strategy which was adopted in December 2009 and the Site Allocations and Development Management Policies DPD which was adopted in 2016. Also relevant is the Good Design Guide Supplementary Planning Document (SPD) which was adopted in 2020.

5.6 The relevant policies of the Core Strategy are (relevant extracts from policies have been included, not necessarily the full wording):

- Policy 1 – Development in Hinckley - To ensure development contributes to Hinckley's character and sense of place and that the town's infrastructure can accommodate the new development, the council will:
  - Deliver the strategic green infrastructure network detailed in Policy 20. To achieve this, strategic interventions involving Burbage Common and Woods, Hinckley Town Centre, Harrow Brook Corridor, Disused Railway Line (Nuneaton – Shenton Station), and Hinckley/Barwell/Earl Shilton/Burbage Green Wedge will be implemented
  - Deliver safe, high quality cycling routes as detailed in Policy 5 with particular focus on the routes to Hinckley town centre and schools, existing and proposed residential and employment areas, community and leisure facilities, the Hinckley railway station and bus station and into the countryside to provide an alternative to car travel and encourage physical exercise.

- Require development to be of the highest environmental standards in line with Policy 24
- Policy 2 – Development in Earl Shilton - To ensure development respects the character of Earl Shilton, builds on its sense of place and helps deliver the regeneration of the town the council will:
  - Deliver the strategic green infrastructure network detailed in Policy 20. To achieve this, strategic interventions involving the Earl Shilton Urban Extension and the Hinckley/ Barwell/Earl Shilton/Burbage Green Wedge will be implemented.
  - Deliver safe, high quality cycling routes as detailed in Policy 5 with particular focus on routes to Earl Shilton local centre and schools, existing and proposed residential and employment areas, community and leisure facilities, the Hinckley town centre and railway station and into the countryside to provide an alternative to car travel and encourage physical exercise.
- Policy 3 – Development in Barwell - To ensure development respects the character of Barwell, builds on its sense of place and helps deliver the regeneration of the town the council will:
  - Deliver the strategic green infrastructure network detailed in Policy 20. To achieve this, strategic interventions involving the Barwell Sustainable Urban Extension and the Hinckley/Barwell/Earl Shilton/Burbage Green Wedge will be implemented.
  - Deliver safe, high quality cycling routes as detailed in Policy 5 with a particular focus on routes to Barwell local centre and schools, existing and proposed residential and employment areas, community and leisure facilities, the Hinckley town centre and railway station and into the countryside to provide an alternative to car travel and encourage physical exercise.
- Policy 4 – Development in Burbage – To ensure development contributes to Burbage’s character and sense of place and that the village’s infrastructure can accommodate the new development, the council will:
  - Deliver safe, high quality cycling routes as detailed in Policy 5, with particular focus on routes to Burbage local centre and schools, existing and proposed residential and employment areas, community and leisure facilities, the Hinckley town centre, railway station and bus station and into the countryside to provide an alternative to car travel and encourage physical exercise.
- Policy 5 – Transport Infrastructure in the Sub Regional Centre - The following transport interventions (as detailed in the Hinckley Core Strategy Transport Review 2007) are proposed to support the additional development in and around the Hinckley sub-regional centre, particularly the urban extensions at Barwell and Earl Shilton, to promote sustainable development within the area:
  - New public transport linkages from proposed developments to Barwell and Earl Shilton, and improved public transport linkages between Barwell, Earl Shilton, Hinckley town centre and Hinckley Northern Perimeter Road employment areas

- New pedestrian and cycle linkages from proposed developments into Barwell and Earl Shilton

Developers will be required to contribute towards the implementation of these initiatives through developer contributions where they meet the tests set out in national guidance. New development that would prejudice their implementation will not be permitted.

- Policy 6: Hinckley/Barwell/Earl Shilton/Burbage Green Wedge - Within the Hinckley/Barwell/Earl Shilton/Burbage Green Wedge uses will be encouraged that provide appropriate recreational facilities within easy reach of urban residents and promote the positive management of land to ensure that the Green Wedge remains or is enhanced as an attractive contribution to the quality of life of nearby urban residents.

Any land use or associated development in the Green Wedge should: (a) Retain the function of the Green Wedge (b) Retain and create green networks between the countryside and open spaces within the urban areas (c) Retain and enhance public access to the Green Wedge, especially for recreation and (d) Should retain the visual appearance of the area.

- Policy 20: Green Infrastructure - The implementation of the Green Infrastructure Network as outlined on the Key Diagram is a key priority of the council. To assist delivery of this plan, the following strategic interventions will be supported:
  - Burbage Common and Woods - Increase the size of the site to increase both the community value and biodiversity holding capacity and improve access to the site, particularly for pedestrians and cyclists.
  - Barwell Sustainable Urban Extension (SUE) - Retain strategic footpath routes that pass through the site to ensure access from Barwell to the open countryside, retain the River Tweed corridor as an open watercourse and as a strategic route for recreation, maintaining access between Barwell and the open countryside and investigate the possibility of creating a larger green space within the green wedge that separates Barwell and Hinckley to improve the recreational offer for the residents of the Sustainable Urban Extension and the residents of North Hinckley
  - Earl Shilton Sustainable Urban Extension (SUE) - Protect existing access to Burbage Common and provide a recreational corridor to Burbage Common and beyond, ensure suitable crossing points over the Earl Shilton Bypass are retained to maintain the visual and physical links between Earl Shilton and the surrounding countryside and address the deficit of open space provision in Earl Shilton
  - Hinckley/Barwell/Earl Shilton/Burbage Green Wedge - Maintain the green wedge between Hinckley and Barwell as it plays an important environmental and landscape protection role. Look to develop it into a large-scale recreational asset to service the Sustainable Urban Extensions and residents living in North Hinckley



5.7 The relevant policies of the Site Allocations and Development Management Policies DPD are (relevant extracts from policies have been included, not necessarily the full wording):

- DM3: Infrastructure and Delivery - Where development will create a need to provide additional or improved infrastructure, amenities or facilities, developers will be expected to make such provision directly or indirectly through the appropriate funding mechanism.
- DM4: Safeguarding the Countryside and Settlement Separation - To protect its intrinsic value, beauty, open character and landscape character, the countryside will first and foremost be safeguarded from unsustainable development. Development in the countryside will be considered sustainable where:
  - iv) If within a Green Wedge, it protects its role and function in line with Core Strategy Policies 6 and 9.
- DM6: Enhancement of Biodiversity and Geological Interest - Development proposals must demonstrate how they conserve and enhance features of nature conservation and geological value including proposals for their long-term future management. Major developments in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services. On site features should be retained, buffered and managed favourably to maintain their ecological value, connectivity and functionality in the long-term. The removal or damage of such features shall only be acceptable where it can be demonstrated the proposal will result in no net loss of biodiversity and where the integrity of local ecological networks can be secured. If the harm cannot be prevented, adequately mitigated against or appropriate compensation measures provided, planning permission will be refused.

#### **Internationally and Nationally Designated Sites:**

International and Nationally Designated Sites will be safeguarded. Development which is likely to have any adverse impact on the notified features of a nationally designated site will not normally be permitted.

#### **Locally Important Sites:**

Development proposals affecting locally important sites should always seek to contribute to their favourable management in the long term. Where a proposal is likely to result in harm to locally important sites (including habitats or species of principal importance for biodiversity), developers will be required to accord with the following sequential approach:

- h) Firstly, seek an alternative site with a lesser impact than that
- i) Secondly, and if the first is not possible, demonstrate mitigation
- j) Thirdly, and as a last resort, seek appropriate compensation measures, on site wherever possible and off site where this is not feasible.

- DM7: Preventing Pollution and Flooding - Adverse impacts from pollution and flooding will be prevented by ensuring that development proposals demonstrate that:
  - a) It will not adversely impact the water quality, ecological value or drainage function of water bodies in the borough.
  - c) All reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light intrusion.
  - d) It would not cause noise or vibrations of a level which would disturb areas that are valued for their tranquillity in terms of recreation or amenity.
  - f) It will not contribute to poor air quality.
- DM9: Safeguarding Natural and Semi-Natural Open Spaces - All developments within or affecting Natural and Semi-Natural Open Spaces should seek to retain and enhance the accessibility of the space and its recreational value whilst ensuring the biodiversity and conservation value is also enhanced. Development within areas of Natural and Semi-Natural Open Space, as defined on the policies map, will only be considered appropriate where:
  - e) If within a Green Wedge, it protects its role and function in line with Core Strategy policies 6 and 9.
- DM10: Development and Design - Developments will be permitted providing that the following requirements are met:
  - a) It would not have a significant adverse effect on the privacy and amenity of nearby residents and occupiers of adjacent buildings, including matters of lighting, air quality (including odour), noise, vibration and visual intrusion.
  - b) The amenity of occupiers of the proposed development would not be adversely affected by activities in the vicinity of the site.
  - c) It complements or enhances the character of the surrounding area with regard to scale, layout, density, mass, design, materials and architectural features.
  - e) It incorporates a high standard of landscaping where this would add to the quality of the design and siting.
- DM17: Highways and Transportation - Development proposals will be supported where they:
  - a) Seek to make the best use of existing public transport services and, where appropriate, provide opportunities for improving and sustaining the viability of those services.
  - b) Seek to ensure that there is convenient and safe access for walking and cycling to services and facilities.
  - d) That the development is located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
  - e) Where it can be demonstrated that the residual cumulative impacts of development on the transport network are not severe.

Where appropriate, improvements will be required to be undertaken to the highways and transportation network to limit any significant impacts arising from the development (taking into account cost effectiveness). All proposals for new development and changes of use should reflect the highway design standards that are set out in the most up to date guidance adopted by the relevant highways authority.

5.8 The Good Design SPD is divided into two parts, part two focusses on specific village identity and features and is not relevant to the determination of this application. Part one, however, deals with the approach and objectives to achieving good design and is relevant to the determination of this application and should be considered alongside the guidance in the NPS and other national design guidance. In particular chapters 1 (Planning and Design Process), 2 (Design Objectives) and 7 (Commercial Development) are relevant.

## **6. Characteristics of the Local Area**

6.1 Hinckley and Bosworth borough is predominantly rural in nature where the borough's urban and rural settlements sit within a significant landscape backdrop. This backdrop has a varied and diverse character including settled forests, rolling farmland, open farmland, village farmland, and agricultural parkland associated with historic aristocratic estates.

6.2 There are also specific landscape character areas within the borough that require additional consideration, such as Charnwood Forest which incorporates parts of the National Forest. Certain heritage assets, most notably the Bosworth Battlefield and Ashby Canal, draw primary value from their landscape character.

6.3 The borough has a rich and diverse historic development that has created very specific built and spatial characteristics including a wide range of designated and non-designated heritage assets. This heritage has a significant time depth, ranging from the early remains of prehistoric and Roman settlements, through medieval agricultural development, to modern industrial and residential expansion. This variety has been influenced by several historical factors. Most of the Borough's towns and villages began as medieval agricultural settlements, reflecting the specific influence of farming associated with landed estates. These settlements were morphed through the growth of industries such as hosiery, framework knitting and shoe/boot manufacture, including early cottage-based workshops and later purpose-built factories. This was complemented by the growth of mining and quarrying particularly in the northern regions and supported by the development of the railway and canal networks.

6.4 The main urban area is located to the south of the district, formed from the close proximity of Hinckley, Earl Shilton, Burbage and Barwell. These urban areas are predominantly medieval in origin. Through 20th century suburban growth, the separation between Hinckley and Burbage shrank significantly, joining the two urban areas.

6.5 The rest of the district is characterised primarily by relatively isolated rural centres, villages, and hamlets set into expansive open landscape. These rural areas

initially developed as agricultural settlements associated with important manorial centres and estates and there is an extensive surviving range of scheduled medieval aristocratic moated sites that dot the landscape.

## **7. Impacts**

### **Landscape & Visual Impact**

7.1 The application site is located within a low-lying vale landscape contained to the west, north and southwest by the low ridge (up to 130m AOD) containing the settlements of Burbage, Hinckley, Barwell and Earl Shilton. A minor ridge also extends to the south of the site containing the woodland at Aston Firs and across the motorway, providing a landscape setting for the villages of Aston Flamville and Sapcote. The low-lying vale continues east where it dips meeting the tributary streams of the River Soar, east of Stoney Stranton.

7.2 While the site itself is low lying and appears visually enclosed from within, with views partially contained by the woodland backdrop at Aston Firs and the mature trees and hedgerows within the site, it sits as part of a more visually exposed low-lying vale, with settlements on surrounding minor ridges. Apart from Burbage Wood and Aston Firs this is an open, unwooded landscape with a limited sense of enclosure provided by low trimmed hedgerows with mature trees allowing long views, both within and across from surrounding higher land.

7.3 From the ridge top settlements of Barwell and Earl Shilton the characteristic long views out across the vale from the edges of the development with its patchwork of farmland and trees (where existing linear infrastructure of the road and rail line is not discernible or in the case of the grid line is permeable) will be blocked in the middle ground by the large scale freight facility which breaches the skyline and results in a solid vertical 'wall' with loss of the sense of space and the wider rural landscape continuing across the vale. For the small linear ridge village of Elmesthorpe the scale of the development is such that it will be a permanent solid development backdrop extending across the whole range of view, with the rectilinear roofscape dominating the skyline.

7.4 The proposed HNRFI will replace the existing farmed rural landscape across the entire site with large-scale built form, roads, and rail infrastructure. The development site covers a substantial part of two Landscape Character Areas (Blaby: Aston Flamville Wooded Farmland and Elmesthorpe Floodplain) and is overlooked by the Burbage Common Rolling Farmland to the west in Hinckley and Bosworth, which includes the proposed A47 link road. Surrounding settlements are located on higher ridges of land and are covered by separate settlement/urban character areas.

7.5 The development will entirely replace the existing rural vale landscape which is comprised of a mix of arable and grazed farmland enclosed by a network of mixed hedgerows with mature trees (oak, ash and elm), crossed by minor stream and water features. The site is part of a relatively tranquil rural landscape between the urban areas of Burbage, Hinckley, Barwell and Earl Shilton which lie to the west/north and the M69 part of a wider vale which extends from the settlements to the Soar tributaries in the east. The development will change the character of the extensive site from open countryside to industrial/urban, with complete loss of all features

including the mature trees (including a veteran tree) and hedgerows, water features and rural farms within the site. The existing network of footpaths/bridleway and the rural lane which cross the landscape will be stopped up and replaced with one new bridleway to follow a corridor between the development and the M69 around the development, crossing and following the link road to Burbage Common and Woods to the west. The landscape impacts of the scheme will be much wider than the site itself and the rural character of the surrounding landscape and villages of the vale will change as a result of the bulk and scale of the development. The sense of the vale extending to the west away from the ridgetop settlements of Hinckley and Barwell will be blocked by the development, and it will be prominent from the landscape west of the M69 with associated effect on the overall sense of rural tranquillity of the vale.

7.6 These impacts on the landscape will be present at day and nighttime, despite the lighting strategy. The size and scale of the development is such that significant effects will remain in the long term/permanently and cannot be mitigated. The proposed design is not sensitive to the landscape context, in terms of scale, massing, local vernacular, or general materiality.

7.7 The scale of the development means that the Landscape Strategy (ES Figure 11:20, document reference APP - 304) does not mitigate the effects but does seek to reduce them. The proposals allow for buffer planting and screening to the edge of the development, but the areas required to sufficiently screen the scale of the development are currently inadequate. For people moving around the area (on local rights of way and roads) the development is of such a size and scale that it will be a constant presence, even where screening means that in specific, individual views there are only glimpses, these will contrast with other views where the scale and size of the facility is wholly dominant forming the horizon.

7.8 The separation between the main site and the Burbage Common and Woods Country Park is reduced to a pinch point 25 m at one point, which crosses into Burbage Common Local Wildlife site and is within part of a Green Wedge identified in the Local Plan. This is a particular concern given the proximity of the proposed lighting columns.

7.9 There is proposed planting of a new Western Amenity Area extending to 22 ha as an extension to the public open space, however, this area can already be appreciated as an undeveloped rural farmed vale landscape as it exists (albeit without public access). The new 'amenity' area will be impacted by the proposed A47 Link Road which will be a dominant feature affecting the amenity of users to the extent that it is unlikely to offer any further attraction over the existing amenity area. However, the proposed native tree and shrub planting here will be effective in helping to screen views from some local areas to the south including parts of Burbage Common and illustrate the benefits of 'off site' planting at distance from the development.

7.10 The landscape strategy has been designed to fit around the perimeters of the development rather than working with the natural landscape context. The narrow 'green' corridor, wedged between the development and the motorway, location of flood attenuation pools at the top of gradients, and design of public amenity space along a major link road are examples of a landscape that does not respond well to the local context and character. The networks of public rights of way (PRoW) across the rural landscape are stopped up and the provision of pavements and cycleways

running along large main roads, within the site adjacent to the development will present an entirely different urbanised character.

7.11 The scale and bulk of the layout of container stacks, rectilinear roofscape, plus the tall rail gantries will have a dominant visual presence and the proposed height of the container stacks (22-28m) means that for the majority of views, mitigation by screening is not possible. The development will have many and far reaching significant visual impacts from its initial construction and continuing during operation of the site as illustrated in the applicant's LVIA. People affected include those travelling along local roads between villages and the urban centres at Hinckley and Barwell, people using the network of local rights of way and local open spaces including adjacent to settlements, people resident in local properties, and those travelling on the motorway. The proposed visual mitigation includes screening and visual filtering. However, for most views the size and scale of the development means that it remains well above the treeline at year 15 and beyond.

7.12 Visual mitigation is effective in reducing effects on users of Burbage Common and Woods Country Park to an extent where the proposed planting has the potential over time to help screen the development. Screening by trees/woodland is only possible where planting can be achieved in the middle distance away from the development. The height (28m) and scale of the development means that planting along boundaries such as the 'meandering woodland' on earth bunds north of the railway line or the 'green' corridor to the south adjacent to the M69 is not effective in screening or filtering views of the development.

7.13 There are significant long term negative residual effects on the following visual receptors: footpath (PRoW) and road users, visitors and recreational receptors including to the Country Park and church users in the settlements referred to above. The Council believes that these visual effects will be experienced at a greater number of viewpoints than identified in the LVIA. The overall impact of the development on the landscape and visual amenity is negative.

## **8. Ecology & Nature Conservation**

8.1 Burbage Common & Woods Local Nature Reserve is a site of national importance located immediately adjacent to the site. In the wider landscape surrounding the proposed development, being largely agricultural in nature, there is a deficit of woodland and trees meaning that the hedgerows, treelines and individual trees between the proposed development and Burbage Common & Woods provide vital commuting and foraging opportunities for bats.

8.2 Loss of and damage to hedgerows will occur as a result of the construction phase, leading to the loss of 13.44km of hedgerow. This is inclusive of species rich hedgerows along Burbage Common Road which will be partially lost. There is a large number of important and potentially important hedgerows within the site, indicating the importance of hedgerows across the immediate landscape.

8.3 The results of the application desk study show a number of records of bat species utilising the habitats within 3km of the site, with bat roosts located within 1km to the south. A total of five buildings/built structures within the site were found to support bat roosts during surveys undertaken in 2021. No roosts were recorded within trees located within the site. Low to moderate levels of commuting and foraging bat activity were recorded, associated with hedgerows, woodland edge, waterbodies and mature trees within the site. A total of 63 trees within the site with

potential to support roosting bats, and all existing buildings will be lost as a result of the development.

8.4 There should be the inclusion of Great Crested Newts (GCN) as an Important Ecological Feature (IEF) within the application; and in recognition of the potential for terrestrial GCN to be present within the site and with particular mitigation to be proposed during construction (e.g. with an appropriate precautionary method of working within suitable habitats). The buffer for GCN is noted as 250m from potential waterbodies, however a more appropriate buffer of 500m is also outlined within the application documents. The more appropriate buffer of 500m should be included within updated documentation.

8.5 The application considers the loss of refuge and foraging habitats for over-wintering bird species and loss of potential nesting and foraging habitats for breeding bird species as a result of the development. The application further considers the availability of habitat outside of the development order limits.

8.6 The majority of permanently wet ditch habitat will be retained and buffered from the proposed development. Risks to the quality and condition of this habitat are deemed to be generally neutral, with the exception of pollution from vehicles and runoff.

8.7 The impacts on invertebrates as a result of the loss of arable land are considered to be low to neutral, however habitats where invertebrate populations are expected to be elevated such as mature trees, woodland, hedgerows and waterbodies will be subject to disturbance, loss and potential degradation.

8.8 The current proposals anticipate a loss of 3.49 river units (11.85%), or with offsite compensation, 2.58 units (8.75%) loss. The stream present within the site is to be re-routed, with the post development condition entered into the biodiversity metric as 'moderate'. It is considered that this will be challenging to achieve and that further assessments of the watercourse will be required, including offsite compensation in order to meet 10% Biodiversity Net Gain (BNG).

8.9 Badger surveys identified two setts that will be completely lost as a result of the proposed development: a subsidiary sett and an outlier sett. As no main sett has been recorded a replacement sett will not be required (unless pre-construction surveys identify any). The applicant also acknowledges the loss of foraging habitat (and disruption to foraging habitat during construction). Opportunities are presented within the creation of new habitats and enhancement of retained habitats, to improve foraging habitat for badger.

8.10 The applicant outlines species that are not considered an IEF within the application (e.g. reptiles, invertebrates, amphibians) and includes a brief overview of proposed mitigation measures for these species, however further effort is required to include detailed precautionary methods of working and best practice mitigation measures within the CEMP.

8.11 Measures to mitigate adverse effects are proposed including a buffer between the built development and the designated woodlands of between 25 and 50m, retention of onsite broadleaved semi-natural woodland, retention and provision of buffers to hedgerows around the site boundaries, provision of a large wildlife area, provision of habitat to the south of the A47 Link Road and provision of new structural and hedgerow planting.

8.12 It is proposed that 11.81km of hedgerow will be planted onsite, with 0.67km of off-site creation, however further detail is required with regard to the proposed additional hedgerow creation or enhancement that is expected to be achieved through partnering with the Environment Bank. It is proposed that areas of intact hedgerows are to be retained, and the retained defunct hedgerows will be enhanced to 'native species-rich hedgerows with trees' of 'moderate' condition through management and gap planting to increase structural and species diversity, including the establishment of trees, and gap planting with native tree and hedgerow species. This will act as both a buffer between the proposed development and the surrounding woodland and as important habitat for invertebrates, bats and birds.

8.13 The proposed retained and enhanced habitats provided by the development are likely to support breeding, foraging, and over-wintering bird species, however these habitats are at risk of increased vehicular traffic, pollution and noise during the operational phase of the development. The applicant's mitigation includes a buffer around the proposed retained/enhanced habitats, however it is unclear within the application documents as to the dimensions of these proposed buffers.

8.14 The applicant proposes retaining and buffering the key habitats and corridors around the perimeter of the order limits, however retaining connectivity of habitats is under explored within the application. In addition, the current lighting strategy is brief and unsupported by appropriate surveys to determine the effect of the proposed development on the surrounding/retained habitats. Further, the severance and fragmentation of habitats through the loss of hedgerows, trees and woodland and the time take to reach the target condition of these habitats where they are replaced or enhanced is considered to be a negative ecology and nature conservation impact.

8.15 The impacts on invertebrates as a result of the loss of arable land are considered to be low to neutral, however habitats where invertebrate populations are expected to be elevated such as mature trees, woodland, hedgerows and waterbodies will be subject to disturbance, loss and potential degradation. While agricultural land cannot be wholly dismissed as providing low ecological value, it is generally considered the loss of the crop fields will have a low to neutral impact on the majority of species, with the exception of breeding and wintering birds.

8.16 Long term operational impacts on designated sites, such as pollution and potential water inundation on adjacent ancient woodland and broadleaved woodland habitats, including the potential for nutrient enrichment impacts on ground-level flora requires further and more detailed analysis due to the potential negative impacts.

8.17 Due to the nature of the proposed development, it is considered unlikely that recreational pressures will be notably increased as a result of the development in the same way as would be expected for a residential development, however it is likely that there will be a displacement of walkers and dog walkers. Walkovers of the proposed development site noted observations of moderate levels of activity across and in proximity to the site. It is therefore likely that some increases in recreational pressure will be likely at Burbage Common & Woods.

8.18 Due to potential impacts from overland runoff, including silt, heavy metals from vehicles and other pollutants, buffer planting or vegetated swales would be beneficial to reduce the likelihood of pollutants entering the watercourse and further hindering the enhancement of the rerouted stream. There is a risk of increased air pollution as a result of construction and operational stages of the proposed development which



has the potential to impact woodland ground flora due to the effects of excess nitrogen deposition.

8.19 Based on the application stage BNG calculations referenced in Document APP - 198 – Biodiversity Impact Assessment Calculations, the project is estimated to result in a 4.82% net biodiversity loss in area units, a 7.12% net gain in hedgerow units and an 11.85% loss in river units. The current offsite proposals are predicted to achieve a 5.5% net gain in area units, an 11.7% net gain in hedgerow units and an 8.75% net loss in river units. This does not meet planning policy requirements or the aims of the Environment Act 2021. It is proposed that through partnering with the Environment Bank, further area habitat and linear river units will be achieved in order to meet the 10% requirement. This, however, has not yet been established nor is it clear how these proposals will be achieved. A full and complete Biodiversity Impact Assessment (BIA) report should provide an assessment of the proposed offsite BNG provision.

8.20 It is considered that the development, including the provision of offsite BNG, provides significant opportunities for enhancement, creation and protection/retention of habitats to better mitigate for the impacts of the loss of habitat and the creation of large structures with extensive areas of hard standing. It is currently unclear as to how offsite BNG and the provision of a green amenity area as an extension to Burbage Common will offset the loss of habitat while maintaining habitat connectivity. Further detail is required regarding the biodiversity impact of the loss of hedgerows, particularly those which link to the Common and how this will be mitigated. The need for a phased assessment approach needs to be further explored, as it is proposed that the development will be constructed in phases, therefore it may be possible that habitat could be created or enhanced in advance of loss, thus improving the overall BNG score and providing greater enhancements for biodiversity.

8.21 A full lighting assessment has not been undertaken by the applicant to determine potential light spillage onto adjacent habitats both during construction and operation. Furthermore, there is no discussion within the application on how operational light spill will impact on retained and enhanced habitats proposed as mitigation for a number of species (e.g. birds, bats, otter and badger).

8.22 The most significant impacts of the development proposed are considered to be the loss of woodland, mature trees, hedgerows and watercourse and the fragmentation of habitats, particularly in relation to species such as bats, birds and GCN. Overall the impact of the proposal on ecology and nature conservation is negative.

## **9. Highways and Transport**

9.1 The bodies responsible for transport and highways matters are Leicestershire County Council, Warwickshire County Council and National Highways who will be submitting their own Local Impact Reports. However, the Council has appointed its own consultants, Markides Associates, to work alongside these responsible bodies and to advise the Council on highways matters pertaining to HBBC and the matters listed below are based on that advice.

9.2 The proposed development is a very significant land use addition with 8,400 – 10,400 jobs in very close proximity to Hinckley borough and will have a major impact

on local transport networks and travel. The site itself is just over 2 miles from the Hinckley railway station and town centre and approximately 3 miles from the local settlements at Barwell and Earl Shilton. While the site lies in Blaby District Council, the introduction of new slip roads at the M69 junction 2 and the proposed new link road will significantly alter travel in the Hinckley area, and the proximity to the main urban settlements offers opportunities for sustainable transport access and a reduction in the need for and distance travelled to the employment opportunities.

9.3 The development is very close to the existing settlements of Hinckley, Earl Shilton and Barwell, and while the applicant proposes to link to these for walking, there are issues with the width and quality of some footways (e.g. on the B4469 Sapcote Road to Hinckley) and no improvements are proposed. Further information is required on the walking/cycling/PRoW proposals before the impact can be assessed. There will be increased difficulties crossing some roads due to increased traffic volumes or changes created by the development and link road.

9.4 There is a lack of cycling facilities on the B4669 Sapcote Road from the site to Hinckley and the railway station, and only partial cycling facilities on the B4668 Leicester Road to the west of the proposed link road junction with this road. Controlled cycling crossing facilities do not exist on these roads or on the A47 in the vicinity of the Leicester Road junction. Furthermore the cycling links from the A47 into Earl Shilton and Barwell are very poor.

9.5 There are no bus routes serving the site at present (the X6 runs close by as it accesses the M69) and no suitable bus or cycling access to the railway station.

9.6 There is an extensive network of PRoW's and bridleways across the site which will be severed and will require diversion or replacement. The applicant has made various proposals, but these require more information and consideration; some issues raised by Elmesthorpe Parish Council on this may also not yet be resolved.

9.7 There appears to be a discrepancy between the HGV management strategy and current modelling. The applicant says that only HRNFI users will be able to access the lorry park, and further information is required on how this will be enforced. However, it remains very likely that due to the increase in HGVs using the area from the development, or facilitated by the link road, that ad hoc HGV parking will take place on local roads, which is a concern for local residents. In addition, the lorry park will be charged, and some drivers will be seeking to avoid these charges by parking elsewhere locally. The applicant should set out proposals to reduce or eliminate this.

9.8 This proposed nationally significant freight facility is proposed at this location partly as it is adjacent to the Strategic Road Network (SRN), namely the M69, and thus has good access to the wider SRN in particular the M1, M6 and A5. However, this access is severely constrained by the capacity issue at the SRN junction immediately to the north of the site, J21 of the M1 (J23 of the M69). No mitigation is proposed here for a site of national significance, and this means that traffic on the SRN will be forced off onto local roads. The applicant has contended that mitigation is not feasible or too expensive; but has not provided detailed information on this, and indeed has not modelled the junction in detail. One possible mitigation is to reduce the scale of the proposed development either permanently or for a time until this issue has been resolved. The Council requests that further detailed information

be provided on this issue and that appropriate mitigation for this junction be included in the DCO order and associated S106.

9.9 The modelling submitted by the applicant indicates that with the introduction of the development and slip roads there will be some flow reductions in Hinckley itself, but other flow increases on parts of the A47 and on the A447 Ashby Road and Stapelton Road amongst others. The applicant has proposed local mitigation at some junctions, and this is being reviewed. However, a key conclusion from the development modelling is that (1) the development takes up capacity on the M69 (north) where J21 is at capacity; this means that other traffic that would have used the M69 now needs to use local roads, and this is a concern for Hinckley. In addition the traffic generation of this facility will place increased pressure on this critical junction, resulting in increased delays and lengthening of the peak hours and reducing network resilience. Given that no mitigation is proposed, and the significance of the M69 for travel to and from Hinckley, this is a major concern. The Council notes that despite requests the applicant has not modelled this junction in detail, and therefore the actual impacts cannot yet be determined.

9.10 The applicant's HGV Route Management Strategy notes that for any end occupiers who operate high sided vehicles a mechanism will be put in place for checking heights of vehicles leaving and travelling to the B8 units with route management to avoid low bridges in the area including the A5 Nutts Lane railway bridge. It is not clear if this will also apply to vehicles using the lorry park and rail freight terminal, and the Council request that it does. Further information is required of how these high-sided vehicles will be detected and how they will be routed around the A5 low bridge. The HGV Route Management Strategy should be implemented during the construction period to ensure that construction vehicles take the designated routes. While the HGV strategy appears to preclude the use of the link road to the A47 by HGV's, the modelling shows that these movements are expected to take place, and this needs to be clarified by the applicant. The Council's view is that additional HGVs on their local network should be minimised, potentially through use of enforceable restrictions. The Council also has concerns regarding the effectiveness and enforcement of any HGV routing strategy.

9.11 The applicant's Sustainable Transport Strategy indicates the starting base mode share of 11% walk and 2% cycling, increasing to 11% walking and 5% cycling. However these are based on current census areas with very little development (APP - 153), and presumably the walk trips are those mostly very close to the urban area of Hinckley. Without new safe infrastructure to key local destinations it is very doubtful if these base census mode shares of walking and cycling can be met. The introduction of 8400 – 10,400 jobs within 2 - 3 miles of the urban areas of Hinckley, Barwell and Earl Shilton (both of the latter are planned to expand by 4000 homes) offers significant opportunities with the appropriate infrastructure to at least achieve and perhaps exceed these mode shares.

9.12 It is not clear if the pedestrian and cycle access proposals are adequate. For example, there does not appear to be safe or clear crossing of the access roundabouts 2 and 3; cyclists from the development on the north side of the link road until across the railway bridge; the northern path then disappears, and it appears that cyclists need to cross to the southern side to continue, but it is not clear how this will be achieved safely. It is also not clear if the link road foot and cycle paths will be

illuminated. Cyclists then have to cross a busy and relatively fast Leicester Road at an uncontrolled crossing. Cyclists heading into Hinckley can use the existing western cycleways for a while, but this then ends and there is no safe cycling route. This issue should be mitigated. It is also not clear how cyclists and walkers will proceed safely from the site to Hinckley town centre and the railway station on the B4669 Hinckley Road where there is no cycle provision. There is the potential of safe cycle route from the settlement of Earl Shilton via Elmesthorpe to the site avoiding the busier roads, but this does not appear to have been considered, and should be. Finally, it is not clear from the plans how the levels for these pedestrian and cycle routes will work and interface with any PRoW's or bridleways; and further information should be provided to make this clear.

9.13 The applicant's Sustainable Transport Strategy (APP - 153) discusses existing services and sets out proposals, which are far from clear in relation to Hinckley, Earl Shilton and Barwell and other parts of the borough. Table 6 of this report does not mention any services linking to Hinckley at all at initial occupation and only half hourly rail connection services to Hinckley in the future (6 services per day). While there is some reference to Demand Responsive Services (DRT) there is no indication of (1) how such services will work with the shifts suggested (2) the frequency and capacity of such services (3) the journey times from key destinations (4) where these buses will stop on the site (4) the cost to the customer (5) how these services will be sustained in the long-term, given that the vast majority of the DRT trials have failed beyond the initial subsidy period of approximately 3 years. The current mitigation of public transport is not likely to deliver the base or future mode share targets and is not acceptable to the Council and further information, details and financial commitment is required.

9.14 There are also aspects of the applicant's Construction Traffic Methodology that concerns the Council, in particular how traffic impacts can be reduced and enforced.

9.15 Based on the information submitted in the DCO it is considered that the impact of the proposal on the local and strategic highway network will be negative.

## **10. Socio – Economics**

10.1 The proposed development, if authorised, would be a substantial employment site. HNRFI will provide a rail head and up to 850,000 square metres of warehousing, thus enabling a road and rail logistics interchange. An estimated 8,400 – 10,400 employees could be employed at the site.

10.2 A total of 461 Construction Workers is estimated on site per annum derived from the division of the estimated construction cost by average turnover per construction employee in the East Midlands and West Midlands. The study area for construction employment assessment in the Environmental Statement (ES) is 30km, as 86% of those in Leicestershire employed in the construction sector travelled less than 30km to their place of work at the time of the 2011 Census. It would have been more appropriate for the study area to be based on a drive distance of 30km rather than a radius of 30km. By using a 30km radius, the applicant's assessment misrepresents the actual study and fails to consider the connectivity of key routes of the M69, A5 and M1

10.3 Leakage is considered at 0% in the ES as the "Study Area takes into account the residential location of the HNRFI construction workers and therefore there is no

leakage.” This is considered unrealistic given that typically 14% of construction workers travel beyond 30km and the inaccuracies in the drive distance mapping. As a result of this discrepancy the applicant’s assessment may overstate the local employment benefits of the proposed development.

10.4 The location of jobs is developed using a trip model based on worker densities at output area level, aggregated up to districts (ES figure 7.3). The image shows the greatest density of workers in Leicester, Blaby, Hinckley, Coventry, Tamworth, Nuneaton and Bedworth. It is possible to estimate the proportion of occupations listed in the ES (Table 3: Census Occupational Categories, ES Appendix 8.1: Transport Assessment Trip Distribution Document reference APP - 142) within the Leicester and Leicestershire authorities against the longer list of authorities in the ES socioeconomic chapter at para 7.17 using data from BRES and the Annual Population Survey. This suggests that 53% of those identified in the trip model are based in Leicester and Leicestershire and 47% are based outside. This indicates that of the net additional on-site jobs of 6,300 to 7,800, 53% or 3,339 to 4,134 are likely to be taken by residents of Leicester and Leicestershire. Some of the additional multiplier jobs will also be taken by residents in Leicester and Leicestershire.

10.5 In terms of wages, the ES notes £30,700 for logistics nationally. ONS4 report the median weekly pay for 2021 for people employed in the East Midlands warehousing and support activities for transportation as £517 per week or £26,884 per annum, against an East Midlands all-sector average of £471 per week or £24,492 per annum. Wholesale trade pay is £521 per week in the East Midlands or £27,092 per annum. This suggests that sector pay is £24,500 - £27,100 per annum as a proxy for future wages at the proposed development. Smaller area sector breakdown data is not provided. Given the comparatively low sector pay for the future operational wages at the proposed development it is likely that fewer employees will reside in the borough and Leicestershire. This will reduce the positive impacts referenced in 9.2.1 and increase the negative impact referenced in 9.2.3 and the traffic and transport impacts referenced in paragraphs 8.3 – 8.6.

10.6 Overall, whilst the provision of employment within the borough is considered a positive impact, the likely employment requirements of the proposed development as it progresses towards operation could have significant negative impacts for resourcing staff or particular skills. This is compounded by the operational employment and housing impacts specified above.

10.7 No information is provided in the ES regarding the type of construction workers or skills required for the proposed development. This creates uncertainty as to whether the existing construction worker profile is suitable in meeting the proposed development’s requirements. It also hinders the development of a training and skills programme for the construction period by preventing the programme being able to target identified skills shortages.

10.8 Assuming the average GVA per worker of £49,830 (HENA 2022) the construction GVA benefits for Leicester and Leicestershire are estimated as £17,839,140m per annum for the ten-year construction period.

10.9 Overall, whilst the provision of employment within the borough is considered a positive impact, the likely employment requirements of the proposed development as it progresses towards operation could have significant negative impacts for

resourcing staff or particular skills. This is compounded by the operational employment and housing impacts specified above.

## **11. Health**

11.1 Projects of the nature of Hinckley National Rail Freight Interchange ('HNRFI') can have direct impacts on health, well-being and quality of life related to traffic flows, noise, vibration, air quality and emissions, dust, light pollution and/or community severance. Indirect impacts can result if there is an impact on access to housing, social infrastructure and services, local transport, opportunities for cycling and walking or the use of open space for recreation and physical activity. The project also has the potential to generate direct and indirect employment during construction and operation. Impacts can be beneficial or adverse.

11.2 The applicant expects that the construction phase has the potential to influence several potential health determinants. Construction activities and traffic movements would result in changes to local air quality and noise however, the health and wellbeing impacts were not anticipated to be significant. It was concluded that the Construction Environmental Management Plan would ensure any potential impact on surface water and flood risk would be negligible and would not result in significant health and wellbeing impacts. Changes to the visual environment are difficult to mitigate entirely but the impact on health and wellbeing would not be significant on the basis that reasonable and accessible alternative resources for physical activity and recreation exist in the local area. Additionally, the construction phase would generate jobs and income, with beneficial effects at an individual level but not significantly altering population health outcomes.

11.3 The Health and Equalities Briefing Note indicates changes in air quality and noise would be minimal and therefore not significant in terms of health and wellbeing. Mitigation measures would ensure potential impacts linked to surface water and flood risk would be negligible. Overall, in a health and wellbeing context, the changes in visual amenities are not considered to be significant on the basis that reasonable and accessible alternative resources for physical activity and recreation exist in the local area. No substantial changes in operational transport nature/flow rate have been identified and there is no potential for adverse health effects associated with the operation of the HNRFI. Some beneficial impacts are reported about pedestrian delay/amenity. In terms of Electric and Magnetic Field (EMF) exposure, the potential impact on health and wellbeing would not be significant.

11.4 Within Appendix 7.1 Health and Equalities Briefing Note, the applicant has presented some of the national and local legislative and policy requirements pertinent to the assessment of health and equality. However, the Leicestershire 2022-2032 Joint Health and Wellbeing Strategy (JHWS) has not been included in this analysis. This is a key health-focused document that provides an overview of the current health and wellbeing of the County as well as setting the overarching vision for the health of the County's residents and the strategic priorities.

11.5 The JHWS recognises that the health and wellbeing of Leicestershire residents is generally good compared with England overall, however, there are significant inequalities and challenges in certain communities. In summary, key points from the JHWS include:

- Leicestershire County faces the challenge of an ageing population with an estimated 38.9% increase expected in 60+ year olds.
- Inequalities in life expectancy are growing across Leicestershire, with increases in life expectancy growing at a fast rate in the least deprived deciles as compared to those in the most deprived deciles.
- Over the last five years, the rate of A&E attendances in 0-4 year olds/under 1 year olds and admissions of babies under 14 days has been significantly increasing.
- Even though Leicestershire is a relatively affluent county, pockets of significant deprivation exist, with some neighbourhoods falling into the 10% most deprived neighbourhoods in England.
- The Education, Skills and Training deprivation domain and Barriers to Housing and Services deprivation domain for Leicestershire indicate a higher number of neighbourhoods in the top 10% deprived nationally compared to some of the other deprivation domains.
- According to the Leicestershire County Council Community Insight Survey (2017-2021), 82.7% of respondents reported being in good/very good health, whilst 3.5% reported being in bad/ very bad health.
- Leicestershire performs significantly worse than England for the percentage of adults walking for travel 3x per week, access to travel (disabilities or no car) and use of park and ride.
- Leicestershire performs significantly worse than England for the gap in the employment rate for those in contact with secondary mental health services and the overall employment rate.
- Although overall crime numbers are generally low across Leicestershire, an increase (57.6%) in hate incidents (specifically racially motivated incidents) has been witnessed over a 12-month period (to June 2021) compared to the previous year.

Additionally, the JHWS sets out the overall vision of “giving everyone in Leicestershire the opportunity to thrive and live happy healthy lives”. To achieve this there are three main cross-cutting priorities for the County - to improve mental health, reduce health inequalities and aid the Covid-19 recovery.

11.6 The applicant has provided information on the local health profile of the communities within the Health and Equalities Briefing Note. However, it is unclear on what wards have been selected to form the study area in the briefing note<sup>1</sup>. Furthermore, as shown in Figure 1.1, the suggested wards appear selective in using wards that are mostly rural and neglect the majority of Hinckley, Earl Shilton and Narborough.

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<sup>1</sup> Appendix 7.1 refers to in paragraph 1.60 that the baseline information sets out the local health circumstances of the communities living within the ward study area comprising of several wards (i.e. Croft Hill; Hinckley de Montford; Burbage St Catherine’s & Lash Hill; Stanton & Flamville; Barwell; Broughton Astley-Primethorpe & Sutton; Cosby with South Whetstone; Lutterworth West; Ullesthorpe; and Revel and Binley Woods)

11.7 The health appraisal section of Appendix 7.1 fails to identify and discuss the impact the proposed development will have on Burbage Common despite consultees raising such concerns. It is noted in the Hinckley and Bosworth Open Space and Recreational Facilities Study (October 2016) that based on a consultation undertaken which supplemented the study, when residents were asked what their favourite open spaces are within the Borough, Burbage Common (and Bosworth Country Park) were identified as the most popular. This suggests that the larger open spaces are higher valued than the smaller incidental open spaces.

11.8 Drawing on the analysis of the further work completed by LUC on the Landscape Design and Review (submitted as an appendix to the Council's Written Representations), it is understood that the masterplan will provide 22ha of new publicly accessible green space south of the proposed link road, which will be provided with permissive public access, it is not clear what the quality of the proposed space provided will include and whether it will be attractive. This is important as good quality open space enhances community wellbeing by offering areas for recreation, relaxation and social interaction which contribute to physical and mental health. Overall, based on the information provided by the applicant there is a limited understanding of how discouraging car use and providing opportunities for walking and cycling can increase physical activity help prevent chronic diseases, reduce the risk of premature death, and improve mental health.

11.9 Appendix 7.1 refers to ES Chapter 8: Transport and Traffic (APP – 117) to understand the impact of the road, pedestrian, and cycle network on human health. Based on no significant adverse effects being identified, the appendix assesses no adverse health effects associated with the operation of the HNRFI. However, Appendix 7.1 health appraisal section is absent on the impact on the existing network of footpaths/bridleway and the rural lane that cross the landscape will be stopped up and replaced with one new bridleway to follow a corridor between the development and the M69 around the development, crossing and following the link road to Burbage Common and woods to the west. While in empirical terms there is re-provision of the bridleways, there is also a lack of analysis around the qualitative replacement of rural open space bridleways. The user experience ultimately is changed from encountering a natural aesthetic to an urban one with most of the proposed routes being adjacent to roads. The perceived health impact of such could include reducing physical activity, harming mental well-being, disconnecting from nature, and hindering community interaction, impacting overall user experience negatively.

11.10 A further area where there is no analysis within Appendix 7.1 is an understanding of the commuting patterns and how active travel will be incorporated into the Proposed Development. Based on the JHWS it is understood that Leicestershire performs significantly worse than England for the percentage of adults walking for travel 3x per week, access to travel (disabilities or no car) and use of park and ride. Including active travel, such as walking or cycling, into the design offers a range of health benefits including improved cardiovascular fitness and enhanced mental well-being. The site being located in rural surroundings, it primarily makes the site an unsustainable location for commuting, which has the potential to cause congestion in the surrounding area, with consequential negative impacts for human health.



11.11 Overall it is considered that the impacts of the proposal on health are negative and it should be noted that the Council considers that a full Health Impact Assessment should be submitted in order to fully understand the impacts of the proposal on the local health of the borough's population.

## **12 Air Quality, Noise and Vibration**

12.1 The Air Quality ES Chapter (APP -118) presents baseline conditions, an air quality assessment, the mitigation requirements and residual effects for the site. In terms of construction, an assessment of the potential impacts from the construction of the proposed development was undertaken in accordance with IAQM guidance. The guidance sets out principles to determine the sensitivity of the area and dust emission magnitudes based on those receptors which will experience the maximum impact. A detailed assessment of construction phase road traffic emissions was undertaken to consider the impact of peak construction phase road traffic on local air quality. The assessment was undertaken in accordance with IAQM and EPUK guidance and DEFRA air quality technical guidance. A detailed assessment of operational phase road traffic emissions on local air quality was undertaken in accordance with DMRB LA105, with reference to DEFRA air quality technical guidance, IAQM and EPUK guidance and National Policy Statement (NPS) for National Networks guidance.

12.2 The sensitivity of all the assessed receptors is considered to be high. The overall effect of the HNRFI on air quality is considered to be 'negligible' and 'not significant'. A qualitative construction phase dust assessment was undertaken, and measures were recommended for inclusion in a CEMP to minimise emissions during construction activities. With the implementation of these mitigation measures the impact of construction phase dust emissions is considered to be 'not significant' in accordance with IAQM guidance.

12.3 A quantitative construction phase road traffic emission assessment was undertaken to consider the impact of peak construction traffic vehicle movements on local air quality at identified existing human and ecological receptors. The impact of construction phase road traffic emissions at identified human receptors was determined to be 'not significant' in accordance with IAQM and EPUK guidance. No exceedances of the NO<sub>x</sub> critical level or changes in nitrogen deposition of greater than 1% of the relevant critical loads were predicted. Furthermore, the construction phase road traffic emissions will be temporary. The impact of construction phase road traffic emissions on human and ecological receptors was therefore considered to be 'not significant'.

12.4 A detailed operational phase road traffic emissions assessment was undertaken to consider the impact of development-generated road traffic on local air quality at identified existing human receptor locations within the study area. This included cumulative traffic flows for the study area as detailed within Chapter 8: Traffic and Transport (document reference APP - 117). Road traffic emissions were modelled using the dispersion model ADMS. Roads and concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> were predicted at identified sensitive receptor locations within the study area. The modelling assessment was undertaken in accordance with DEFRA guidance. Changes in pollutant concentrations were determined and the impact of the development on local air quality at identified human receptors was predicted to be

'negligible' overall and therefore 'not significant' in accordance with IAQM and EPUK guidance.

12.5 The Council seeks confirmation that when the revised Air Quality Objectives are published by the Government this year, that the air quality assessments will be revised to take account of them and confirmation should be given that the 2022 version of the DEFRA Technical and Policy Guidance has been used. With those provisions the overall impact of the proposal on air quality is considered to be neutral in terms of receptors within Hinckley borough.

12.6 ES Chapter 10: Noise and Vibration (APP – 119) is the primary document produced by the applicant to assess the noise and vibration impacts of the proposed development. ES Chapter 10 presents baseline surveys, an acoustic assessment, the mitigation requirements and residual effects for the Proposed Development.

12.7 Cumulatively, there will be irreversible, major, adverse, negative impacts on the majority of the assessed Noise Sensitive Receptors (NSR) and on the local areas of recreation, such as Burbage Common woods. The operational sound levels of the proposed development throughout the daytime and night-time, are predicted to exceed the prevailing background sound levels by up to 12dB even with mitigation.

12.8 The mitigation measures do not follow a good acoustic design process and rely upon visually intrusive barriers, up to 6m in height, between 5 and 20m away from residential properties at Aston Firs Caravan Site and dwellings located on Burbage Common Road respectively. Good acoustic design should follow the principles of addressing noise impacts at their source, with intrusive barriers the last resort to be considered. Furthermore, the acoustic character corrections applied to the assessment are lenient and do not reflect the irreversible change in acoustic environment that the proposed development will have.

12.9 The Applicant has undertaken an indicative assessment of potential railway noise based upon calculated data using 'Realtimetrains' (Table 10.50). The resultant calculations show a calculated noise level of 62 dB for daytime and night-time (when rounding to the nearest whole number for assessment purposes). However, measured sound level data from receptor NMP3, which is adjacent to the railway line in question, shows much quieter sound levels of 52 – 58 dB (when removing installation and collection dates which could influence the sound levels).

12.10 In total, 11 NSRs have either an 'Adverse' or 'Significant Adverse' impact which would be classified as a major, negative, adverse impact that would be irreversible. This is solely based upon the BS 4142 assessment presented in the ES Chapter, and it is considered that with the inclusion of more robust corrections and modelling exercises, this would likely increase to more receptors.

### **13 Conclusion**

13.1 The proposed development will have significant and irreversible negative impact on the landscape and visual setting of the development site and the wider area, local ecology and nature conservation, traffic and transport and health. Although the proposed development may give rise to some positive impacts in terms of employment opportunities and training, this is far outweighed by the negative impact the proposal. These matters are expended upon further in the Council's Written Representations.



