

Hinckley & Bosworth Borough Council
Interested Party Reference Number:
20039546

Written 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 The Council has submitted a full written representations setting out the Council's concerns in more detail and explaining why the Council opposes the development proposed and the reasons for so doing. This is a summary of those representations.

2. Need & Site Selection

- 2.1 The Council acknowledges that the applicant has supported the DCO submission with evidence of quantum of need taken from the *'Warehousing and Logistics at Leicester and Leicestershire: managing growth and change'* (April 2021) document together with an analysis of market need together with an explanation of how alternative sites had been considered and dismissed. Notwithstanding this the Council does not consider that the applicant has submitted a sufficiently robust proposal to justify the development contained in the DCO submitted and the Council sets out the reasons why it does not consider that the proposal should be supported and why the Examining Authority (ExA) should not recommend the DCO for approval by the Secretary of State.

3. Design

- 3.1 The Council has commissioned and appended to its written representations a Landscape Design Review within which the merits of the proposal are considered taking into account the applicant's submitted 'design code' and the National Design Guide, National Model Design Code and the HBBC Good Design Guide SPD.
- 3.2 The Design Review considers the merits of the proposal against the ten characteristics of a well-designed place as set out in the National Design Guide – context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan. The review finds that the development has been imposed on a landscape without sufficient attention paid to how the layout and design of the operation and buildings can be configured so as to have minimal impact on the landscape and nearby receptors; rather, the development has been designed for optimal operational configuration aimed at maximising the developable floorspace and shoe horned into the location with little regard for optimal assimilation taking account of the context and setting.
- 3.3 Overall, it is considered that the development generally represents poor design when considered against the characteristics of a well-designed place and fails to meet the expectations of the NPS. The Design Review sets out suggestions as to how the design of the scheme could be improved.

4. The Development Plan

- 4.1 The proposed development is contrary to the adopted Development Plan for the Hinckley & Bosworth Borough area - the Local Plan 2006 – 2026 which comprises the Core Strategy adopted in December 2009 and the Site Allocations and Development Management Policies DPD adopted in 2016.

- 4.2 The proposal is against the allocated use of land affected by the development, particularly the A47 Link Road, as 'Green Wedge' which protects an area between the north /north-east of Hinckley and Burbage and the nearby settlements of Barwell and Earl Shilton. Further the proximity and impact of the development to both local wildlife site allocation and the Aston Firs national SSSI designation creates further conflict with the Local Plan.
- 4.3 The failure of the proposal to provide satisfactory alternative sustainable means of travel conflicts with the Local Plan and offers little prospect of the local communities of Hinckley, Burbage, Barwell and Earl Shilton being connected to the site to ensure that access for employment purposes is maximised. Consequently the impact of the additional traffic arising from the use of the site further impacts on the local road network to detrimental levels.

5. Landscape & Ecology

- 5.1 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 proposal will change that forever and will impose an 'alien' feature into the landscape which pays little heed to assimilating the development into the existing landscape – take for instance the removal of a veteran tree and replacement with a new tree. Further, the mitigation proposed around the perimeter of the site will not 'hide' the development from long distance views from settlements such as Elmesthorpe, rather, features such as the noise attenuation fencing will be of such a height to add to the incongruous nature of the development.
- 5.2 Burbage Common & Woods LNR is a site of National importance located immediately adjacent to the development. Also located immediately adjacent to the site is the Aston Firs SSSI, this SSSI is comprised of ancient and semi-natural woodland and is also classed as priority habitat inventory deciduous woodland. It is currently unclear as to how offsite BNG and the provision of a green area as an extension to Burbage Common will offset the loss of habitat while maintaining habitat connectivity. Due to the nature of the proposal, it is considered unlikely that recreational activity on the Common and in the woods will be increased because of the development and it is likely that there will be a displacement of walkers and dog walkers put off by the presence and proximity of the development.
- 5.3 The extent of the loss of important hedgerows and the impact on the local watercourses means that the ecological dynamics of the site will be fundamentally changed, and the Council does not consider that the applicant goes far enough in the proposed mitigation for this to be accepted as satisfactory.

6. Highways & Transport

- 6.1 The Council is extremely concerned regarding the inadequacy of necessary information provided with the application as expressed by the statutory bodies responsible for assessing the impact of the proposal on the local and strategic road network and to ensure that appropriate mitigation measures form part of

the proposal. In the absence of this information, it is the Council's opinion that the DCO cannot be recommended to the Secretary of State for approval. Of the information which has been submitted the Council considers that it falls short of thoroughly justifying the proposed development.

- 6.2 The Council is concerned that the Sustainable Transport Strategy submitted fails to enable full and effective access to the development for residents in nearby settlements of Barwell and Earl Shilton and from Hinckley and Burbage. In fact, the applicant states in socio-economic terms the site would be accessible for a 30km commute, yet the Sustainable Transport Strategy does not address accessibility from such a distance and seems to focus mainly on settlements to the north of the A5 and immediately to the west and east of the development. The means of travel proposed in the Strategy does not go far enough in enabling significant modal shift from car to other means of transport and the proposed sustainable alternatives set out in the Strategy are both flawed (for example reliance on Demand Responsive Transport) and have no means to guarantee delivery (for example the proposed bus service connecting the site to Hinckley, Barwell and Earl Shilton).

7. Socio - Economic Effects

- 7.1 The Council has concerns regarding some of the assumptions made and the methodology used by the applicant in arriving at their determination of the impact in the document 'Land Use & Socio-Economic Effects' (APP - 116) including for example assumptions regarding displacement and use of 'average' years employment rather than spend profile, operational assumptions regarding leakage and displacement and insufficient analysis of the development's impact on the local housing market and whether future housing delivery will be sufficient to support employment growth associated with the development.

8. Health

- 8.1 The Council believes that the baseline study area used by the applicants is flawed due to the geographical boundaries of the study area excluding some key communities – for example Hinckley and Burbage. Consequently, the Council believes that the applicant's assessment of the likely impacts on the health of the local population and proposed mitigation is flawed.
- 8.2 Specifically, the Council is concerned that the proposed development falls short of expected health outcomes for example lack of inclusion of suitable and sufficient quality green space to enhance wellbeing and promote active lifestyles, inadequate provision to promote cycling and walking to work in the sustainable transport strategy and whether the impact on existing local healthcare facilities has been robustly assessed in terms of the expected number of employees projected for the site.

9. Energy Generation

- 9.1 The Council is very concerned at the applicant's approach to the artificial capping of the energy generation potential of the site. The applicant states that the site requires a typical annualised demand in the order of 155 Megawatts (MW) of energy to support the new development, but they indicate the capacity

for the energy generation capability of energy generation on the site to just under 48 MW per year, or about 31% of the required energy and Requirement 17 seeks to limit the extent of on-site generation to 49.9 MW. The applicant should be required to give a full explanation why the suggested cap is to be imposed and why the development is not being future proofed by enabling more on site energy to be generated.

10. The DCO Requirements

10.1 The Council does not agree with the proposed hours of work which it considers will impact on nearby receptors and the Council proposes an alternative of reduced hours which would be acceptable. A number of proposed amendments to the Requirements were agreed with the applicant but they do not appear in the revised DCO submitted by the applicant and published on the PINS website on 12th September. The agreed wording is set out in the Council's representations.

11. Conclusion

11.1 These Written Representations explain why the Council does not support the proposed development and is vehemently opposed to it and why it considers the ExA should not recommend to the Secretary of State that the DCO should be granted.