



The countryside charity
Leicestershire

Charity Number: 1164985

HINCKLEY RAIL FREIGHT TERMINAL

Comments: Transport and Access

CPRE Leicestershire

Unique Reference: 20038675

(With Sapcote (UR 20039514))

Oct 2023

1. Introduction

1.1 CPRE Leicestershire is particularly concerned about the impact of the Rail Freight Terminal on transport.

1.2 We do not believe that the implications of the proposal for the transport network, access to the site and impact on vulnerable users are acceptable. Nor do we believe that the site has been shown to meet the NPPF requirements of 'safe and suitable' access. In our view the proposer has yet to demonstrate that the impacts will not be severe.

1.3 We are aware that Leicestershire County Council is objecting to the proposals and has set out in its relevant representation concerns about the traffic modelling and outputs. Considerable doubt has also been placed on some of the outputs by local residents. These two factors, in themselves, cause CPRE concerns. However, we have not been privy to the detailed discussions of the Transport Working Group so this written statement, based on our Relevant Representation, has to rely on our understanding from material provided by Tritax, even where it is limited.

1.4 We have also been working collaboratively with Sapcote Parish Council, who jointly, funded work by Gerald Kells, a Policy and Campaigns advisor, who assisted in this submission. To avoid duplication, they will submit specific comments relating to their village.

2. Relevant Representation

1. The rail network is unlikely to be utilised to the extent assumed and there is no requirement for it to be used from the outset or at all.

This includes limitations to the availability of rail paths, the limited prospects of any significant measures to overcome rail capacity limitations, as well as uncertainty about usage of the rail freight element.

2. The direct and indirect traffic impact will be serious, particularly on surrounding roads.

This includes the M69 itself and the M1.

It also includes impacts on local villages and on rural roads, all the time and when there are diversions because the M69 (or other major roads) are not available.

3. There are wider detrimental impacts from the major change of introducing additional slip-roads to the M69 Junction 2.

This includes HNRFI traffic and the impact of redistribution of existing traffic and newly generated traffic, not necessarily associated with the HNRFI itself.

4. It has not been demonstrated that the site would have good sustainable transport access or that this would make a noticeable difference to the way people would access to the site.

This includes limitations to existing and proposed public transport and its viability, as well as walking and cycling provision.

3. The Rail Network

3.1 CPRE does not consider that the rail network has the capacity to accommodate the number of trains modelled for the HNRFI. This is a fundamental requirement to justify the rail element of the proposals.

3.2 We also consider the current assessment of the rail network is too limited to demonstrate it can accommodate the projected paths. At the same time, (as we address in our submission on need), we are not convinced that the developer has demonstrated that there is sufficient demand for the rail terminal given other existing and proposed competing sites.

3.3 The HNRFI is located alongside the Felixstowe to Nuneaton railway line between Hinckley and Leicester. Although this route has been modified to allow large containers it is not electrified.

3.4 There does not appear to have been any attempt by the developer to evaluate the impact of SRFIs on either the wider national rail network or the port terminals.

3.5 Indeed, fundamental to the Market Need Study (DR 16.1), presented with the proposals, is the ability to access those ports so this lack of detailed analysis seems a fundamental flaw in the proposals.

3.6 Especially as, without such an analysis, the assessment cannot take into account of the growth of existing SRFI's, as well as those currently approved, before considering the need for more, and where they should be located.

3.7 In fact, the HNRFI Rail Study (DR 6.2.3.1) only considers timetable availability on the section between Water Orton and Wigston (Para 3.1).

3.8 Even there the previous PIER assessment noted that Wigston North junction was close to capacity¹ and that some trains entering and leaving the SRFI would create a conflicting movement when crossing the southbound track. This, surprisingly, does not seem to be referenced to in the current assessment.

3.9 Also, in the consultation version of the rail study Tritax were clear that constraints remained during certain periods of the day (Para 4.7.4 and 4.7.5) which may hinder 24-hour operation and lead to bunching of trains, which may not be realistic and in Para 4.7.6 that:

'The operational study concluded that with the assumed design that sufficient paths could be found on and off the railport onto the Leicester and Nuneaton Line to support the maximum number of freight trains, however it is recognised that beyond the study area there are other infrastructure constraints that may require upgrades to achieve the full potential of the site.'

3.10 However, again, we cannot find reference to this in the latest material. What is clear is that the HNRFI Rail Study fails to consider capacity constraints on the entire route to Felixstowe, which includes traversing critical junctions, for example north and south of Leicester, Peterborough and Ely.

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Assuming that Wigston North Junction is not a constraint (noting that it is close to capacity today and to achieve significant extra capacity on this route the grade separation of the Nuneaton line and MML between Wigston North Junction and Glen Parva Junction as identified in the Leicester Capacity development proposals would be required) there is generally up to two opportunities an hour to arrive and depart HNRFI. This does also assume that any infrastructure upgrade / re-modelling in the Leicester area will retain the facility to regulate freight and therefore match a path on the wider network to one arriving / departing HNRFI. (Para 4.4.1 Draft HNRFI Rail Report, December 2021)

3.11 The Felixstowe branch is also part single track, as is a section between Ely and Soham. In 2019 a 1.4 km passing loop was added to the Felixstowe branch at a cost of around £60m. This was said to increase the capacity to 47 freight paths per day. This scheme emerged after previous plans were abandoned in 2015 as costs had increased substantially due to the complexity of the project.

3.12 There are now no approved plans to upgrade any parts of the Felixstowe to Nuneaton railway line or to enable electric trains to use it throughout.

3.13 Lastly, while some unused freight paths exist in the national timetable there is no guarantee that these could be used to serve the SRFI.

3.14 Given all these constraints we are not convinced there is a realistic prospect of reaching 16 train paths per day each way to HNRFI or that the current Rail Report identifies all the constraints.

4. The Strategic Road Network

4.1 CPRE Leicestershire is particularly concerned about the increase of traffic from the development of the site and traffic generated by changes to the road network, most notably the introduction of south facing slips on Junction 2 of the M69 and the construction of a new road between the M69 and the A47.

4.2 The Transport Assessment (DR 6.2.8.1) appears to concentrate on local connectivity and not consider the impact on the M69 which would bear the brunt of all HGV traffic generated by the site, in particular, the increase in South Bound traffic on the M69, both from the development itself and from other development enabled by the junction change.

4.3 Junction 21A (J21A) was added to the M1 in 1995 to serve the A46 Leicester Western Bypass which led to a significant increase in traffic between J21 and J21A. This prompted the widening of that section of the M1 to four lanes prior to the bypass opening.

4.4 The effect of this was to increase congestion at J21 (J15 in the TA). Since then, various proposals to deal with congestion on the M1 have been looked at and rejected. Works to add traffic signals and more circulation lanes to the J21 roundabout have not eliminated congestion even though this junction is crucial to the operation of the M1 and M69 and is discussed in Paras 8.21 in the TA and below.

4.5 Table 7-3 in the TA shows that J15, (M1 Junction 21) has an WoD VoC of 109% in the AM Peak Hour and that this reduces to 108% in the WD scenario. These are the highest VoCs recorded in Table 7- 3. A VoC which is so far over 100% would suggest a serious congestion problem and a modelled flow which may be unrealistic.

4.6 Table 7-4 identifies whether junctions were selected for further analysis using the criteria stated in 7.42. J15 was not found to meet the modelling criteria.

4.7 Para 8.24 refers to a proposal called Leicester Western Access. This appears in the RIS2 Pipeline as scheme C14 but we do not have further information about this scheme. Para 8.26 assumes it does not happen and states that:

'If nothing were to happen at Junction 21 through RIS3, then the impacts of the redistributed traffic on the local network are being mitigated. It would also not demonstrate a scenario which would be realistically implementable either now or in the future.'

4.8 Para 8.28 goes on to refer to small increases and decreases and claims a net reduction of approximately 10 vehicles in the morning peak.

4.9 The Summary in Paras 8.39 to 8.42 makes it clear that the junction is heavily overloaded already, which would explain why the predicted changes will be small, Equally the wider consequences of that congestion already exist. Substantial development has already been committed and more is already in the planning pipeline and there is no sign of any measures to reduce traffic growth at that point.

4.10 Para 8.42 assumes that: *'the Leicester Western Access project is coming forward through the next RIS programme'* but that can only be speculation at this stage.

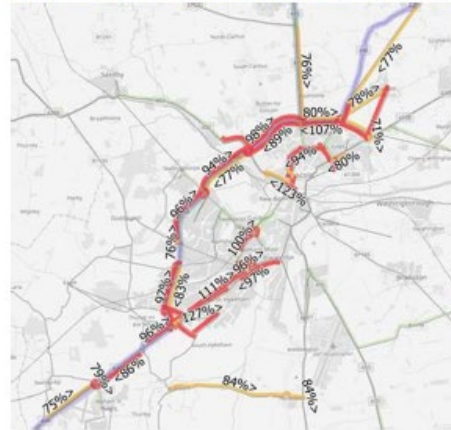
4.11 The overall problem is that while this allows for the junction to avoid further analysis, it underlines the fact that the junction is heavily constrained and this will have impacts on the functioning of the relevant strategic highways.

4.12 At the same time the A46 Western Bypass has become one of the most congested sections of the A46 as evidenced in work undertaken by Midlands Connect, for example, their A46 Corridor Study Initial Report (Appendix 1).

Figure 3-8: VCR 2015 base year, morning peak period - Leicester



Figure 3-9: VCR 2015 base year, morning peak period - Lincoln



From A46 Corridor Study: Atkins for Midlands Connect

4.13 Figure 3.8 of that report shows that capacity already exceeds 85% (a proxy for congestion) on several sections around Leicester in the a.m. peak, most notably Hobby Horse Island a well-known pinch point to the North of the City.

Figure 3-2: Average speeds northbound and southbound at 09:00, weekdays, November 2017



Source: INRIX. Note there is a small, but real difference between northbound and southbound mileage in certain locations.

4.14 Fig 3.8 of that report shows am peak speeds along the whole of the A46 and it can be seen how they dramatically fall close to Leicester.

4.15 We understand from the Charnwood Local Plan Examination that a raft of highway works were considered to be essential on the A46 and over the wider area to mitigate the development proposed in the Local Plan but no funding is yet identified for these works.

4.16 None of this is surprising given the additional development that has been permitted which relies on the motorway and the A46. Unless traffic demand were reduced there appears to be no sensible scheme that could eliminate congestion on these sections of the M1 and M69 or on the A46 given the suppressed demand and the scale of development in the 'pipeline'.

4.17 Junction 2 of the M69 was specifically designed with only north facing slip roads because in the 1970s it was understood that south facing slip roads would increase traffic travelling towards what is now the B4114 (the A46 prior to the M69 opening).

4.18 The likelihood of substantial traffic diverting through a myriad of minor roads has only become greater because of development that has taken place and the problems associated with the M1 and M69 and this is a major concern for us.

5. Local Road Network

5.1 The Transport Assessment by BWB seeks to quantify the impact on local roads.

5.2 The links tested are set out in Table 8.3 of the EA (DR 6.1.8). Unfortunately, we could not find a corresponding map so the location of some links was not entirely clear to us.

5.3 Having said that we have a number of concerns about the analysis:

a. Rail Split

5.4 Firstly, as said above, the level of usage of the rail terminal are based on existing terminals. Given, the number of competing terminals coming forwards, the level of usage may be lower, increasing the level of road-based usage above the 30-70 split envisaged in the assessment. Moreover, the amount of rail traffic may be limited by capacity constraints on the railway system itself.

b. Traffic Generated by HNRFI

5.5 Secondly, there is considerable dispute about the level of traffic generated by the proposals themselves.

5.6 The HGV/LGV trip generation from the rail freight depot is based on 16 trains a day. This is split 30/70 for internal/external trips. According to Para 6.10 of the Transport Assessment this has been based on similar numbers for Northampton Gateway and West Midlands Interchange, although neither project is yet operational so the projections must be theoretical. Given that similar assumptions are likely to have been modelled in to those cases, one is relying on those assumptions proving to be correct. Any error will be magnified across all the sites.

5.7 Trip generation for the B8 units is similarly based on rail sites which are not all operational (Para 6.19). It is unclear why this is not based on trip generation from other B8 sites which are in operation.

5.8 One issue that clearly arises is that, if one is taking the worst-case scenario, one should assume a maximum trip rate.

5.9 In particular, if the rail facility at the site is under-utilised by on site users, the amount of external HGV/LGV traffic from the B8 units would be higher. As a result, the Railfreight split would be lower (for example, because if the B8 units were taken by non-rail occupiers so more Railfreight was attracted from elsewhere). This would mean the external Railfreight HGVs would increase and, presumably, and some of the internal trips from the B8 units to the Railfreight terminal would be replaced with external trips using the local network. This could significantly increase traffic (particularly) HGVs going into and out of the site.

5.10 In terms of non-HGV traffic generation to the site, it is hard not to draw the conclusion that this is derived from employee numbers, even given the reassurances from the promoter at the preliminary meeting.

5.11 Para 6.37 of the Transport Assessment directly quotes the 8,400 figure as the basis for car trips. This appears to be broken down by mode based on modal breakdowns across the Hinckley area.

5.12 Para 2.5 of the Forecast Modelling Report (DR 6.2.8.1 Appendix 11) says:

'The forecast light vehicles to/from the proposed NRFI development are assumed to correspond to employees and are therefore assigned to the car commuting user class within the highway assignment model.'

5.13 One can only conclude that the figure of 8,400 was entered into the model for car and light vehicles transport. Otherwise, the Forecast Report, as well as the Transport Assessment itself, are both incorrect.

5.14 Clearly, this would not be the worst-case scenario, even if one only allows for direct employees, since Para 7.214 of the Land Use section of the EA (DR 6.1.7) gives a range between 8,400 and 10,400 employees depending on employment density and also reliant on an assumed 6% vacancy rate.

5.15 Furthermore, as we discuss later, (in Paras 7.1-7.5,) the assumptions about modal-split are not clear and may not represent the worst-case scenario for car usage,

5.16 A higher figure of 10,400 to 12,900 is given for indirect employment in terms of additional (fit) jobs, the addition resulting from 'Off-site employment induced by operational employment.' (Table 7.17 of the EA)

5.17 While, it may be that some of the indirect employment does not occur within the modelled area (or use the local network), almost certainly some, perhaps much, of it will. Furthermore, this does not include additional cars accessing the site who are not employees of the site but may have business on the site.

5.18 A further issue arises in that the Transport Assessment does not explain what assumptions were made about the number of part time workers. Clearly those assumptions would influence trip generation and might well vary dependent on occupier.

5.19 In other words, it appears to us that the applicant has not considered the worst-case scenario in terms of direct traffic generation relating to the site and the figures given cannot be relied on.

c. Induced Traffic

5.20 Thirdly, the modelling of non-development traffic seems to assume a fixed growth in traffic which is then distributed on existing roads. This appears to be the implication of Section 4.8 of the Transport Highway Assessment Validation Report (DR 6.2.8.1 Appendix 6), which says:

'The calculation of cost for each route is based on that calculated after all demand has been loaded onto the network'

5.21 However, the reality is that changes to the road network, especially when they add significant opportunities to travel, generate additional traffic and lengthen the journeys made by car.

5.22 Indeed, CPRE was so concerned about this that it commissioned independent research in 2017 into the 'induction' of traffic from new road schemes (Appendix 2). Instead of simply testing whether traffic growth was in line with National Highway projections (which can be higher than actual traffic growth), the researchers compared traffic growth on the scheme with the surrounding area. This showed

'Average increases over the short run (3-7 years; seven schemes) were +7%. Average increases over the long run (8-20 years; six schemes) were +47%' (Page 6).

5.23 In the case of the HNRFI, the introduction of southbound slips to Junction 2 is integral to the scheme and, while constraints on road capacity may mitigate their impact to some extent, this could substantially change both the overall volume of traffic on the network and its origin and destination. For example, increasing commuting from Hinckley and surrounding villages into Coventry.

5.24 There is no clear explanation of the extent to which any induced traffic was included in the modelling.

5.25 Moreover, the addition of those slip roads would influence future developments patterns, as can already be seen by proposals for 5,000 houses in the Blaby Plan on the other side of the motorway to the HNRFI proposals. This would particularly bring into question the model outputs in terms of traffic in the '*with-development with infrastructure*'.

5.26 The Blaby scheme is not included in the modelling, nor assessed in a sensitivity test, even though it is included in the cumulative impacts report as we discuss in our comments on Environment and Amenity.

5.27 If, as seems likely, traffic levels were substantially higher on the network overall once that infrastructure is put in place, the capacity of the M69 and other routes would be likely to be under more pressure, which would lead to more displacement onto the local network.

5.28 This would amplify the increase in traffic on those local roads which the model shows as having increased traffic, while not impacting so much on those roads where traffic levels are reduced. This would include roads such as the B4669 where Sapcote Parish Council have submitted details of its inadequacies, including measuring the road and shown it is insufficient for HGV movements being less than 6m wide.

5.29 In other words, one cannot simply consider the impact of development traffic on the network, but the overall consequential and cumulative impacts of the changes to the road network resulting from the proposals need to be considered.

d. Links and Delays in the Model

5.30 Fourthly, the HNRFI assessment uses link flow data. A model should, in theory, reflect the capacity of the junctions and, therefore, the most critical junctions will inevitably be suppressed. Indeed, models can show a small increase even if that may not be possible in practice. Tweaking the model may not genuinely address the problems because of suppressed latent demand.

5.31 The network statistics for Leicestershire (taken from the Charnwood Local Plan Interim Forecasting Report (Appendix 3)) shows Network Distance (veh.km) and Vehicle Delay Time (veh.hr) for am peak, Interpeak and pm peak, based on known or proposed development.

5.32 In Blaby it shows a very substantial increase in Delay Time between the 2014 Base and 2037 Baseline (49%, 69% and 70%). Vehicle Distance also increases by 18%, 38% and 18%. These two statistics are lost when comparing flows because the model shuffles traffic around based on the many finite junction constraints.

5.33 We could not find evidence in Section 6 (Model Outputs) of the Forecast Modelling Brief (6.2.8.1) that BWB requested any of these important network statistics which may have called into question the realism of their outputs based on these figures.

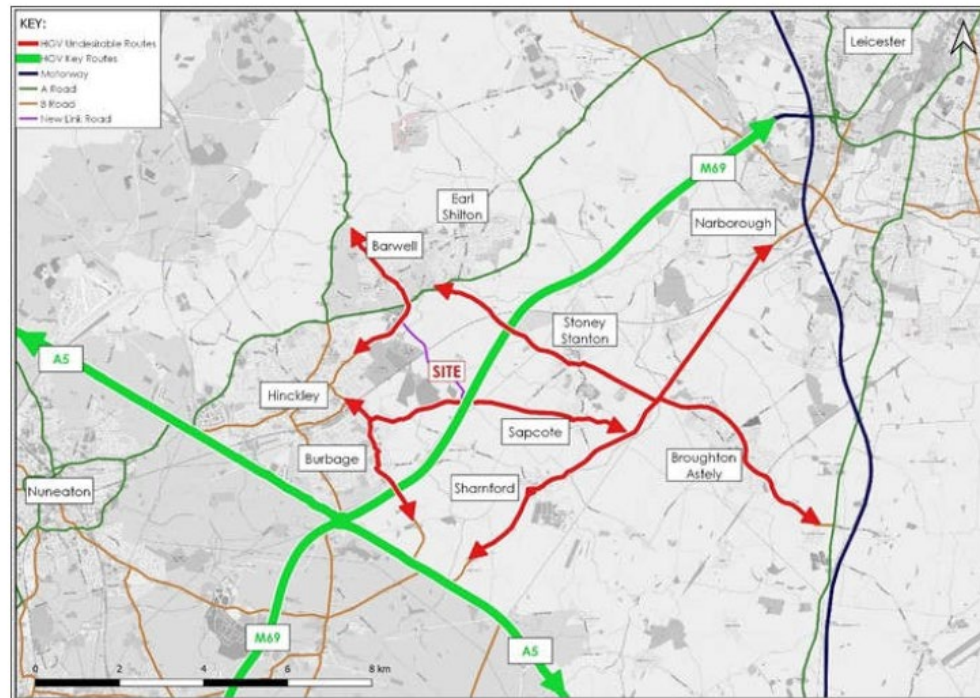
e. Diversions

5.34 Fifthly, we are concerned that the routing of the development traffic assumes the M69 will be the main road used by HGVs. Section 2.6 of the Modelling Report (DR 6.2.8.1 Appendix 11) sets out the distribution anticipated by Tritax.

5.35 It is accepted that the proposed routing can only be advisory (Para 8.327 of the EA) and HGVs may use other routes, even when there is no incident.

5.36 Figure 5.7 identifies routes which it considers are undesirable for HGVs. Those include routes which even according to the modelling by Tritax will see HGV increases with the development in place according to Table 8.19 of the EA, such as the B4669 through Sapcote.

Figure 5-7: Key Desirable and Undesirable HGV Routes



5.37 Clearly, the impact on these other roads will be much more serious at times when the M69 is not available and development traffic is diverted. This needs to be fully considered.

5.38 Para 8.322 of the Environmental Statement explains that:

‘in the case of an incident on the Strategic Road Network, there will be a site access emergency plan in place which will include alternative routes to/from the Site.’

5.39 That emergency plan is not detailed at this stage and there is no modelling undertaken which would identify the routes which would be taken if this occurred. Nor does specific evidence appear to be forthcoming from the applicant on current closures and delays although local residents have raised this issue.

5.40 Moreover, it is accepted by the applicant that flow changes are small on the M69 east of Junction 2 in the 'with-development' scenario, precisely because it would be running at or beyond capacity (Para 3.3.6 of the Forecast Modelling Report²) and that this will ordinarily lead to some displacement onto roads such as Huncoat Road.

5.41 One can only assume, if that is the case, that breakdown in flow on the motorway would increase as a result of congestion and that the frequency of disruption which would lead to diversions would increase but that does not appear to be explored in detail by the proposers.

5.42 It seems, in our minds, incumbent on the applicant, in line with consideration of a worst-case scenario approach, to provide sufficient detail of how an emergency plan would operate to ensure its robustness could be tested at this stage but that has not been done.

5.43 Taking all these elements into account we have major concerns about the realism of the projections for traffic, especially on those routes which are, even under the current modelling, assumed to have very significant traffic growth (as set out in Figs 5.10 and 5.11 of the TA).

5.44 We also consider that some routes predicted to see reductions in traffic could actually see increase in traffic resulting from induced traffic and more particularly during flow-breakdown conditions or incidents, notably, the B4114 Coventry Road which is considered to improve in the modelling.

5.45 This would lead to HGVs in particular going along the B4669 towards Sapcote to the B4114 Coventry Road or using the various cut-through routes to Sharnford and other villages. This would include both traffic accessing existing local facilities as well as HGVs with destinations on the A5 or in Leicester.

5.46 It is clear from even a cursory glance at the local roads that this would be a far shorter cut-through than going to the A47 to get to the A5 and M69 and would avoid entering Hinckley itself.

5.47 These routes are not, in our view, safe and suitable for HGVs.

² Whilst Figure 3.1 and Figure 3.2 show that a proportion of the Hinckley NRFI development traffic is forecast to access / egress the development site via the M69, east of Junction 2, the forecast flow changes for M69 between Junction 2 and Junction 3 are small. As discussed above, some movements on the M69 Junction 3 and the M1 Junction 21 are at or near capacity in both 2026 and 2036 for both peak hours, thus limiting flow in both directions on the M69 between Junctions 2 and Junction 3. This suggests that the Hinckley NRFI development traffic is forecast to cause some displaced traffic to the parallel routes, such as Huncote Road.

5.48 In particular the narrow chicane road through Sapcote at the partially blind junction between Hinckley Road and Church Street/Stanton Road cannot cope with HGV traffic using it as part of a 'rat-run' from the M69 to the A5. It is already a busy route, being the main road through the village.

5.49 We also understand the junctions with Sharnford and Grace Roads are often congested simply from 'everyday traffic' (cars and vans). HGV movements would make these and the adjacent pedestrian crossing dangerous for Sapcote villagers.

5.50 Similarly, both roads into Sharnford have pinch points where HGVs cannot pass each other without mounting the pavement. There have also been several crashes on the stretch of the B4114 beyond Sharnford in the last 5 years.

5.51 Notwithstanding the comments above it is clear that, even optimistically, the 'with development' scenario dramatically increases traffic on many local roads.

5.52 The EA acknowledges in 8.292 that:

'Adverse effects for the 'with Proposed Development 2036' scenario is predominately on roads located in the Eastern Village areas, such as Sapcote, Stoney Stanton or adjacent to the HNRFI Site, such as the B4669 and B4668.'

5.53 Sharnford is not mentioned which is odd because Table 7.2 suggests increase of over 100% in traffic levels on both sections of Aston Lane.

5.54 All this is consistent with the junction modelling in Table 7.3 of the Transport Assessment which shows some of the largest increases on junctions along those routes and more generally with the way traffic models reroute traffic away from the most congested routes to those that show some spare capacity.

5.55 Previous iterations of the proposals did include bypasses to alleviate pressure on some of these Eastern Villages. These were dropped because of the potential for environmental damage. We also consider they would, most likely, have simply moved the problem to other junctions and communities.

5.56 However, they were an acknowledgement of the impact on the villages such as Sapcote and Stoney Stanton and do suggest our concerns about the traffic in those communities are not unfounded.

5.57 The current proposals include a number of off-site mitigations, in particular at the Junction on the B4669 (Junction 39), aimed at mitigating the additional traffic anticipated on those roads. (In the case of that junction, 110-156% over capacity from Stanton Lane according to the Transport Assessment Table 8-35)).

5.58 While this is less mitigation than the previous bypasses of Sapcote and Stoney Stanton the current mitigation would almost certainly increase the attractiveness of that

route, encouraging traffic (including HGVs) to route along the B4669 with all the issues described above.

5.59 Mitigation is also considered at the Stoney Stanton New Road/Long Street/Broughton Road junction (Transport Assessment Para 8.112). This would be over capacity and that would be exacerbated by development. A proposal to signalise the junction is rejected, but this is, in itself, seems an acknowledgement that mitigation is not possible at this point, since the junction is left as it is.

6. Environmental Impact

6.1 In terms of the Environmental Impact of the traffic increase the EA Transport Chapter relies heavily on the IEMA guidance, although, it is accepted in Table 8.1 (Section 4.2.6) of the EA, that the guidance is not intended as a rigid approach.

6.2 In particular, under Rule 2 (Para 3.20) of the guidance links may need to be assessed below the thresholds set out in Rule 1 if there are significant HGV increases. This is particularly important where there are high pedestrian flows, although in this case there appears to be no consideration of overall pedestrian flows in villages (such as Sapcote) to judge this by.

6.3 This Rule is referred to in Para 8.47 of the EA. However, Table 8.22 seems to simply identify pedestrian facilities as opposed to flows.

6.4 Para 2.8 of the guidance is also clear that:

'In preparing an environmental statement it is considered that the documentation should enable affected people, parties or interests to be able to identify the 'worst' environmental impact that might reasonably be expected'

6.5 That in our view would specifically include the impact on the Eastern Villages when the M69 is not available or there are congestion problems on that route or the M1.

6.6 That being said, we are also not convinced that use of the IEMA guidance is always appropriate and may not answer the NPPF question as to whether roads are 'safe and suitable', especially if they are interpreted too rigidly.

6.7 For example, 8.217 interprets the guidance as follows:

'For example, pedestrian amenity along a rural lane without footways could be rated as average, whereas along a residential road this would be classed as poor or very poor.'

6.8 A rural lane may well fail the test of being safe and suitable in NPPF terms, where there is no safe refuge for pedestrians, even if flows are small.

6.9 And, importantly the rigid use of traffic growth percentages (as an interpretation of the guidance) does not necessarily account for different locations, including rural lanes.

6.10 Compartmentalizing impacts risks also misses the combined impacts on a community, particularly in a rural village.

6.11 Urban areas with a high level of facilities will also score highly under these criteria and so that rural settlements tend to have low 'receptor sensitivity'.

6.12 Overall, a standardized approach can lead to some elements of road risk being downgraded or ignored, such as road width, as suggested above, an issue in Sapcote and in Sharnford.

6.13 It is hard to agree that the current sensitivity ratings represent a fair representation of the potential for highly detrimental impacts to villages such as Sapcote and Sharnford and the use of the IEMA guidance alone in these circumstances causes us concern.

6.14 What is noticeable is that according to the EA tables there is little acknowledged deterioration of pedestrian amenity or cycling amenity despite the large increases in traffic, including HGVs on a number of routes. And severance impacts are extremely limited, with the B4669 and Long Street in Stoney Stanton suffering only minor impacts. We find this difficult to agree with.

6.15 The NPPF requirement that roads should be 'safe and suitable' for development is still relevant in as much as it applies in relation to NPS development (Para 1.18 of the NPSNN³) and that is something which should in our view be fully examined with a risk assessment approach on these routes.

6.16 The level of increase of traffic on these rural routes, especially the increase in HGVs represents (for example 93.6% on the Hinckley Road, East of Jn2), is in our view, an unacceptable impact, even if it is not exacerbated by further generated traffic resulting from the changes in accessibility resulting from the new road infrastructure.

6.17 These problems would only be exacerbated if further development were permitted on the arc around the South and East of Leicester as envisaged in the current Strategic Growth Plan for the County.

³ The NPPF is also likely to be an important and relevant consideration in decisions on nationally significant infrastructure projects, but only to the extent relevant to that project.

7. Public Transport

7.1 In terms of modal split the Sustainable Transport Strategy (DR 6.2.8.1 Appendix 15) starts with the local 2011 census modal split. It is not clear why this is likely to be achieved at this site.

7.2 This data, we are told, relates to the two Census Output areas. MSOAs: Blaby 010 and Blaby 012 (Outputs in Appendix 4). Those Census Output areas were created to have a broadly similar population and they take no account of the number or distribution of workplaces. The larger MSOAs comprise several smaller LSOAs which typically include part or all of some villages. Census data is not available for the modal split of journeys to these smaller areas but it does exist for journeys from them.

7.3 When people who do not travel to work (i.e., Not Employed or Work at Home) are excluded the Car Driver share for both Blaby 010 and Blaby 012 is 86%. The car passenger share is 4% and 5% respectively. The Bus share is 2% and 1%, with 5% walking and less than 1% by train. Walking trips would typically be short and within a village.

7.4 It is not made explicit how the figures in Table 4 of the Strategy are derived from that raw data, as they also do not tally with the figures even including home working. If assumptions have been made about working from home they are not explained. In any case, this does not seem to represent a worst-case scenario (very little home working) and so underestimates the overall car traffic that the site might generate.

7.5 Having Assumed 75% car travel, Table 5 goes on to suggest that this can be reduced to 65% in 5 years, an ambitious 10% reduction in car travel. It assumes a 3% base which rises to 6% within 5 years. It also proposes an increase in train use from 0% to 1% without a station nearby.

7.6 In particular, this involves a doubling of existing bus use for journeys to the site, even though it is not currently connected to any of the regular local bus routes.

7.7 The Transport Assessment (DR 6.2.8.1) includes a map which shows bus routes (Figure 4-8) which it considers to be close enough to be relevant to the site. In reality the only regular services, the 158 and 48L are services which go to centre of Hinckley. The X6 and X55 are longer distance services with limited stops, however, they are highly infrequent and would not currently go to the site.

7.8 The TA suggests that the X6 could be extended to go into the site (Para 5.46). However, it should be noted that the X6 is an Express Bus Service with a travel time of approximately 1hr 30 mins from Coventry to Leicester. Any additional stops would slow the service down and be likely to decrease reliability, especially if they involved leaving and returning to the highway network.

7.9 Para 5.46 suggests typical shift times that might be applied to the site. These do not match the current timetable. The difficulty of matching such an infrequent timetable is apparent when one considers the 06.00 shift change. A bus leaves Hinckley in either direction at 6.33/6.35, but there is no incoming bus (Appendix 5). There is no bus on a Sunday. Only the Coventry Leicester bus would pass by the site.

7.10 Of course, one might say that the service times could be changed, although presumably these have been set to match existing commuting patterns and any change would potentially disadvantage current customers.

7.11 The assertion in Para 5.56 of the TA that: *'Minor adjustments to timetabling will assist in allowing for better coordination with office start times'* seems to us to underestimate the difficulty of ensuring Public Transport provision matches the needs at the site.

7.12 The Sustainable Transport Strategy includes a more detailed precis of discussions with bus companies, none of which are committed at this stage. There is discussion of a dedicated bus service, although this comes with a £140k prices tag per year per bus and depends on uptake by businesses and the preference is for adapting existing services (Para 6.14).

7.13 Either way it is unclear to us that there is any guarantee a bus service would materialize. It would be for one of the bus companies to negotiate this. Nor would this necessarily be in the interest of existing passengers. Moreover, without a considerably enhanced timetable, which may well not be viable, it would be hard to match with shift patterns at the site.

7.14 In other words, this all seems to us, speculative at the moment.

7.15 It is also clear from Para 5.57 that there is little that can improve access by rail, the nearest station being Hinckley.

7.16 The use of DRT is suggested, although this is currently only on trial with LCC for 3 year (Para 5.57 of the TA) and so cannot be relied on to continue. There are currently two such services in Leicestershire, run by Vectare and Fox Connect. Assuming the service survives it is unclear how flexible this service will be. The current Vectare service has fixed pick up times. We are not convinced that this would materially alter the modal balance.

7.17 Para 7.6 also notes:

'The intention that there will be an initial subsidised period for both fixed and DRT services. Thereafter sufficient demand from staff at the site will enable buses to operate on a purely commercial basis.'

7.18 Yet no information is provided to demonstrate that the forecast demand would be sufficient to cover the operating cost and we have serious doubts about this.

8. Walking and Cycling

8.1 Cycling

8.1.1 The TA attempts to address cycling provision in the vicinity of the site. It can be seen that there are some cycling facilities on the A47, including a dedicated cycle lane, but limited provision to the site.

8.1.2 Figure 4-5 shows the 10 km isochrones for cycle movements to the site. Notably they would be similar to isochrones for cycle movements to Hinckley with the villages of Stoney Stanton, Sapcote and Sharnford within those isochrones.

8.1.3 Figure 4-6 is titled cycle infrastructure. However, to be clear, the local cycle routes identified are bridleways where it is legal for cycling to take place. It is not clear that any of these routes are used by cyclists in practice. The only bridleway where the proposer has provided figures for cycling is Table 13, Pedestrian Link 9 in the Walking, Cycling and Horse-Riding Assessment (DR 6.2.81. Appendix 16) and that is because it is located within their development (Figure 14 shows the count sites). In that case they recorded no cyclists.

8.1.4 Our understanding is that many of the local bridleways are not suitable for cyclists (although some off-road cyclists may use them). It certainly seems unlikely to us that they will be used by cyclists commuting into Hinckley in particular.

8.1.5 We could find no detailed information on cycle usage on those roads which are likely to see very large increases in traffic, such as the B4669, nor any mitigation to address that issue.

8.1.6 Figure 8 of the Sustainable Transport Strategy includes a heatmap of STRAVA usage and Para 4.53 argues that, although STRAVA is largely a leisure cycle app:

‘travel patterns are representative of the overall population and that it also gives a robust insight about the use of the network by cyclists.’

8.1.7 The heatmap shows high STRAVA cycle usage on precisely the routes which are projected to have high levels of traffic growth, something which accords with what local people tell us, yet this does not appear to have resulted in any detailed analysis of that usage, and those routes are not identified in the EA as important cycle routes. Since they do not have dedicated cycle paths it is likely that most cycling is done on the road.

8.1.8 Without more detailed cycle usage information it is difficult to assess fully the impact of traffic increases. However, if one considers, for example, the Aston Lane route from Sharnford to Hinckley it would seem, notwithstanding the STRAVA data, an obvious route for cyclists to take from Sharnford to Hinckley, avoiding the M69 Junction 2. Yet, Figure 4.6 would suggest they go up a parallel bridleway.

8.1.9 Aston Lane is a route that the promoter accepts in Table 8.19 of the EA would see a doubling of traffic, including an increase in HGVs, yet there is no consideration of the impact that would have on cyclists, or even the level of cycle usage. The EA (Table 8.14) identifies only 4 locations for assessing the impact on cyclists, three of which have cycling lanes already.

8.1.10 In the case of Aston Lane, one might use fear and intimidation as a proxy for the impact on cyclists. However, it is clear from Table 8.24 of the EA that this is considered minor at present and the impact of development minor.

8.1.11 We do not believe this problem would not be alleviated by the current Mitigation. For example, at Junction 39, a cycle/footpath is included, but it is likely that cyclists will be using the carriageway at that point. Furthermore, the pulling back of the stop line on Stanton Lane to allow lorry to turn may well create increased risk for cyclists. What is also unclear is whether any consultation has been done with cyclists on the design of that junction.

8.1.12 Para 4.86 of the TA acknowledges 81 crashes involving cyclists within the last 5 years but there is no detail given of the sites involved. Those did not include any fatalities. In fact, two cyclists have since been killed close to the junction of the B4114 and B4669 (2020 and 2022).

8.1.13 It appears to us that the impact on cyclists has not yet been properly assessed because there has simply been no work to assess cycle usage or the risks that might result from increases on traffic on those routes.

8.2 Walking

8.2.2 In terms of pedestrians the site would be poorly situated for access. The entrance to the site from Hinckley would be via the newly constructed link-road. This would be unlikely to provide an attractive environment for pedestrians. The distances to the site would also be prohibitive as is accepted in the TA (Para 4.53) which would limit opportunities to encourage walking to the site.

8.2.3 The TA provides a digest of baseline pedestrian facilities. However, this is presented without reference to the level of usage at those sites. In villages such as Stoney Stanton, Sapcote and Sharnford one would expect more significant pedestrian usage. There will also be routes which link PROWs along the Highway where pedestrian usage would be higher and there may not be pavement.

8.2.4 Given that situation we don't believe there has been adequate identification of those locations where the impact on pedestrians in terms of both amenity and fear and intimidation might be particularly sensitive.

8.2.5 The Assessment considers the impacts on the Public Right of Way Network and identifies improvements that it suggests can result from development. This is

underpinned by a PROW assessment which paints a glossy picture of potential improvements.

8.2.6 However, the impact on the PROW network of the development appears to us to be severe. The network between Hinckley and the motorway, as well as the opportunity to walk on the quiet Burbage Road are curtailed drastically and Pedestrians wishing to access the PROW network on those routes are forced to either walk along a newly-constructed link road and through the Industrial Park itself or on a circuitous bridleway around the proposals. None would enjoy the attractiveness of the current routes which are through open countryside.

8.2.7 Equally, residents of Stoney Stanton, Sapcote and Sharnford would find the PROW links to Burbage Common restricted both in quantity and quality by the development.

8.2.8 Those who currently use the PROW network may have physically improved paths adjacent and through the development but the reason for using those PROWS would be almost entirely removed. It is hardly likely people from Hinckley or the surrounding villages will wish to avail themselves of a walk through a Logistics Complex or under its shadow. Similarly, those wishing to walk to and from Burbage Common will do so in the lee of the new buildings.

8.2.9 What is clear is that this development would be highly car dependent and that very significant amounts of new traffic (including large (OGV2) articulated HGVs) would route through local villages, even if the Traffic Assessment is correct. We consider the impacts to be unacceptable.

9. Conclusions

9.1 In conclusion, CPRE Leicestershire believe these proposals should be refused on traffic grounds.

9.2 We do not believe the true extent of the impact on the network, and particularly local roads, has been captured.

9.3 But even assuming the traffic evidence is correct, there are unacceptable impacts on local roads, such as the B4669, which would be accentuated by any diversions if the M69 were not available.

9.4 We are not convinced there are viable public transport alternatives, and

9.5 We consider the impacts on vulnerable users, in villages and on rural roads, would be severe.

9.6 As a result the proposals should not be given permission.