



The countryside charity
Leicestershire

Charity Number: 1164985

HINCKLEY RAIL FREIGHT TERMINAL

Summary: Transport and Access

CPRE Leicestershire

Unique Reference: 20038675

(With Sapcote (UR 20039514))

Oct 2023

1. Introduction

1.1 CPRE does not believe the implications of the Rail Freight Terminal for the transport network, access to the site and vulnerable users are acceptable. Nor that the site has been shown to meet the NPPF requirements of 'safe and suitable' access. Some impacts may be severe.

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.
2. The direct and indirect traffic impact will be serious, particularly on surrounding roads.
3. There are wider detrimental impacts from the major change of introducing additional slip-roads to the M69 Junction 2.
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.

3. The Rail Network

3.1 CPRE does not consider the rail network has the capacity to accommodate the number of trains modelled for the HNRFI. The current assessment is too limited to demonstrate that either the projected paths are available or there is sufficient demand, taking account of physical and freight path constraints on the wider network and at port terminals.

3.2 In particular, the Rail Study only considers timetable availability on the section between Water Orton and Wigston.

3.3 As a result, we do not think there is a realistic prospect of reaching 16 train paths per day.

4. The Strategic Road Network

4.1 CPRE is concerned about the increase of traffic, both from the site and traffic generated by changes to the road network, notably the introduction of south facing slips on the M69 Jn 2 and a new link road to the A47.

4.2 The introduction of Junction 21A led to a significant increase in traffic congestion between J21 and 21A. The heavily constrained J21 impacts on the functioning of the relevant strategic highways so modelled flow may be unrealistic.

4.3 The A46 Leicester Western Bypass has also become heavily congested, which is hardly surprising given additional permitted development reliant on the motorway/A46.

4.4 These constraints increase the likelihood of substantial traffic diverting onto minor roads.

5. Local Road Network

5.1 The Transport Assessment, which seeks to quantify the impact on local roads, raises a number of issues.

5.2 Firstly, the level of usage of the rail terminal (based on existing terminals) may actually be less.

5.3 Secondly, the level of traffic generated by the proposals may be greater. HGV/LGV trip generation will be higher if there is less use of the rail terminal and the modelled light vehicle trip generation does not seem to consider the worst-case scenario of higher

employee numbers, more part time working, off-site related traffic increases and extra visitors to the site.

5.4 Thirdly, the modelling of non-development traffic seems to assume fixed growth distributed onto existing roads. However, the introduction of the southbound slips to Junction 2 could generate more traffic on the network and change its origin and destination, as well as influencing future developments patterns, such as the 5,000 houses proposed in the Blaby Plan (not in the model).

5.5 Higher traffic levels would put the M69 and other routes under pressure and lead to greater displacement onto the local roads, such as the B4669.

5.6 Fourthly, the use of link data in the model may not account for network restraints, revealed in delay data.

5.7 Fifthly, the routing of development traffic assumes the M69 would be the main road used by HGVs but the proposed routing is advisory. HGVs may use other routes, even those identified as 'undesirable' which already see modelled HGV increases.

5.8 This would be even more serious if the M69 were not available. No emergency plan is detailed at this stage. No modelling is undertaken to identify emergency routes and there is no evidence on current closures and delays.

5.9 We, therefore, have major concerns about the realism of the local traffic projections on routes already assumed to have significant extra growth and on diversion routes, such as the B4114.

5.10 In particular, the narrow chicane road through Sapcote cannot cope with HGV traffic and HGVs currently mount the pavement at pinch points in Sharnford.

5.11 Off-site mitigations, such as proposals at the B4669 Junction with Stanton Lane (Junction 39), would increase the attractiveness of that route, encouraging more traffic (including HGVs) to route along the B4669.

6. Environmental Impact

6.1 The EA Transport Chapter relies heavily on the 1993 IEMA guidance. We are not convinced that guidance is always appropriate if it does may not answer the NPPF question as to whether roads are 'safe and suitable', especially when interpreted too rigidly.

6.2 Such, a standardized approach can lead to some elements of road risk being downgraded or ignored, (such as road width).

6.3 We cannot agree that the current sensitivity ratings represent a fair representation of detrimental impacts to villages such as Sapcote and Sharnford.

6.4 For example, the EA tables show little deterioration of pedestrian or cycling amenity despite large increases in traffic, including HGVs.

6.5 We consider such an increase, especially of HGVs, to be unacceptable, made worse by generated traffic and exacerbated further if development were permitted on the arc around the South and East of Leicester as envisaged in the current Strategic Growth Plan for the County.

7. Public Transport

7.1 The Sustainable Transport Strategy starts with the local 2011 census modal split. It assumes a 10% reduction in car travel from 75%, although the census results appear higher. It is not clear why the HNRFI would be similar. We consider such reductions optimistic.

7.2. There is currently no regular bus service past the site. It is unclear that improved bus services would materialize or would be viable. Rerouting could also impact negatively on current users.

7.3 Little could be done to improve rail access, the nearest station being Hinckley.

7.4 DRT is currently being trialed, but may not to continue in Leicestershire and we are not convinced that DRT could materially alter the modal balance.

7.5 No information is provided to demonstrate that the forecast demand would be sufficient to cover operating cost of any type of bus service, making any ongoing new service speculative at the moment.

8. Walking and Cycling

8.1 Cycling

8.1.1 The 10 km isochrones for cycle movements includes the villages of Stoney Stanton, Sapcote and Sharnford.

8.1.2 The TA identifies bridleways as local cycle routes but many are not suitable for cyclists.

8.1.3 Without dedicated cycle-paths most cycling will be done on road but there is little information on cycle usage on roads, including where large increases in traffic are projected, even though the STRAVA heatmap suggests high cycle usage and, sadly, two cyclists have recently been killed (close to the junction of the B4114 and B4669).

8.1.4 The Aston Lane route is an example where fear and intimidation might act as a proxy but that is considered to remain 'minor' by the developer despite significant traffic growth after development.

8.1.5 We also do not believe this could be alleviated by the current mitigation. It is unclear if there has been any consultation with cyclists on junction design.

8.2 Walking

8.2.1 The site would be poorly situated for pedestrians. The entrance, via a newly constructed link-road, would not provide an attractive environment for pedestrians. Distances to the site would also be prohibitive.

8.2.2 More widely the TA provides a digest of baseline pedestrian facilities without reference to level of usage or locations where pedestrian impact would be particularly sensitive, for example, in villages such as Stoney Stanton, Sapcote and Sharnford. Routes linked to PROWs along the Highway may also lack pavement.

8.2.3 The Assessment paints a glossy picture of potential improvements to the PROW network which is curtailed drastically between Hinckley and the motorway, as well as losing the opportunity to walk on the quiet Burbage Road. Pedestrians are forced onto the newly-constructed link road, then through the Industrial Park, or on a circuitous bridleway around the proposals. None would enjoy the attractiveness of the current routes through open countryside.

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

8.2.8 Even with physically improved paths the reason for using them would be removed.

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.