



The countryside charity
Leicestershire

Charity Number: 1164985

HINCKLEY RAIL FREIGHT TERMINAL

Summary: Environmental and Amenity Impacts

CPRE Leicestershire

Unique Reference: 20038675

(With Sapcote (UR 20039514))

Oct 2023

1. Introduction

1.1 CPRE Leicestershire is concerned that the Rail Freight Terminal would have significant impacts on the local environment and, more widely, on the UK and local climate commitments.

2 Relevant Representation

6. The impact on the landscape, biodiversity and amenity cannot be adequately addressed.
7. Impacts on air quality, noise and vibration.
8. The overall impact on climate emissions is likely to be more serious than is being suggested.
9. Cumulative Impacts

3. Air Quality. Noise, Vibration

3.1 We are not in a position to examine the air quality, noise and vibration evidence in detail but have concerns about the underlying transport evidence.

3.2 In particular it is not clear that the Noise Assessment models additional noise from rerouted and generated traffic or the implications should congestion on the M69 lead to traffic diverting through local villages.

3.3 Furthermore the Noise Assessment refers to the 'worst-case' hour while the Transport Assessment is based on an average trip rate. The rail movements are also subtracted from the B8 movements, implying all rail movements are associated with B8 units on site which is not the case.

3.4 We think the assessment may not have considered the worst-case scenario.

3.5 The ES Air Quality Chapter also predicts large impacts from dust during construction but we are not clear how well mitigation will be monitored and what actions or sanctions would be applied.

4. Landscape, Ecology and Heritage

a. Visibility

4.1 The proposals involve high-bay warehousing which would have a significant impact on the surrounding landscape, whether viewed from houses, roads or Public Rights of Way (PROWs).

4.2 Those remain in year 15 even when tree cover has grown up. Mitigation will not completely hide the buildings and there will be gaps so making the buildings visible to someone moving through the landscape.

4.3 The change in light pollution at night could also be significant.

4.4 The ES accepts that mitigation will never be entirely successful, and that landscape impacts close to development remain high, particularly in the Elmesthorpe flood plain area.

4.5 Given the serious impacts on the local landscape and longer views we think mitigation will have a limited benefit.

b. Loss of Biodiversity

4.6 We are concerned about the impact on the wider environment and biodiversity. The ES acknowledges that Local Nature Sites will be lost. The development is particularly close to the Burbage Woods and Aston Firs SSSI and its wider woodland setting.

4.7 The Arbicultural Impact Assessment accepts that a significant numbers of trees and hedgerow would be lost.

4.8 Beyond that there would be impacts on protected species, such as bats and badgers.

4.9 To mitigate these impacts the ES Chapter proposes 'inherent mitigation' within the site and further 'mitigation' where the former is inadequate. The Tree Management Plan sets out more detail but that only applies to land within the development, not key sites in the Zone of Influence of the development.

4.10 While such mitigation is welcome sensitive sites remain close to the development. Parking for lorries and cars would be almost adjacent to these important areas.

4.11 Whatever is put in place, we think the development will have significant direct impacts on specific sites and on the wider biodiversity landscape.

4.12 We are also concerned about the compartmentalization of impacts. In the case of Burbage Woods, for example, cumulative impacts relate to landscape, biodiversity and amenity.

5. Amenity

5.1 We could find no separate amenity assessment and the topic seems to be largely confined to two paragraphs about Burbage Common in the Land Use chapter of the ES and the somewhat rosy evidence on PROWs.

5.2 We are not convinced that landscaping, even once it is in place, would fully screen the site for users of Burbage Common and Woods Country Park and Smenell Field, or in the augmented areas within the development itself.

5.3 There would be cumulative negative impact on residents close to the proposals and others enjoying the countryside, especially the Burbage Common Country Park and the Hinckley/Barwell/Earl Shilton/Burbage Green Wedge (identified in Policy 6 of the Hinckley and Bosworth Local Plan).

5.4 The area's importance was underlined by the Open Spaces and Recreational Study which identified the park as one of the two most popular open spaces in the district.

5.5 This resource has even wider benefits when considering PROWs which link it to villages, such as Stoney Stanton, Sapcote and Sharnford.

5.6 Notably the Green Wedge coincides with the two landscape designation areas where the development is considered to have the greatest impact, even after 15 years of mitigation.

6. Climate Change

6.1 CPRE Leicestershire strongly supports the need to reach Net Zero by 2050. The impacts of Climate Change are already serious and everything should be done to avoid jeopardizing carbon reduction.

6.2 The NSPNN says that refusal should only occur when carbon emissions have a 'material impact' on meeting that target.

6.3 However, individual project's impacts need to be considered against a reasonable benchmark, especially when the rise in emissions is not only from the site, but from associated transport infrastructure. Otherwise, any test for a regional site is likely to become meaningless when based on overall UK emissions.

6.4 The IEMA guidance gives limited advice on what target an individual project should be tested against but suggests comparison should be made with the most appropriate target.

6.5 The EA justifies adopting the National Target because the project is defined as a National Infrastructure Project. Unsurprisingly the HNRFI would influence only a small part of the National Carbon budget.

6.6 HNRFI would be primarily serving a Property Market Area of a 20-mile truck drive so we think the HNRFI should be considered at most in a West Midlands/East Midlands context to avoid underplaying its role, (while acknowledging that this includes similar proposals which would also contribute to the overall UK climate budget.)

6.7 HNRFI also includes changes to the highway network, with indirect impacts on traffic emissions in Leicestershire as traffic is rerouted (or generated) and this needs to be viewed locally or regionally.

6.8 The carbon assessment compares the impact of the operational traffic within the study area with the total study area network traffic in 2036. Not surprisingly it forms only a small part of the overall traffic.

6.9 The ES still admits a major adverse impact from an operational traffic emission increase of 167kCO₂e when compared to the regional average (-0.3), but downplays this by concentrating on the sectoral impact of the traffic directly associated with the development.

6.10 The construction phase creates a further 341 ktCO₂e, which is not much less than the current total emissions for Blaby District.

6.11 There would be a further 78.4 ktCO₂e from rail use but it is suggested this could offset 194.3 ktCO₂e of emissions from 83 million HGVs, although those HGVs do not currently (and may not ever) exist.

6.12 All together the project would create an unmitigated addition of 597.6 ktCO₂e.

6.13 It is suggested, in mitigation, that modal shift will reduce congestion in the East Midlands but that seems at odds with the traffic evidence in terms of congestion.

6.14 CPRE acknowledges the carbon benefits of improving rail freight facilities but considers this project is incompatible with the National Target Net-Zero target and trajectories.

7. Cumulative Impacts and Future Development

7.1 The impact of the proposals will be wider than simply the terminal. However, the assessment of cumulative impacts appears inconsistent.

7.2 The landscape impact of 5,000 homes on the B4669 proposed in the upcoming Blaby Plan is included but not their transport impacts, even though the motorway junction upgrade facilitates the Blaby site, and potentially a new settlement all around the HRNFI.

7.3 We question whether such a conglomeration of development would create a sustainable community, what facilities would be provided and what impact this would have on carbon emissions.

7.4 We are concerned that those additional houses would access the B4669 where substantial increases in traffic are already identified as a result of the current proposals. There would be significant additional impacts on the setting and amenity of the villages of Sapcote, Stoney Stanton and Sharnford.

8. Conclusion

8.1 In conclusion we consider the proposals are unacceptable in terms of their visual impact on the local landscape.

8.2 We are concerned about the impact on the local biodiversity, in particular key assets such as Burbage Common and the wider links across the countryside.

8.3 We consider there would be a significant loss of amenity, including access to the countryside and that this would combine with the other impacts to create cumulative effects.

8.4 We are not convinced the proposals would contribute to meeting out net-zero requirements and that the level of additional emissions may well be higher than estimated.

8.5 Lastly, we are concerned about the cumulative impacts with other developments and, in particular, the enabling of large-scale housing reliant on the changes to the M69 Jn2.

8.6 For these reasons we do not believe these proposals should be approved.