

HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE – LAND WEST OF STONEY STANTON

WRITTEN REPRESENTATIONS

1. Introduction

- 1.1. We are instructed by a consortium of land promoters predominantly consisting of Barwood Development Securities Limited and Parker Strategic Land Limited (the “Consortium”) and Mrs Jennifer Taylor.
- 1.2. We refer to our relevant representations that were submitted by Shoosmiths LLP on 23 June 2023. A copy of those relevant representations (“RR”) is enclosed at Appendix 1. This written representation (“WR”) is supplemental to, and should be read in conjunction with, our RR.
- 1.3. In summary, the RR noted that:
 - 1.3.1. the level of technical detail in the Environmental Statement (“ES”) and supporting documentation does not allow the Secretary of State to properly assess the likely significant effects of the HNRFI and whether proposed mitigation measures are sufficient with respect to highways, noise, air quality and landscape.
 - 1.3.2. there was an inadequate justification for the temporary acquisition of land within Plot 122 identified in the Land Plans.

Taking each matter in turn:

2. Evidence in support of proposal

- 2.1. Our concerns regarding the level of information submitted in respect of highways, noise, air quality and landscape remain.
- 2.2. With regards to highways, we note that updated Transport Assessment (“TA”) documents dated September 2023 have been provided by the applicant. However, these appear much the same as the previous documents provided, with the amendments relating to issues raised in the context of junctions on the A5 corridor.
- 2.3. Somewhat surprisingly, the updated TA still states at paragraph 2.26:

“The following documents are not complete at this stage and an addendum to the TA will be prepared in due course to cover the resultant modelling and mitigation package agreement in them.

 - *Final Transport Assessment*
 - *Traffic Modelling – WCC Rural Rugby Area Model Reports*
 - *Stage 1 Road Safety Audits and Audit Response.”*
- 2.4. In the context of the comments made in our RR and accompanying technical note dated 25 May 2023 from RPS, the updated TA does not provide any new information or changes to the proposals.

- 2.5. Therefore, the information provided as part of the TA still does not fully address the basis of assessment or fully consider the necessary mitigation. Hence the issues previously raised in the context of the impact of the development to the east of the M69 and specifically through Sapcote and Stoney Stanton remain. Further detailed information must be provided to clarify the basis of the distribution of the traffic and the effects of rerouting associated with the new infrastructure.
- 2.6. Once adequate information has been provided regarding traffic distribution and mitigation, the assessment of impacts of the HNRFI on noise, air quality and landscape also need to be updated.

3. Justification for temporary acquisition of land within Plot 122

- 3.1. The applicant has not provided any further justification for the temporary acquisition of land within Plot 122. Therefore, our objection set out in our RR still stands.
- 3.2. Furthermore, paragraph 19 of the Department for Levelling Up, Housing & Communities' Guidance on Compulsory Purchase Process and The Crichel Down Rules (July 2019) (the "CPO Guidance") states that acquiring authorities must, inter alia, give full information from the outset about what the compulsory purchase process involves and provide general assistance to affected owners. Reasonable steps must also be taken to acquire land by agreement.
- 3.3. The applicant has provided Mrs Taylor with little information about the compulsory purchase process and made minimal effort to acquire Plot 122 by agreement.
- 3.4. This is contrary to statements made by the applicant during compulsory acquisition hearing 1 (CAH1) on 14 September 2023, whereby they asserted that they had spoken to Mrs Taylors agents and provided a full explanation for why her land was required. It is also contrary to the requirements set out in the CPO Guidance.

Appendix 1 – Relevant Representations submitted on 23 June 2023

HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE – LAND WEST OF STONEY STANTON

RELEVANT REPRESENTATIONS

1. INTRODUCTION

- 1.1. We are instructed by a consortium of land promoters predominantly consisting of Barwood Development Securities Limited and Parker Strategic Land Limited (the “Consortium”) and Ms Jennifer Taylor.
- 1.2. This response is made on behalf of the Consortium and Ms Taylor and relates to Tritax Symmetry (“Tritax”)’s DCO application for the proposed Hinckley National Rail Freight Interchange (“HNRFI”).
- 1.3. The Consortium has interests in land covering approximately 340 hectares to the west of Stoney Stanton (the “Site”). The Site is being promoted as a residential-led mixed use development comprising approximately 5,000 homes and is shown edged red on the plan attached at **Appendix 1**. The Consortium members own part of the Site and have promotion agreements with the landowners of the remainder. Ms Taylor owns the land within the southeast corner of the Site registered at the Land Registry under title number LT187671.
- 1.4. The Site is adjacent to the HNRFI and will be significantly impacted by it.
- 1.5. Whilst the Consortium and Ms Taylor do not object to the overall principle of the HNRFI, they have the following concerns:
 - 1.5.1. Insufficient evidence has been submitted in support of the DCO application; and
 - 1.5.2. Inadequate justification has been provided for the temporary acquisition of land within the Site adjacent to the junction at Hinckley Road and Stanton Lane.
- 1.6. We reserve the right to make further representations as and when further supporting evidence becomes available.
- 1.7. We understand that landowners of parts of the Site who are not part of the Consortium may be making separate representations in respect of their freehold interests.

2. THE SITE

- 2.1. The Site is bound by the settlement of Stoney Stanton and Hinckley Road to the east, the M69 to the west, the B4669 Leicester Road to the south and the Birmingham to Leicester mainline railway to the north. It is not within the Green Belt and is not subject to any significant landscape constraints. It is also relatively flat and in an area of low flood risk. Due to the Site’s beneficial location and characteristics, it is considered highly suitable for a substantial residential-led mixed use development.
- 2.2. The broad location has been the subject of promotion for development for a period of years, with the wider area being supported by the Leicester and Leicestershire Strategic Growth Plan (December 2018).

- 2.3. Blaby District Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) (2019) went on to specifically identify the Site (reference STO026) as having capacity to deliver approximately 5,000 dwellings within the next 11-15 years. It noted that, subject to delivering supporting infrastructure, the Site is "available, achievable, and developable."
- 2.4. More recently, the Site has been included in the 2021 Regulation 18 consultation on the emerging Blaby Local Plan, which identified land west of Stoney Stanton as a potential strategic site option for future growth.
- 2.5. In the emerging Local Plan consultation, emphasis has been placed on delivering a small number of larger strategic sites that are well-located, well connected, and sustainable rather than spreading growth amongst smaller sites in existing villages and urban areas. Representations have been made to Blaby District Council in response to the Regulation 18 consultation to support the Site's allocation. Those representations demonstrate the Site's suitability and deliverability.
- 2.6. Based on the above, it is highly likely that the proposed allocation of the Site will come forward in the Blaby District Council Regulation 19 Local Plan, which is currently scheduled to be published within the timescale for consideration of the DCO application.
- 2.7. The Site's status as an emerging strategic allocation is a material consideration for the Secretary of State when determining the DCO application. It should therefore be given consideration by the Secretary of State during the examination process, so that the HNRFI does not place any unreasonable additional constraints on the Site that would harm its future development.

3. INSUFFICIENT EVIDENCE IN SUPPORT OF PRE-APPLICATION PROPOSAL

- 3.1. An Environmental Statement ("ES") has been submitted as part of the DCO application. In order for that ES to comply with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 it must include the information reasonably required to assess the likely significant environmental effects of the development.
- 3.2. We are concerned that the level of technical detail in the ES and supporting documentation does not allow the Secretary of State to properly assess the likely significant effects of the HNRFI and whether proposed mitigation measures are sufficient. Further detail is set out below.

(i) Highways

- 3.3. The evidence base provided does not clearly show the effect of the HNRFI proposals. Much of the analysis is contained within modelling reports prepared by Aecom for the Pan Regional Transport Modelling (PTRM) and also within Micro Simulation Modelling reports prepared for the assessment of the M69 junctions 1 and 2. However, these documents do not explain the changes in traffic flow on the local road network that result from the HNRFI proposals including the infrastructure measures that are required to deliver the overall scheme.

- 3.4. There are no details on the 'generic' growth factor that has been used to inform the PTRM. It is therefore unclear how traffic associated with the growth within Blaby, including any growth from development at the Site, forms part of the background flows. There is also insufficient evidence to consider the impact of the HNRFI outside of the network peak hours and at its operational peak.
- 3.5. The Transport Assessment report at Appendix 8.1 of the ES identifies, at table 7-2, 54 junctions within the study area have been considered in terms of the impact of HNRFI associated traffic. However, there is a lack of clarity as to the year of assessment and the basis of the flows being assessed. Therefore, it is unclear what the actual changes in traffic expected at each of the junctions within the study network are.
- 3.6. From the ES, there is also a lack of clarity of the changes in traffic flow on the various links within the study network which prevents an accurate assessment of the significance of effects.
- 3.7. Overall:
 - 3.7.1. There is insufficient evidence within the ES and appendices to be able to determine the impact of the overall HNRFI scheme on the study network.
 - 3.7.2. There is insufficient evidence to understand the growth factors that have been applied to the network in order to determine how growth within Blaby District has been considered and the extent to which traffic associated with the growth within Blaby and specifically at the Site forms part of the background flows.
 - 3.7.3. The impact of the HNRFI to the east of the motorway is not clearly defined to be able to ensure suitable mitigation is provided. Specifically, the level of traffic predicted to travel through Sapcote and Stoney Stanton varies considerably between the evidence provided in the transport assessment and that included in the transport section of the ES.
 - 3.7.4. There is insufficient evidence to consider the impact of the HNRFI outside of the network peak hours and at the HNRFI's operational peak.
- 3.8. We note that paragraph 2.26 of the Transport Assessment confirms that the highways modelling and assessment are not complete.
- 3.9. Additional information is therefore required to understand the full extent of the highways impacts and whether the proposed mitigation measures are sufficient. Until such information is provided we reserve our position non the final assessment of the scheme effects.
- 3.10. Further details of our concerns regarding the highways evidence are set out in a technical note from RPS at **Appendix 2**.

(ii) Noise

- 3.11. The evidence base shows that operational noise levels for off-site roads are expected to increase by between 3 dB(A) and 9dB(A) for the roads bounding the Site. Increases of up to 2dB are predicted at night-time.
- 3.12. However, due to the uncertainty surrounding the transport modelling and the likely traffic flows on the roads surrounding the Site, we question the accuracy of the data and conclusions in Chapter 10 of the ES regarding noise from off-site roads. This should be revisited once further information is available regarding the impact of the HNRFI on the surrounding road network.

(iii) Air quality

- 3.13. Due to the uncertainty surrounding the transport modelling and the likely traffic flows around the Site, we also question the accuracy of the data and conclusions in Chapter 9 of the ES regarding air quality impacts. This should be revisited once further information is available regarding the impact of the HNRFI on the surrounding road network.

(iv) Landscape

- 3.14. Chapter 11 of the ES assesses landscape and visual effects of the HNRFI. Overall, and allowing for natural differences in opinion, the assessment of effects appears reasonable and proportionate.
- 3.15. Despite the above, the description of effects, in particular visual effects, underplays how different elements of the masterplan, including the container storage and associated cranes will appear in views and their likely visual discordancy.
- 3.16. Accordingly, the textual analysis of the likely visual effects within the ES landscape chapter should be updated to describe this visual discordancy more accurately in order to enable the examining authority to fully understand the impact on landscape arising from the HNRFI.

4. INADEQUATE JUSTIFICATION FOR TEMPORARY ACQUISITION OF LAND

- 4.1. A large area of the Site adjacent to the highway works at Junction 19 – B4669/Stanton Lane is shown shaded yellow at Figure 1 and is included within the DCO land. It is owned by Ms Taylor. From a review of the DCO application documents, it is unclear why that is the case when the only works in the area are new traffic signals at the junction and some minor works on the B4669 Hinckley Road.
- 4.2. Reference is made within Schedule 10 of the draft DCO to a “Construction compound and laydown area in connection with the works on the B4669 Hinckley Road and the alterations to the junction at Hinckley Road and Stanton Lane including access.”
- 4.3. However, it is not clear why the land shaded yellow has been drawn that way. It is excessive and excludes part of the Site in the middle which is effectively isolated from the remainder of the landowner’s interest. This is illogical.

- 4.4. The Statement of Reasons is also silent on why this land is included within the draft DCO and we see no justification for locating a construction compound there whilst there is a significant amount of space within the main body of the HNRFI site that could easily be utilised for such purposes.
- 4.5. Any construction compound in that area could sterilise the development of the Site on that land for a significant period of time, which would be unacceptable to the Consortium and Ms Taylor.

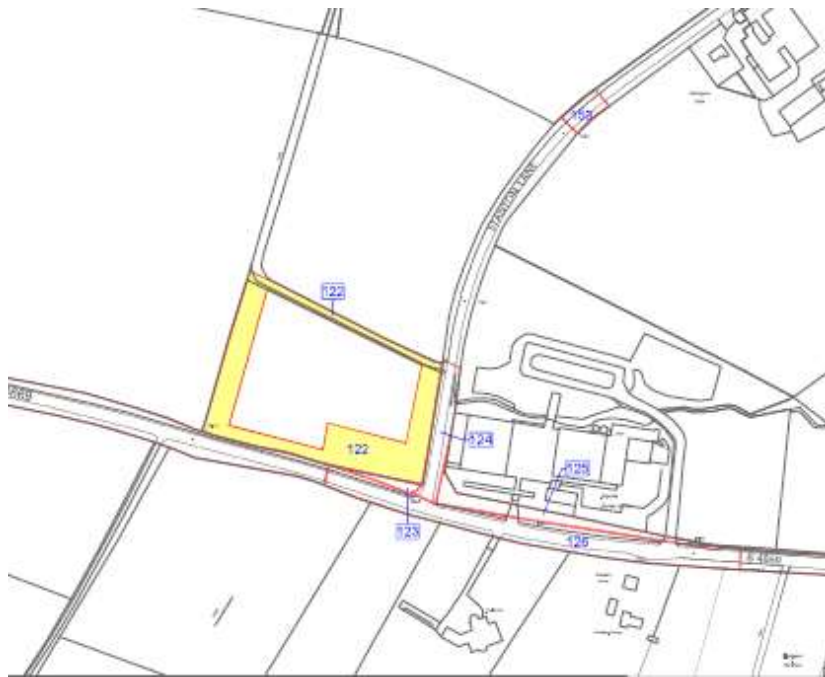


Figure 1

- 4.6. In short:
 - 4.6.1. There is no compelling case for the temporary acquisition and sterilisation of this land; and
 - 4.6.2. There are reasonable alternatives to the use of this land as a construction compound that the applicant has failed to adequately explore.

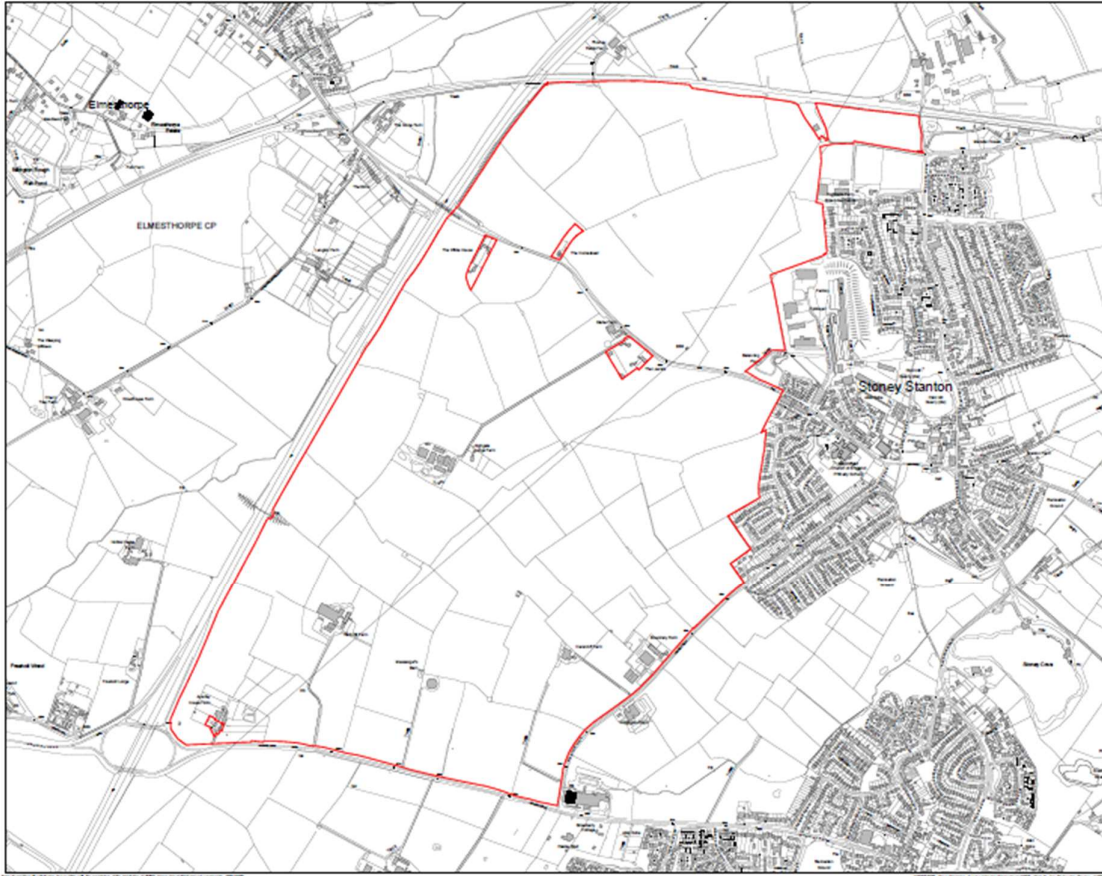
5. SUMMARY

- 5.1. The Consortium is concerned that there is a lack of sufficient evidence to support the proposed DCO.
- 5.2. To comply with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 the DCO application must include the information reasonably required to assess the

likely significant environmental effects of the development. The appropriate level of information has not been provided, especially with regards to impacts on highways, noise, air quality and landscape.

- 5.3. We also note that further details of the HNRFI scheme will be provided pursuant to the Requirements listed in Schedule 2 of the draft DCO, for example in relation to drainage, landscaping and waste management. The Consortium reserve the right to make further representations in relation to such matters once further detail is known.
- 5.4. Finally, no compelling case has been made for the temporary acquisition of the land shaded yellow on figure 1 above and the Consortium object to that proposed acquisition accordingly.

Appendix 1 –Site plan



Appendix 2 – RPS Technical Note

TECHNICAL NOTE

Project Title: Hinckley NRF Interchange

Report Reference: JNY10702-11

Date: 25th May 2023

UPDATED REVIEW OF DCO TRANSPORT ASSESSMENT

Introduction

- 1.1 This Technical Note on highways and transportation matters, has been prepared by RPS on behalf of the Consortium of Landowners / Developers representing the proposed development of land to the West of Stoney Stanton. The land to the west of Stoney Stanton forms part of the option testing for the Blaby Local Plan Regulation 18 assessment and is included within the options which include strategic residential allocations for the period up to 2038. Hence this land could form part of the growth within Blaby for the period up to 2038.
- 1.2 This Updated Review of the Hinckley National Rail Freight Interchange (HNRFI) follows the submission of the DCO for the HNRFI and has considered the issues previously raised as part of the consultation for the scheme, which were submitted as part of the representations provided by Shoosmiths on the 8th April 2022 on behalf of the Consortium.
- 1.3 Accordingly set out below is an update in the context of the documents relating to highways and transportation matters, that form part of the Hinckley National Rail Freight Interchange DCO Application. This review includes the comments previously made in respect of the consultation which are shown in *italics* followed by an update based on the current DCO documentation.

General Matters

- 1.4 RPS maintain their view that as a general matter, the evidence base provided does not readily inform the individual of the effect of the development proposals. It is also noted that in terms of the evidence, the documents submitted are not the final versions. Paragraph 2.26 of the Transport Assessment, (doc ref. 6.2.8.1 Pt1), identifies that:-

“The following documents are not complete at this stage and an addendum to the TA will be prepared in due course to cover the resultant modelling and mitigation package agreement in them.

- **Final Transport Assessment**
- **Traffic Modelling – WCC Rural Rugby Area Model Reports**
- **Stage 1 Road Safety Audits and Audit Response.”**

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- 1.5 Hence until a final complete assessment is made available for consultation, the comments within this review must be considered as “interim” and we will wish to reserve our position on the final assessment of the scheme effects.
- 1.6 In the context of the documents that have been submitted, much of the analysis is contained within modelling reports prepared by Aecom for the Pan Regional Transport Modelling (PTRM) and also within Micro Simulation Modelling reports prepared for the assessment of the M69 junctions 1 and 2. However these documents do not explain the changes in traffic flow on the local road network that results from the development proposals including the infrastructure measures that are required to deliver the overall scheme. Accordingly it is considered that the evidence base submitted to date for the DCO application is incomplete to allow consultee’s to fully assess the overall impact of the development proposals
- 1.7 In the context of the information available, document reference 6.2.8.1 Part 1 table 7-2 now shows 54 junctions within the study area that have been considered in terms of the impact of the development traffic. However there is a lack of clarity as to the year of assessment and the basis of the flows being assessed. Whilst it is understood that assessment scenarios are agreed with the Highway Authorities for 2026 and 2036, there is a lack of information provided especially in the context of the 2026 assessment year. Hence the reader is left questioning what are the actual changes in traffic expected at each of the junctions within the study network as a consequence of the development and infrastructure requirements for the development.
- 1.8 As an example Junction 3 is highlighted in table 7-2 as having only a 4% highway impact with an increase in traffic of 95 vehicles, hence the amber highlighting of the junction. However the total without development flow would appear to be far higher than the current baseline flow indicating this to be the total flow through the junction in 2036. In practice this increase in traffic is likely to be higher in the opening year of 2026 and would represent an increase in excess of 5% and hence another red highlighted junction within the table requiring the need for the junction impact to be addressed.
- 1.9 In the context of the Environmental Statement, there is a lack of clarity of the changes in traffic flow on the various links within the network be able to consider the significance effect.
- 1.10 Overall RPS remain of the view that :
- there is insufficient evidence within the application to be able to determine the impact of the overall development on the study network in the opening year and design year.
 - There is insufficient evidence to understand the growth factors that have been applied to the network in order to determine how growth within Blaby District has been taken into account and the extent to which traffic associated with the growth within Blaby and specifically at Stoney Stanton development, or whether is forms part of the general background flows.
 - The impact of the development to the east of the motorway is not clearly defined to be able to ensure suitable mitigation is provided. Specifically the level of traffic predicted to travel through Sapcote and Stoney Stanton varies considerably between the evidence provided in the transport assessment and that included in the transport section of the ES. In this regard we would concur with the view of Leicestershire County Council in their response to the Public Consultation in December 2021 and more recently in their letter to the Planning Inspectorate in February of this year.
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- There is also insufficient evidence to consider the impact of the development outside of the network peak hours and at the operational peak of the development.

1.11 This review now considers some of the detailed elements contained within the consultation evidence.

Trip Generation

- 1.12 RPS maintain their view that trip distribution diagrams for the AM and PM peak periods are required, this being a 3 hour period around the peak hour, together with the inter peak period, this being a 3 hour period within the middle of the day. The reason for this is that these three peak periods will reflect broadly 60% of the total traffic movements to and from the site throughout the 24hour period and that the impact of the development traffic will not only be material in the specific AM and PM peak hours but also within the peak periods and interpeak period.
- 1.13 Generally as the network peaks become more congested the hours before and after the peak period also become congested, and the impact of the B8 operation can become more significant during these periods. Furthermore the operation of the development is also likely to have a material impact in the interpeak period around the middle of the day when the traffic flows from the development are likely to be higher than in the peak hours.
- 1.14 Hence it is considered that further and clearer evidence is required of the movement of the traffic to the strategic and local road network within the overall study area and throughout the operating day of the development.

Background Traffic / Growth

- 1.15 The Transport Assessment states that the PRTM 2.2 model has been used. This is designed to forecast future network flows from a 2014 base. However this model has now been superseded and LCC advocate the use of version 1.1 of PRTM2019. Given this updated model has been available for some time, and the significance of this development, it is not clear why the development has not been remodelled in the latest version of PRTM.
- 1.16 Within the DCO TA, it is advised that the planning and infrastructure uncertainty logs have been signed off by the key authorities in March 2022. However no detail of what is included or excluded has been advised. Again it is considered that this information should be included to ensure it is current both in terms of the planning and infrastructure data included in the model. Finally, there is no reference to growth within the modelling reports and this needs to be clarified to ensure the growth takes full account of the specific growth within both Blaby and Hinckley and also within the wider areas specifically within Leicestershire and Warwickshire.
- 1.17 Previously in response to the consultation submissions, RPS commented as follows.
- Furthermore, there are no peak hour baseline traffic flow diagrams for each of the assessment years included in Appendix 5. This would enable an understanding of the changes in traffic flows between the assessment years. This is particularly important as an initial review of the traffic data extracted for some of the individual junction assessments shows reductions in background traffic for some junctions and increases at other junctions. Hence there is not a clear understanding of the base line traffic data adopted in the assessment and the growth rates applied to this base data.*

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- 1.18 This remains the case. Such information would also assist in a local calibration of the baseline models.
- 1.19 The DCO TA advises that surveys undertaken pre-covid in 2017 – 2019 have been used to validate the model, however there is no evidence provided of these flows. In addition whilst in the appendices there are base line junction assessments carried out these have not been validated against observed traffic flow data to demonstrate that the models used to assess the various junctions accurately reflect the existing operation.
- 1.20 As an example of the concern over the base line flows used in the assessment, the flows abstracted from the data indicate peak hour flows on the B4669 to the east of the M69 of 358 vehicles two way in the AM peak and 456 vehicles two way in the PM peak. These figures are taken from Appendix 12b (page 48) Junctions 10 output. These base line flows are substantially below the traffic flows recorded by RPS which show 775 two way in the AM peak and 781 two way in the PM peak and would also appear to be inconsistent with the figures included in Table 7-2 of the TA.
- 1.21 Such an error in base line data is extremely concerning given the potential impact on the villages to the east of the motorway.

Assessment Years / Scenarios Traffic Flow Data.

- 1.22 Previously RPS commented on the modelling scenarios as follows:
- The comment on the consultation board seems to be suggesting that the traffic increases to the east of the M69 are due to traffic redistribution and not as a result of the HNRFI. However the changes are due to the new infrastructure which is a requirement of the HNRFI. Consequently any residual change in traffic which results in an adverse impact is a matter the HNRFI needs to address.*
- 1.23 The DCO TA includes extracts from the PRTM to show the changes in vehicle flow, the images below are Figure 5-8 & 5-9 (AM & PM Peaks) from the DCO TA and show the changes in flow without the development but with the infrastructure in place against the base line assessment.
- 1.24 The red lines show an increase in flows as a result of the new infrastructure and the green shows a reduction. The point previously raised with regard to addressing the impact associated with the redistribution of traffic resulting from the new infrastructure is still a matter that does not appear to have been fully addressed.
- 1.25 These diagrams do however highlight that even without the development in place there is a material impact on the local road network to the east of the Motorway. This is evidenced by the red lines on the routes through both Stoney Stanton and Saproate, with the higher levels of impact being through Saproate.

Figure 1. Extracts from the TA of Figures 5-8 and 5-9.

Figure 5-8: AM 2036 WoDevWInf-WoDev



Figure 5-9: PM 2036 WoDWInf-WoDev



1.26 RPS previous concern also identified:-

These changes to flows as a result of infrastructure measures as well as the development traffic need to be identified in traffic flow diagrams showing the changes in peak hour flows across the entire network (including individual 40 junctions) for the different assessment scenarios. Without this information it is difficult to fully understand and assess the full impact of the traffic reassignment resulting from the proposed access infrastructure and that of the development itself.

Such information would then assist in understanding the traffic redistribution as a consequence of the changes in infrastructure etc. As an example, analysis of the data illustrates an increase in traffic along the B4669 / Stanton Lane and further north (Hinckley Road, Lynchgate Lane,

Sharnford Road, Pingle Lane, Huncote Road) but with insufficient explanation as to why this is occurring. This needs to be reviewed and justified rather than accepted as a consequence of the PRTM traffic modelling. The PRTM model will reassign traffic via various routes to balance the traffic around the network rather than route the traffic along routes drivers will prefer the travel, albeit there may be increased congestion along such routes. Hence a review of the model is required to justify any anomalies within the model outputs.

- 1.27 The DCO TA does not include details of traffic flows or Select Link Analysis of the development traffic which is crucial to understanding the impacts on a surrounding highway network especially when modelling software such as PRTM is used. Therefore the concerns advised above still remain.

Highway Impact Assessment

- 1.28 In the context of Highways Impact Assessment RPS previously advised:-

The highway impact assessment is summarised within the Appendix 8.1 Interim Transport Assessment Report with detailed assessment considered of 40 junctions which are shown at Figure 26 of the report and listed at Table 21. However, the report only includes details of 7 of these junctions, where mitigation is considered. More detailed assessments are included at Appendix 10 of the Interim Transport Assessment, including reports prepared by Aecom on the PRTM and other reports relating to the Microsimulation model of the M69 junctions.

However, these reports are identified as being, Local Model Validation Reports (LMVR), Base Year Model reviews as well as Forecasting Modelling briefs. There does not appear to be any detailed evidence of the outputs from these reports to show the changes in traffic flows at the key junctions as a consequence of the development, together with the development infrastructure that stems from this, nor any sensitivity testing of these outputs.

Hence missing from the overall assessment is the detailed model report outputs of the remaining 33 junctions not included in the report. This is required to understand the changes in traffic movement at each of these junctions which results from the overall development including the new infrastructure.

- 1.29 As highlighted above, no baseline validation has been undertaken to demonstrate that the models used for the junction assessments are accurate and hence we would therefore question the accuracy of the modelling outputs. Furthermore, the DCO TA does not include any detail of traffic movements across the network which is easily obtainable from the PRTM and would show how the model redistributes traffic flows more clearly.
- 1.30 Again as identified above, the DCO TA also now reviews the impact on 54 junctions as opposed to 40 in the initial review, however whilst Table 7.2 identifies the total through movements per junction and change in vehicle flow, no details of this data from the model are included in the appendices so cannot be verified.
- 1.31 It is also noted that Table 7.2 only includes a review of the change in traffic With and Without the proposed development, in what is assumed to be 2036. No details are provided for the assessment in 2026 where the percentage impact on some junctions may be higher.

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- 1.32 The DCO TA then proceeds with a process to determine which junctions should be assessed, which includes a number of reviews of the V/C % and concludes that only 21 junctions would be materially affected by the increase in traffic.
- 1.33 The previous consultation response then provided comments in the context of the percentage impacts at various locations which were comments on at paras 1.30 to 1.36 of the Initial Review which extracted information from both the TA and ES chapters. However the DCO application no longer makes these comparisons within the ES chapter with the only changes in traffic flow being those reported in Table 7-2 of the TA.
- 1.34 As identified above Table 7-2 highlights the various flow changes and highway impact which is assumed to be in 2036 and not 2026, the year of opening. Other than the impacts on the two M69 junctions, of the top 10 junctions affected by the scheme, 6 are to the east of the M69 and relate to junctions in and around Sapcote and Stoney Stanton. This represents over half of the key junctions effected by the proposals. However of these junctions only 1 is proposed to be mitigated with an improvement scheme, which still results in the junction operating close to capacity in the PM peak hour.
- 1.35 In the context of the M69 junction 2, this junction is seen to increase in traffic from the baseline flows of 1370 AM peak and 1586 PM peak, to 4372 AM peak and 4949 PM peak with the development and development infrastructure. This is shown as an increase of up to 219%.
- 1.36 Table 8.7 identifies the HNRFI traffic movements at the M1/M69 junction to the north of the site which is the main junction serving Leicester. This shows there will be an additional 321 two-way movements of which 100 will be HGV's in the AM peak, and 443 two-way movements of which 114 will be HGV's in the PM peak. RPS consider that this level of additional traffic at an already congested junction should be considered as significant as it reflects an increase of between 5% and 7% in these peak hours.
- 1.37 However no detailed analysis of this junction has been provided. Paragraph 8.35 states:- **“the proposed development provides a betterment/low impact at the junction in both peak periods...”**. RPS consider this is not a true reflection of the likely impact of the development on the junction.
- 1.38 The modelling VISSIM outputs for the M69 Junction 2 which will be the primary access for the site, show that there will be a significant increase in delay for vehicles that use the junction from around 6-8 seconds without development (existing arrangement) to up to 131 seconds in the PM Peak (2036) with development, these are average delays and not the maximum.
- 1.39 The output does not include any queue length details and whilst there is a significant increase in delay it is simply advised in para 8.17:- **‘Signalised of entry arms generally add delay to journey times however a review of the network performance indicates that the junction is able to accommodate more than 2,000 additional vehicles in an WDWS scenarios whilst operating satisfactorily. Therefore, it is considered no further refinements to the design is required.’**
- 1.40 This statement is considered to be at odds with the results. The figures set out in Table 7-2 show the increase in traffic at this junction is in fact between 3002 and 3363 additional vehicles. Whilst some of this additional traffic may well be existing rerouted traffic, the effect of the development results in significant increases in delay as a consequence of the development.
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- 1.41 The DCO TA also advises that the VISSIM model used includes for MOVA which would provide a betterment over fixed timing in terms of capacity however even with MOVA there are still long delays identified. RPS consider more detailed assessment is required including the use of LINSIG assessment to determine the likely queues within the junction at the internal stop lines to ensure these do not block the exit slips. It is recognised that LINSIG does not include the benefit of MOVA but such an assessment would assist in ensuring the internal queuing within the junction was appropriately accommodated, and not affecting the operation on the approach arms of the junction.

Mitigation

- 1.42 The previous assessment of the scheme highlighted the following:-
- For some junctions, it would be useful to understand the design chosen, particularly the southern slips of J52 M69 J2. Here there is insufficient explanation of these proposals within the reports. The type of slip roads identified on the drawings shows Type C merge and Type B1 diverge. Both these slip roads therefore allow two points of entry and exit from the motorway. This would suggest slip road flows in the peak hours in excess of 1500 vehicles on each slip road. However there is no apparent assessment of these slip roads in accordance with the requirements of the Design Manual for Roads and Bridges CD122. Likewise there is no review of the north facing slips and any changes in flow to these to consider whether these slip roads will operate within capacity base on the current standards or whether these slip road need upgrading.*
- 1.43 However, no assessment of the proposed slips roads for the M69 junction 2 has been included in the DCO TA, albeit that these are shown as ghost island merge and diverges, which would indicate that the proposed slip road flows would be in excess of 1500 vehicles per hour in the design year.
- 1.44 In the context of the local road network within Stoney Stanton, the DCO TA shows an update of the analysis of junction 37 (New Road/ Hinckley Road/ B581) which shows that a signalised junction at this location will be provided including controlled crossing facilities for pedestrians. However, whilst this is described as an improvement, the junction will be operating close to its capacity in the design year of 2036 in the PM peak. No assessment is provided of the opening year of 2026.
- 1.45 Junction 38 (Long Street/ Broughton Road/ New Road) is predicted to operate above capacity in the AM Peak without development and above capacity in both peaks with development. A review of potential improvements to this junction has been undertaken in the DCO TA which includes signalisation.
- 1.46 However the TA identifies that there would be no material benefit with longer queues on New Street. Accordingly the TA concludes that due to the land constraints:- **‘whilst the existing junction would operate over capacity in all of the 2036 scenarios, the existing form of the junction is the best performing junction that could be provided in this location.’** Hence whilst the development materially impacts on this junction and shows an 11% impact in the PM peak in 2036, no mitigation is proposed at this junction.
- 1.47 Mitigation for Stoney Stanton and Sapcote is proposed in the form of limited traffic calming, details of which are shown on the plans included in Appendix 8.1. part 14. The traffic calming

proposals only include entry gateway treatments and one priority arrangement. Whilst a series of traffic calming measures would have an effect in slowing traffic movements through these villages, traffic will not be deterred from using these routes as there are no alternatives and will simply create more congestion through these villages.

- 1.48 The DCO TA does not include a review of 'with mitigation' within PRTM to determine how the effect of the mitigation measures proposed on the flow of traffic through the local road network.
- 1.49 The key element to highlight is from Table 7-2 of the TA. This shows in 2036, an increase in traffic through the Stanton Lane / B4669 junction in the AM peak of 746 and 643 in the PM peak. This represents a doubling of traffic on current baseline flows along this route. Such flows will then translate to increases in traffic within both Sapcote and Stoney Stanton.

Summary

- 1.50 In summary therefore, the information provided as part of the DCO TA does not fully address the basis of assessment or fully consider the necessary mitigation. Further work is required and information to be provided to clarify the basis of the distribution of the traffic and the effects of rerouting associated with the new infrastructure.
- 1.51 Whilst there are some junctions which include detailed assessment in 2036, all junctions should include a base year assessment from observed flows to validate the models used, and the analysis and results should include 2026 and 2036 for all scenarios.
- 1.52 Any assessment of the effects of the overall development must consider and mitigate both the effects of the rerouting of traffic which results from the new infrastructure proposals and also the effects of the development traffic itself. Hence any mitigation strategy must address the full effects of traffic changes resulting from the development proposals on the local road network.
- 1.53 All of the above are comments on the latest information provided recognising that a Final TA has yet to be submitted. Accordingly, only once such an assessment has been submitted can the full and final review be undertaken.
- 1.54 In conclusion it is considered that:
- there is insufficient evidence within the DCO TA to be able to determine/ verify the impact of the overall development on the study network assessed. Furthermore there is insufficient evidence to understand the growth factors that have been applied to the network in order to determine how growth within Blaby District has been taken into account. In this regard without such information the assessment does not explain the extent to which traffic associated with the growth within Blaby and specifically at Stoney Stanton development forms part of the background flows.
 - The impact of the development to the east of the motorway is not clearly defined to be able to ensure suitable mitigation is provided. Specifically, the level of traffic predicted to travel through Sapcote and Stoney Stanton varies considerably between the evidence provided in the transport assessment and that included in the transport section of the ES.
- 1.55 Accordingly it is considered that the information provided as part of the DCO relating to highways and transportation does not demonstrate suitable assessment and mitigation of the scheme proposals.