



Mr. Robert Jackson  
Lead Member of the Examining Authority  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

10<sup>th</sup> October 2023

Dear Mr. Jackson,

**Re: Hinckley National Rail Freight Interchange**

**Joint Written Representation from Alberto Costa MP and Dr Luke Evans MP**

### **Executive Summary**

As the two MPs whose constituencies are the most affected by the proposed development of the Hinckley National Rail Freight Interchange (HNRFI) we stand together to oppose these plans which we believe will have substantial, material, and negative impacts for our constituents both in the construction and ongoing operation of the interchange. Any positive impact of these proposals is negligible. We have serious concerns about the application across many areas including but not limited to:

- The definitive lack of community support in Bosworth and South Leicestershire for these proposals: Approximately 18,000 surveys were sent to Bosworth and to South Leicestershire constituents – jointly responses showed that of the 2,721 respondents 95% were opposed to the HNRFI.
- The significant lack of information shared by the applicant with local councils and decision makers.
- Problematic and confused public engagement between the applicant and wider communities – resulting in formal complaints being raised by both MPs due to poor information. Constituents who attended public engagement sessions have also raised concerns about poor information and a lack of confidence in the process.
- The destructive environmental impact of these proposals across both constituencies, particularly the negative consequences for Burbage Common and the Fosse Villages.
- The tangible negative impact of the HNRFI on local infrastructure including roads and traffic flow.
- Detrimental impact on Narborough Level Crossing barrier down time and we reject the accuracy of the applicant's long-term modelling of this issue.
- The number of major developments damaging the identity and character of the Hinckley and Bosworth and South Leicestershire and local areas.
- The number of other nearby rail freight interchanges within a 45-mile radius of proposed HNRFI site.

## Accompanied Site Visits

Whilst this Written Submission seeks to capture the key points and concerns raised by the MPs, other political leaders and constituents, we are minded that the impact of the proposed HNRFI may need to be considered via an accompanying site visit with the MPs.

The relationship between this proposed major development and current infrastructure – such as the road network around Narborough Level Crossing and station, or Burbage Common and Woods – should be seen in real time, and as the MPs, we would like to request site visits on 16<sup>th</sup> November 2023. To arrange times please contact:

- [REDACTED]@parliament.uk
- [REDACTED]@parliament.uk

### The specific sites which Dr Evans MP invites the Planning Inspectorate to view are:

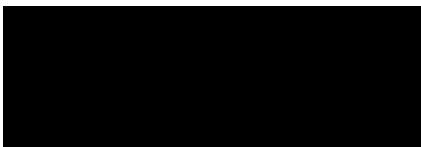
- The site on Leicester Road (B4668) where the link road is proposed to join, at rush hour
- The A5/M69 Junction at rush hour
- Burbage Common and woods

### The specific site Mr. Costa MP invites the Planning Inspectorate to view is:

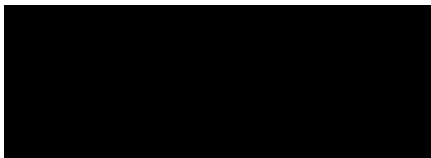
- Narborough Level Crossing (at times to be agreed during rush hour)
- Traffic pinch points of concern (during rush hour): Stoney Stanton (where Huncote Road and Occupation Road meet; where Long Street and New Road meet), Sapcote (where Hinckley Road and Leicester Road meet), and Sharnford (Leicester Road).

We kindly ask that the 16<sup>th</sup> November 2023 slot is given preference for the MPs to attend a site visit so as to avoid clashing with their parliamentary duties (typically Monday-Wednesday).

Yours sincerely,



Alberto Costa  
**Member of Parliament for South Leicestershire**



Dr Luke Evans  
**Member of Parliament for Bosworth**

## **Comments from Alberto Costa MP**

### **South Leicestershire Parliamentary Survey**

I conducted two surveys, funded by the UK Parliament about the HNRFI proposal. In the most recent one sent out in 2023, 5,938, surveys were sent by the Office of Alberto Costa MP to households on the electoral roll in the villages of Aston Flamville, Croft, Elmesthorpe, Huncote, Potters Marston, Sapcote, Sharnford, Stoney Stanton, Thurlaston and Wigston Parva, in response to concerns raised regarding the proposals for the HNRFI.

The purpose of the survey was to ask for constituents' views on the proposed development and to gauge support for a Parliamentary Petition – the questions asked respondents to identify their main concerns and to ask what potential mitigation might be acceptable for constituents living within the affected area.

The survey received a response rate of just over 27%, an extremely high number for a survey of its kind, with 1631 total responses received. Of the 1631 responses, 94.5% of those were explicitly not in favour of the proposals for HNRFI, with an additional 1.78% responding "don't know". Only 3.68% of respondents were in favour.

One of the key reasons for sending out this survey was to identify the principal areas of concern constituents hold about the proposals. 39% of respondents stated that their primary concern was the potential burden on local infrastructure, such as roads and other amenities. A further 32% of respondents said that the development's potential environmental impact was their main concern. Similarly, when asked about the proposals likelihood to detrimentally affect their village's identity, 92% of respondents believed this would be the case; an increase of 10% in response to the same question on the previous survey issued in 2019.

95% of respondents were in favour of me formally presenting a Parliamentary Petition opposing the HNRFI.

In summary, the survey indicates that the vast majority of residents of the Fosse Villages are opposed to the proposals in question, with almost 95% against the plans for the HNRFI. The developments potential impact on the identity of the Fosse Villages and the accompanying environmental impact of the proposals were identified as two key concerns of residents who responded to the survey.

### **Narborough Level Crossing**

I share the concerns of constituents that the level crossing which connects the villages of Narborough and Littlethorpe has not been given adequate consideration by the applicant. Firstly, the modelling conducted by the applicant regarding the down time of the barrier is insufficient. As a result of this, the lack of mitigations proposed by the applicant are a major cause of concern to the residents of both villages. The issue carries considerable implications; for the villages of Narborough and Littlethorpe, the level crossing is the only road directly connecting the two villages.

It is widely felt by residents that the two villages are so closely connected that they are like one large village, separated only by a level crossing. In 2019 Friends of Narborough Station and the Littlethorpe

Residents Group, conducted a visual survey<sup>1</sup> over 14 separate 1 hour periods. They found that the level crossing was closed to road traffic for an average 16.25 minutes per hour.

The down time cited by the applicant in the applicant's Environment Statement - Chapter 8 Transport and Traffic<sup>2</sup> during the peak times of 7-10am and 4-7pm is an additional 2.5 minutes. As far as I can see the applicant does not specify specific days or times of year. It is unclear how this could be possible given the length of time a typical barrier down time lasts for normal passenger trains, let alone lengthy freight trains. Even if this were somehow accurate, I would like to also know what assurances can be provided by Network Rail and the applicant that this timetabling will not change and peak times will be protected from additional freight paths, as it is understood that there have been numerous proposals to divert extra services through Narborough to make capacity elsewhere on the network.

The Applicant has failed to propose any mitigation to account for increased barrier down time at Narborough level crossing. Representatives of Narborough Parish Council explain that if this goes ahead without mitigations, it will cause significant problems in the local area, with one representative stating that "it will be the straw that breaks the camel's back". If the maximum timetable and barrier down times proposed by the applicant, which are by no means favourable, cannot be safeguarded indefinitely, adequate mitigations need to be proposed by the applicant before this development can be properly considered.

The applicant has also not provided proper assessments of the impact of additional barrier down time on air quality, noise, health, and the Narborough Conservation Area. I am grateful that the Examining Authority have requested further information from the applicant about the modelling for the level crossing closure times and the lengths of queue. Already, with the current amount of rail traffic on the line, vehicles often back up to the main roads through Narborough (Coventry Road, Desford Road, Leicester Road, Riverside Way, and Station Road).

It is imperative that the Planning Inspectorate understand the implications of the proposed development and as such I would like to request an accompanied site inspection on 16th November 2023 so that the Examining Authority is able to see first-hand the current situation faced by road-users using the level crossing at Narborough. Concerns were also raised in the Preliminary Meeting by Councillor Terry Richardson, Leader of Blaby District Council that the initial modelling undertaken by the applicant was conducted at a time of the year when the line is used below its normal levels. This concern was also noted by the lead Planning Inspector at the Preliminary Meeting on 12th September 2023. An accompanied site inspection will also demonstrate visibly the extent to which Narborough and Littlethorpe, as a community, rely on the connectivity this road provides between the two villages.

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<sup>1</sup> 'Will Narborough be Ready?', Friends of Narborough, April 2019  
<https://fonsnarborough.wordpress.com/2019/04/09/will-narborough-be-ready/>

<sup>2</sup> Environment Statement - Chapter 8 Transport and Traffic, Tritax Symmetry, November 2022  
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050007/TR050007-000723-6.1.8%20Hinckley%20NRFI%20ES%20Chapter%208%20Transport%20and%20Traffic.pdf>

## **Overburdening of local infrastructure in the surrounding villages**

Many of the villages closest to the proposed site are rural in nature and therefore there are widespread concerns that local, country roads will become too busy with traffic leading to gridlock in village centres. Whilst I appreciate that the site in question is designed to cater for freight train deliveries, as opposed to a reliance on HGVs, little consideration appears to have been given to the transport arrangements for the claimed 8,400 employees that the applicant has suggested will be employed on the site.

To add to this, the unemployment rate in South Leicestershire is well below the national average, at around 2% and it is at a similar level in neighbouring Bosworth and the immediate surrounding area. This suggests that the majority of the purported 8,400-person workforce at HNRFI will need to travel from outside South Leicestershire and Bosworth; thus, these commuters will need to travel relatively long distances through villages and country roads, adding pressure to an already congested infrastructure network. The applicant has not given enough consideration to this issue, in part because of the incorrect modelling completed on employee numbers.

I have particular concerns about Stoney Stanton and the roundabout connecting Long Street, New Road and the B581 which will inevitably serve HNRFI with high levels of congestion already an issue at peak times. Parents and carers for example, making the journey to Manorfield Primary School in the west of Stoney Stanton on the B581, already experience congestion at peak times.

Sharnford also experiences similar issues which are compounded as Sharnford is used as a thoroughfare if there are any issues on the M69. And it is a similar story if there are issues on the A5 which, given the known safety issues on the A5 as things stand, residents are all too aware of.

Add to this the potential for proposals that up to 10,000 new homes could be built in the next 10-15 years in the immediate vicinity adding even more likelihood for the infrastructure to become overburdened.

Further north, towards Fosse Park (one of the UK's largest out-of-city retail shopping sites), the M1-M69 junction 21 has also been highlighted by a number of stakeholders for its very high levels of congestion.

Many of the issues highlighted throughout this representation could have been mitigated by a relief road which would bypass the Fosse Villages. This was initially proposed by the applicant but has since been dropped. This, as envisioned in those early stages, would have helped with infrastructure issues.

What is of major concern is that the applicant has not completed accurate or timely transport modelling, which has delegitimised much of the public consultation phase and cost valuable time and money for stakeholders such as Blaby District Council. Crucially, key stakeholders are expected to make representations on proposals which are lacking in substance and accuracy. I trust that the Examining Authority will take this into account when producing its report to the Secretary of State for Transport.

## **Total number of major developments in area and identity of local villages**

Whilst the proposed location of HNRFI is in the so-called Golden Triangle, constituents in South Leicestershire frequently write to me to raise concern about the level of industrial development in the area. Magna Park for example, one of the largest logistics parks in Europe, is one such development

which is only 10 miles away from the proposed HNRFI site, and there are many more in the constituency too. I am generally supportive of appropriate developments in my constituency. South Leicestershire already takes more than its fair share of large-scale commercial developments and housing. However, in South Leicestershire the balance between homes and warehousing is at a tipping point that risks South Leicestershire no longer being a desirable place to work, live or raise a family.

The East Midlands is increasingly the location for new large-scale developments, including railway hubs and logistics parks. Therefore, it is unsurprising that in my survey, 92% of respondents felt the proposal would tip the balance and have a detrimental impact on the identity of their villages.

The site is already surrounded by rail freight interchanges within a very short radius of the proposed development. As I have said, South Leicestershire is home to large logistics warehouses like Magna Park (13.1 million sq. ft of floor space across 47 buildings), and in addition my constituency is already surrounded by additional rail freight interchanges: 4 Daventry International Rail Freight Terminals just 18 miles away from the HNRFI site, 4 national rail hubs within 45 miles and Northampton Gateway Rail Freight Interchange which is under construction just 31 miles away.

The map attached provides a visual representation (not to scale) of the major developments proposed, underway and completed in South Leicestershire and the surrounding area to illustrate the sheer magnitude of developments the Examining Authority should consider HNRFI in the context of.



## **Development listing**

### **Green – Approved**

- 1 – New Lubbesthorpe: 4000 homes being built with two primary schools, secondary school and retail centre.
- 2 – New Prison completed in spring 2023 called HMP Fosse Way on the former site of HMP Glen Parva. With an additional block approved on the same site.
- 3 – Bruntingthorpe: former military airbase with a 2-mile runway now a car storage auction facility. Now a major UK car storage auction facility.
- 4 – Magna Park, one of Europe's largest logistics parks, currently there is no national policy on siting logistics parks.
- 5 – Fosse Park Shopping Centre recently expanded to double its capacity of retail, food outlets in a £127 million expansion, which includes the new Next flagship store.
- 6 – Shawell Quarry
- 7 – Approved Lorry Park with facilities to improve the working conditions of lorry drivers.
- 8 – Logistics Park being built on the outskirts of Rugby, located next to the M6.
- 9 – Service station located at the junction of M6, which is the last service station before HGVs head towards A14 and M1.

### **Red – Proposed**

- 1 – Whetstone Garden Village with plans for 6000 homes, and development of Junction 20a on the M1.
- 2 – Associated logistics park, which will be located near junction 20a.
- 3 – Motorway service station relocated from junction 21 to junction 20a.
- 4 – Croft Quarry.
- 5 – Proposed development of 6000 homes, which would be located between the village of Stoney Stanton and the M69.
- 6 – Shawell Disposal Site.
- 7 – Hinckley Logistics Park, which is currently being expanded and home to a large DPD warehouse.

### **Yellow – Significant Concerns**

- 1 – Lutterworth East Sustainable Development Area. This includes proposals to build up to 3000 new homes, which would double the current size of Lutterworth Town.
- 2 – Proposed development of Hinckley National Rail Freight Interchange, with associated logistics park. The HNRFI if approved would be located within reasonable distances of similar developments.



## **Comments from Dr Luke Evans MP**

### **Lack of Information Provided to Local Councils – A Significant Concern**

Through contact with local councils which would be impacted by the site, I have been seriously concerned by the lack of consultation and missing information they require. This calls into question: how can the Planning Inspectorate recommend a decision given there are serious concerns that information required by statutory consultees is missing?

### **Preliminary Meeting**

I (Dr Luke Evans) am minded that issues associated with the Environmental Impact Assessment as well as Travel and Transport were raised at the Preliminary Meeting on 12 September 2023. I note that:

- Warwickshire County Council raised Traffic and Transport modelling as an Issue.
- Burbage Parish Council raised traffic impact figures as an issue.
- Blaby District Council reported that Highways information produced by the applicant was currently incomplete.

I also note comments from the Leader of Blaby District Council that at the present time, *'the impacts of the scheme have not been properly considered and the mitigation required is unknown.'*

This has created a problematic situation for all parties, and as local political leaders, Alberto Costa and I are encountering considerable constituent unease and concern about these major proposals.

### **1.b Ongoing Communication with Local Authorities**

Further dialogue has been initiated with local Councils since 12 September 2023 and issues regarding incomplete information continue to persist. On 29 September, there continued to be concerns about the lack of detail provided by the applicant, despite this application now being considered in front of the Planning Inspectorate. As the weeks progressed, I was advised of the following:

- Warwickshire County Council had yet to receive a draft SOCG for comment. (20.9.2023)
- Leicestershire County Council yet to receive a SOCG for transportation and highways (20.9.2023)
- Leicestershire County Council were concerned about information needing to be submitted for an informed decision to be made about the application including data about air quality and noise pollution. (20.9.2023)
- Rugby Borough Council was initially concerned about potential highway impacts within their Borough and understand that this will be considered at an Issue Specific Hearing on Traffic and Transport. (27.9.2023)
- Rugby Borough Council was awaiting the discussions with the applicant regarding the Statement of Common Ground as proposed earlier in September (27.9.2023)
- National Highways could not comment on the design drawings nor accept the Stage 1 Road Safety Audit briefs because the understanding and agreement of the strategic modelling outputs is outstanding (27.9.2023)
- National Highways raised concerns about the limited sustainable transport strategy for the development site not according to the requirements of National Policy Statement. (27.9.2023)

- National Highways made reference to ‘the applicant’s’ transport consultant halted pre-application discussions with statutory bodies in Summer 2022. It is not clear why this has occurred. Only limited meetings have since occurred. One statutory body has only received the detail sent to the Examining Authority (27.9.2023)
- I am advised that the Statement of Common Ground had not progressed and Warwickshire County Council is concerned that this will be done at the last minute. I am advised that the Applicant is required to lead on the process, and this current situation impacts on heavy Council workloads responding to other planning application and major schemes development. (28.9.2023.)
- Warwickshire County Council reported on a number of ongoing important discussions with several issues remaining under consideration such as passenger rail capacity and the HGV routing strategy. (28.9.2023)
- Warwickshire County Council reflected on how the Local Highway Authority (Warwickshire, Leicestershire and National Highways) made relevant representations as there was modelling information not included in the Transport Assessment originally submitted. I understand that the information was subsequently submitted and is currently being considered in view of their written representation (28.9.2023.)

While I appreciate that national infrastructure decision making involves complex and intensive discussions, I am concerned that local statutory authorities have been receiving information in a haphazard way. It has been particularly challenging for statutory bodies to make informed judgements when key information is missing and pre-application discussions with statutory bodies were halted in Summer 2022 for unclear reasons. I believe critical decisions about major proposals should be presented in a more holistic manner so decision making can be made with full and multi-faceted consideration of all factors.

## **Infrastructure.**

### **Burbage Common and Woods**

Burbage Common and Woods is much loved by residents from both mine and Alberto Costa’s constituencies as a place of greenery and solitude with diverse wildlife habitats across a mix of semi-natural woodland and unspoilt grassland. The Common is a welcome venue for leisure pursuits like dog walking, running, horse riding, orienteering and wider conservation activities.

Constituents regard the Common and Woods as a “safe, large quiet space,” a natural habitat enjoyed for many years including an important space for exercising during the Covid-19 pandemic. The Café and Visitor Centre are popular community venues as well as the Wild Play Sessions for children at Burbage Common helping future generations to understand the natural habitats in their communities.

The possible negative impact of the proposed NRFI site next to the beauty spot has caused acute alarm within the community and requires intense consideration by decision makers.

The proposed A47 link road would also have an additional impact upon Burbage Common and Woods, compromising the tranquilly and habitat vitality of the site.

Residents in South Leicestershire have expressed concerns regarding access issues to the Common, with the Stoney Stanton Action Group raising the possible closure of Smithy Lane leading to Burbage Woods.

A proposal for an alternative bridle way has been included in the plans, but the Action Group believe this alternative provision does not provide the access and car parking that visitors require.

Our local green spaces are much loved and provide pleasure for constituents of all ages. I am concerned that the NRFI would create an unacceptable and uncontrollable burden on Burbage Common, which needs to be fully considered in line with proper processes through the decision-making matrix.

### **Environmental Impact Assessment**

Issues associated with the environment are a key concern for Bosworth constituents, with a focus on the future ambiance and stability of Burbage Common and Woods. Nevertheless, I am minded that issues arising with the Environmental Assessment process were raised at the Preliminary Meeting on 12 September 2023, with reference to Advice Note Nice: Rochdale Envelope.

I understand that the ExA has stated concerns that the lowest of the three employment levels have been used to determine traffic levels. There were also several references within other chapters indicating that the traffic figures had been used to assess associated environmental effects. Noting that the applicant explained that traffic figures have been generated from two sources, the applicant accepted that there were discrepancies in the figures quoted in the Environmental Statement in terms of traffic impacts.

It was suggested that the Applicant would be seeking to '*rectify this as the examination progresses*'. I hope that is the case, because Environmental Issues as well as traffic matters are the key issues raised by constituents and cause the most fear and upset in our communities. I trust that the promised technical note to explain these figures will be produced as soon as possible with a coherent explanation that can be understood by all Interested Parties.

### **Traffic Flow**

#### **Local Gridlock and the A5**

I am concerned that the proposed NRFI will cause a serious and tangible increase in road traffic within the local area due to HGVs visiting the site as goods are transferred from rail to road. In my constituency, I am aware of considerable frustration about existing traffic flow jams and gridlock around towns such as Hinckley and Earl Shilton, especially during peak periods and moments of A5 closure due to HGVs hitting the Watling Street Railway Bridge, routinely one of the UK's most-bashed bridges.<sup>3</sup>

Discussion on the local travel network in the Bosworth and South Leicestershire constituencies cannot be made without consideration of current pressures facing the A5, which is a key artery to the south of both constituencies. The A5 has been superseded by the nearby motorway network as primary routes, however it remains a growing critical link supporting local economic development and growth. The A5 faces extreme traffic flow pressures especially during regular closures of the motorways due to accidents or maintenance.

I have taken a keen interest in the current and future state of the A5 since my election as MP for Bosworth. The Westminster Hall Debate I organised in March 2022 captures my concerns about the road in detail. I have worked closely with Midlands Connect to explore these issues further and their

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<sup>3</sup> See Impact of Watling Street Railway Bridge Incidents on Local Economy and Area. BBC News 14 July 2023: <https://www.bbc.co.uk/news/uk-england-leicestershire-66191087>

statistical overview remains a critical resource when considering the impact of large-scale infrastructure projects in the area. Please see following weblinks:

<https://www.midlandsconnect.uk/projects/roads/a5-corridor/>

<https://www.drlukeevans.org.uk/news/local/mps-continue-call-improvements-along-a5>

The local economic importance of the road is critical link towards and through the UK's Logistics Golden Triangle. The A5 corridor affects 1 million people and supports almost 500,000 jobs. It has a GVA of £22 billion; 10% of the Midlands Connect area which I believe to be a substantial amount. Nevertheless, there are severe resilience and reliability issues facing the road in its current form.

- There are 25,000 vehicles per day on the A5's busiest sections.
- 1/3 of those vehicles using the A5 are classified as HGVs.
- The Average speed for the corridor is 40mph but in some sections, at the peak, it can get down to 10mph including at the M69 J1 (a key junction for my constituents to access the wider motorway network.)
- At the time of the Watling Street bridge being classified as the most bashed bridge in Britain at the start of the 2020s, there was an incident happening every two weeks. There was on average a six-hour delay to clear it resulting in severe local congestion.

Midlands Connect have also stated:

*"There is up to a 20 mph difference between the fastest and slowest journey time, making it challenging for users to plan for their journeys...this does not meet Midlands Connect's reliability conditional output that journey times should not be more than 20% higher than the average journey time for all days."*

Many of these issues continue to be present today. In April 2023, Midlands Connect reported<sup>4</sup> that every day on the A5, that is situated near to the proposed RFI:

- The cost of journeys is £18,000 higher due to journey time delay causing resilience issues, road safety and environment issues.
- Average speeds at peak times drop below 20mph compounded by additional traffic when other routes are closed and contributing to exacerbating air quality concerns.
- The variety in the standard of road causes confusion and accidents, including varieties of road junctions, speed limits between 40 and 70mph, sections of both single and dual carriageway.
- There are accident clusters with rates higher than the national average. Between Atherstone and the Longshoot between 2011 and 2015, there were 15 collisions in which someone was killed or seriously injured. In another cluster between Dodwells Roundabout and Sketchely, a further six period were killed in the same period.
- Midlands Connect have classed the A5 corridor as a *slow and unreliable route* with only 3% to 12% (depending on the time-period and direction) of the corridor meeting Midlands Connect's aspirational target of 60mph. These statistics are stark, and I remain concerned, drawing on experience in the constituency, conversations with businesses as well as my long-suffering constituents that circumstances are not getting better. I question whether proposed NRFI traffic

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<sup>4</sup> Midlands Connect. A5 Hinckley to Tamworth, Enhanced Strategic Case, April 2023

subsequently using the A5 is going to do anything other than to make a challenging situation worse.

### **The Proposed A47 Link Road**

I am also concerned that the proposed link road would join Leicester Road (B4668) at the point of entry to a multi-use sports site home to Hinckley Rugby Club, Hinckley Town Tennis Club and Hinckley Leicester Road Football Club. I have been advised that the development of the road would involve:

- The compulsory purchase of land reducing parking areas and compromising access to the site of the sports grounds.
- A failure to note the joint ownership/use of land on the site.
- Serious access issues from the site of the proposed link road onto the A47
- The destruction of several established trees which mitigate against traffic noise and flooding.

All of these issues must be considered as part of a wider transport analysis of the area in the context of the proposed NRFI.

### **Local Employment**

In the applicant's consultation documents, I note that the target workforce, hoped to operate the site, are located at a significant distance from the proposed NRFI. The information submitted by Tritax Symmetry suggests that few of the individuals expected to work at the NRFI live in the immediate vicinity, with potential employees predicted to be living in Nuneaton, Bedworth, Leicester and Coventry. It is probable that these employees will travel to the site creating additional air pollution and congestion on local roads which are already heavily congested at peak times. *Fig 1. Employee Catchment Area Map*



According to the ONS (Office for National Statistics), the current count of those claiming unemployment benefits in the Bosworth constituency is 2.4% of the population aged 16-64. I know that essential sectors such as social care have severe recruitment and retention issues locally and I am concerned that the jobs created by the proposed NRFI would only place further pressure on already stretched services. Another important consideration considering the above, is the fact that, the population of my constituency aged 65+ is 22%, compared with the national average of 18.6%: <https://commonslibrary.parliament.uk/constituency-statistics-population-by-age/>

### **Hinckley NRFI versus nearby Rail freight Terminals?**

This Network Rail map highlights the acute concentration of Rail Freight Interchanges and Terminals in the Midlands: <https://www.networkrail.co.uk/wp-content/uploads/2022/02/Network-Rail-freight-map-intermodal-sector.pdf> If all the facilities listed on the map situated in the East and West Midlands became active, there would be more terminals in this area than in Greater London or near other major ports such

as Southampton. I am surprised that there are no terminals currently active or proposed for areas with connections to major ports of Milford Haven or Dover, for instance.

Currently in the East Midlands, I note the following Rail Freight Interchanges and Terminals:

- DIRFT I (Malcolm Group) (Active)
- DIRFT II (Sainsburys) (Active)
- III (Tesco) (Active)
- DIRFT III (Under Development)
- East Midlands intermodal Park (Proposed)
- Burton on Trent (Operational)
- Castle Donnington (EMDC) (Operational)
- East Midlands Gateway (Active)
- Hinckley (Proposed)
- Rail Central (Proposed)
- Northampton Gateway (Under Development)

If there is such a demand for a further NRFI in the East Midlands, I need to understand how a) the proposals for the Hinckley NRFI complement other similar facilities in the immediate area and b) why the existing rail infrastructure is not sufficient to meet demand. Ideally, I believe that new NRFIs should be built in areas away from the East Midlands to ensure equalised traffic flow and satisfy the Government's desire to encourage freight away from the roads onto rail across the whole of the UK.

In these circumstances, I question whether there is a need for further Rail Freight Terminals close to other sites that do not appear to complement other similar facilities in the area. I believe that new RFIs should be built in areas away from the East Midlands to ensure equalised traffic flow and satisfy the Government's desire to encourage freight away from the roads onto rail across the whole of the UK.

### **Dr Luke Evans MP's Survey and Constituent Correspondence**

As this proposal has the potential to impact the local area so significantly, I set out to understand the views and concerns of local constituents and stakeholders through face-to-face engagement as well as through wider surveying to ensure that the views were captured by as many constituents as possible.<sup>5</sup>

To this end, I sent out 12,500 physical surveys to constituents who live within the vicinity of the site of the proposed NRFI and ran the survey online for residents of Bosworth outside of this area. Qualitative and quantitative data obtained by my survey captures the real difficulties facing the applicant to achieve community support for their proposals. The applicant had made the local community aware of the proposals with (98% awareness), but the response was overwhelmingly negative:

- 96.2% respondents are against the proposals
- 96% of respondents believe that the proposals will have a detrimental impact

Development proposals are most successful when there is community buy-in for what is put forward. Planning proposals can be accepted by communities with there is clear demonstration that pressures will be avoided for existing infrastructure whilst offering a tangible benefit to the local community for the

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<sup>5</sup> In YEAR, 12,000 paper surveys were sent to local residents in Bosworth. A total of 1,090 responses were received

future. The responses to my survey show that such acceptance has not taken place. This situation is of no benefit to any party, and the absence of any workable relationship or mutual understanding between the developer and my community must be considered as part of the decision making process.

Constituents have fundamental concerns about the applicant's choice of site. The biggest concerns about the proposed NRFI were:

- The environmental impact (selected by 79.8% of respondents)
- Burden on local infrastructure (72.2%)
- The overbearing nature of the site (63%)

When considering the most frequently used words used in the survey, alongside the words of Common, Wildlife, Noise, development and pollution, the top words arising from survey response were:

- Traffic
- Area
- Burbage
- Local

I believe the above shows wide public concern about the immediate impact of the day-to-day operations of the proposed NRFI. Further correspondence external to my survey refers to “devastation” and the “obvious destruction” of the countryside.

Correspondents refer to:

- Pressures on local traffic networks across all levels including motorways and local A roads.
- Risks to wildlife habitats and ecological ecosystems including Burbage Woods and Common.
- Concerns about space loss for recreational activities like walking, dog-walking, jogging, running and horse riding.
- Air quality risks with increased diesel freight train operation to and from the NRFI.

In conclusion, I believe that it would be a mistake to determine these anxieties as a ‘predictable local emotional response’ to nearby large-scale development proposals. My constituents have sought to delve deep into the rubric of the application and robustly question the assumptions, but they have also faced frustrations when they seek to raise their legitimate concerns at consultation events.

### **The Consultation Process**

I believe that the public consultation process has been operationally ineffective, meaning local people have not had an effective opportunity to raise their views and concerns about the NRFI directly with Tritax Symmetry.

The Local Government Association says that it is the role of a consultation to give “local people a voice and an opportunity to influence important decisions”.<sup>6</sup>

When bringing forward proposals for the Hinckley NRFI, I believe the applicant needed to appreciate that the prospect of a major piece of national infrastructure built near to multiple neighbourhoods was likely

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<sup>6</sup> Local Government Association <https://www.local.gov.uk/our-support/communications-and-community-engagement/resident-communications/understanding-views-2>

to cause upset and unease. The consultation was an important moment for the applicant to speak to the local community and be prepared to embrace community feedback.

It is with regret that serious logistical issues as well as attitudinal behaviours by the representatives presenting those proposals, left me questioning whether the consultation for the NRFI met the standard for proper processes. The following issues were brought to my attention:

- The hiring of small-sized consultation venues causing over hour-long queues into events
- At the time of the January 2022 consultation in Burbage, concerns about the Covid-19 security of the venue.
- A lack of facilities such as extra seats for attendees who are infirm or have mobility issues which waiting in the queues.
- Access issues to view the exhibition panels and documents due to sheer numbers of attendees.
- Inadequate information provided by the applicant about issues including air pollution and traffic flow, including penalising drivers for taking short cuts away from prescribed routes.
- The supply of consultation forms ran out at the Burbage event.
- A passive aggressive approach by exhibitors created a nervousness to raise contrary opinions.

As a result of the above, the amount of constituent complaints raised with me directly and my own severe concerns with the process, I raised a formal complaint with Tritax Symmetry. Please find my letter appended to this document.

I was most concerned to receive this intelligence from my constituents hence my formal complaint to the applicant regarding the unacceptable treatment of residents. Public consultation is a vital part of the planning process, so to hear that residents were struggling to have the opportunity to have their say was troubling as well as their ability to access the correct information to do so. With my active MP representational role, I had no option but to make a formal complaint, on behalf of my constituents.

## **Appendix**

### **Comments from Constituents of Dr Luke Evans MP**

- **The need for another NRFI near to other sites in the Midlands.**

*“Just down the road along the A5 is the D R I F T rail freight terminal that at the time was set up to service the Magna Park distribution facility, it was said that if it expanded it could still handle all of the freight, that future expansions would require*

*This terminal also takes trains that come from under the channel tunnel at Dover. My question why is it that two very large freight terminals are required in such close proximity to each other with all of the disruption the new freight and distribution park will cause*

*This is a huge development to deal with freight in an area of the midlands that is already saturated with freight facilities. The existing facilities should suffice.”*

- **Burbage Common and Woods**

*“There has been a dramatic increase in the amount of development, including housing estates, recently. It was noted during the pandemic just how important outdoors spaces were, as someone who found solace*



*going to burbage common with my dog in one of the only large free outside spaces where I can enjoy an off lead walk with him without loud noises & the worry of traffic. I'm extremely disappointed to learn that more than half of the space is going to be destroyed, there is currently a petition on change.org where over 4,000 people have signed to reject the proposals.*

*Burbage common is a safe space important for members of the public's mental health as that was only source of communication for the day for many of us, it remains the highlight of my day greeting dogs walkers, runners and generally people who just come to enjoy a peaceful walk in the country side.*

*We have lived in this area and grew up in Earl Shilton, like you, we have taken many of our dogs to enjoy the beautiful surroundings of Burbage Common. In 1972 when we married my wife bought me a Weimaraner dog and we would exercise him in the evenings by walking down to the common and back along the bridleway to the Wentworth Pub and then back home. Both those passions have never waned, well apart from the pub. We have been successful breeders of Weimaraners for nearly 50 years. This year is our 50th wedding anniversary and it is tinged with sadness at the prospect of losing the joy that we have experienced and that many others could have shared in the future.*

*Let this thing take place and not only is our environment damaged but the much prized Burbage Common and woods will suffer. Are we not entitled to areas of peace and quiet. The environment will suffer, areas that go back almost to Magna Charter will suffer and who knows under the expansions of the future be ruined and maybe swallowed up."*

- **Traffic Flow**

*"The A47 is already getting increased HGV traffic from the major AMAZON and DPD hubs on the A5 and two new very large housing developments. The proposed LINK ROAD to the A47 would bring even more HGV traffic to the A47 and surrounding area. Many serious accidents at the A47/Ashby road junction are already an issue that has been getting worse in the last few years. The A47 will become a lorry park if this Interchange goes ahead. Like operation stack on the M20."*

- **The Consultation Process**

*(When asking about Compulsory Purchase Orders) "At this point, the gentleman snapped aggressively at me and said that no CPOs had been enforced and the phrase "don't leave here with that sort of comment. You come and look at these boards here to see what is happening."*

*"I went in to ask questions to see what they had to say (in a professional, non-aggressive manner) and it was demanded that I stand in front of a board while he started to lecture me. At this point, I replied that I was not there to be spoken to in such a manner and left that part of the room."*

*(Regarding the lack of cranes pictured in the exhibition photographs) "Pictures on display of the proposed site now and in 15 yrs time did not include cranes etc which would be necessary to unload the cargo onto and from the trains and would be a blot upon the landscape. I believe this is very misleading and I only found out due to attending an online webinar where this was pointed out. I assumed the 15yr photos included everything, as would everyone else who attended."*

*(Regarding queues and the lack of consultation forms) "Secondly I waited my turn (over an hour) to look and discuss the proposals to then want to fill out a feedback form for me to be told they had ran out! I was told to either go online or attend another venue! I explained not everyone has access to transport*

*or IT skills/internet access ( how about the vulnerable , people with disabilities or the elderly? ) The discrimination of our local residents is disgraceful. I spoke to 2 gents with regards this and to be honest they were extremely dismissive and could only comment well its not our fault we had 450 forms earlier "someone must have took them.""*