

HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE

Local Impact Report

Leicestershire County Council

October 2023

Planning Inspectorate Reference: TR050007

County Hall, Leicester Rd, Glenfield, Leicester LE3 8RA
<https://www.leicestershire.gov.uk/>

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1.0 Introduction

- 1.1 This Local Impact Report (LIR) has been prepared by Leicestershire County Council (LCC) in accordance with the requirements of the Planning Act 2008 (the Act) as amended by the Localism Act 2011. The LIR also takes into account the advice set out in the Planning Inspectorate (PINS) Advice Note One: Local Impact Reports (Version 2: April 2012).
- 1.2 The LIR is part of the Council's response to an application submitted by Tritax Symmetry (Hinckley) Limited for a Development Consent Order (DCO) authorising, in summary, the construction of a rail freight interchange and up to 850,000m² of warehousing to the west of the M69, known as 'Hinckley National Rail Freight Interchange' (HNRFI).
- 1.3 The scheme involves the development of new rail infrastructure and would provide an area for trains to be unloaded, marshalled and loaded. Works include development of an intermodal freight terminal or 'Railport' capable of accommodating up to 16 trains up to 775m in length per day, with hard-surfaced areas for container storage and HGV parking and cranes for the loading and unloading of shipping containers from trains and lorries.
- 1.4 The scheme will also include highways works to the M69 Junction 2 comprising the reconfiguration of the existing roundabout and its approach and exit lanes, the addition of a southbound slip road for traffic joining the M69 motorway and the addition of a northbound slip road for traffic leaving the M69 motorway at Junction 2. A new road ('the A47 Link Road') from the modified M69 Junction 2 to the B4668 / A47 Leicester Road will be built with a new bridge over the railway, providing vehicular access to the proposed HNRFI from the strategic highway network.
- 1.5 HNRFI is considered a Nationally Significant Infrastructure Project (NSIP) as the proposal compromises a rail freight interchange as described in Section 26 of the Planning Act 2008. The HNRFI lies 3km to the north-east of Hinckley, Leicestershire

and is situated upon the Leicester to Hinckley Railway line. The land within the DCO covers an area of approximately 268 hectares (ha), with the main HNRFI site covering an area of approximately 186 ha.

- 1.6 As the development proposals compromise an NSIP, the application for a DCO has been submitted to PINS (acting for the Secretary of State for Transport). The application was made by Tritax Symmetry (Hinckley) Limited on 17 March 2023 and accepted for examination by the Secretary of State (SoS) on 13 April 2023.

2.0 Terms of Reference

- 2.1 Section 60(3) of the Planning Act defines a LIR as a “report in writing giving details of the likely impact of the proposed development on the authority’s area (or any part of that area)”. In coming to a decision, the SoS must have regard to any LIRs that are submitted (section 104(2)(b) of the Planning Act).
- 2.2 The PINS Advice Note One (Local Impact Reports – Version 2, April 2012) provides guidance on the content of a LIR and confirms that the content of the LIR is a matter for the local authority concerned as long as it falls within the statutory definition referred to in paragraph 1.4 above. The PINS Advice Note provides suggested topic headings (site descriptions etc.) and this LIR broadly follows the suggested structure.
- 2.3 This LIR sets out the Council’s existing knowledge and evidence on local issues in order to present a robust assessment to the Examining Authority. As suggested by the PINS Advice Note, this LIR includes an evaluated statement of positive, negative and neutral local impacts within a structured document. This LIR also includes the Council’s views on the relative importance of different social, environmental and economic issues and the impact of the scheme on them. Finally, this LIR includes the Council’s views on the DCO articles, requirements and obligations.

2.4 For the purpose of this LIR the following environmental, economic and social topics will be considered:

- Highways and Transport
- Public Health
- Net Zero / Sustainability
- Flood Risk
- Economy

3.0 Site Description and Constraints

Introduction

- 3.1 HNRFI is situated on land to the east of the Hinckley to Leicester railway line, and west of the M69 with access from M69 Junction 2. The development of the Main HNRFI Site lies within the East Midlands Region and the administrative boundaries of Leicestershire County Council, Blaby District Council, the Borough of Hinckley and Bosworth and the Civil Parishes of Hinckley, Burbage, Elmesthorpe, Barwell, Stoney Stanton, Sapcote and Aston Flamville.
- 3.2 The site is adjacent to the Felixstowe to Nuneaton Freight Line (also known as the Hinckley to Leicester Line) and is located approximately 2km east of Hinckley Town centre, immediately north west of Junction 2 of the M69. The Order land for the Proposed Development comprises approximately 268 hectares of land.

Site Description

- 3.3 The main HNRFI site lies within an established railway infrastructure to the south east of the Felixstowe to Nuneaton Freight line, which forms part of Network Rails strategic freight network. The Main Order Limits also include land to its north western side. The land either side of the railway is presently connected by three level crossings serving footpaths and an overbridge on the Burbage Common Road within the scope of the Order Limits.
- 3.4 The DCO site lies in National Character Area (NCA) 94 'Leicestershire Vales', which comprises an open landscape of gentle clay ridges and valleys used for a mixture of pasture and arable agriculture, bisected by small watercourses.
- 3.5 Within the Blaby District Character Assessment (2008) the Main HNRFI Site lies in two Landscape Character Types (LCT). The northern area of the HNRFI Site falls within LCT A 'Floodplain' and the southern area is within LCT G 'Wooded Farmland'. In terms of Landscape Character Areas (LCA), the Main Site falls similarly within two

zones. The northern parts of the HNRFI Site lie in LCA E: ‘Elmesthorpe Floodplain’ and the southern portions are located in LCA A: ‘Aston Flamville Wooded Farmland’.

- 3.6 Although to casual inspection the Main HNRFI Site appears broadly level, it slopes gently downhill from a high point of 110m Above Ordnance Datum (AOD – i.e. above sea level) adjacent to M69 Junction 2 to a low point of 83m AOD beside the railway at the northern end of the Main Site. South-west of M69 Junction 2 the M69 motorway falls gently to a height of c. 96m AOD at the southern extremity of the DCO Site. To the west of the railway the A47 Link Road corridor falls from 99m to c. 93m before rising gently to 96m where it joins the A47 Leicester Road.
- 3.7 The existing highway infrastructure consists of the M69 Junction 2, which is located to the south east of the HNRFI site and is connected to the M69 via a northbound entry slip lane and southbound exit slip lane and to the east and west with connections to the B4669 Hinckley Road. Burbage Common Road crosses the Main HNRFI site, and is a rural lane that connects the B4668 at Burbage Common with the B581 Station Road in Elmesthorpe as well as providing access to Woodhouse Farm and Langton Farm. Access to other residential properties in the Main HNRFI Site, including Freeholt Lodge and Hobbs Hayes to the north of M69 Junction 2, is from a track that extends from Smithy Lane, which branches from the B4669 Hinckley Road.
- 3.8 The majority of the Proposed Development is located in the Thurlaston Brook catchment. An unnamed tributary of the Thurlaston Brook flows eastwards across the route of the proposed A47 Link Road and immediately beyond the railway line to the north of the Main HNRFI Site. This watercourse has its own two tributaries which flow through Burbage Common and cross the route of the A47 Link Road.
- 3.9 Most of the Main HNRFI Site and the land inside the Main Order Limits to the west comprise a regular pattern of fields used for arable farming and grazing. The fields are defined by hedgerows and interspersed with deciduous trees. Interspersed amongst the fields are a small number of agricultural dwellings and outbuildings with

a cluster of buildings at Woodhouse Farm in the centre of the Main HNRFI Site.

- 3.10 Businesses in and immediately adjacent to the Main HNRFI Site include a farm shop at Woodhouse Farm, close to the centre of the Main HNRFI Site, and the Wentworth Livery Stables on Burbage Common Road to the south of Elmesthorpe.
- 3.11 Pole mounted, overhead electricity lines cross the Main HNRFI site in various locations, serving the existing dwellings and farms. Similarly, overhead, pole mounted telegraph lines also cross the site and follow the alignment of Burbage Common Road. To the south east of M69 Junction 2 and within the DCO site, there is a large electricity pylon, from which the overhead lines head in a south west - north east direction and outside of the DCO site.

Areas adjoining the Order Limits

- 3.12 Areas immediately outside of the Main Order Limits are generally similar in character, comprising level or gently undulating farmland interspersed with farmsteads, smallholdings and freestanding dwellings.
- 3.13 The closest settlements to the Main HNRFI Site are the village of Elmesthorpe along the B581 Station Road to the north and a mobile home park and a separate gypsy and traveller settlement off Smithy Lane to the south-west of M69 Junction 2.
- 3.14 In the wider area and generally at a range of 2-3km from the Main HNRFI Site are the settlements of Stoney Stanton and Sapcote to the east, Earl Shilton and Barwell to the north and north-west, Hinckley and Burbage to the west and south-west and the village of Aston Flamville to the south.
- 3.15 Burbage Common and Burbage Wood to the south-west of the Main HNRFI Site are a popular recreational resource managed by Hinckley and Bosworth Borough Council, providing woodland and open meadows for informal recreation, with car parks and a visitor centre.

Site Constraints

3.16 Constraints of the site include:

- With no specific entrance, a new vehicular, pedestrian and cycle access strategy needs to be formulated.
- The physical constraints of the existing developments, the M69 and the railway all limit any development potential to the north, east and west.
- Burbage Common and Woods are being treated as the natural limit of development to the south.
- The woodland benefits from a historic woodland protection zone that limits development of any form, including new landscaping.
- The proximity of closest residential premises to the north and south, and the west albeit some of these properties are naturally screened already or are on the far side of the existing railway lines will require careful consideration and appropriate mitigation measures.
- There are a number of views from the surrounding area, all of them need to be sensitively addressed, particularly from the land off to the north and east, and careful consideration with respect to scale and general building design but particularly the roof scape as this is the most influential element when seen from distance.
- There are a number of existing services that either cross the site or run alongside its boundaries and need to be maintained to service other developments and the wider area.
- There is a small area in the north west that is identified as being in a Flood Zone 3.

- There are a number of Public Rights of Way and Bridleways that cross the site and these need to be considered within the development proposals to maintain the connectivity that the area currently benefits from.
- There are a number of existing watercourse and ponds within the development site and any loss or realignment needs to be sensitively addressed.
- The existing hedgerows and trees across the site, as well as the existing farm buildings across the site have the ability to have environmental and ecological benefits and appropriate mitigation measures and features need to be designed into the scheme to appropriately offset any impact.
- The Burbage Wood and Aston Firs Site of Special Scientific Interest (SSSI) lies close to the south western boundary of the Main HNRFI Site and outside the DCO Site. This SSSI is designated for its mixed ash, oak and maple woodland. The SSSI adjoins the Burbage Common and Woods Local Nature Reserve.
- A number of non-designated heritage assets of local importance have been identified within the Main HNRFI Site. These assets comprise three farm buildings and the Burbage Common Road railway bridge, as well as discrete areas of ridge and furrow earthworks and the buried remains of discrete late prehistoric/Romano-British settlement activity.

4.0 Description of the Proposal

- 4.1 The Hinckley National Rail Freight Interchange scheme has evolved from initial identification through scheme development and public consultation to submitted application.
- 4.2 The Applicant considers that an SRFI on the Felixstowe to Nuneaton, strategic rail route ideally within the South West Leicestershire Growth Area (GA5), with good access to the M69 and M1 motorways and the A5 corridor, would provide optimal multi-modal connectivity and a nodal point for the expressed need for future growth.
- 4.3 The HNRFI site was considered to offer an optimum balance of advantages as it provided ample area of open land; had sufficient at grade rail frontage for rail connections to the main line, and the ability to accommodate up to 775m in length; the potential for direct road access to the strategic highway network from M69 Junction 2, with scope to add southbound slips to the Junction; a comparatively low level of environmental constraint, with no designated features of landscape, ecological or cultural heritage interest inside the site; and is a location within the LLEP's designated South-West Leicestershire Growth Area.
- 4.4 The works involve creation of a strategic rail freight interchange, that connects to the Felixstowe to Nuneaton Freight Line, the M69 at Junction 2 and the A47 via a new link road.
- 4.5 The Principal Development is capable of supporting up to 16 trains per day and a rail-served development of up to 850,000 square metres (gross internal area or GIA) of warehousing and ancillary buildings with a total footprint of up to 650,000 square metres and up to 200,000 square metres of mezzanine floorspace, generating substantial economic and sustainability benefits, which are achieved through the transfer of freight from road to rail.
- 4.6 The scheme also includes proposed highway works to M69 Junction 2 comprising

the installation of south facing slip roads (so as to form Junction 2 into an ‘all-ways’ junction on the M69) lie within Blaby District. M69 Junction 2 will be further altered to provide access into the Main HNRFI Site from the roundabout as well as to provide a link to the A47 (A47 Link). The A47 Link lies partly within Blaby District and partly within the administrative area of Hinckley and Bosworth.

4.7 In summary the application seeks consent for the following works:

- New rail infrastructure off the Leicester to Hinckley railway;
- An intermodal freight terminal (rail port) capable of accommodating up to 16 trains per day;
- Up to 850,000 square metres of buildings for logistics use (comprising 650,000 square metres at ground floor level and a further 200,000 square metres of mezzanine floor space)
- Lorry Park with welfare facilities and HGV fuelling facilities;
- An energy centre;
- Highway works including:
 - Provision of south facing slips onto Junction 2 of the M69;
 - A new highway link between Junction 2 and B4668 / A47 Leicester;
 - Improvements to existing highway junctions in the vicinity of the site.

5.0 Planning Policy

Relevant Planning History

- 5.1 An EIA scoping application (18/03/EIASCO) was submitted for the creation of a Rail Freight Interchange with a rail port of up to 850,000 square metres of high bay storage and logistics buildings, dedicated road access from Junction 2 of the M69, the creation of a northbound off slip and a southbound on slip to the junction and associated infrastructure.
- 5.2 The Main Site is a potential draft allocation considered in the Blaby New Local Plan Options Consultation as an Employment Site (Site reference ELM001).

National Planning Policy

- 5.3 HNRFI is a Nationally Significant Infrastructure Project (NSIP) as a Rail Freight Interchange within the meaning of Section 26 of The Planning Act 2008.
- 5.4 The National Policy Statement for National Networks 2014 (NPS) sets out the national need for, and Government's policies to deliver the development of NSIPs on the national road and rail networks in England. The NPS provides planning guidance for promoters of NSIPs and provides the primary basis for the examination of the merits of proposals by the Examining Authority and for subsequent decision-taking by the Secretary of State for Transport. Paragraph 1.2 of the NPS states:

'The Secretary of State will use this NPS as the primary basis for making decisions on development applications for national networks nationally significant infrastructure projects in England'

- 5.5 National planning policy is also provided in the National Planning Policy Framework (NPPF). The most up to date statement of national policy in the NPPF is dated July 2021. The overall strategic aims of the NPPF and the NPS are consistent as statements of national planning policy but serve different roles. The NPPF provides

policy guidance upon which local authorities can prepare development plans to bring forward developments and comprises a material planning consideration in decision-making on individual planning applications under the 1990 Act. The NPPF makes clear that it does not contain specific policies for NSIPs where quite particular considerations can apply (NPPF, paragraph 5).

- 5.6 In addition, the NPS provides guidance and imposes requirements on matters such as good scheme design and the treatment of environmental impacts. These considerations are addressed within this Planning Statement, drawing upon the assessments set out in the accompanying Environmental Statement (document reference 6.1).
- 5.7 The Government has concluded ‘that at a strategic level there is a compelling need for development of the national networks and as an integrated system’ (NPS, paragraph 2.10) (emphasis added). The Government in referencing a ‘critical need to improve the national networks’, acknowledges ‘that improvements may also be required to address the impact of the national networks on quality of life and environmental factors’ (NPS, paragraph 2.2).
- 5.8 The Government’s vision for transport is set out in the NPS (paragraph 2.53) stating:

‘The Government’s vision for transport is for a low carbon sustainable transport system that is an engine for economic growth, but is also safer and improves the quality of life in our communities. The Government therefore believes it is important to facilitate the development of the intermodal rail freight industry. The transfer of freight from road to rail has an important part to play in a low carbon economy and in helping to address climate change.’

6.0 Relevant Development Plan Policies

Context

6.1 Section 104(2) of the Planning Act 2008 states that in deciding an application the Secretary of State must have regard to, inter alia, any local impact reports. The PINS Advice Note for the preparation of LIRs refers to the inclusion of relevant development plan policies, supplementary planning guidance, development briefs or approved masterplans. The LIR should also include the local authority's appraisal of the proposed development's compliance with local policy guidance.

Development Plan

6.2 The relevant Development Plan documents of the host authorities (Blaby District Council, Hinckley and Bosworth Borough Council and Leicestershire County Council) are as follows:

- Leicestershire Minerals and Waste Local Plan Up to 2031 (September 2019)
- District/Borough Wide Local Plans:
 - Blaby District Local Plan Core Strategy 2006 to 2029 (February 2013)
 - Blaby District Local Plan (Delivery) Development Plan Document (February 2019)
 - Hinckley and Bosworth Borough Core Strategy Development Plan Document 2006 to 2026 (December 2009)
 - Hinckley and Bosworth Borough Site Allocations and Development Management Policies Development Plan Document (July 2016)
- Neighbourhood Plans:
 - Fosse Villages Neighbourhood Plan 2018 to 2029 (made June 2021)

- 6.3 Consideration of the policies of the district Local Plans and the Fosse Villages Neighbourhood Plan can be found in the Local Impact Reports prepared by Blaby District Council and Hinckley and Bosworth Borough Council.

Leicestershire Minerals and Waste Local Plan (2019)

- 6.4 The County of Leicestershire is a principal source nationally of economically important minerals to meet infrastructure and commercial development needs. Igneous rock extraction (primarily granite) accounts for approximately 73% of the mineral extracted within the County. The Leicestershire Minerals and Waste Local Plan (September 2019) has a plan period to 2031 and seeks to provide sufficient minerals and waste facilities within Leicestershire to meet identified needs. It forms part of the statutory Development Plan for the County.
- 6.5 The Local Plan sets out the policies and proposals to guide the future winning and working of minerals and the form of waste management development over the period to 2031 and includes development management policies which set out criteria against which planning applications for minerals and waste development will be considered. It also contains a spatial vision and strategic objectives for sustainable minerals and waste development in Leicestershire which are delivered through these policies. Policies are divided into strategic policies by type of mineral or waste site and development management policies for specific issues.
- 6.6 The use of recycled and secondary aggregates in construction and infrastructure is encouraged, recognising this lessens the need for quarrying and the efficient use of a finite resource. Provision is made for:
- i. Sand and gravel: the extraction of 19.04 million tonnes (2015 to 2031), maintaining a landbank of at least 7 years with priority given to proposals for extraction as extensions to existing site operations (Policies M1, M2 and M3);

- ii. Crushed rock: the extraction of 231 million tonnes (2015 to 2031), maintaining a landbank of at least 10 years with priority given to proposals for extraction to be worked as extensions to existing rail-linked site operations, allowing proposals for new extraction sites where it has been demonstrated that the landbank and production capacity cannot be maintained from existing permitted sites (Policy M4).
- 6.7 Provision is also made for a steady and adequate supply of brickclay, fireclay and gypsum, with building and roofing stone being extracted where it can be demonstrated it would be primarily used in the conservation and repair of historic buildings. With policies also included to assess proposals for the extraction of coal and for the exploration of conventional and unconventional hydrocarbons (oil and gas).
- 6.8 To protect mineral resources of local and national importance Policy M11 sets out the safeguarding of mineral resources and Mineral Safeguarding Areas (MSA) are identified and are contained in Mineral and Waste Safeguarding documents produced for each Leicestershire district in 2015. Policy M12 on the safeguarding of existing mineral sites and associated minerals infrastructure seeks to ensure that significant infrastructure that supports the supply of minerals in the County will be safeguarded against development that would adversely affect operations at an existing mineral site and the use of associated mineral infrastructure by **creating incompatible land uses nearby**.
- 6.9 Policy M14 sets out criteria to be met for planning permission to be granted for borrow pits to supply materials for major construction projects.
- 6.10 With regards to waste the Local Plan seeks to deliver sufficient new waste management capacity equal to the waste arisings in Leicestershire to support the delivery of the Leicestershire Municipal Waste Management Strategy (LMWMS) targets and to allow waste management in the County to move greater amounts of

waste away from disposal and up the waste hierarchy.

- 6.11 A suite of policies is included to meet this objective, which includes policies for strategic and non-strategic waste facilities, the biological treatment of waste, facilities for energy and value recovery from waste and safeguarding waste management facilities.
- 6.12 A review of the Local Plan was carried out during 2022 in the light of the Environment Act (November 2021), the Levelling Up and Regeneration Bill (LURB) and various local factors such as the delivery of the Newhurst Energy from Waste facility and low sand and gravel reserves. The review concluded that the Leicestershire Minerals and Waste Local Plan is performing well, including at appeal, and its implementation is delivering sustainable minerals and waste development.
- 6.13 Reference is made in the Environmental Statement (APP-126, Doc 6.1.17, paragraph 17.41) to Leicestershire County Council having “recently produced the Leicestershire Minerals and Waste Local Plan Up to 2031 (adopted in 2019) which is referred to and used for assessing the operational cumulative effects in this chapter” regarding materials and waste. A draft Materials and Waste SoCG has been produced and Leicestershire County Council have made comments upon this. These have been agreed with the applicant’s representatives and include recognition of the Waste Management Plan for England 2021 and a correction of the definition of the ‘Proximity Principle’, as well as clarification of the use of Local Aggregate Assessments to inform the statements on aggregates supplies from nearby quarries.
- 6.14 No reference is made in the Planning Statement (APP- 347, Doc 7.1, Rev 3) to the Leicestershire Minerals and Waste Local Plan being part of the statutory Development Plan.
- 6.15 The HNRFI is not within a Minerals Safeguarding Area though it is relatively close to an existing rail served quarry, Croft Quarry.

- 6.16 Where a quarry is rail served and the scope therefore exists to move worked minerals away from a quarry via rail and bring restoration material into the quarry via rail this facility needs to be well utilised and protected. Strategic Objective 3 of the Leicestershire Minerals and Waste Local Plan seeks ‘the most sustainable locations so movement other than by road is maximised’. This reduces the number of heavy vehicular movements into and out of quarries, the number and frequency of heavy vehicles travelling on the local road network through or nearby local communities, reduces the impact of noise disturbance on local communities, helps to improve air quality and helps contribute towards social and environmental benefits as a key operational element of the quarry is being undertaken using a sustainable mode of transport.
- 6.17 Croft Quarry is one of several quarries in Leicestershire which is rail served, it is located close to the village of Croft to the north-east of Stoney Stanton. In early 2022, planning permission was granted for a lateral extension to the mineral workings at Croft Quarry, which will release an additional 6.3m tonnes of aggregate over 17 years. Restoration will require infilling with around 14 million m³ of inert material. Over 90% of the restoration materials for this would be imported from the southeast by rail.
- 6.18 It is important to protect the rail served nature and frequency of trains required for the operational use of Croft Quarry. Although it is understood the quarry is not currently extracting, the ability to transfer material via rail is essential to the operation of the quarry. Aggregate Industries UK (Limited) has confirmed the site is currently in a transition period between their previous planning permission and their new planning permission, and they are liaising with Network Rail with regards to upgrading the rail sidings which they hope will come online in 2025.
- 6.19 This is considered to be most effectively secured through a requirement to ensure that the four trains per 24-hour period (as included in the Environmental Statement associated with the most recent planning permission for Croft Quarry) would not be reduced by the operation of the HNRFI, and through seeking assurance from Network

Rail that the relevant license required for the operation and restoration of Croft Quarry would not be prejudiced by the operation of the HNRFI.

7.0 Consideration of Local Impacts

- 7.1 The submitted ES and supporting documentation sets out a wide-ranging assessment of the development proposal, its impacts and proposed mitigation measures. Leicestershire County Council accepts that the chapters of the ES address the range of issues that are of local concern to the authority. The following section sets out the Council's view of the local impacts of the development.
- 7.2 Consideration of mitigation measures which could address the negative impacts identified in the relevant sections are also addressed.

A. Highways and Transport

Access Infrastructure

- 7.3 From the scale of the drawings submitted it appears that the link road includes for a 3m footway/cycleway which does not appear to be continuous and would require pedestrians and cyclists to continually cross the road, not always with designated crossing provision. APP-011 does appear to include for a pegasus crossing and a toucan crossing. However, it remains unclear how these facilities link with footway/cycleway provision. The drawing does not include for connections to existing provision on the B4668 Leicester Road, creating gaps in pedestrian and cycle provision for employees drawn from the villages of Barwell, Earl Shilton and Elmesthorpe.
- 7.4 The proposed design as shown on *APP-011* does not appear to include any improvements to walking and cycling provision or any safe controlled crossing points across the existing and proposed slip roads to encourage employees from the eastern villages of Stoney Stanton and Sapcote to walk or cycle to the site. In addition, no walking and cycling improvements are included to the west to encourage employees from Hinckley and Burbage to walk or cycle to the site.

Personal Injury Collision (PIC) data

- 7.5 Paragraphs 4.76 – 4.136 of the submitted Transport Assessment (APP-138) include for an analysis of PIC data to identify existing patterns and trends of accidents on the LRN and SRN with the intention of demonstrating that the development proposals will not exacerbate these. This appraisal appears incomplete and does not appear to inform the access and mitigation strategy, especially for vulnerable users.

Strategic modelling

- 7.6 The submitted Land Use and Socio-Economic Effects document (APP-116) states at paragraph 7.223 that “it is estimated that the proposal would generate 8,400-10,400

gross on-site jobs. Once leakage, displacement, and multiplier effects have been considered, the proposed development is expected to generate some 10,400-12,900 on and off-site jobs”.

- 7.7 As discussed by the Examining Authority at the Preliminary Meeting, the above discrepancies bring in to question the validity of the submitted transport evidence and consequent environmental assessment parameters under the Rochdale Envelope.
- 7.8 In addition to the above, at no point during our discussions with BWB were the TWG made aware that the development proposals were to include a lorry park to the west of the proposed A47 link road. Indeed, the lorry park and its associated traffic movements did not form part of the strategic or local modelling exercise as can be seen from the agreed Forecast Modelling Brief (APP-145). LCC LHA therefore also questions the comparability of the 5 sites on this basis, none of which appear to include for assessment of a lorry park.
- 7.9 In October 2021, LCC LHA formally signed off version 8 of the uncertainty log (APP-148). The uncertainty log details the planning and network assumptions to be included in the modelling exercise i.e., committed development and associated infrastructure. However, in March 2023 it was resolved to grant planning permission to a significant employment development. This development, known as Padge Hall Farm (21/01191/HYB) takes access directly from the A5 at Hinckley and has not been considered as committed.
- 7.10 This is fundamental for a number of reasons.
- 7.11 Firstly, the mitigation strategy for Padge Hall Farm, includes for the lowering of the A5 under the Nutts Lane railway bridge. Once delivered, this will allow high sided HGV traffic to use this section of the A5. During the Padge Hall Farm application process it was identified that this could increase HGV traffic on this stretch of the A5 by as much as 20%. This additional HGV traffic has not been accounted for in the modelling exercise.

- 7.12 Secondly, the Padge Hall Farm development includes for mitigation at the A5 Longshoot/Dodwells junction (part of the LCC, NH and WCC network). This has not been accounted for in either the strategic or local modelling. Appended to this report is the modelling protocol produced by National Highways and agreed with Leicestershire County Council and Warwickshire County Council, as the respective Local Highway Authorities, to assess the impact of development on the operation of the A5 The Longshoot and Dodwells Junctions.
- 7.13 Thirdly, the Padge Hall Farm development is assessed to have an impact at M69 J1 (in addition to attracting high sided HGVs to the A5) that has also not been accounted for in either the strategic or local modelling.
- 7.14 Furthermore, whilst the application is accompanied by an HGV Route Management and Strategy document (APP-362), this Strategy was developed after the trip distribution (APP-142) and Forecast Modelling brief (APP-145) were agreed. Hence, the modelling does not take account of the Strategy. For example, at paragraph 3.11 the Strategy proposes to restrict development HGV movements “to/from A5 West via link road, B4668, A47”. However, the modelling outputs at Figure 2.2 of the Forecast Modelling (APP-148) clearly show development HGV traffic using this route. The strategic impact of the HGV Route Management Strategy therefore remains unknown and is not reflected in either the strategic or local model outputs.

Strategic model outputs

- 7.15 The strategic model outputs as presented in the submitted Transport Assessment (APP-138) and the Forecast Modelling (APP-148) assess three different scenarios: “without development”, “without development with scheme” (i.e. access infrastructure), and “with development”. On the basis that the access infrastructure would only be delivered in a scenario that includes the on-site development proposals, the true impact of the development can only be identified by comparing the “without development” to the “with development” scenarios.

- 7.16 Notwithstanding the above, LCC LHA has reviewed the strategic model outputs. In August 2022 LCC LHA wrote to BWB raising a number of concerns with the outputs as follows:
- 7.17 The significant and detrimental impact on the LRN brought about by development impact and congestion at M1 J21/M69 J3.
- 7.18 The modelling outputs confirm LCC LHA understanding that M1 J21/M69 J3 operates significantly over capacity in the base and do minimum scenarios i.e., without development. The introduction of the proposed development of national importance at the adjacent M69 J2 understandably assigns a significant proportion of trips to the SRN.
- 7.19 The impact of this, on a network already exceeding capacity, is re-assignment of existing trips currently using the SRN onto the LRN. Consequently, the modelling only shows a limited impact on the M69 J2 to M1 J21/M69 J3. Indeed, Table 8-6 of the submitted Transport Assessment (APP-138) suggests that in the am peak hour with development there will be a reduction in traffic using the M1 J21.
- 7.20 LCC LHA do not consider this output to be reasonable on the basis that all highway users do not benefit from perfect knowledge of the network, nor do all users make their preferred route choice based on distance and time i.e., some drivers will choose to use the SRN regardless of congestion, as this is a preferred route compared to less suitable rural local roads.
- 7.21 This modelling information was provided to the TWG in more detail than appears to have been formally submitted with the application, including zoomable volume/capacity plots which cover the entire Aol of the development.
- 7.22 LCC LHA, NH and WCC suggested that the development be modelled in an unconstrained scenario to establish exactly what development traffic would use the M69 J2 to M1 J21/M69 J3 if it wasn't constrained in its capacity. Following this

unconstrained assessment a true picture of actual demand could be established and an associated scheme of mitigation designed to accommodate the identified development demand i.e., only mitigate against the impact of the development, not address an existing problem.

- 7.23 LCC LHA went on to advise that this mitigation scheme could then be included in a “with mitigation” model run. This would demonstrate if the traffic displaced onto the LRN as a consequence of the existing capacity constraints at M1 J21/M69 J3 could be attracted back to the SRN in line with the NPSNN paragraph 5.213.
- 7.24 BWB acknowledged that this modelling could be undertaken but declined to carry out the exercise.
- 7.25 The proposed access infrastructure operates over capacity upon implementation
- 7.26 For example, the new link road access roundabout junction with the B4668 Leicester Road is predicted to operate over capacity in the 2036 with development scenarios in both the am and pm peak. This can be seen in Figure 3.19 and Figure 3.21 of the Forecast Modelling (APP-148).

Sapcote village impact

- 7.27 Two-way flows through Sapcote village appear to double on the B4669 Leicester Road. This can be seen in Section 3.3 of the Forecast Modelling (APP-148). It is worthy of note that the TWG have been provided with a more detailed select link analysis of the village impact by BWB, although this information does not appear to form part of the formal submission. Therefore, LCC LHA is not in a position to identify the severity of the impact.
- 7.28 LCC LHA noted that the B4669 is severely constrained in terms of its width in a number of locations, particularly between its junctions with Buckwell Road and Sharnford Road. LCC LHA had requested further assessment of this sensitive part of the LRN. To date this assessment has not been provided.

Junction assessment criteria

- 7.29 When LCC LHA signed off the Forecast Modelling Brief in February 2021 (APP-145) this included how the Aol of the development would be determined. The criteria are set out at Section 6 and follow an industry standard approach.
- 7.30 However, at paragraph 7.39 of the submitted Transport Assessment (APP-138) an alternative non-standard approach has been adopted. Not only are alternative criteria set out, but combinations of this criteria have been applied to establish whether the impact of the development on local junctions warrants further investigation. Furthermore, the combinations of criteria do not appear to have been consistently applied. This means that where there is a development impact on the LRN it may not have been identified nor tested, and therefore the mitigation strategy identified may not be comprehensive.
- 7.31 LCC LHA is therefore unable to conclude that significant impacts from the development on the transport network can be mitigated in line with the NPPF paragraph 110.
- 7.32 As a consequence of the application of the unagreed assessment criteria, only 21 junctions have been assessed in detail at Table 8-10 in the submitted Transport Assessment (APP-138). It is worthy of note that some junctions and arms have been incorrectly labelled and do not marry with the description in the Table.
- 7.33 In addition, the following junction specific errors have been noted:
- 7.34 Junction 4: A5 Watling Street/A47 Longshoot and Junction 14: A5/B4666/A47 – The TWG have requested a VISSIM model assessment of this junction in line with the modelling protocol for the A5 as agreed by LCC LHA, NH and WCC.
- 7.35 Junction 5: Rugby Road/Brookside; Junction 9: A47/B582 Desford Road; Junction 30: A5/Higham Lane/Nuneaton Lane – all junction assessments missing from Transport Assessment.

- 7.36 Junction 26: A5/A426/Gibbet Lane – the assumption in the Transport Assessment is incorrect. NH do not have a committed scheme at this junction. Therefore, the impact of the development has been incorrectly modelled. In addition, BWB have been requested by LCC LHA, NH and WCC to model the junction in the NH VISSIM model. To date this modelling has not been provided.
- 7.37 Junction 38: New Road/Long Street/Broughton Road – the Transport Assessment identifies an unmitigated impact at this junction in the centre of the village of Stoney Stanton.
- 7.38 Significantly, LCC LHA note that despite requests from the HAs and LPAs no detailed VISSIM assessment of M1 J21/M69 J3 has been submitted. This would appear to be a fundamental omission given that VISSIM models have been provided for M69 junctions 1 and 2. M1 J21/M69 J3 is fundamental to the safe and appropriate functioning of the LRN and SRN, and the development proposals as a whole. It is worthy of note than in November 2019 Hydrock acting on behalf of DB Symmetry carried out a scoping exercise for a VISSIM assessment of M1 J21/M69 J3 using an existing model.

Rail impacts and the LRN

- 7.39 The development proposals include for up to 16 trains a day serving the rail freight terminal. These trains will pass through the Narborough level crossing and impact the barrier down time (2.5 minutes in the pm peak) as detailed in Forecast Modelling Brief (APP-145). This increase in down time will have an impact on all users of the LRN. In respect of pedestrians and cyclists this will increase delay at a crossing with a stepped footbridge i.e., cyclists must dismount and carry their cycles across the footbridge or wait for the barrier to lift, and those with mobility problems are unable to cross until the barrier is lifted.
- 7.40 LCC LHA do not consider that the impact of the additional downtime on traffic has been adequately assessed. The only assessment of this impact has been an

adjustment of signal timings in PRTM. LCC LHA hold a VISSIM model of the crossing and local area and have suggested this be used by the Applicant. However, this advice does not appear to have been heeded. Consequently, no mitigation proposals have been included within the application submission. Impacts on other level crossings along the route are covered below in the section entitled “Public Rights of Way Strategy”.

- 7.41 It remains unclear what impact the development proposals will have in respect of capacity on the rail network and wider aspirations to re-introduce passenger rail services between Coventry and Leicester reducing impacts on the LRN and SRN as promoted by Midlands Connect contrary to paragraph 5.213 of the NPSNN.
- 7.42 In addition, the recent Government announcement regarding the curtailing of High Speed 2 at Birmingham and the introduction of *Network North* gives rise to questions as to whether there will be sufficient capacity on the network to serve additional strategic rail freight As the NPSNN envisages (para 1.7):

This NPS sets out the Government's policy for development of the road and rail networks and strategic rail freight interchanges, taking into account the capacity and connectivity that will be delivered through HS2

- 7.43 Furthermore, the new proposals for the East Midlands include increased rail capacity by increasing the number of trains between Birmingham and Leicester from two to four per hour¹ (which will itself increase the amount that Narborough crossing is closed).

Mitigation strategy and proposals

- 7.44 Of the 54 junctions considered within the Transport Assessment (*APP-138*), the Applicant is proposing schemes of mitigation at six junctions on the LRN and one

¹ <https://www.gov.uk/government/news/find-out-about-every-new-transport-project-in-your-region>

junction on the SRN.

- 7.45 As outlined above, LCC LHA does not agree with the Applicant's approach to mitigation, and this position has been documented over a period of time. LCC LHA maintain that the approach to mitigation for this strategic development of national importance should be to mitigate against its own impact at M1 J21/M69 J3 identified through an unconstrained modelling exercise, and then address this impact to encourage traffic displaced onto the LRN by the development to return to the SRN. Furthermore, the focus of mitigation appears to be on road infrastructure, and not on sustainable access and transport, contrary to the NPPF paragraphs 104, 110 and 112 and NPSNN paragraph 5.213.
- 7.46 At paragraph 8.23 of the submitted Transport Assessment (*APP-138*), this position is accepted but suggests that the traffic that is displaced is local traffic. This is not the case as demonstrated in the Forecast Modelling (*APP-148*). For example, at Figure 3.6 it can be seen that in the with development scenario there is a reduction in traffic on the M1 north of the development (at least to J22), with an associated increase in traffic on the LRN. Furthermore, the assumption that the traffic that is displaced by the development proposals is local would not appear to be supported by select link analysis outputs from PRTM which would identify the origin and destination of these trips.
- 7.47 The details of the off-site mitigation proposals are shown on Highways Plans (*APP-028 and APP-029*). The drawings have been supplied at such a scale (1:2500) that makes design checking extremely difficult and not in line with the basic requirements as set out in the LHDG.
- 7.48 Basic design information appears to be missing from the submission including topographical surveys, vehicle tracking, highway boundary information, signal equipment etc. It is therefore unclear if this package of mitigation can be delivered to adopted design standards within the constraints of the red line boundary.

- 7.49 In the absence of a Stage 1 RSA and Designer’s Response for any of the mitigation proposals, LCC LHA is unable to confirm that the proposals will be safe for all users and mitigate against the impacts of the development in accordance with the NPSNN paragraph 5.213 and paragraph 110 of the NPPF.
- 7.50 Based on the comments above including lack of basic design information, outstanding RSA’s, queries on survey data etc, LCC LHA have not carried out any detailed checks of the supporting junction capacity models.
- 7.51 No strategic modelling of the mitigation proposals has been undertaken by the Applicant to demonstrate that the impact of the development will be mitigated, i.e. a modelling scenario of with development plus mitigation
- 7.52 In respect of specific proposals, the agreed uncertainty log included for a committed scheme at Junction 3: B4114 Coventry Road/B581 Broughton Road (Mill on the Soar) junction. Despite the inclusion of this committed scheme in the strategic modelling, the outputs demonstrate that it would operate over capacity with the development. LCC LHA are at a loss to understand why an alternative scheme of mitigation has been proposed that removes widening to the Coventry Road (east) arm of the junction on the basis that the development to which this committed scheme is attached is located on Coventry Road (east) and any traffic wishing to use the proposed development access infrastructure would continue to travel through this junction. Indeed, it is likely that additional traffic would be drawn through this junction as acknowledged in paragraph 5.104 of the Transport Assessment (*APP-138*).
- 7.53 Proposals for mitigation in the village of Sapcote do not appear to relate to the identified impact i.e., predicted doubling of vehicular traffic. This traffic will include vehicles of all types, including HGV’s drawn to the SRN. Whilst it is proposed to control the routing of HGV traffic to/from the development, general HGV traffic will not be controlled and its impacts on the residents of Sapcote remain unknown.
- 7.54 The proposals are limited to a gateway feature and associated road markings, a

zebra crossing and associated re-location of a bus stop, and some seating and planters. No evidence appears to have been presented to suggest that there is a speeding issue to the east of the village to justify the proposed gateway feature.

- 7.55 As above, in the absence of a more detailed drawing of a scale that can be checked, and a supporting RSA, it is not possible for LCC LHA to determine whether the proposed zebra crossing is deliverable. However, based on local knowledge this is proposed to be in a part of the village with restricted forward visibility from the east, heavy footfall, and in a location where available carriageway and footway widths are restricted.

HGV Route Management Plan and Strategy

- 7.56 The intention of the submitted HGV Route Management Plan and Strategy (*APP-362*) is to ensure that development HGV traffic uses the most appropriate routes to/from the site. The sentiment of this document is welcome in its acknowledgement that the impact of development HGV traffic on the LRN and Leicestershire residents could be significant. As noted above this Strategy was developed following the strategic modelling being undertaken and therefore the impact of the Strategy has not been tested.
- 7.57 The “undesirable” routes identified in the Strategy have not been agreed with the HA’s, and this is acknowledged in paragraph 5.14 of the document. The term undesirable suggests that routes can still be used by development HGV traffic. Indeed, at paragraph 6.3 the Strategy states “a package of encouragement measures” will assist in formalising HGV movements. This does not provide assurance that HGV routing to/from the site will be effectively monitored and enforced against a strict routing plan.
- 7.58 Within the draft DCO (*APP-085*), there is a proposed Requirement to implement the HGV Route Management Plan and Strategy (*APP-362*). However, on the basis that the Strategy acknowledges that it remains subject to further discussions and

amendments, it is unclear how this requirement could be discharged. The Strategy uses phrases like “could”, “to be agreed”, “details of implementation will be subject to approval”.

- 7.59 The monitoring and enforcement of the Strategy is intended to be included within tenancy agreements with future occupiers of the development. However, the only control appears to be the loosely worded Requirement as set out above that relates to a Strategy under development.
- 7.60 The Strategy (paragraph 5.34) places onus on LCC and WCC to investigate breaches. This is not something that has been discussed with the HAs. It is unclear what legal powers of investigation and enforcement the HAs hold, and no resource is proposed to be provided to assist. Whilst the Strategy used at Redditch Gateway has frequently been referenced LCC LHA has questioned deliverability, enforcement, implications in respect of GDPR, and the legality of ANPR cameras for private enforcement on the public highway. The Document does not provide these answers, nor does it appear to include for a robust, implementable, enforceable Strategy.
- 7.61 Responsibility for co-ordination and monitoring the Strategy will be the responsibility of the Travel Plan Co-ordinator as set out at paragraph 8.5 of the Framework Site Wide Travel Plan (*APP-159*). However, there appears to be no commitment in the DCO (*APP-085*) or the s106 Heads of Terms (*APP-351*) to this Travel Plan Co-ordinator post. Moreover, the Framework Site Wide Travel Plan (*APP-159*) states at paragraph 8.3 “the Site Wide Travel Plan Co-ordinator will be in post from the start of construction on the site for a period of 5 years after first occupation of the last unit occupied”. Therefore, LCC LHA question how the Strategy will be co-ordinated and monitored in perpetuity.

Public Rights of Way Strategy (PRoW)

- 7.62 The development proposals will have a significant impact on PRoW both during construction and operation. Given the lack of proposals for new walking and cycling

infrastructure as described above and below, there is a reliance on PRoW for providing access to/from the site on foot. There has been very limited engagement with LCC LHA on PRoW despite requests. This has been documented through our formal responses. It is worthy of note that PRoW has not been discussed at the TWG because of it being dealt with by a different consultant to the other highway and transport aspects of the scheme.

7.63 However, the Applicant team did approach LCC LHA in August 2023 to discuss the proposed Strategy (*APP-192*). LCC LHA advised the Applicant that there was no evidence submitted in the application to demonstrate that the PRoW proposals are deliverable. *APP-298* and *APP-299* simply show coloured lines on a plan to indicate proposed PRoW. There appears to be no supporting evidence to demonstrate that PRoW along these alignments are deliverable in accordance with the design requirements set out in the LHDG i.e. details of widths, surfacing, gradients, fencing etc. to demonstrate these routes would be safe and appropriate. This information has been requested but to date has not been forthcoming.

7.64 Specific comments on the proposed strategy include:

PRoW - U52

7.65 No details have been provided within the application of the proposed A47 link road underpass. Therefore, it is unclear if this will provide sufficient clearance for equestrian users, and indeed how attractive this underpass may be to use. From the submitted drawing (*APP-022*) it is also unclear given significant level differences if this PRoW can connect to the A47 link road footway provision.

PRoW – V35/1

7.66 LCC LHA have suggested that this PRoW could be stopped up inside of the red line boundary where duplicated by the proposed bridleway i.e., between M69 J2 and roundabout 3 as shown on *APP-298*. The Applicant disagrees on this point. Should

the PRoW remain, LCC LHA is concerned that users will be channelled against acoustic barriers ranging in height from 4-6 metres as shown on *APP-279*.

7.67 PRoW – U17

7.68 The proposed PRoW diversion in this location to facilitate removal of the existing level crossing as shown on *APP-299* would take users on a route of approximately 440m compared to the existing 20m. The proposed route includes use of the existing footbridge to Thorney Fields Farm. LCC LHA have queried ownership and future maintenance of this structure. No details have been provided, and in the absence of a risk assessment it remains unclear if this is a safe and appropriate alternative.

7.69 PRoW – T89/1

7.70 The proposed PRoW diversion in this location is shown on *APP-299*. The alternative provision to facilitate removal of the existing level crossing would direct users over the existing road bridge over the railway line on the B581 where the width of the existing footway is restricted. LCC LHA have requested a RSA of this proposal. To date this has not been forthcoming.

7.71 PRoW – V23 & U50

7.72 LCC LHA is unclear how the alternative provision for these routes will connect to the footway of the A47 link road given level differences between the PRoW, the link road, and considering the constraints of maintaining the existing private access to Bridge Farm. LCC LHA have requested details of this proposal. To date these have not been forthcoming.

7.73 PRoW – U8

7.74 The proposed PRoW diversion in this location is shown on *APP-299*. The alternative provision to facilitate removal of the existing level crossing includes for a new footbridge. However, no details of the footbridge design appear to have been

provided in the application submission. LCC LHA are therefore unclear if this footbridge will provide access for all users including those that are mobility impaired i.e., be ramped contrary to NPPF paragraph 112 (b). However, given reference to the construction of the footbridge in the Construction Environmental Management Plan (*APP-359*) only refers to steps, it is assumed that unfortunately this is not the case.

- 7.75 In addition, LCC LHA have requested details of future maintenance of this structure, noting that this will not be adopted by LCC and Network Rail in their Relevant Representation to this application have stated the same. Given details of the structure have not been provided LCC LHA remain unclear if the restricted access to this location as identified by the red line boundary will allow for the structure to be installed.

Construction impacts

- 7.76 The application submission includes a Construction Environmental Management Plan (*APP-359*) and a Construction Traffic Management Plan (CTMP) (*APP-364*). Neither document is drafted in any detail. Details of construction traffic routing and monitoring and enforcement are extremely limited, and details in respect of access from the LRN, haul roads, compounds, contractor parking, methods to prevent detritus being deposited on the public highway etc. have not been provided. Furthermore, the limited details provided do not appear to cross-reference with the Illustrative Phasing and Works Plans (*APP-050 – APP-055*).
- 7.77 Whilst LCC LHA accept that further information would be available following appointment of a Principal Contractor, commitments to providing this information are limited. For example, LCC LHA can find no details of the proposed routing of construction traffic with the exception of the construction of the M69 slip roads, and no commitment to this information being provided in either the DCO (*APP-085*) or the s106 Heads of Terms (*APP-351*).

- 7.78 Concerningly, the proposal for routing of construction traffic to construct the slip roads includes for U-turning HGV traffic at M1 J21/M69 J3. Whilst the CTMP (*APP-364*) states at paragraph 1.94 that it will be necessary to impose restrictions on construction movements in the network peak hours, there is no commitment to doing so. Indeed, requirement 16 at page 54 of the DCO (*APP-085*) states that construction works will take place between 07:00 to 19:00 Monday to Saturday with no reference to restrictions on peak hour movements. Given concerns in respect of capacity at this junction as outlined above, it is unclear what additional impact this U-turning construction traffic may have on the displacement of traffic onto the LRN, or indeed any associated impacts on highway safety.
- 7.79 It remains unclear how the Applicant proposes to construct the A47 link road access and where construction vehicles are proposed to route i.e., will it be built out from M69 J2 and all construction traffic routed through the site, or will construction traffic need to route via the A47/Hinckley/Leicester? No reference appears to have been made to construction traffic routing and management for the construction of off-site mitigation works.

Framework Site Wide Travel Plan and Sustainable Transport Strategy

- 7.80 The submitted Framework Site Wide Travel Plan (*APP-159*) appears to be very limited in content. Moreover, it lacks commitments to the measures identified, incentives to encourage modal shift, monitoring and penalties. It is therefore unclear to LCC LHA how the modal shift target of 10% reduction in single occupancy car trips (paragraph 3.7) will be achieved.
- 7.81 Paragraph 4.6 of the Framework Site Wide Travel Plan (*APP-159*) acknowledges that “given the location of the site, opportunities to encourage more people to walk to the site are limited”. Paragraph 4.12 also acknowledges that whilst “there is some cycle infrastructure in the area, the access to the site is currently limited”. Despite these statements and acknowledgement that there is an opportunity for residents of local

villages to walk and cycle to the site, no improvements to the existing network to facilitate walking and cycling access are proposed. This is in clear contrast to the requirements set out in the NPPF paragraph 110.

- 7.82 Some information in the documents appears to be out of date including reference to the Leicester City E-bike scheme which ceased in February 2023. In addition, there are obvious omissions e.g., reference to EV charging and parking.
- 7.83 The Sustainable Transport Strategy and Plan (*APP-153*) includes for a Bus Strategy at section 7. This relies on the X6 Leicester to Coventry service being diverted to serve the site. However, this service operates with limited stops outside of the City boundaries on a frequency and timetable not conducive to shift working patterns. Details of capacity of the existing service have not been provided and it is unclear if this service was utilised if single deck buses would need to be replaced with double deck buses. It is noted that no discussions have taken place with the operator since April 2022.
- 7.84 The s106 Heads of Terms (*APP-351*). includes for a contribution of £500,000 to LCC for provision of the suggested diverted and enhanced service for a limited period of 5 years. This is not something that LCC LHA have requested. Given the service is limited stop it would provide little benefit to County residents. Moreover, it is unclear how the contribution is calculated, and this is not something that LCC would lead on procuring. The Applicant has been advised to liaise with LCiC in this regard.
- 7.85 The Bus Strategy relies on a Demand Responsive Transport (DRT) proposal for serving surrounding villages. It is important to note that the DRT service referenced is a trial funded by the Department for Transport. Funding for this service is due to expire in July 2025 i.e., in advance of the modelled opening year of the development of 2026. There is no guarantee that the service will continue after this trial period as has been the experience elsewhere in the County. LCC LHA do not consider that DRT is the most effective provision for an employment site operating on fixed shift

working patterns. This would be most suited to a fixed timetable service. Moreover, there appears to be no commitment to providing a DRT service in either the DCO (*APP-085*) or the s106 Heads of Terms (*APP-351*).

- 7.86 It is also worthy of note that no update to information on existing bus services as set out in paragraphs 4.20-4.29 of the Framework Site Wide Travel Plan (*APP-159*) appears to have been made since October 2022. Some of the services listed have seen timetable and/or routeing changes, and others have been subsequently withdrawn and cannot be relied upon.
- 7.87 It is understood that the Applicant is undertaking a sensitivity test of the proposed modal split based on employee origins identified by a gravity model assessment. This will require the Applicant to re-consider the appropriateness of the proposed Bus Strategy to ensure that it meets the needs of prospective future employees and the policies as set out in the NPSNN paragraph 5.205 and NPPF paragraph 110.

B. Public Health

- 7.88 The Health and Equality Briefing note, appended to the Environmental Statement (APP-137), sets out the work the Applicant has undertaken to assess health impacts. This details an approach to considering the health and wellbeing of communities focused on environmental, socio, cultural and economic precursors protective of the environment and health. The approach and methodology draw on wider determinants of health from key chapters of the Environmental Statement (APP-116 Chapter 7 Land Use and Socio-Economic Effects through to and including APP-129 Chapter 20 on Cumulative and In-combination Effects).
- 7.89 The approach and methodology which considers the wider determinants of health is generally supported, although the study area chosen around environmental impacts is disputed. However, there are concerns as follows:

Health Impact Assessment

- 7.90 The applicant has addressed health considerations in accordance with the formal Scoping Opinion, however, Leicestershire Public Health team's preference, given the size and nature of the development and location in close proximity to populations experiencing health inequalities is for a full standalone Health Impact Assessment (HIA). This was also requested by statutory consultees, stakeholders and the local community during the pre-application process and has not been undertaken.
- 7.91 The World Health Organisation (WHO) describes HIA as: "a combination of procedures, methods and tools that systematically judges the potential, and sometimes unintended, effects of a policy, plan, programme or project on both, the health of a population and the distribution of those effects within the population. HIA identifies appropriate actions to manage those effects". WHO advocates the use of HIA to judge the potential health effects of a project to maximise the proposal's positive health effects and minimise its negative health effects.

7.92 As indicated in APP-137 the project has potential health impacts during both the construction and operational phases through likely impacts on local air quality and noise pollution. A full HIA may have helped to identify potential negative health effects during the construction phase as well as identify potential health considerations for the operational phase of the project including impact on the use of Burbage Common and likely impacts on traffic flow and air quality.

Local data and strategies

7.93 APP-137 includes legislative and policy requirements pertinent to the assessment of health and equality, however, it does not appear to include the Leicestershire 2022-2032 Joint Health and Wellbeing Strategy (JHWS) and the Leicestershire Health Inequalities Joint Strategic Needs Assessment (JSNA 2023), both of which provide robust, up to date, local data.

7.94 The JHWS provides a comprehensive assessment of health and wellbeing in the county, establishes an overall vision for health as well as outlining the strategic priorities for health for Leicestershire. It recognises that the health and wellbeing of residents is generally good compared with England; however, there are significant inequalities and challenges in certain communities.

7.95 In particular, it is noted:

- Inequalities in life expectancy are widening, with increases in life expectancy growing at a faster rate in least deprived compared to most deprived deciles;
- Even though Leicestershire is a relatively affluent county, pockets of significant deprivation exist, with some neighbourhoods falling into the 10% most deprived neighbourhoods in England;
- Data around education, skills and training and barriers to housing and services for Leicestershire indicate a higher number of neighbourhoods in the top 10% deprived nationally compared to other deprivation domains;

- Leicestershire performs significantly worse than England for the adults walking for travel 3x per week (%), access to travel (disabilities or no car);
- Leicestershire performs significantly worse than England for the gap in the employment rate for those in contact with secondary mental health services and the overall employment rate.

Vulnerable population

7.96 The Health Inequalities JSNA (2023) provides context and evidence on current health inequality priorities within the county. It identifies current groups at risk of facing health inequalities in Leicestershire, including (but not limited to):

- People with a disability, including people with a learning disability
- People living in poverty/deprivation
- Bangladeshi, Pakistani or Gypsy or Irish Traveller groups

7.97 The Health Inequalities JSNA identified groups with a particularly high risk (evidence of years lost from their lives as a result) of facing health inequalities within Leicestershire. Based on the groups of concern identified Gypsies and Travellers could potentially be at higher risk of harm to their health from the HNRFI, and those vulnerable to poor air quality due to traveller site of Aston Firs being in close proximity to the proposed site for development . A consultation with Aston Firs residents was undertaken by the applicant but not included within the APP-137.

7.98 Gypsies and Travellers health is a key concern within the Health Inequalities JSNA. In 2011, 14.1% of Gypsy and Irish Traveller people in England and Wales rated their health as bad or very bad, 17 compared with 5.6% on average for all ethnic groups.⁶² Further research evidences 14% of Gypsy and Traveller people describing their health as 'bad' or 'very bad', more than twice as high as the White British group. 42% of Gypsy and Traveller people are affected by a long term condition, as opposed to

18% of the general population (Race Disparity Unit, Cabinet Office. Gypsy, Roma and Irish Traveller ethnic group: facts and figures. February 2022)

- 7.99 The second main Those vulnerable to poor air quality are also potentially at higher risk of harm to their health from the HNRFI. Public Health England (2018, now Office for Health Inequalities and Disparities) recognise although that air pollution can pose harm to everyone, some people are more at risk with most vulnerable populations face multiple disadvantage around exposure and existing health. These groups more affected by air pollution include: Older people, children, individuals with existing CVD or respiratory disease, pregnant women, communities in areas of higher pollution, such as close to busy roads and low-income communities (Health Matters: Air Pollution 2018). The most vulnerable populations face multiple disadvantage around exposure to air pollution and their existing health. As such mitigation is sought to address potential harm for these groups.

Accessibility

- 7.100 There are potential impacts on the residents of Narborough and Littlethorpe due to the impact of the freight trains and increased barrier down time at Narborough Level Crossing (situated within Blaby District). The level crossing does not currently provide step-free access, therefore, making it inaccessible to people with disabilities or pushchairs. Alongside this, there is potential for additional delays and increased barrier downtime associated with this project, which may cause community severance in the ability to access key services including schools, pharmacies and medical centre for people unable to navigate the stairs at Narborough Data from Office for National Statistics, Census 2021 shows the disability rate Blaby District to be 6.1% of the population to be Disabled under the Equality Act with day to day activities limited a lot. There is a risk that the increase in the level crossing downtime will impact local traffic flow. Ambulance response between Narborough Ambulance Station to incidents in Littlethorpe and surrounding areas may be delayed due to the level crossing impacting traffic flow. A full health impact assessment could identify

likely impacts in full and consider mitigation. The study area included in APP-137 does not clearly include these areas

Conclusion for public health considerations

- 7.101 In the absence of consideration of key health inequality groups within the county, set out in the JSNA document, and a set of mitigating factors derived from a full HIA, conclusions such as those made in Chapter 9 (Air quality) that impacts will be negligible require ongoing monitoring to consider the need for mitigation work to protect from risk to health, predominantly through amendments in design.
- 7.102 The Community Fund identified for the project should be apportioned with direct input from the local community and informed by evidence of need explored above. A similar consultative approach needs to be taken around health at work and training support for employees in both construction and operational phases.
- 7.103 As such the following requirements/ mitigation is sought from the Applicant to address these impacts:
- a) Air quality, noise, dust and lighting are monitored on a regular and ongoing basis throughout construction and operation in locations resided by vulnerable groups and wider local communities to ensure air quality does not diminish, and noise, dust and lighting levels increase to unacceptable levels as advised by Environmental Health.
 - b) Financial support is provided for GP support/ out-reach youth workers for children and young people in Earl Shilton and Barwell to help ensure health inequalities do not widen.
 - c) Active travel provision by foot or cycle to, from and across the site is enhanced for all identified vulnerable groups, with severance of existing routes avoided wherever possible.

- d) Financial support to the Multi-Agency Traveller Unit (MATU, or successor) to assist with advice to the Gypsy and Travellers community at Aston Firs to help ensure health inequalities do not widen and they have a clear, trusted channel to express concerns.
- e) Sufficient advance notification provided for local communities of forthcoming disruptions (including utilities) and diversions to lessen the impact on daily living.
- f) Improvements to accessibility at Narborough Train Station step-free alternatives to crossing barrier to reduce disruption for disabled residents in accessing key services and local amenities.
- g) Analysis of impacts to traffic flow due to increased barrier downtime and work with the emergency services to ensure response time is not compromised as a result of more frequent barrier downtime

C. Net Zero / Sustainability

Key Environmental Policies and Commitments

- 7.104 Leicestershire County Council is committed to addressing climate change through becoming a net zero council by 2030 and working with Leicestershire people and organisations to become a net zero county by 2045 or before. The council declared a climate emergency in 2019 but has since gone on to launch Leicestershire’s Climate and Nature Pact, which is based on the principles of the Glasgow Climate Pact, signed by the UK government in November 2021 and displays a true partnership effort for Leicestershire stakeholders working toward common principles and goals to help acknowledge and tackle both the climate and ecological emergency.
- 7.105 To facilitate action towards our commitments the council adopted its Net Zero Leicestershire Strategy and Action Plan in December 2022, setting out its approach to delivering the council’s ambitions and plans for action across the next 5 years.
- 7.106 Furthermore, the council is the lead authority on the development of the Local Nature Recovery Strategy for Leicestershire, Leicester and Rutland, which will bring together landscape scale, multifaceted approaches focused on preserving, conserving and enhancing nature and help meet other environmental objectives such as climate change, flood mitigation and improved air and water quality. Additionally, the council is committed to ensuring Leicestershire is resilient to the effects of climate change and adapted to better withstand climate impacts.

Issues and Impacts

- 7.107 The council has concerns over the impact of HNFRI on Leicestershire’s emissions. Leicestershire baseline in 2019 demonstrates the county emits 4.87 MtCO₂e (million tonnes of carbon dioxide equivalence), with transport contributing 40% of emissions.

Through the development of HNRFI, almost 5% of emissions will be added to the county's territorial emissions – that would otherwise not have existed (due to growth of logistics) or have occurred elsewhere in the UK via other means. There are concerns over both the ongoing emissions associated with the site but also the emissions associated with its long-term construction, which in some instances have not been fully accounted for and mitigated against. This has a negative impact upon the council's net zero commitments and will increase the emissions associated with the transport sector, which is already the county's biggest contributor and hardest to decarbonise.

- 7.108 Where HNRFI could have a positive impact on Leicestershire net zero journey, for example local on-site solar power generation and low carbon heating solutions (e.g. ground source heat pumps), these have not been maximised for their potential that could help support Leicestershire's ambitions and the local area and communities.
- 7.109 Furthermore, where the development looks to offset emissions, Leicestershire people and communities are not currently set to necessarily benefit due to prioritising UK offsetting projects and not those local to the development. Whilst the council, strongly recommends reducing emissions as far as possible at their source in the first instance, where offsetting is used, this would have a greater benefit to locals impacted by the development or take place within the county boundary to help contribute to Leicestershire net zero ambitions through Land Use, Land Use Change and Forestry carbon sequestration.
- 7.110 Already, Leicestershire has experienced the effects of a changing climate locally, with extreme weather events becoming more of an occurrence, such as the record-breaking temperatures of 39°C recorded in Summer 2022. The impacts of climate change will become more frequent and severe – as a result, the development must be future ready to ensure the site is resilient and prepared for these climate related impacts. There is a need for the site to implement adaptation measure to help combat the effects of rising temperatures and heatwaves in locations that would be most

affected, such as office locations. Without this adaptation, Leicestershire people and businesses operating within the site could be at greater risk to climate change impacts associated with overheating and heat stress.

D. Flood Risk

7.111 This topic is considered by chapter 14 of the ES (Surface water and Flood Risk) and 3.1 3.1 HNRFI Draft Development Consent Order.

7.112 Having considered these documents, LCC, in its role as LLFA, is satisfied that the works proposed are sufficient to mitigate any surface water run-off and can be discharged as set out in the DCO.

E. Economy

- 7.113 This topic is considered by Chapter 7 of the ES – Land Use and Socio-Economic Effects (Document reference 6.1.7)
- 7.114 The proposed development which includes up to 850,000sqm of floor space will have a significant impact on the economy of the surrounding area both during the construction phase and in subsequent operation. There is potential for the creation of a large number of jobs in the delivery of the scheme and in personnel required by end users, but also in the opportunities provided to the local supply chain for related goods and services.
- 7.115 Whilst there is potential for significant benefit for the local economy through employment opportunities, skills development and the supply of goods and services, as outlined below, the application does not give sufficient detail or clarity to provide reassurance that the local community will be able to fully capitalise on these opportunities.

Employment

- 7.116 The ES estimates 4,611 construction jobs (direct employment) will be generated over the 10-year build period, but does not profile the volumes over this period, nor the particular skills required at each stage, instead using an average figure of 461 jobs per annum. This does not enable local agencies to consider availability of skilled personnel at periods of peak activity or to put in place programmes (such as retraining of ex forces personnel or a tailored inward investment campaign) to meet likely requirements through local resources.
- 7.117 Following completion, onsite employment is estimated to be between 8,400 and 10,400 workers once the site is fully occupied. The range given is dependent on employment density levels (between 95 sqm and 77 sqm) based on predicted occupational split. However, it is noted that alternative employment figures of 8,000

workers are forecast in relation to traffic impacts and that the Applicant has been asked to provide additional clarification in this respect by the Examining Authority.

- 7.118 Investment in construction will generate considerable expenditure on construction materials, goods and other services that will be purchased from a wide range of suppliers. This expenditure has far-ranging benefits both locally and further afield, as it filters down the construction supply chain and generates indirect effects. Employees working in construction of the Proposed Development will also spend their wages on goods and services, generating induced effects.
- 7.119 These factors collectively amplify the initial investment in the proposed development, with an economic multiplier effect resulting in linked benefits in terms of expenditure on goods and services locally. This will bring indirect employment and financial benefits for local individuals and firms involved in skilled construction trades and associated professions and could help to sustain employment within this sector across the local and wider economy.
- 7.120 The relationship between employment, health and wellbeing also needs to be further considered. There is recognition that access to skills and qualifications delivers health benefits, with unemployment and a lack of stable employment in contrast frequently leading to poor health, increased stress, illness and a reduction in personal and social esteem. As a consequence, the creation of new employment opportunities, during and post-construction can be further considered beneficial to the local population.
- 7.121 The development should also stimulate the demand for locally available housing which could be supported by the proposed Barwell and Earl Shilton Sustainable Urban Extensions.
- 7.122 The number of people who are claiming Job Seeker Allowance and Universal Credit gives an indication of the potential number of people who may be able to fill any low skilled vacancies both during construction and once the units are occupied. Currently, there are approximately 2,900 out of work universal credit claimants living in Blaby

and Hinckley & Bosworth districts, a declining number, but higher than pre-Covid levels.

Skills

- 7.123 In terms of education, skills and training, over 6% of LSOA in Hinckley and Bosworth district fall within the most deprived 10% nationally. People from these wards may be attracted to both construction and warehouse/manufacturing positions leading to financial and health benefits for individuals and their families.
- 7.124 What is unclear to date is both the number and type of jobs that will be created, during the construction phase. There is also no breakdown between the initial construction – i.e. enabling/ground works and construction of the buildings and operational sections of the proposed development. This information should be easily extrapolated by the applicant from other similar sites that they have delivered. This information is crucial to assess if those skills are available locally and if not, to work with local FE colleges to put on relevant courses. There is currently the time frame to be able to do this, however significant lead times are necessary to ensure course development, promotion and delivery prior to onsite requirement. There could be many specialist skills required to deliver the infrastructure and the buildings, which could lead to the appointed contractors bringing in companies from outside the area, rather than capitalising on local opportunities.
- 7.125 The information provided to date contains no timeline for the Construction phase making it difficult to predict future needs and work with the local colleges, for example, – South Leicestershire College which has a specialist construction unit on the Harrowbrook Industrial Estate in Hinckley.

Skills and Training Plan

- 7.127 Given the lack of information highlighted above, the application contains no training strategy again making it difficult to predict training requirements.
- 7.128 It is acknowledged that a skills/training plan is now being drafted, but if a strategy had been submitted by the Applicant this would have given greater weight to the training plan and reinforced its need.
- 7.129 0% leakage has been assumed in the proposal; this is unrealistic given the current low unemployment rates and number of people who are currently on benefits in the local area. It is improbable to assume all vacancies can be filled locally, especially as there are some many similar sites in the surrounding area including Magna Park, Hinckley Park, New Lubbethorpe, DIRFT2 to name but a few. For the East Midlands Gateway, a very comparable 700 acre SRFI, 25 miles to the north of the proposed Hinckley development, 25% was used in calculations.
- 7.130 Leading on from 7.128 above there is the issue that some of the warehouses when complete will offer 24 hour a day 3 shift working patterns which will distort the number of FTE jobs created.
- 7.131 The study area adopted for construction employment has been defined as a 30km radius from the main order limits. It is felt that a 30 minute drive time would be more representative of good practice, particularly given that a drive time and gravity model was used in the Transport Assessment (ES Vol 2, Appendix 8.1).
- 7.132 There is no mention of utilising the local supply chain which, as mentioned in 7.118 above, could provide materials for the groundwork element including the railhead, construction of the warehouse units and utilising local labour through both groundworks and construction phases. These need to be dealt with at the procurement/tendering stage including, if possible, a minimum percentage of people employed from within a specified radius or drive time.

Housing

- 7.133 ES Chapter 7: Land Use and Socio-Economic Effects (Document Reference: 6.1.7) considers the demand for housing (para 7.239 – 7.250).
- 7.134 Annual Population Survey Data from 2022 indicates a slightly higher number of workers in the construction sector within the study area (52,300) than jobs in the sector (51,700) and from this it is estimated that the 740 net additional construction jobs are likely to be met by the local workforce, therefore creating a neutral effect on housing demand. The above figures indicate a tight margin for recruiting roles locally and take no account of the particular skill sets or trades required, nor is there any profiling of requirement over the construction period, but it can be assumed that there will be periods of more intense activity and therefore labour requirement.
- 7.135 Projections indicate that operational demand for labour may not be met by the local workforce and there would be additional housing demand. The 2017 HEDNA was used to calculate whether planned new dwellings would be sufficient to meet the demand created by operation of the site. The more recent Leicester and Leicestershire Housing and Economic Needs Assessment (HENA, April 2022, updated June 2022) would have been a more appropriate source of data, as it provides the most up to date and robust joint evidence base relating to housing need, economic growth and employment land needs. The HENA indicates that the housing market has performed strongly in recent years with long-term house price growth of 6.4% resulting in a medium house price of £222,000 in 2020. Sales of detached and semi-detached homes predominate. The HENA acknowledges that the Government's Help-to-Buy Equity Loan scheme has played a key role in supporting the new build market and some cooling of the market could be seen over time with the ending of this and other related initiatives. The HENA analysis identifies an acute need for rented affordable housing in all parts of the County, which impacts significantly on those with limited choice of other housing options.

- 7.136 There is an established and effective strategic planning partnership in Leicester and Leicestershire (established in 2015) which seeks to work collaboratively to understand and advise on strategic planning issues. The partnership forms the key mechanism through which evidence is commissioned to inform strategic planning issues, through which a non-statutory long-term vision for growth to 2050 has been prepared (the Leicester and Leicestershire Strategic Growth Plan) and helps to demonstrate the statutory Duty to Co-operate for authorities in Leicester and Leicestershire.
- 7.137 In December 2020 Government introduced the ‘Cities and Urban Areas Uplift’ to the Standard Method which raised the City of Leicester’s local housing need (and that of 19 other cities and urban areas across England) by 35%. The difference between Leicester City’s local housing need and supply generates an unmet need for Leicester City of approximately 18,700 dwellings to 2036.
- 7.138 As a consequence, the HENA also includes a methodology for arriving at an interim distribution of unmet need across the rest of the Leicester and Leicestershire HMA to 2036. All seven districts and boroughs in Leicestershire have an upwards adjustment for the scale of housing which takes into account the functional relationship to Leicester, supporting employment distribution and adjustments to support deliverability. This resulted in the publication of the Leicester and Leicestershire SoCG relating to Housing and Employment Land Needs (June 2022), which to date has been agreed by the City Council, County Council and five of the seven district authorities. Harborough District Council and Hinckley and Bosworth Borough Council have still to formally consider the Leicester and Leicestershire SoCG.
- 7.139 Note the figures in the Leicester and Leicestershire SoCG will be tested through the respective local plan-making processes and sustainability appraisals to ensure the scales of growth are achievable.
- 7.140 Should the HNRFI be granted consent local authorities in Leicester and

Leicestershire would need to consider whether the level of housing provision in the longer term would need to be increased. This consideration is likely to be informed by further updated evidence and would inform housing provision post 2036.

- 7.141 The issue of affordability has not been addressed and without more detail of worker profiles, it is difficult to accurately assess this issue. However, for the construction phase, data shows that the average wage in the construction sector is £35,065, lower than the UK average of £36,191 (Lightcast Report, data from 2021). Over the last 12 months, the average selling price for a property within a 10-mile radius of Hinckley was £267,391 (Rightmove, 7 August 2023). This is significantly lower than the UK average house price of £372,812 (Rightmove, June 2023). Whilst this may suggest that local housing is likely to be affordable, this remains dependent on the availability of particular skill sets locally, rather than migrant workers living locally whilst also supporting a house and family elsewhere.
- 7.142 Locally, the East Midlands Gateway, is a 700 acre development with 4.5m sq ft of logistics accommodation and a Strategic Rail Freight Interchange. The nearby village of Kegworth (population 4,290 – Population Census 2021) has seen an increase in HMO applications, with 10 in the last two years. This creates issues around access to services, noise and availability of parking. Whilst the increase in HMO cannot be directly related to the new logistics facility, it is thought to be a factor.
- 7.143 In conclusion, LCC recognise the benefits that HNRFI could bring to the local economy should the application be successful. However, much greater detail regarding the construction phase timings and requirements, provided at the earliest opportunity, and a clear commitment from the Applicant to support local individuals, companies and communities to gain maximum benefit from the development is required. This commitment must also be reflected in the contractual arrangements with the principal contractor to ensure positive ongoing engagement.

8.0 Planning Obligations

8.1 LCC, as local highways authority, seek a number of s106 obligations based on the information submitted in support of the application to date. It is not possible to provide a definitive list of s106 contributions that will be necessary to make the development acceptable in highway and transportation terms at this stage, due to the issues highlighted above. However, the following have been identified:

1. employee travel packs to inform of and advocate for sustainable travel options (one pack per employee. Indicative cost £52.85/pack, or applicant can elect to provide their own with a minimum £500 admin checking fee);
2. employee bus passes (one 6-month bus pass per employee – approx. £360-£510/pass depending on the bus operator);
3. travel plan monitoring fee (indicative cost £11,337.50);
4. provision of a travel plan co-ordinator/s;
5. sustainable travel offer – £500,000 contribution towards the X6 service a matter of discussion between Tritax and Leicester City Council. Further consideration of DRT/alternative provision is required to serve the development based on evidence of employee locations and consideration of shift working patterns
6. Traffic Regulation Order's – restrictions (maximum 3 roads) £8,756 per Order, speed limit changes £9,392 per Order
7. Construction traffic routeing – on the basis that construction traffic routeing does not currently appear in the CEMP requirement
8. Permanent HGV routeing – defining ANPR monitoring, enforcement, and reporting

8.2 The above costs are also indicative and subject to review as further information is provided and the Examination progresses.