

**Traffic and Transport**

- 1.1 LCC in its statutory capacity as Local Highway Authority (LHA) hereby referred to as LCC LHA has reviewed the submissions supporting the DCO application against relevant national and local policies, including the NPPF, NPSNN, and the LHDG<sup>1</sup> and cannot conclude that these policy requirements have been met by the application.

**Access infrastructure**

- 1.2 Access to the site is proposed via an A47 link road between B4668 Leicester Road, Hinckley and the M69 J2 with the inclusion of new south facing slip roads.
- 1.3 The impact of this link is described below in the section entitled “Strategic model outputs”, but in short it enables the A47 to act as an alternative route to the M69 J2/M1 J21 and consequently shows traffic displaced onto the less desirable Local Road Network (LRN) and away from the Strategic Road Network (SRN).
- 1.4 It is unclear if this road can be designed and delivered in accordance with the adopted design standards of LCC found within the LHDG.
- 1.5 In the absence of a Stage 1 Road Safety Audit (RSA) and Designer’s Response, LCC LHA is also unable to confirm that the proposed access will be safe and suitable.
- 1.6 LCC LHA is unable to conclude if the development access infrastructure would operate within capacity and with a reduced impact on the wider network if dualled in its entirety.
- 1.7 In addition, it would appear that no detailed junction assessments of the roundabouts along the route of the link road have been carried out.
- 1.8 There is no continuous 3m footway/cycleway along the link road.
- 1.9 No information has been provided to demonstrate that the existing structures at M69

---

<sup>1</sup> <https://resources.leicestershire.gov.uk/environment-and-planning/planning/leicestershire-highway-design-guide> [accessed 10.10.23]

J2 are capable of accommodating the provision of slip roads without structural integrity being compromised and no improvements for walking and cycling are included.

### **Personal Injury Collision (PIC) data**

- 1.10 The Collision History Study area should be expanded to reflect the area of impact of the development / agreed Area of Influence (Aol).
- 1.11 Analysis of PIC data should include the latest 5-year period.
- 1.12 LCC LHA will not sign off the RSA briefs until this has been addressed.

### **Strategic modelling**

- 1.13 LCC LHA agreed that the proposed development should be modelled using Leicestershire's Pan Regional Transport Model (PRTM).
- 1.14 However, a number of concerns are identified. These include, lack of up to date data in respect of "furnessing" for input into local junction models and comparable sites.
- 1.15 The discrepancies in employment generation bring in to question the validity of the submitted transport evidence and consequent environmental assessment parameters under the Rochdale Envelope.
- 1.16 Development at Padge Hall Farm (21/01191/HYB<sup>2</sup>) has not been considered as committed. This could increase HGV traffic on the A5 by up to 20%, includes mitigation at the A5 Longshoot/Dodwells junction and have an impact on M69 J1.
- 1.17 To our knowledge no phased strategic modelling has been undertaken.
- 1.18 The strategic impact of the HGV Route Management Strategy remains unknown and is not reflected in either the strategic or local model outputs.

---

<sup>2</sup><https://pa.hinckley-bosworth.gov.uk/online-applications/applicationDetails.do?activeTab=externalDocuments&keyVal=QZXJN11I0SL00>  
[accessed 10.10.23]

**Strategic model outputs**

- 1.19 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.
- 1.20 LCC LHA has a number of main concerns:
- a) The significant and detrimental impact on the LRN brought about by development impact and congestion at M1 J21/M69 J3.
  - b) The proposed access infrastructure operates over capacity upon implementation
  - c) The potential impact on Sapcote village; the B4669 is severely constrained in width in a number of locations and the Applicant has not provided a detailed select link analysis to identify the severity of the impact

**Junction assessment criteria**

- 1.21 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.
- 1.22 LCC LHA identified 45 junctions as operating over capacity, impacted by the development, and therefore warrant further detailed junction assessment. LCC LHA acknowledge that this list could be reduced further if a scheme of mitigation at M1 J21 was proposed, but this does not form part of the application.
- 1.23 However, only 21 junctions have been assessed in detail, with general and specific errors identified.
- 1.24 No detailed VISSIM assessment of M1 J21/M69 J3 has been submitted, which is fundamental to the safe and appropriate functioning of the LRN and SRN, and the development proposals as a whole.

**Rail impacts and the LRN**

- 1.25 The increase in down time at Narborough level crossing will have an impact on all users of the LRN and has not been assessed adequately.
- 1.26 It remains unclear what impact the development proposals will have in respect of capacity on the rail network including the reintroduction of rail services between Coventry and Leicester.
- 1.27 There does not appear to be any requirement for future occupiers to use the proposed terminal.

**Mitigation strategy and proposals**

- 1.28 Mitigation at just six junctions on the LRN and one junction on the SRN is proposed.
- 1.29 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.
- 1.30 It is unclear if this package of mitigation can be delivered to adopted design standards within the constraints of the red line boundary.
- 1.31 Without 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.
- 1.32 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
- 1.33 Junction 3: B4114 Coventry Road/B581 Broughton Road (Mill on the Soar) junction would operate over capacity with the development and the existing mitigation scheme

for another development has been reduced.

- 1.34 Proposals for mitigation in the village of Sapcote do not appear to relate to the identified impact i.e., predicted doubling of vehicular traffic and it is not clear if mitigation is deliverable.

### **HGV Route Management Plan and Strategy**

- 1.35 It is not evident that the HGV routeing strategy, and associated Requirements, is comprehensive, robust, implementable, or enforceable.

### **Public Rights of Way Strategy (PRoW)**

- 1.36 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.
- 1.37 There appears to be no supporting evidence to demonstrate that PRoW along proposed 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.

### **Construction impacts**

- 1.38 The Construction Environmental Management Plan and Construction Traffic Management Plan are not drafted in any detail. Details of construction traffic routeing 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.
- 1.39 It is unclear:

- what additional impact U-turning construction traffic at M1-J21/M69-J3 may have on the displacement of traffic onto the LRN, or indeed any associated impacts on highway safety.
- how the Applicant proposes to construct the A47 link road access and where construction vehicles are proposed to route

### **Framework Site Wide Travel Plan and Sustainable Transport Strategy**

- 1.40 The Framework Site Wide Travel Plan 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.
- 1.41 The Sustainable Transport Strategy and Plan includes for a Bus Strategy at section 7. The following concerns are highlighted:
- The use and frequency of an enhanced X6 service and the appropriateness of the proposed £500,000 contribution
  - The appropriateness of Demand Responsive Transport
  - Services with timetable and/or routing changes
  - The need to review strategy in light of gravity model assessment

### **Conclusion on Traffic and Transport**

- 1.42 LCC LHA concludes that the Applicant has failed to demonstrate that the policy requirements in the NPPF and NPSNN have been met. This conclusion has been reached following a review of submitted documentation and identification of missing/incomplete/out of date information. In order to address the concerns of LCC LHA as described above, a series of items must be addressed by the Applicant as identified in LCC's full written representations.

**Socio-Economic Considerations**

- 1.43 There are a number of concerns in respect of Socio-Economics highlighted in the draft SOCG. In summary, these relate primarily to matters of methodology and sources used, including discrepancies over the potential level of employment generation, approach to the study area adopted for construction employment, not taking into account the L&L HENA 2022, and the wider societal impacts of construction.
- 1.44 The benefits of construction for local residents and suppliers should be appropriately secured alongside an effective training strategy.

**Carbon Emissions**

- 1.45 It remains unclear how much of the modal shift carbon benefit is down to a real shift from road to rail, versus new freight due to growth from additional demand created by the Proposed Development, therefore proposed carbon benefits are overexaggerated.
- 1.46 Local, on-site, energy generation and low carbon solutions have only been considered for office and warehouse use and not for other energy intensive infrastructure on site such as cranes and lighting.
- 1.47 It is unclear what the justification is for the artificial cap on energy generation proposed by Requirement 17 other than to potentially avoid a separate or combined NSIP process.
- 1.48 The Council is concerned that not all potentially significant emissions have been analysed and thus mitigated against. For instance, carbon generated by construction waste, and land use, land use change and forestry (LULUCF) and energy used by temporary structures during the 10-year construction period, are not currently accounted for within the Applicant's carbon analysis undertaken.
- 1.49 The proposed development will bring a significant amount of new emissions to Leicestershire that currently either do not exist due to the development leading to

growth, or shift emissions from outside of Leicestershire into the county. Where residual emissions remain and carbon offsetting is considered, the Applicant should prioritise local projects that provide benefit to Leicestershire.

### **Public Health**

- 1.50 A full Health Impact Assessment should have been undertaken.
- 1.51 The Leicestershire 2022-2032 Joint Health and Wellbeing Strategy (JHWS) and the Leicestershire Health Inequalities Joint Strategic Needs Assessment (JSNA 2023), provide robust, up to date, local data and should have been taken account of.
- 1.52 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.
- 1.53 Requirements/ mitigation is sought from the Applicant in respect of air quality, health inequalities, active travel, Gypsy and Traveller community, communication and Narborough train station.

### **Minerals Planning**

- 1.54 It has not been evidenced that Croft Quarry can remain rail served for up to four trains in a 24 hour period.

### **Overall Planning Balance & Conclusion**

- 1.55 The Secretary of State must consider whether the proposed development is in accordance with the National Policy Statement on National Networks and overall whether any adverse impacts do or do not outweigh its benefits.
- 1.56 Whilst the potential benefits of HNRFI, which are primarily economic in nature, are acknowledged having regard to the issues raised through these written



representations, it is LCC's view the potential adverse impacts of the Proposed Development, particularly in relation to Traffic and Transport are substantial.

- 1.57 This is on the basis of the assessment that LCC, in its role as local highway authority, has been able to undertake based on the Application Documents. As highlighted previously, there has been significant gaps to the traffic and transport evidence base, including whether the proposed mitigation is effective and deliverable and whether the proposed development represents 'good design'.
- 1.58 Therefore, a precautionary approach has been taken; it is not possible to support the application as proposed due to the lack of information. On this basis, LCC do not consider that the benefits of the proposed development outweigh the potential impacts.

Word Count: 2204