

WRITTEN REPRESENTATION

I am dismayed that a subject such as Climate Change is being 'heard' under Air Quality. These are very different things and feel Climate Change impacts are very important and should deserve its own hearing.

I'm also very concerned that with so many points expected to be raised regarding Traffic and Roads, that 1 full day will not be enough. I hope that if time runs out that there will be opportunities for valid points to be raised and full responses to be given by the Applicant.

I have made the representations below but unable to navigate through 6000+ pages of ES documentation; there will be so many other aspects of this proposal that need addressing,

Traffic and Roads

I'm very concerned that, as was highlighted at the Preliminary meeting, key traffic and road information had not been provided in order for statutory consultees to complete Local Impact Assessments.

This disrupts the process and disadvantages the public from the very beginning, not to be able to view LIA information.

As a resident of Stoney Stanton, I have also been disadvantaged by a woeful public consultation where questions at public face-to-face meetings were vague and dismissive of my concerns, specifically on traffic.

Doc 6.1 para 8.292 – confirms adverse effects on Stoney Stanton, but the mitigation below will not lessen these.

Doc 6.1, paras 8.317 – 8.328 - Highways Improvements

I don't agree that any of the mitigation measures will lessen the catastrophic impact the HNRFI HGV traffic will have on Stoney Stanton and other surrounding villages.

Each mitigating measure makes no sense, nor will impact the increase in volume of traffic through the village:

M69 Junction 2 south-facing slip roads to allow all movements – this will introduce new traffic:

'rat-run' traffic through from other villages, local businesses, and delivery vans to access the M69 south.

New A47 Link-road between B4668 Leicester Road, the HNRFI Site and the M69 Junction 2 with access for all general traffic.

With the use of a B road, to link to a single carriageway A47 road, this will slow traffic down and become very busy.

Junction capacity improvements, including enhanced pedestrian facilities as described in Table 8.28.

B1 option – putting traffic lights on this roundabout will cause a lot more queuing traffic, near a school and doctors' surgery. Hinckley Road is only one vehicle wide in the residential section due to on-street parking so if the traffic lights cause a queue, then those leaving the roundabout to get to Hinckley Road will be trapped.

B3 option – mentions Stanton Lane, but not sure where that is? But reducing the speed won't make any difference to the congestion which is the main issue here.

B5 option – is a desperate second-best measure to the proposed Traffic lights already in the pipeline.

However, none of the above begin to alleviate the inevitable increase in traffic volumes. It shows a poor understanding of the current traffic situation in and around Stoney Stanton, and other local villages. It will just mean there is more stationary traffic waiting in queues, with the obvious impacts on noise, pollution, and health and safety.

8.353 – low accident volumes/forecasts do not factor in the estimated increase in road movements to and from the HNRFI site that do not use the M69/A47 link.

I don't think this should be used as valid 'justification' to say mitigation has been addressed.

8.327 – basically advises that if required HGVs can use roads in Stoney Stanton ... However, HGVs are permitted to use any classification of roads for access and local deliveries even if there is a weight restriction in place.

What are the volumes for this particular scenario?

8.332 – refers to an 'emergency plan' but no detail given on this so unable to see whether this is in anyway sustainable.

8.341 - HNRFI, with the proposed mitigation improvements in place is considered to have an overall direct impact of long-term minor adverse effect. This is because traffic from the HNRFI Site be distributed along major roads which already accommodate heavy traffic, such as the M69 motorway, and therefore any severance issues will already exist. Enhancements to pedestrian facilities and upgraded links to existing and proposed non motorised routes will improve connectivity around the HNRFI Site notably around Sapcote and Stoney Stanton.

I disagree that the mitigation improvements will help as 'new' traffic will emerge, and Tritax have acknowledged here that there is heavy traffic on the M69 already. This is not far from A5 junction 1 of the M69, where the roundabout is already not able to cope with recent increases in warehouse traffic.

Location

In 16.1, para 2.10 refers to sites not being near flood plains, ... and therefore unsuitable for SRFI.

NPS-NN paras 5.90 and 5.91 state:

5.90 Climate change over the next few decades is likely to mean milder wetter winters and hotter drier summers in the UK, while sea levels will continue to rise. Within the lifetime of nationally significant infrastructure projects, these factors will lead to increased flood risks in areas susceptible to flooding, and to an increased risk of flooding in some areas which are not currently thought of as being at risk. The applicant, the Examining Authority, and the Secretary of State (in taking decisions) should take account of the policy on climate change adaptation in paragraphs 4.36 to 4.47.

5.91 The National Planning Policy Framework (paragraphs 100 to 104) makes clear that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. But where development is necessary, it should be made safe without increasing flood risk elsewhere. The guidance supporting the National Planning Policy Framework explains that essential transport infrastructure (including mass evacuation routes), which has to cross the

area at risk, is permissible in areas of high flood risk, subject to the requirements of the Exception Test.

I don't believe that the HNRFI development is 'necessary' in this location and feel this goes against NPS policy statements above.

In document 6.1.4

Outputs from the PRTM 2.2 traffic modelling indicate that redistributed traffic makes up the majority of traffic flow change on the network when compared with traffic flows generated by the HNRFI. However, the new access infrastructure provides clear reductions of traffic on routes in and around Hinckley. Some increases are inevitable on routes around Stoney Stanton and Sapcote, but of these many have destinations or origins within the villages themselves. Further review indicates that the redistributed traffic constitutes a significant number of existing residents and businesses rather than through traffic between the M69 and the B4114 Coventry Road to the east of the villages.

4.179. On this basis the Applicant concluded that the level of through traffic does not justify the adverse economic, social, and environmental impacts occurring through the construction of either bypass option A and B, and that the access infrastructure and off-site mitigation provided adequately mitigates the transport and traffic impacts of the HNRFI.

The true impact of access infrastructure at Junction 2 of the M69 southbound will definitely attract through traffic from the local area around Stoney Stanton; many people have stated that they're aware of this and would use the junction. I therefore don't agree with the claim in para 4.179 that the mitigation is adequate.

Need

16.2 para 2.6 states: SRFIs are distribution centres as defined in the Planning Act 2008, that seek to optimise the use of rail freight journeys by connecting to both the rail and strategic road network. The Government supports the creation of a series of SRFIs across the UK, to reduce lorry movements from the roads and transfer them onto the rail network, reducing both road traffic congestion and carbon emissions.

This may help to contribute to a national overall 'benefit', less lorry movements, but the HNRFI proposal will cause more traffic congestion

in the local area. 'Across the UK' should be reflected in furthering the SRFI network geographically. We already have several SRFIs in the Midlands area, serving Ports. The above statement means that further SRFIs can be located across the UK and not have to be within the so-called Golden Triangle

16.2 para 6.6 states: HNRFI's location in the centre of the country, between the West Coast and East Coast Mainlines and immediate access to the National and Regional Strategic Rail Freight Network, makes it exceptionally well placed to serve a regional market function and a national rail hub function.

The connectivity 'on paper' may look adequate (definitely not 'exceptional' though as quoted by Tritax several times); but the Nuneaton to Leicester line has passenger traffic which is set to be increased as part of the Midlands Rail Hub project to double the number of trains per hour.

The journey between the West Coast and East Coast Mainlines includes stations with barriers in Narborough and Oakham. The barrier down time will be increased, snowballing traffic congestion.

This area is already well populated with SRFIs, - DIRFT; East Midlands Gateway;; Hams Hall ; Birch Coppice ; Birmingham; Northampton; West Midlands Interchange – construction started in 2023.

Of these, Birmingham Landor St, Birch Coppice, East Mids Gateway and Hams Hall already have services to and from Felixstowe for freight. I believe the West Midlands Gateway will be able to serve Felixstowe as well.

Many of these, (e.g., East Midlands Gateway, Hams Hall, Birch Coppice, Birmingham Landor Street) already operate freight services to/from Felixstowe, which is a main feature of HNRFI, and the West Midlands Interchange will also when it is built.

RAIL

NPS-NN paragraph 2.41 states that The Government's strategy is to provide for increasing use of efficient and sustainable electric trains for both passenger and freight services. The environmental performance of the railway will be improved by continuing to roll out a programme of rail electrification.

HNRFI does not provide an electric rail option.

Opening the rail link between Rugby and Lutterworth and electrifying it would be a more future proofed solution and enable a direct link to Magna Park.

Comment by Chartered Institute of Logistics and Transport in the letter of support) page 49 of 16.1)

We face a climate emergency and transport generates approaching half of all CO2 emissions in the UK. Electric cars, vans and buses are now commonplace **and electric HGVs for local and regional deliveries are starting to emerge.** There is, however, no practicable solution available for decarbonising long distance road haulage and **the only proven method of moving freight in quantity over long distances with zero emissions is electric rail.**

NPS-NN paragraph 2.6 (not specifically referred to in 16.1) states: "A need for the development on the national networks to support national and local economic growth and regeneration, particularly in the most disadvantaged areas – helping to rebalance the economy.

This is certainly not true for the area that the proposed HNRFI is to be sited in as employment in this area is already above average.

WAREHOUSING

16.2 Para 2.2.2 states After discussions with rail freight operators, it is felt a 20-mile truck-drive isochrone from the proposed HNRFI is appropriate. This equates to roughly a 45-minute truck-drive time which most I&L companies would consider a reasonable distance from which to use the rail freight interchange to either collect or drop off materials and goods as part of their supply chain. This recognises that not only the rail-linked units provided within the Proposed Development will use the rail terminal.

With the amount of non-rail related warehousing proposed, this would indicate a massive increase in amount of road journeys that will be made to and from the HNRFI, impacting high levels of traffic congestion around Junction 2 of M69, and local trunk roads.

Take up of Logistics building supply.

Paras 3.2.4 and 3.2.5 state:

Even stronger than the national picture, take-up in the East Midlands was 113% above the long-term average in 2021 (12.39 million sq. Ft.); the highest on record Take-up in the East Midlands in 2021 accounted for around 22.5% of national take-up, the supply of premises is at an historically low level as evidenced by a regional vacancy rate which stands at just 1.40%

Occupier demand is shifting towards larger units. Take-up in the West Midlands too reached a new record in 2021, with 9.38 million sq.ft. accounting for 17% of national take-up. This means that together, the East Midlands and the West Midlands, which the HNRFI PMA sits within, accounted for nearly 40% of national take-up in 2021.

This indicates that already this area (East and West Mids) has taken a lot of the demand, and the impacts of those commitments is and will be felt on our road infrastructure and the local population, as these units are built and occupied.

16.2 Para 3.3.2 states: ... We consider the shift in habits we have been witnessing – such as the extraordinary growth in online retailing – to be structural rather than temporary.

It is not accurate to judge the Covid-19 pandemic as a future proof tool for forecasting warehousing need, as habits may reverse with the strong will to retain high streets and meet other demands on our country to protect green space, the environment and social well-being; a conservative shared approach across the country should be adopted to warehouse unit building supply.

Visual Affects

Landscape

The B8 buildings will become the significant view from all around the surrounding areas and overshadow the features of the landscape on all sides. This will impose and undermine the beauty of Burbage Common which is a SSSI, and the wider views of the countryside from the villages in the local area.

The fact that the DCO boundary is next to but not on the SSSI seems to be used as a 'technical' justification for the proposed development location and removes the Proposer any substantial need to give consideration on the wider landscape area itself.

This is in conflict with para 174 of the NPPF: **174.** Planning policies and decisions should contribute to and enhance the natural and local environment by:

(a) protecting and enhancing valued landscapes

Stoney Stanton will be significantly impacted by the large scale warehousing B8 and not in keeping with the Stoney Stanton rolling farmland LCA 15 (Local Character Area).

Users of the PROW and Bridleways will experience adverse effects on their visual amenity because the HNRFI site will be clearly visible from the east side of the M69.

Noise

Document 6.1.10

Table 10.54 doesn't include any monitoring from outside Stoney Stanton, along the PROW network towards the M69. I have measured noise from this location myself and the level was 80db. Also, a lot of the results/measurements in this Chapter are from 2021. New developments have emerged since then.