

# TR050007 Hinckley National Rail Freight Interchange Examination

## Written Response – Executive Summary

### Stoney Stanton Action Group

October 2023

The Stoney Stanton Action Group (SSAG) believes that the HNRFI development should not be allowed to go ahead for many reasons. The SSAG committee is formed of a small group of residents of Stoney Stanton.

#### 1. Purpose, Need, Location and Policy

- 1.1 The area is already well served by SRFIs and the country would not benefit from another one being built in this location.
- 1.2 The applicant has stressed the importance of the connection to Felixstowe, however there are already many regular services operating from Felixstowe to RFIs in the Midlands, with more planned.
- 1.3 There will be a surplus of warehousing in Leicestershire, as the Magna Park extension is already being built.
- 1.4 Because of the location in the “golden triangle”, most markets served will be a long haul distance from HNRFI by road. This does not comply with the NN NPS.
- 1.5 NN NPS calls for SRFIs in areas that are **not** already well served. The Midlands is not one of them.
- 1.6 NN NPS talks about development of the National Networks “to support national and local growth and regeneration particularly in the most disadvantageous areas – helping to rebalance the economy”. We are in an area where employment is already above average.
- 1.7 NN NPS paragraph 3.2 states “The Government recognises that for development of the national road and rail networks to be sustainable these should be designed to minimise social and environmental impacts and improve quality of life”. This development will have a detrimental impact and will decrease the quality of life for residents.
- 1.8 Most of the jobs “created” will actually be redeployments. The majority of people employed on the site will need to travel long distances.
- 1.9 The site selection process has been Leicestershire centric, which should not be the case for a nationally important Strategic Rail Freight Interchange. The site chosen is on the very Western

edge of Leicestershire. Other sites to the West of Leicestershire should have also been considered.

## 2. Land Use and Socio Economic Effects

### 2.1 Impact:

The impact of all aspects of the development has been underestimated including the impact of climate change on the workforce.

### 2.2 Employment

Lack of availability of workforce. Employment rates in the local area are higher than the national average. The proposed workforce will be from locations outside the area and will put more strain on the infrastructure.

### 2.3 Housing

Housing needs will outstrip supply.

### 2.4 Infrastructure

The importance of upgrading the A5.  
Extra traffic volume on the M69, particularly at the M1 junction.  
Proposed mitigations for limiting the effects of employee traffic, plus 9,500 HGV movements per day, are inadequate.

### 2.5 Policy

Current NN NPS - development will not improve our quality of life.  
New draft NN NPS – looking to a national network, not all clustered in the Midlands. Shift from building new infrastructure to fewer and more targeted interventions and improving existing assets.  
Developments should not be built on farmland.

## 3. Rail Traffic

3.1 No rail freight paths are guaranteed, but the applicant is claiming there will 16 trains in and out per day. The SRFI should not be allowed to be built if there is no guarantee of paths. National Rail is aiming to increase passenger services, as reported in the press. Required paths are not likely to be available for HNRFI.

3.2 The concept of using HNRFI as a rail freight hub has not been factored into any rail path requirements calculations.

3.3 Lack of suitable sidings in the area to cope with train problems.

3.4 Potential traffic caused by more closures at the Narborough crossing

3.5 Have the difficulties of slow moving large freight trains been taken into account?

#### 4. Road Traffic

- 4.1 Lack of agreement between the applicant and relevant highways authorities about the content and completeness of traffic modelling.
- 4.2 A Safety audit is required for all junctions affected.
- 4.3 A bypass for Stoney Stanton and Sapcote is still required
- 4.4 The construction phase is not “short term”.
- 4.5 Information about GEART modelling provided in the consultation material which indicated that many “sensitivity receptors” had been missed out of the assessment of traffic through Stoney Stanton and Sapcote, was not supplied in the examination documents and so the conclusions could not be checked.
- 4.6 References to the Leicester and Leicestershire 2050 Our Vision for Growth document and associated documents ignored the fact that the A46 Expressway is not happening so reducing the argument for HNRFI.
- 4.7 Information supplied is often insufficient to draw conclusions, rendering it impossible to check the stated conclusions.
- 4.8 Dismissal of the importance of existing traffic on trunk routes, e.g. M69, A5. Where there are regular hold-ups, a small increase will have an amplified effect. The algorithm used is incorrect.
- 4.9 The link numbers of roads used in modelling are almost impossible to follow as different links sometimes have the same name.
- 4.10 Significant roads have been missed out, however in some cases they are so close to the site (e.g. B581 Station Road through Elmesthorpe) that their significance is due to their location.
- 4.11 It is still clear that the applicant has disregarded features which affect traffic through Stoney Stanton and Sapcote (difficult tight S bends with narrow walkways)
- 4.12 The choice of a “future baseline” of 2036 apparently minimises the effect of HNRFI. This is misleading.
- 4.13 Results of traffic modelling presented are too simplified. Traffic flow disruption scenarios are not described.
- 4.14 Public transport improvements are not underwritten by potential operators.
- 4.15 The proposed A47 link road joins onto a smaller road which has many amenities directly fronting onto it. We could not see any mitigation for these.
- 4.16 Mitigations for parts of Stoney Stanton and Sapcote will have a detrimental effect on the quality of life for residents and will not mitigate against the real problems
- 4.17 The M69 Southbound slip roads were not opened in 1976 due to potential traffic problems which would occur. This is not addressed.
- 4.18 Adding 1,767 vehicles (494HGV, 1,273 light) to the M69 J2 roundabout at the peak hour is a major disruption to the motorists that regularly use this junction.

## 5. Pollution

- 5.1 Net global offsetting of CO<sub>2</sub> emissions does not remove the problem of local increases.
- 5.2 Increases in NO<sub>x</sub> and Particulate Matter levels in an area where levels are known to be already higher than national figures
- 5.3 Inadequate provision for electric HGV charging points.

## 6. Ecology and Biodiversity

- 6.1 Site Description and proximity to SSSIs – insufficient separation.
- 6.2 Concerns regarding Biodiversity Net Gains and offsetting. Lack of information about how BNG will be achieved, lack of evidence that proposals will work and lack of involvement of local communities
- 6.3 Loss of Mature Trees: Mitigation will not be effective for decades
- 6.4 Impact of hedgerow removal
- 6.5 Loss of carbon capture opportunities
- 6.6 Specific concerns regarding impact on wildlife populations.
- 6.7 Concerns about the effectiveness of mitigation strategies. Will TSH be held accountable for failed mitigations? SSSIs should be afforded more protection given the uncertainty of the efficacy of protective measures proposed.

## 7. Environmental

- 7.1 Serious concerns about the routing of natural waterways
- 7.2 Serious local floods in 2019 demonstrate that the area is prone to flooding if waterways are not managed properly
- 7.3 Concerns about the capacity of existing sewage and freshwater systems
- 7.4 Concerns that issues that have been raised with South Trent Water authority resulting from the 2019 flooding event have not been taken into account.
- 7.5 Concerns that changes to the level of the water table will have a serious effect on the health of the SSSIs

## 8. Agriculture, landscape and heritage

- 8.1 Agricultural land should be protected for food production
- 8.2 The development will have a major detrimental effect on the character and appearance of the local countryside
- 8.3 The development does not comply with national policies. The harm done to the environment, ecosystems and the peaceful aesthetic of the area will far outweigh any value of the proposal.

## 9. Visual Impact, Quality of Life and Wellbeing

- 9.1 The proposal will have a detrimental effect on mental health and wellbeing
- 9.2 None of the mitigations proposed to reduce the adverse visual impact will work in the medium term (15 years) and probably not in the long term.
- 9.3 Consultation material lacked any night-time views. This is unacceptable as it will have an impact on people in the local area. The nearby Calor gas site can be seen for miles, and the proposed main site is 10 times larger.
- 9.4 The proposal to have through the night lighting controlled by motion sensors will be disturbing to nearby residents and have a catastrophic effect on wildlife.
- 9.5 The overall combination of noise, pollution, overwhelming size of the development, traffic, light pollution, vibrations, intrusion into a peaceful and loved area, damage to the ecology etc. will have a very bad impact on the wellbeing of local residents.