

HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE

*Summary of Relevant
Representation on behalf of
Blaby District Council in
response to Tritax Symmetry
(Hinckley) Limited submission of
a Development Consent Order
(ref. TR05007)*

Deadline 1 - October 10, 2023

1. Introduction

1.1. This Relevant Representation ("**this Representation**") is made by Blaby District Council ("**the Council**") in respect of the application made by Tritax Symmetry (Hinckley) Limited ("**the Applicant**") for a Development Consent Order (DCO) for the Hinckley National Rail Freight Interchange (HNRFI) ("**the Scheme**") [Planning Inspectorate's reference TR05007].

2. Site Selection and Evolution

2.1. Appropriate justification for the Scheme needs to be provided. It is a significant greenfield site that if developed will represent a permanent loss of this open countryside.

2.2. The Council is not satisfied that the Scheme and the currently proposed Requirements adequately ensure the delivery of a rail based scheme, comply with the future direction of the draft National Networks National Policy Statement (NNNPS), nor demonstrates a sustainable access to the SRN which are intrinsic to its consideration as a Strategic Rail Freight Interchange.

3. Relevant Legislation and Policy

3.1. The Council is concerned that due consideration has not been given to the local policy context, nor is it sure to what extent the draft revised NNNPS has been taken into account.

3.2. No reference is made to the Planning Policy for Traveller Sites (PPTS). There is a traveller community around Aston Firs, immediately adjacent to the Site and thus, this policy is directly relevant and needs to be adequately addressed.

4. Land Use and Socio-Economic Effects

4.1. The Council considers that the information provided to be factually inaccurate and incomplete/absent in places. There are overarching issues with the approach to consistently using employment figures across the Environment Statement (ES) and the absent assessment of Narborough Level Crossing barrier down time. There are also a number of more detailed concerns ranging from the Scheme's impact on housing need to the availability of employees.

4.2. The Scheme's provision of employment is one of its principal potential localised benefits but the Council is underwhelmed by the ambition of the Applicant in this regard and the proposed Requirements and S106 Obligations are inadequate.

5. Transport and Traffic

5.1. The Scheme's transport and traffic related impacts are of significant concern; its impacts, mitigation, and modelling in terms of both the strategic and local road networks and its approach to vehicular movements and sustainable travel

is inadequate; moreover, it has failed to appropriately assess the impacts of increased barrier down time on Narborough Level Crossing.

5.2. The inadequacy of these mitigation measures and assessments is likely to result in significant and wide ranging impacts including, but not limited to, congestion, noise, air quality and carbon emissions.

5.3. The provision of up to 10,400 jobs in an unsustainable location substantially served by unsustainable private vehicular employee movements seriously undermines the Scheme's ability to deliver the climate change benefits envisaged in the NNNPS.

6. Air Quality

6.1. The general methodology of the air quality assessments appears acceptable with the crucial exception of the transport and traffic issues identified in section 5 of this Representation. Those issues have the potential to create substantially different air quality impacts.

7. Noise and Vibration

7.1. The approach and extent of the assessment overall is considered appropriate, but there are a number of more specific concerns in respect of the assessment. An overarching concern is whether the information included in the assessment is correct, given the inaccuracies considered to be included within the transport modelling and mitigation. This may have a significant impact upon the Noise Assessment and any expected mitigation as a result.

8. Lighting

8.1. Given the scale of the development, the number of lights proposed to be installed and the proximity of some highly sensitive areas, the Council considers that the Lighting Strategy is insufficient. It needs to present further evidence in the form of a quantitative assessment to prove that the impact on surrounding receptors in terms of light intrusion and glare intensity is acceptable.

9. Landscape and Visual Effects

9.1. The approach undertaken to the Landscape and Visual Impact Assessment (LVIA) is generally considered to accord with best practice.

9.2. In terms of the contents of the Landscape and Visual Impact Assessment, concern is raised in respect of the extent of residual significant effects at Year 15 even with mitigation planting included. The landscaping proposed is not considered sufficient to enable assimilation into the countryside setting

9.3. The scale of residual impacts indicate that the Scheme has overdeveloped the Site.

10. Ecology and Biodiversity

- 10.1. The quantum of ecological work undertaken is recognised and that sufficient Phase 1 and 2 species surveys are considered to have been completed and in general accordance with standard guidance. However, the Scheme as proposed fails to clearly demonstrate and secure 10% BNG including its long-term management.
- 10.2. The Council have a number of concerns in respect of the assessments.

11. Cultural Heritage

- 11.1. Further work is required to adequately assess the cultural heritage impacts of the Scheme. The impacts upon the settings of some designated assets assessed have been undervalued, and the amalgamation of all heritage assets into a single entity in terms of impact is considered inappropriate.

12. Surface Water and Flood Risk

- 12.1. The statutory responsibility falls with the Environment Agency for this type of development, with LCC as the Lead Local Flood Authority liaising with the EA and with the Applicant in relation to the surface water proposals.

13. Geology and Contamination and Waste

- 13.1. The Council have no concerns in respect of the work undertaken or proposed additional investigative work programmed in respect of the geology and contamination. However, additional information should be included within the SWMMP to ensure contamination is effectively dealt with during construction.

14. Energy and Climate Change

- 14.1. The Scheme in its current form results in unnecessary energy, water, and climate impacts. The proposed buildings will not be capable of net-zero operation in 2050, the Scheme fails to justify the proposed energy technologies and has potentially failed to capitalise on its full solar potential. The sustainable travel strategy is inadequate and compounds the Site's unsustainable locational issues.

15. Cumulative and In-Combination Effects

- 15.1. Despite all of the information tabled in respect of the Scheme, no clear conclusions are actually provided within the Cumulative and In-Combination Effects paragraph.

16. Design

- 16.1. The design of the scheme as proposed in its current form warrants further consideration, discussion and assessment.