

HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE

*Summary of Written
Representation (ref. HRFI-
20040018) 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. BDC vehemently opposes the HNRFI due to the far-reaching adverse environmental and social impacts it would cause in the local area.
- 1.2. There are significant flaws and omissions within the Applicant's assessment of impacts caused by the HNRFI and the mitigation being put forward to address these impacts.

2. Consequences of inadequate consultations and engagement

- 2.1. BDC notes that the traffic modelling and proposed mitigation have still not been agreed with the Local Highway Authority and the Highway Authority considers there are significant omissions in the Applicant's modelling.

3. Site selection and Evolution

- 3.1. The Leicester and Leicestershire Strategic Distribution Study (updated March 2022) recognises that the HNRFI site would meet the anticipated demand to 2041 for rail-served warehousing in Leicestershire, however, this is only one option that could be taken forward.

Site Alternatives

- 3.2. The Applicant should be asked to provide reasoned justification for why alternative sites were not considered.

Scheme Evolution

- 3.3. BDC raised concerns in respect of the layout of the Proposed Development, with any tugmaster movements needing to cross the A47 link road.
- 3.4. BDC consider that the link road needs to be expressly secured through the description of works at Schedule 1, Part 1 to the dDCO.

4. Relevant Legislation and Policy

- 4.1. Due consideration has not been given to the local policy context in which the HNRFI proposal sits.
- 4.2. No reference is made to the Planning Policy for Traveller Sites (PPTS) or to this community within the Applicant's Equalities Impact Assessment Statement.
- 4.3. The Applicant should be asked to explain how the Proposed Development will impact the traveller community around Aston Firs and how the scheme is consistent with the principles in the PPTS.

5. Land use and Socio-Economic Effects

- 5.1. The overall socio-economic impacts of the Proposed Development may be positive for the wider region, but many of these benefits will not be experienced in BDC's area.

Skills and Training

5.2. The Applicant's current proposals in respect of skills and training set out in Requirement 32 (employment and skills) of the dDCO and the obligations in Schedule 2 to the draft Section 106 Agreement (doc ref 9.1) are not sufficient.

6. Transport and Traffic

6.1. Leicestershire County Council Highways will provide their own representation on this matter.

6.2. BDC have concerns on a variety of matters and require the applicant to submit further information on all areas outlined.

6.3. The Framework Site Wide Travel Plan should be amended to require a fixed/shuttle bus service and improvements to cycle storage at Hinckley Railway Station and Narborough Railway Station and ensure connectivity within the site and from the surrounding area.

Strategic Road Network

6.4. BDC consider that the Applicant has failed to appropriately mitigate the HNRFI's impacts on both the SRN and the local road network.

Inconsistency in employment numbers used

6.5. The Applicant stated between 8,400 and 10,400 jobs are to be created but various technical reports have adopted an inconsistent approach with these figures.

6.6. The Transport Assessment has been modelled on the lower figure, therefore, BDC requires the Applicant to model the high development scenario.

Maximising use of rail during construction

6.7. BDC require the Applicant to set out how they are maximising the use of the rail during the construction period.

Sustainable Transport

6.8. The Applicant's proposals to facilitate Sustainable Transport are inadequate.

6.9. The Applicant's should set out a Single Travel Plan.

Narborough Level Crossing

6.10. BDC considers there are significant deficiencies in the Applicant's assessment of the traffic impacts of the downtime of the level crossing. Therefore, the Applicant should be required to carry out further assessment work.

6.11. The Applicant should be required to improve safety measures such as additional lighting at the crossing.

7. Landscape and Visual Effects

7.1. HNRFI will have major permanent, adverse effects on the landscape character and visual amenity of the surrounding environment.

7.2. There will be significant long term negative residual effects on a large number of visual receptors, footpath and road users.

7.3. Amendments to the parameter plans, illustrative landscape masterplan and dDCO are required alongside a wider package of landscaping enhancement measures, including off-site local enhancements.

8. Surface Water and Flood Risk

8.1. Statutory responsibility falls to the Environment Agency for this type of development.

8.2. BDC has concerns whether the baseline information providing regarding surface water and flooding is robust.

9. Design

9.1. BDC considers HNRFI has significant deficiencies and fails to meet the criteria for 'good design'.

9.2. HNRFI would lead to an overdevelopment of the Site and significant damage to the setting of the Site and sensitive areas. Moreover, the HNRFI is considered to have repetitive streetscape and limited legible hierarchy, with green infrastructure focused on the fringe areas of the Site.

9.3. BDC have listed of a number of design improvements which are required.

10. Air Quality

10.1. The approach and extent of the Applicant's assessment overall of air quality impacts is considered appropriate.

10.2. An overarching concern is whether the traffic information which informs the Applicant's assessment is correct.

10.3. The air quality in respect of queueing traffic as a result of Narborough Level Crossing Barrier down time has not been assessed.

10.4. BDC expect the Applicant to cover the expense of any monitoring of the off-site impacts of the construction and operation phase.

11. Noise and Vibration

11.1. The HNRFI will result in major, permanent and irreversible adverse impacts on the identified Noise Sensitive Receptors.

11.2. BDC is concerned that the high level employment figures have not been modelled and the noise assessment should be amended to account for this.

11.3. BDC has concerns over the extent and proximity of acoustic fencing required to protect nearby residential properties and the impact this has upon their visual amenity.

12. Lighting

12.1. The HNRFI will result in major, adverse long-term effects on residential receptors due to the height and intensity of some of the lights surrounding the rail yard and road and rail users as a result of glare. Furthermore, this will also

have major, long-term impacts on the community and foraging routes of bats due to light spill.

12.2. The HNRFI will result in minor negative long-term impacts on sky glow.

13. Ecology and Biodiversity

13.1. The HNRFI would have a range of negative and natural impacts on local biodiversity and ecology including the loss of woodland, mature trees and one veteran tree, hedgerows and fragmentation of habitats.

13.2. BDC disagree with the assigning of value to ecological receptors and consider the Applicant should carry out further assessment on the impact of habitat fragmentation on bats.

Ecological Mitigation and Management Plan

13.3. BDC consider there is general lack of detail provided for long term ecological management.

Biodiversity Net Gain

13.4. The Applicant has not clearly demonstrated the mechanisms for calculating and securing the implementation of BNG.

Other impacts

13.5. BDC consider that further assessment and surveys need to be undertaken to adequately understand the potential impacts light spills will have on bats. Furthermore, further detail is required for the biodiversity impact of the loss of hedgerows.

13.6. Further detail is required from the applicant regarding the additional hedgerow creation.

14. Cultural Heritage

14.1. BDC have outlined a number of structures that the HNRFI will have an impact on. These assets are of low sensitivity but will be subject to a large magnitude of change, either through total loss or substantial modification.

15. Archaeology

15.1. It is understood that Leicestershire County Council Archaeologists have requested financial contributions to assist with the management of any post-decision archaeological matters.

16. Geology and Contamination and Waste

16.1. BDC have no concerns in respect of the work undertaken or proposed additional investigate work programmed.

16.2. BDC considers additional details should be added to the SWMMP to detail the procedure that will be followed when dealing with site waste materials.

17. Energy and Climate

- 17.1. The significance of the GHG emissions associated with road traffic during both the construction and operation phase should be reconsidered.
- 17.2. BDC recognises that whilst HNRFI will seek to include net-zero buildings, it will only seek to achieve a 'very good' BREEAM rating, which is not considered ambitious enough.
- 17.3. HNRFI seeks to limit the generation of on site electricity to 49.9MW. The applicants should justify this limitation.
- 17.4. Both Ground Source Heat Pumps and Air Source Heat Pumps should be used and if either are to be excluded, this should be justified.
- 17.5. BDC have consolidated a list of how the Energy Strategy should be revised.

18. Health and Wellbeing

- 18.1. HNRFI will result in negative impacts to numerous health determinants.
- 18.2. BDC considers there has been a lack of analysis that underpins the proposed mitigation measures and around the qualitative nature of replacement rural open space bridleways.
- 18.3. BDC has compiled a list of measures to mitigate the identified adverse impacts.