

**WARWICKSHIRE COUNTY COUNCIL  
(20040686)**

**Hinckley National Rail Freight Interchange**

**Written Representations  
October 2023**

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## **1 Introduction**

- 1.1. These Written Representations are made by Warwickshire County Council in response to the Rule 8 Letter issued by the Examining Authority dated 22<sup>nd</sup> September 2023, for the application made by Tritax Symmetry (Hinckley) for a Development Consent Order to construct the scheme known as Hinckley National Rail Freight Interchange.
- 1.2. The proposed site is located to the north west of M69 junction 2, and located principally within the District of Blaby, with some identified associated works within the Districts of Hinckley and Bosworth, Harborough and Rugby Borough. As a consequence three Highway Authorities have been engaged in discussion with the applicant team – National Highways, Leicestershire County Council and Warwickshire County Council – over the traffic and transport proposals associated with the application.
- 1.3. The proposed scheme is for new rail infrastructure off the Leicester to Hinckley railway providing access to sidings for trains to be unloaded and loaded, construction of a rail port to accommodate up to 16 freight trains (775m in length) per day, up to 850,000sqm of warehousing and ancillary buildings, associated link road serving the site connecting with M69 junction 2 and A47/B4668, lorry park with welfare and refuelling facilities, site hub building, associated ground works, landscaping, drainage, noise attenuation measures, ecological works, changes to public rights of way. In addition to the spine road serving the site, access provision includes the delivery of south-facing slip roads at M69 junction 2 and other associated off-site transport infrastructure works in mitigation.
- 1.4. Warwickshire County Council will continue to engage with the applicant team during the examination process in order to ensure that the impacts of the proposal on the County's network are fully assessed and suitable mitigation proposed. It should be noted that officers' comments should not be assumed to be representative of the views of the Borough or District Councils or their elected representatives.
- 1.5. As part of the application, Tritax Symmetry (Hinckley) has submitted a number of documents. Warwickshire County Council (Highways) has focussed on those documents relevant to the topic of traffic and transportation, on the basis that Warwickshire County Council was consulted on. The documents include plans, an Environmental Statement which

includes an appended Transportation Assessment and Travel Plan Framework, Sustainable Transport Strategy, Construction Management Plan, HGV Routing Strategy and Technical Notes.

- 1.6. These written representations are made by Warwickshire County Council in its capacity as highway and local transport authority.

Warwickshire County Council Plans and Strategies

- 1.7. Warwickshire County Council has three principal policy documents that have a bearing on the proposal and these are the Local Transport Plan, Design Guide, and Rail Strategy.
- 1.8. Warwickshire County Councils Local Transport Plan (4) – Policy Position F7 encourages freight vehicles to use appropriate routes:

## **Policy Position F7**

### **Encourage freight vehicles to use appropriate routes**

HGVs using unsuitable routes can affect the amenity of the affected area and also may present a safety issue for local communities. We will promote the use of suitable routes to help reduce instances of HGVs using inappropriate or smaller local roads, to enhance the environment and wellbeing of those living and working in affected areas.

- 1.9. Further policies MS1 and MS2 seek to ensure that residents have access to a choice of transport modes, and that development proposals provide sustainable transport options in accordance with the National Planning Policy Framework. Whilst these are Warwickshire County Council policies, they underpin the National Policy, and therefore are considered to be applicable to this proposal:

## Policy Position MS1

### Increasing sustainable development and travel

WCC will encourage sustainable development through the promotion of public and community transport, the provision of cycling and pedestrian facilities and traffic management measures. Where feasible and appropriate, and in collaboration with local communities, space will be allocated to more sustainable travel options.

Working with communities, the district and borough councils, external organisations and developers, we will use our influence to put pressure on how new developments are shaped, so that the transport options which serve them are as environmentally beneficial as possible. We will take evidence-based decisions which may include requirements for transport assessments, travel plans, modelling assessments and other appropriate data.

## Policy Position MS2

### Travel options which are accessible to all

We want Warwickshire's residents and visitors to be able to travel around the county in safety and for transport options to be accessible to all. In its role as Highway Authority, WCC will strive to ensure that all developments are accessible, that designs and layouts contribute to the local area and that improved connectivity to footways, cycleways and public transport are incorporated.

- 1.10. Warwickshire County Council's Design Guide (2022) sets out the basis on which highway works are approved and delivered. Significant highway improvement schemes required in mitigation of development impacts are delivered by way of a section 278 agreement between the developer (as land owner) and the County Council. Where cross boundary schemes are required, the Highway Authorities will agree on how technical approval and delivery of the scheme is managed between them.

*The County Council expects the Design Manual for Roads and Bridges (DMRB) will be the primary design manual used for new improvements. Developers' attention is drawn to GG101 Revision 0 Note 2 which states: "Where a local highway authority decides to use the DMRB in whole or in part for development of its own highway/ road network, the overseeing organisation is defined in accordance with their own procedures." In these situations, Warwickshire County Council will act as the overseeing organisation.*

And goes on to state:

*For improvements that will be carried out on the existing road network, it is expected, once planning consent has been granted, the developer will contact WCC Engineering Design Services to progress their application to enter into a formal agreement to begin the process of scheme delivery, as advised in the informative note provided as part of the planning consultation process. In general, the process is expected to be as follows;*

- *Developer to apply to enter into a Section 278 Agreement or Section 38 Agreement. Further information on legal agreements is included in Part 10 and Annex 10.1.*
- *Developer to supply a preliminary general arrangement drawing which corresponds to the planning consent.*

1.11. Warwickshire County Council’s Rail Strategy (2019 -2034) states at Policy WRS10: Freight

*The County Council will support rail freight development where appropriate and work with partners to maximise the benefits of HS2 released capacity for both freight and passenger rail services.*

1.12. Table 6 of that document sets out the plans for new rail stations and service enhancements, an extract that is considered relevant to the Hinckley National Rail Freight Interchange proposal is included below:

Nuneaton Parkway	WCC will investigate the provision of a new strategic multi modal station located between Nuneaton and Hinckley. The provision of this station will provide local and strategic improved connectivity to Coventry, Leicester and Nottingham	Midlands Connect TOCs WMRE	The aspiration for an new station in this location aligns with wider regional priorities to improve services between Birmingham - Leicester and Coventry - Leicester/Nottingham.	2026-2033
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1.13. It is recognised that growth in passenger rail journeys is expected to increase significantly, and therefore Warwickshire County Council is keen to ensure that improvements to rail freight capacity do not prejudice plans for future passenger capacity improvements.

## **2 Key Issues for Warwickshire County Council (Highways)**

- 2.1. Warwickshire County Council submitted its Relevant Representations to the Examining Authority (June 2023), and these captured the key issues that Warwickshire County Council (Highways) wished to raise. Since that time some additional information has been submitted to the Examining Authority, and these Written Representations reflect the position to date and expand on those key issues.
- 2.2. The key issues for Warwickshire County Council, given the distance from the site selected for the Hinckley National Rail Freight Interchange, are:
  - Traffic Modelling
  - Travel by Sustainable Modes
  - HGV Routing
  - Highway Works
- 2.3. These are explained in more detail in the following sections.

### **3 Traffic Modelling**

#### Trip Generation

- 3.1. The trip rates used in the assessment of the Hinckley National Rail Freight Interchange were agreed by Warwickshire County Council (12<sup>th</sup> March 2021). They were based on surveys carried out between 2011 and 2016 for similar rail freight interchanges, and the calculations were based on gross floor area.
- 3.2. The sites surveyed had no operational HGV lorry parks at the time of the surveys, and therefore no account has been made within the trip generation calculations or modelling for HGVs that may be on the network (not associated with Hinckley National Rail Freight Interchange) and want to make use of the lorry park facilities. Therefore it has been assumed that the HGV lorry park proposed as part of the Hinckley National Rail Freight Interchange will only be available to be used by HGVs serving the site. Should this change in the future, further assessments and approvals should be required.
- 3.3. It is understood that further capacity assessments have now been submitted in respect of the proposed spine road/site access junctions. As these fall on the Leicestershire network, and in close proximity to M69 junction 2, and are proposed to be offered for adoption, it is a matter for Leicestershire County Council and National Highways to comment on.

#### Modelling

- 3.4. There are four types of modelling either referred to in the application documents or the Strategic and Local Highway Authority submissions:
  - PRTM – Pan Regional Transport Model version 2.2, Leicestershire County Council’s strategic model built using SATURN (simulation and assignment of traffic in urban road networks) for the County and surrounding districts
  - VISSIM – software used by National Highways to simulate traffic movements in small-medium corridor/junction locations
  - RRAM – Rugby Rural Area Model, uses Paramics Discovery to simulate traffic movements across a defined network (includes A46, A5, network south of the A5 within Rugby Borough covering the rural villages)
  - Isolated Junctions – LinSig for traffic signal junctions, Junctions 10 (ARCADY and PICADY) for roundabout and priority controlled junctions



- 3.5. It was agreed with the applicant team that the PRTM model would be used to derive the peak period traffic flows for the modelled future years (2026 and 2036) scenarios.
- 3.6. Three scenarios were modelled for the future year peak hours and these were:
- Do Nothing - Without Development (WoD) inclusive of committed development
  - Do Minimum - Without Development With Access Infrastructure (WoDWS)
  - Do Something - With Development (WD) including the Access Infrastructure
- 3.7. Warwickshire County Council did respond to the modelling brief and stated that there would be no benefit in modelling the 'Do-Minimum – Without Development With Access Infrastructure Scenario since this is not something that would occur. The M69 south-facing slip roads and spine road are required to serve the development, there are no proposals for this infrastructure to be delivered outwith the proposal.
- 3.8. However following this modelling work, the outputs from the PTRM model runs were not reviewed and agreed by the Highway Authorities, for two principal reasons 1) because the planning situation within the Area of Influence continued to change and new committed development and network changes needed to be scoped in, or at least assessed as a sensitivity assessment to understand the potential changes that could occur, such an instance is the Padge Hall Farm development; and 2) the approach taken to furnishing in order to derive turning flows at junctions was not agreed with the Highway Authorities, the PRTM model provides link flows and not junction turning flows.

#### Padge Hall Farm

- 3.9. The planning landscape is constantly evolving, and it is difficult to account for every planning decision that will inevitably change the model assumptions being made. However, there are some that are likely to have a more significant impact on the operation of the network, and one such example is Padge Hall Farm.

- 3.10. Whilst the Padge Hall Farm application was submitted in 2021, and has not yet been granted whilst the section 106 agreements are being finalised, the resolutions to grant were made at Rugby Borough Council's and Hinckley and Bosworth's Borough Council Planning Committees in March 2023 and June 2023 respectively. In the run up to this period, the highway mitigation proposals were in the public domain (August 2022). The access and mitigation proposals include:
- Introduction of a signalised site access junction onto the A5 (between A5/A47 Dodwells junction and Nutts Lane railway bridge which passes over the A5) that does not provide for a right turn out of the site access
  - Changes to the A5/A47 Dodwells junction to facilitate u-turning traffic on the A5 east arm from the Padge Hall Farm site
  - Lowering of the carriageway beneath the A5 Nutts Lane railway bridge to allow high sided HGVs to use this section of the A5 (A47 to M69 junction 1)
- 3.11. The Highway Authorities requested that these proposals be modelled as a sensitivity test given the impact they could have on the assignment choices for the Hinckley National Rail Freight Interchange HGVs, particularly high sided HGVs, and therefore the potential impacts that could occur should high sided HGVs assign to/from the site via the M69 junction 1 and A5/Dodwells roundabout rather than to/from the site via the A47/Dodwells roundabout.
- 3.12. This modelling assessment has not been carried out, and therefore the impacts are unknown.

#### Furnessing

- 3.13. Further to this issue being raised, a Technical Note has been submitted to the Examining Authority. This sets out the furnessing methodology, and whilst helpful with the detail provided, there are some outstanding queries that need to be addressed, for instance the treatment of turning movements which were observed to be zero or close to zero. It is understood that this matter has been raised by National Highways with the applicant team and will be discussed further following the submission of documents required for Deadline 1 set out in the Timetable within the Rule 8 letter.
- 3.14. As a consequence of these two issues, the PRTM outputs have not been agreed by the Highway Authorities.

### Junctions Requiring Mitigation/Further Assessment

3.15. WCC has requested that in order to assess the impact of the proposal on critical parts of the Strategic Road Network that interface with both Warwickshire and Leicestershire networks, the following junctions should be assessed in the National Highways VISSIM models:

- A5/A426 Gibbet Hill (NB. the A426 is part of the Major Road Network)
- A5 Longshoot-Dodwells
- M69 Junction 1

### A5/A426 Gibbet Hill Junction

- 3.16. This junction was to be signalised to mitigate the impacts of DIRFT III in accordance with their planning consent, but they have not yet triggered for this improvement. However it is understood that the promoter of that development site is in discussions with National Highways.
- 3.17. This junction was also to be signalised to mitigate the impacts of Symmetry/Magna Park as required as part of that planning consent. However, as part of their discussions with National Highways with regard to the detail around the scheme design, the promoter of Magna Park South used the VISSIM model to assess development impact given the junction interactions with M6 junction 1 and the A426 corridor on the Major Road Network (MRN) in North Rugby, and we would expect the Hinckley National Rail Freight Interchange promoter to use the same approach to assess the impact of development traffic.
- 3.18. National Highways considered the junction signalisations proposals and recognised that due to these committed developments and other Local Plan led growth in the area, the proposed signalisation scheme will not accommodate the cumulative impact of various consented developments. As a consequence the traffic signal scheme assessed as part of the Hinckley National Rail Freight Interchange Transportation Assessment is no longer proposed.
- 3.19. National Highways is currently working to identify a scheme that can accommodate the forecast growth, and secure contributions, so that the network, travelling public and businesses do not have to suffer the queues and delays associated with multiple improvement schemes each of which would have roadworks and diversions associated with them if several different

schemes are delivered in succession.

3.20. Furthermore, the queues and delays forecast in the LinSig assessment for the proposed traffic signal junction (with the Hinckley National Rail Freight Interchange traffic) are significantly lower than those in the VISSIM model (without the Hinckley National Rail Freight Interchange traffic).

3.21. Whilst BWB has noted in its response to point 19 in HNRFI-BWB-GEN-XX-RP-TR-0031 Rev P01 that there is not full correspondence between the 18 entry points identified within the VISSIM model and the traffic flows derived from PRTM, Warwickshire County Council consider that it is still important for the VISSIM to be used to assess development impact for the reasons set out below:

- National Highways does not have a committed scheme at this junction as highlighted previously and therefore the baseline position for the modelling must be the existing non-signalised junction arrangement (i.e., a Do Nothing)
- Blocking back towards M6 Junction 1 along the A426 and platooning of traffic between M6 Junction 1 and the Gibbet Hill junction can only be considered within the VISSIM model
- Whilst Warwickshire County Council understands that flow correspondence may only exist across 8 loading points, we do not necessarily consider this to be a limitation which invalidates the use of the VISSIM model
- For example, if the loading points within the VISSIM model which correspond to the PRTM data include the A5 (2), the A426 north and south (2) the M6 (2) and Gibbet Lane (1) then there is sufficient network correspondence to assign the development trips across the study area from the PRTM outputs
- Warwickshire County Council does not require the interaction on the minor roads (i.e., Lutterworth Road or Arthur James Drive) to be considered in terms of changes in development flows and, as such, impacts at these locations can still be considered, particularly in the context of the effects arising from delivery of any proposed mitigation at Gibbet Hill.

3.22. Therefore for these reasons Warwickshire County Council does not accept the modelling or proposed mitigation at this location, and requires the VISSIM modelling to be carried out.

### A5/A47 The Longshoot/A47 Dodwells

- 3.23. The Transportation Assessment identifies a 3% impact at the A5/The Longshoot junction within the PRTM modelling, and conclude that this is not considered a sufficient impact to warrant further assessment.
- 3.24. This is a critical junction on the Strategic Road Network, and its efficient operation is critical to the local road network. Any additional queues and delays will impact on the network, and in order to consider the safety and efficiency of the network that modelling has been requested.
- 3.25. All developments that are shown to be assigning traffic through the A5/Longshoot/Dodwells junctions, including Padge Hall Farm, and several other large sustainable urban extensions (within Warwickshire and Leicestershire) have been required to use the National Highways VISSIM model and we would expect the Hinckley National Rail Freight Interchange promoter to use the same approach for consistency.
- 3.26. Therefore Warwickshire County Council does not accept the position that the impacts on this part of the network are acceptable and that further assessment is required.

### M69 Junction 1

- 3.27. Whilst National Highways are responsible for this part of the network, the B4109 Hinckley Road connects at this junction, and the junction is a controlling factor on vehicle route choice from other routes such as the B4455 Fosse Way, and the A426 further east.
- 3.28. The modelling carried out within the Rugby Rural Area Model includes this junction, and from the information below, the modelling has highlighted some notable impact on the Hinckley Road approach which we require to see further assessment of by way of modelling in the VISSIM model.

### Rugby Rural Area Modelling (RRAM)

- 3.29. Warwickshire County Council agreed that the impacts on Warwickshire's network would need to be modelled using the suite of Paramics models that Warwickshire County Council has developed. These models are of a smaller scale than the PRTM model and due to the extents of this strategic model, areas within Warwickshire have not been modelled in detailed within PRTM. Therefore, further assessment has been undertaken in the Paramics

Discovery Rugby Rural Area Model (RRAM) to ascertain network impacts in Warwickshire.

- 3.30. The outputs from PRTM have been used as inputs to the RRAM. As the output from PRTM have not yet been agreed by the Highway Authorities, this potentially makes the modelling carried out within the RRAM and the results presented below abortive.

#### Overview

- 3.31. BWB has submitted several different files related to the traffic modelling.
- 3.32. It is apparent from the submission that the initial modelling may have identified issues along the A5 to the east of M69 Junction 1 and these 'issues' were reviewed against the existing model calibration and validation levels. This, in turn, revealed that the model had not been subject to detailed calibration checks at one of the 'problem' junctions.
- 3.33. Thus, the model was updated to ensure the traffic flows at the Smockington junctions were calibrated to ensure that any impacts identified through the modelling were realistic and not a result of deficient modelling assumptions.

#### Scenario Development

- 3.34. The approach to deriving the development scenarios has been set out within VM220535.TN001 HNRFI Development Note\_ISSUE\_20230725. This Technical Note sets out the correspondence between the model extent captured within the RRAM and the cordons derived from the PRTM model.
- 3.35. The Technical Note referred to above captures how traffic reassignment has been managed through the modelling thereby allowing for the strategic effects of the proposed junction enhancements to be accounted for within the microsimulation modelling.
- 3.36. The RRAM modelling outputs and supporting Technical Notes were submitted to Warwickshire County Council on Friday 11<sup>th</sup> August 2023. The results for the updated scenarios have been submitted by BWB and include results from the following scenarios:

	Scenario Name	Description
1	2031 Reference Case	<i>2031 RRAM Reference Case Model</i>
2	2031 HNRFI Development + HGV Restrictions	<i>2031 HNRFI + Development with HGV Routing Restrictions</i>
3	2031 HNRFI Development [Sens. Test]	<i>2031 HNRFI + Development without HGV Routing Restrictions [Sensitivity Test]</i>
4	2031 HNRFI Development + HGV RR + Mitigation	<i>2031 HNRFI + Development with HGV Routing Restrictions and Mitigation at M69 J1 (Optimised Signals)</i>

3.37. The performance of these scenarios has been reported in an accompanying Excel spreadsheet and BWB Technical Note.

#### Results Analysis (RRAM)

3.38. At the highest level, the network statistics indicate that there is a modest impact in Scenarios 2 and 3 when compared to Scenario 1. This manifests via increased journey times and reduced speeds on the model network.

3.39. Within Scenario 4, the results indicate that journey times reduce in the AM and increase slightly within the PM. However, as speeds are observed to increase in both AM and PM periods then it is likely that the change in journey times within the PM is a product of how trip patterns have changed within the model rather than being the result of an impact occurring within the model network.

3.40. Additional, more detailed, outputs are also available within the results spreadsheet which consider how queueing and journey times are changing between the different scenarios to identify if there are 'development specific impacts' which occur as a result. Warwickshire County Council has undertaken some supplementary analysis of the modelling outputs which has been completed in line with Warwickshire County Council's Modelling Protocol for Development (specifically Advice Note 03).

3.41. At this stage, we have focussed on high level changes in queueing and journey times between the 2031 Reference Case (Scenario 1) and the 2031 Development Case (Scenario 4) which includes the mitigation and HGV route restriction. This is detailed further as follows:

#### Queueing Impact Analysis

3.42. The changes in queueing levels at the junctions contained within the model has been assessed for the AM and PM peak hours and the outcome of these





**Figure 2 PM Queue Length Impact (Scenario 04 vs. Scenario 01)**



- 3.44. There are notable impacts at M69 junction 1. Given the nature and location of this junction Warwickshire County Council would wish to defer to National Highways as to whether this junction operates effectively but reserves the right to provide further commentary on the M69 junction 1 VISSIM model, in particular we would expect that modelling to be able to demonstrate that there are no impacts observed on the Hinckley Road approach to junction 1 or that mitigation can be provided.
- 3.45. This is the case in both the AM and PM periods. Additionally, within the PM period in particular, additional impacts are observable on the A46 south of M6 J1 and parallel to the A46. Again, we would expect that colleagues in National Highways would need to be satisfied on the operation of the junctions along the A46 and the side arms.
- 3.46. Similar analysis has also been undertaken to understand the impact on journey times within the model. These are already summarised within Table 1 and Table 2 of BWBs technical note but for ease have been illustrated within Figure 3 and Figure 4 for the AM and PM peaks respectively.

- 3.47. Analysis of the information presented within Table 1 and Table 2 of the BWB report, alongside **Figure 3** and **Figure 4** below, reveals that the impacts tend to be focussed around the M69 and approaches to/from M69 Junction 1.
- 3.48. For Warwickshire County Council this means that there is a notable impact observed on the Hinckley Road approach to M69 Junction 1 which we would need to see further evidence, most likely through the associated VISSIM modelling.

**Figure 3 – AM Journey Time Analysis (Scenario 04 vs. Scenario 01)**



**Figure 4 – PM Journey Time Analysis (Scen 04 vs. Scen 01)**



- 3.49. It is considered prudent to also raise concerns with regards the journey time impact on R7 S6 SB which indicates that there may be impacts which occur on the A5 SB approach to the Cross-in-Hands roundabout during the PM peak. Further analysis of this impact is required to determine if it is the Cross-in-Hands roundabout or the Mere Lane junction which is the root cause of the delay.
- 3.50. There are also issues which are apparent on the approach to the A46 Binley Woods junction east of Coventry which could be related to the operation of the junction, since that has also indicated an increase in queueing between scenarios.
- 3.51. Again, we require evidence to be provided so that Warwickshire County Council and National Highways can be satisfied that this junction can accommodate the changes in traffic volumes which are anticipated.

Summary of Key Elements for Further Clarification

- 3.52. Having completed the review of the supporting RRAM model outputs alongside the BWB and Vectos Microsim technical notes, we consider the following points need to be addressed by BWB to enable Warwickshire

County Council to conclude that, post implementation of the mitigation schemes, the development impacts will be acceptable:

- Adjustments were made to reassign HGV trips identified on the local roads within the PRTM such that they were completed within the microsimulation modelling via alternative routes. PRTM appears to indicate around 60 HGVs across the modelled period could interact with the local road network and Warwickshire County Council believe these have been omitted from the RRAM assessment by being assigned to other OD pairs. Confirmation on this point, and how the HGV movements identified in PRTM will be managed, is requested (see Section 5 below).
- The queueing analysis indicates potential issues around the Cross-in-Hands junction which is confirmed in the RRAM journey time analysis. We require further evidence that the network will function acceptably in this area.
- The analysis presented by BWB concludes that the VISSIM modelling, coupled with the fact that it operates under dynamic signal control, is sufficient evidence to conclude that M69 junction 1 will operate effectively. We would require National Highways to be satisfied with this point and, additionally Warwickshire County Council wish to see the supplementary modelling in detail so that we can be confident that the impact on Hinckley Road will not be severe.
- We consider that BWB should provide further detailed evidence, most likely by way of statistical analysis (e.g., Confidence Intervals) to demonstrate that the queueing observed at the Binley Woods junction will not impact Warwickshire County Council's local road network.

#### Cross-in-Hands Roundabout

- 3.53. Cross-in-Hands Roundabout is identified within the Transport Assessment as junction 27 requiring to be mitigated for the impact of the development traffic.
- 3.54. This junction has been assessed using PRTM flows, furnished to generate turning flows and then the junction tested for capacity using ARCADY. The resultant impact of the development traffic is proposed to be mitigated with alterations to the A5 and local road network approach arms as shown in Drawing no. HRF-BWB-LSI-D8-DR-CH-00100 P04 (revised to remove reference to third party developer works at the junction). The improvement is proposed to be delivered as part of a package of off-site mitigation works.

- 3.55. In order to check the validity of the input turning flow data used in the ARCADY assessments for this junction, we require evidence to be submitted in the form of a spreadsheet which includes a comparison of RRAM modelled and demand turning flows for the scenarios listed below inclusive of the A5 calibration adjustment at the Smockington junction (assuming 1 HGV = 2.3 PCUs) with turning flows from the corresponding scenarios in the ARCADY analysis:
- 2018 Base
  - 2031 Reference Case
  - 2031 HNRFI Development + HGV Routing Restrictions + Mitigation
- 3.56. The spreadsheet should highlight the absolute difference between the RRAM and ARCADY turning flows and use the GEH measure to assess the significance of these differences.
- 3.57. It should be noted that no information has been submitted with regard to road safety audits for these proposed works and it is not known if there are any departures from design standards.

## **4 Sustainable Transport Provision**

- 4.1. The measures included within the Framework Travel Plan and Sustainable Transport Strategy are generally in accordance with the type of measures that would be expected. However these documents do not provide any detail as to how employees living in Warwickshire, albeit the northern part of the County most likely, would realistically be able to access the site using sustainable travel modes. Further the baseline percentage mode share applied within the assessment is based on 2011 census data and whilst using the local middle super output areas (010 & 012) for Blaby, the percentage for walking is noted as being high (11%) given the rural location of the proposal. This matter was raised at the Transport Working Group meetings.
- 4.2. Many of the jobs at the Hinckley National Rail Freight Interchange will be on a shift basis, with off-peak hour travel required. Therefore, it is unlikely that a significant volume of employees living within Warwickshire would walk or cycle to the site, which means that the most viable option for travel by sustainable mode (subject to infrastructure delivery) could be public transport.

### Public Transport – Bus Based

- 4.3. The location of the site, and the scale of employment that could be created, means that if suitable sustainable transport provision is not made in terms of the type of infrastructure and the scale to accommodate forecast volumes of users, many employees could revert to/choose to use private car as a means of travelling to work.
- 4.4. The travel plan has included a target of 5% for travel by bus based public transport. Therefore in order to cater for employees who will most likely be drawn from the local population centres, which in addition to the population centres of Hinckley, Leicester and Coventry would be expected to include Nuneaton and Bedworth, Bulkington, Wolvey, Rugby, Atherstone and Tamworth, the public transport provision needs to provide suitable bus services that connect the site with those population centres.
- 4.5. Proposed bus service improvement focusses on the X6 service which currently operates between Coventry city centre and Leicester city centre via the M69. It is proposed to divert this service off into the site via junction 2, which would cater for employees who can connect with that service, but will not provide a suitable option for those employees who do not live within easy accessibility of those city centres.

- 4.6. Other services referred to include the #158 which operates between Leicester and Nuneaton via Earl Shilton and Barwell, and the #48 which operates between Leicester, Hinckley and Nuneaton. It is stated within the Sustainable Travel Strategy that the #158 would not be likely to divert into the site due to the loss of patronage it currently receives on its existing route. It is not clear if other services such as #48 would be diverted to the site, or where suitable bus stops would be located for the services to call at and for employees to access within the recommended 400m walk distance.
- 4.7. The travel plan also proposes that Demand Responsive Transport (DRT) could be used to provide flexible travel opportunities for employees in the more rural areas. However it is understood that the existing DRT scheme is a three year pilot scheme funded by the DfT Rural Mobility Fund, and therefore should this form of transport be promoted by Hinckley National Rail Freight Interchange there would need to be significant funding by the promoter.

#### Public Transport - Passenger Rail

- 4.8. WCC has reviewed document TR050007-000782-6.2.3.1 Hinckley NRFI ES Appendix 3.1 Rail Operations Report.pdf. The timetable work outlined in the report tested the Hinckley National Rail Freight Interchange proposal of a maximum capacity of 16 intermodal trains per day alongside the existing 2 Cross Country passenger trains per hour between Birmingham and Leicester. The timetable work also included an additional passenger service assumed as a sensitivity for future aspirations. The report suggests that this level of service provision can be accommodated.
- 4.9. WCC's work on the proposed Nuneaton Parkway has tested a future scenario of up to 4 passenger trains per hour on the Birmingham-Leicester line. The expansion from the existing 2tph to 4tph on this route is linked to wider capacity enhancements on the line, as proposed by Midlands Connect in their Midlands Rail Hub proposal. Midlands Connect, in their initial draft letter in response to the HNRFI (dated 14/01/2022), indicated that the proposal aligned to the Midlands Connect Strategy. Midlands Connect also acknowledged that their strategy for growth on the corridor required an expansion of capacity on the corridor, for which investment is being sought.
- 4.10. We believe that the timetabling work is sufficient and robust and would not impede the future aspirations for additional passenger rail growth between Birmingham and Leicester (which itself would require capacity

enhancements), nor impede the aspiration for delivery of a Nuneaton Parkway station.

#### Changes in Modes of Transport

- 4.11. Notwithstanding the site location being within Blaby, and their car parking standards being the relevant local standards for consideration, given the scale of development proposed, and Government objectives ascribed to such development, then consideration also needs to be given to flexibility to ensure that Electric Vehicle Charging provision can flex to cater for future demand, and space within the site can be repurposed if and as necessary to accommodate connected and autonomous vehicles in the future.



## **5 HGV Routing**

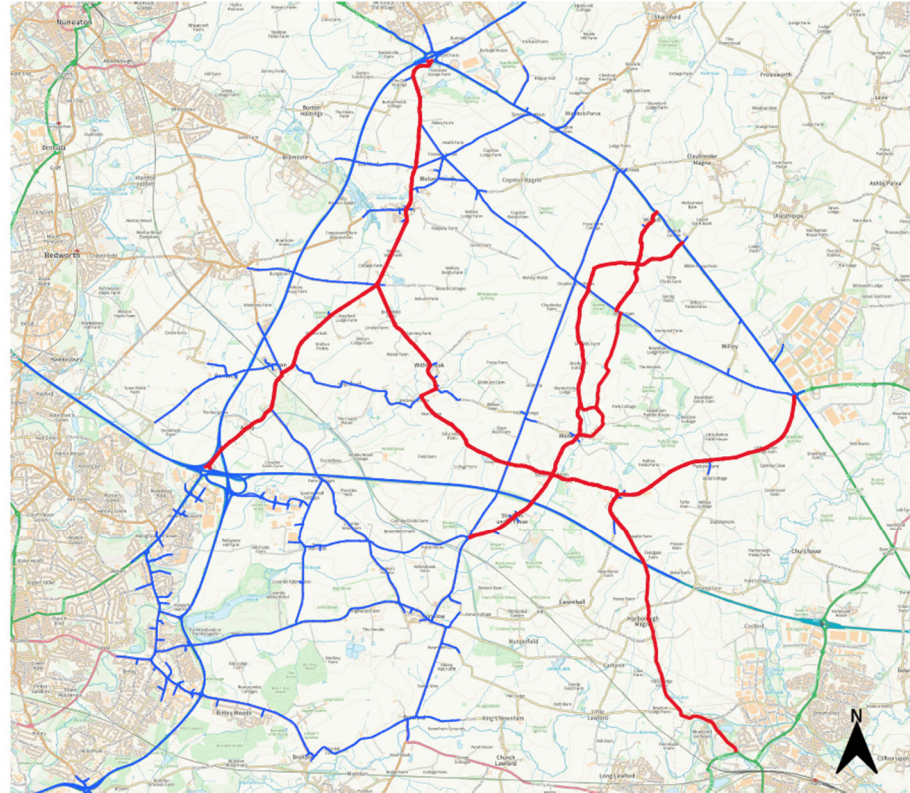
- 5.1. Warwickshire County Council has been made aware by members of the public, Parish Councils and Local Members of issues with HGV traffic travelling through rural villages, often to avoid congestion on the strategic or principal road network in and around the A5 and A426.
- 5.2. Similar concerns were also highlighted from residents of Studley and Mappleborough Green villages during the planning application for the Redditch Eastern Gateway proposal, and at the Local Plan Inquiry with respect to the employment allocation at South West Rugby in the case of Princethorpe and Dunchurch villages. In both of these examples, Warwickshire County Council has worked with the applicants in order to secure a system that monitors HGV routing, and ensures that the Travel Co-ordinator/Site Operator can address any breaches in the agreed HGV Routing Strategy included as part of the section 106 obligation.
- 5.3. Warwickshire County Council requested that the Hinckley National Rail Freight Interchange applicant team consider making similar provisions for the Warwickshire network, and provided Figure 5 to illustrate the routes that HGVs should not be using. The applicant team undertook to assess this along with the impacts of the development traffic on Warwickshire's network as part of the RRAM modelling.
- 5.4. The Hinckley National Rail Freight Interchange proposal includes for a HGV Route Management Strategy, similar in form to that implemented for the Redditch Eastern Gateway development. However there are elements of the document submitted that do not make reference to Warwickshire's network and the roads/villages, and therefore the detail contained within this document would require further revision for Warwickshire County Council to agree to it.
- 5.5. Warwickshire County Council understands from discussions at the time the modelling methodology was being defined that some HGV trips were manually reassigned within the RRAM microsimulation model on account of them being identified within PRTM on routes which would be constrained by HGV routing restrictions if applied.
- 5.6. Routing restrictions were not applied within the PRTM runs which may have led to HGV trips occurring within the Rugby rural road network. These HGV trips were subsequently prevented from occurring within the RRAM model via discrete adjustments to the HGV demand matrix.

**Figure 5 - HNRFI: Map showing routes of HGV restrictions in Warwickshire**  
29-09-2022

**Legend**  
— Routes of HGV Restrictions  
— Network Extent of RRAM



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- 5.7. Warwickshire County Council believes that these adjustments may have been necessary to ensure that the HGV volumes within the model area remained in line with the PRTM predicted totals but since some routes were banned within the RRAM Warwickshire County Council believes that the trips were reassigned to proxy O/D pairs using the non-restricted routes.
- 5.8. Warwickshire County Council understands the rationale behind this assumption but has concerns that this means that the HGV trips within the RRAM were already fixed on the alternative routes before the restriction is applied within the modelling.
- 5.9. The outcome of this is that there is little benefit predicted through the modelling of the HGV routing restrictions being applied. However, Warwickshire County Council has concerns that this may be simply because HGVs are fixed to routes unaffected by the restrictions through the demand build process.
- 5.10. This affects approximately 60 HGVs within the RRAM modelling and, if our interpretation is correct then this means that we cannot yet be entirely confident that HGV movements will not have an adverse effect on the rural

road network as the demand build process excluded them from using those routes in the first place.

- 5.11. Additionally, PRTM did predict some reassignment on to the local road network (this in turn produced the circa 60 vehicles which were reassigned in the demand build process) meaning that HGV routing impacts remain a possible outcome at this stage and BWB has not provided Warwickshire County Council with sufficient evidence to address this concern at the time of writing.
- 5.12. Therefore Warwickshire County Council considers that the requirement for a HGV Route Management Strategy is necessary, that it be included as part of any section 106 agreement if consent is granted, and that a scheme would need to be submitted and approved for the long term monitoring, management and enforcement of HGV routing. This would be required for the construction and operational phases of any development.

#### Community Liaison Group and a Transport Review Group

- 5.13. Given the significant scale of the proposed development, we would encourage the applicant to set up and administer a forum akin to the Magna Park Lutterworth Community Liaison Group (MPCLG) and a Transport Review Group as set up for the DIRFT III/Rugby SUE (Houlton). Both forums were established in order to address concerns by local communities and those experiencing impacts as a result of the developments.
- 5.14. The MPCLG group is well established and involves officers and elected members from Warwickshire County Council, Leicestershire County Council and local parish councils. It provides a useful opportunity for local communities to raise their concerns directly with the site operators on a range of issues including inappropriate HGV routing and parking, and for all parties to explore options for addressing these. Information about the MPCLG including its terms of reference is hosted on its website.
- 5.15. Officers from Warwickshire County Council, West Northamptonshire Council, National Highways, alongside representatives from the developers sit on the DIRFT III/Rugby SUE (Houlton) Transport Review Group (TRG) which meets bi-annually. A key role for the TRG is to oversee and vote on proposals to mitigate unforeseen transport impacts which can be directly attributable to DIRFT III/ Rugby Radio Station SUE (Houlton).

- 5.16. The DIRFT III – Planning Consent Order and Consent Obligation (SI 2014 No.1796 – The Daventry International Rail Freight Interchange Alteration Order 2014) includes the following obligations:

*13 – to contribute towards the funding of additional highway improvement works out of the Additional Highway Works Fund (£1 million) as directed by the Transport Review Group where traffic impact is adjudged to be greater than originally predicted in the Transport Assessment*

*14 – to pay out of the Unforeseen Transport Impacts Fund (£500,000) as determined by the Transport Review Group for measures to address any unforeseen transport impacts arising out of the traffic generation from the development*

- 5.17. With the support of colleagues from Leicestershire County Council, we would seek to ensure the applicant sets up and administers a group similar to that described above. This would be a mechanism for addressing unforeseen transport impacts through appropriate planning obligations, travel plan monitoring and developing detailed proposals for delivery of sustainable transport measures and off-site junction improvements to address any unforeseen impacts. Full details of the Terms of Reference of the TRG are set out in the Rugby Radio Station SUE (Houlton) S106 and the DIRFT DCOB.

## **6 Mechanism for Delivery of Highway Works**

- 6.1. Notwithstanding the issues raised above regards further assessment of the A5/A426 Gibbet Hill, A5/A47 Longshoot-Dodwells junctions and M69 junction 1, which may also be shown to require mitigation, the Transportation Assessment identifies that junction no. 27, A5/A4303 Coventry Road/B4027 Lutterworth Road/Coal Pit Lane, known locally as the Cross-in-Hands roundabout, will be impacted by the development traffic and require mitigating highway works.
- 6.2. It is noted that the Book of Reference does not include the plot numbers shown on the Land Plan sheet 8 of 8 (drawing no. 1842-8018\_003341 v12), nor the Statement of Reasons Appendix 2 because no acquisition rights are sought. It is assumed that the applicant team have confirmed that all of the land that will be required to deliver the mitigation works has been confirmed by the relevant Highway Authorities Searches Teams to be Highway Maintainable at Public Expense.
- 6.3. The delivery mechanism outlined in the draft DCO does not include for a section 278 agreement under the Highways Act (1980). This would be Warwickshire County Council's preferred delivery mechanism. This is a recognised form of highways agreement, can run in tandem with other defined agreements between Highway Authorities if highway authority powers are to be passed over. Warwickshire County Council would engage with Tritax Symmetry (Hinckley), National Highways and Leicestershire County Council in respect of agreeing how to process cross boundary highway works applications and agreements as necessary. It also provides for any claims under the Land Compensation Act.
- 6.4. The application process for a section 278 agreement also encompasses the technical approval process for the review of proposed highway works, check against standards, agree the Briefs for any Road Safety Audits, process the auditor and designer's responses, and should there be any departures these can be dealt with as part of the detailed design technical approval process. There would also be engagement with colleagues in Network management in order to book road space, and it is noted that for a scheme of this scale a minimum of 3 months notice would be required, the dDCO states 14 days.
- 6.5. Warwickshire County Council would engage with Tritax Symmetry (Hinckley); National Highways, Leicestershire County Council and the relevant Local

Planning Authority in respect of any section 106 contributions towards highway works. However, it would be Warwickshire County Council's preference that s106 contributions should only be secured towards schemes/infrastructure already identified, any new schemes/infrastructure required to mitigate the proposal should be funded and delivered via a s278 agreement to avoid the cost burden falling on the public purse.

- 6.6. There has been no phasing assessments carried out as part of the traffic modelling work to determine at what threshold of development occupation the various off-site junction or other infrastructure mitigation schemes would be required. This should be a requirement should the DCO be granted to ensure infrastructure is delivered in a timely manner and to avoid impacts on the networks.