

# **HUNCOTE PARISH COUNCIL**

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10<sup>th</sup> October 2023

# RE: Huncote Parish Council's written representations on Hinckley National Rail Freight Interchange (HNRFI)

Unique Reference: 20040679

Dear Sirs,

Having reviewed the application on multiple occasions, Huncote Parish Council continue to <u>strongly object</u> to the proposals, as indicated in our responses to Tritax's public consultation on 8 April 2023, and in our relevant representations' response of 23 June 2023.

A significant issue in the preparation of the plans is the lack of adequate transport modelling. This leaves us and our residents unable to have any confidence in the highway reports provided.

The developer's suggestion not to build a bypass road either around the southern edge of Sapcote or between Stoney Stanton and Sapcote is incredulous.

Any casual observer of the local highway network will be acutely aware of the frequency of the closures and delays around M1 J21 and along the A5 near Hinckley, which have a considerable knock-on on the M69 and local highway network. Should either of these roads close for any period of time, we do not agree with the assessment that the A47 link road will be adequate to deal with all the diverted traffic movements, not just from the site, but general motorists as well. There will be a need to access the B4114 or the A5 in addition to the A47.

The local rural roads through surrounding villages can be narrow and windy at various points and not suitable for regular usage by large volumes of freight traffic. Pedestrians will be put at significant risk with large volumes of freight traffic utilising these roads.

The narrow stone bridge over Thurlaston Brook in Huncote is not designed to cope with large volumes of traffic. We do not believe the traffic from the HNRFI site will observe the existing 7.5T weight limits on local rural roads which are in effect, as they cut through to other areas to avoid the queues.

While we accept that Leicestershire sits very strategically within the 'golden triangle' more significant mitigation measures are required to enable the ongoing viability of the proposed HNRFI site, than those which have currently been proposed, for both local and strategic traffic.

The proximity to DIRFT (only 17.6 miles away) and East Midlands Gateway Logistics Park (26 miles away) brings into question the need for HNRFI. Both sites have existing capacity, so it is our general belief that this will be a general logistics park next to a railway line, rather than a true Rail Freight Interchange.

It is our belief that this site will only add to the problems created by the overly congested road network, and would question how much traffic the RFI will take off the road? Also, with local unemployment figures being quite low, where will the workforce travel from, to take these necessary jobs, which won't in themselves add unnecessary strain to the local road network and cause additional pollution/noise concerns?

We do not see not see any joined-up thinking in this proposal. If the recruited staff are having to travel anything up to 45 minutes to get to work, this is all further congestion scattered in a wider area unconsidered within this application. And with the inherent fuel costs for employees, mostly being unskilled and low paid, it's

likely that the cost of driving to work would make their travel prohibitively expensive. These SRFIs need to be situated where there is a large and locally available suitable employee resource.

Areas around us have been breaching acceptable levels of pollution for some time, so to add a new large site which will itself add to the levels of local pollutants, is only going to exacerbate an already unsustainable health issue between the M69, M1, M6, A5 and A42.

While we acknowledge the HS2 monies which the PM reallocated to A5 improvements during eh Conservative Party Conference last week, these will not make the HNRFI site viable.

Our residents are very concerned about the impact the development will have on increasing traffic levels through the village, either as direct vehicle movements from the warehousing on the site cutting through from the site or as a rat-run for the varied level of employment (8,400 and 10,400 jobs) for the site.

Residents are also concerned about the potential 40-minute-per-hour closure times of the Narborough rail crossing impacting their ability to utilise the rail network for their personal/business travel. This too will cause issues of pollution and potentially additional vehicle movements as residents are forced to make alternative travel arrangements if not able to access local services.

The usage levels of the railway line also impact the viability of the neighbouring Croft Quarry being able to meet their planning conditions to ensure that they can get reasonable proportions of the granite they produce out of the site by rail.

The clustering of sites around the East Midlands doesn't create a strategic base, just a concentration of similar functionality.

As can be seen from the attached maps, the impact of noise from the existing transport infrastructure on Huncote is not insignificant, with this only going to worsen by the increase in related traffic movements should the development receive approval. The sites proximity to multiple SSSI sites also poses a concern to their ongoing sustainability.

Biodiversity, and flooding impacts while noted within the application, still seem to be inadequate to prevent the potential of significant damage being caused, and are actually more likely to exacerbate the issues and make things worse.

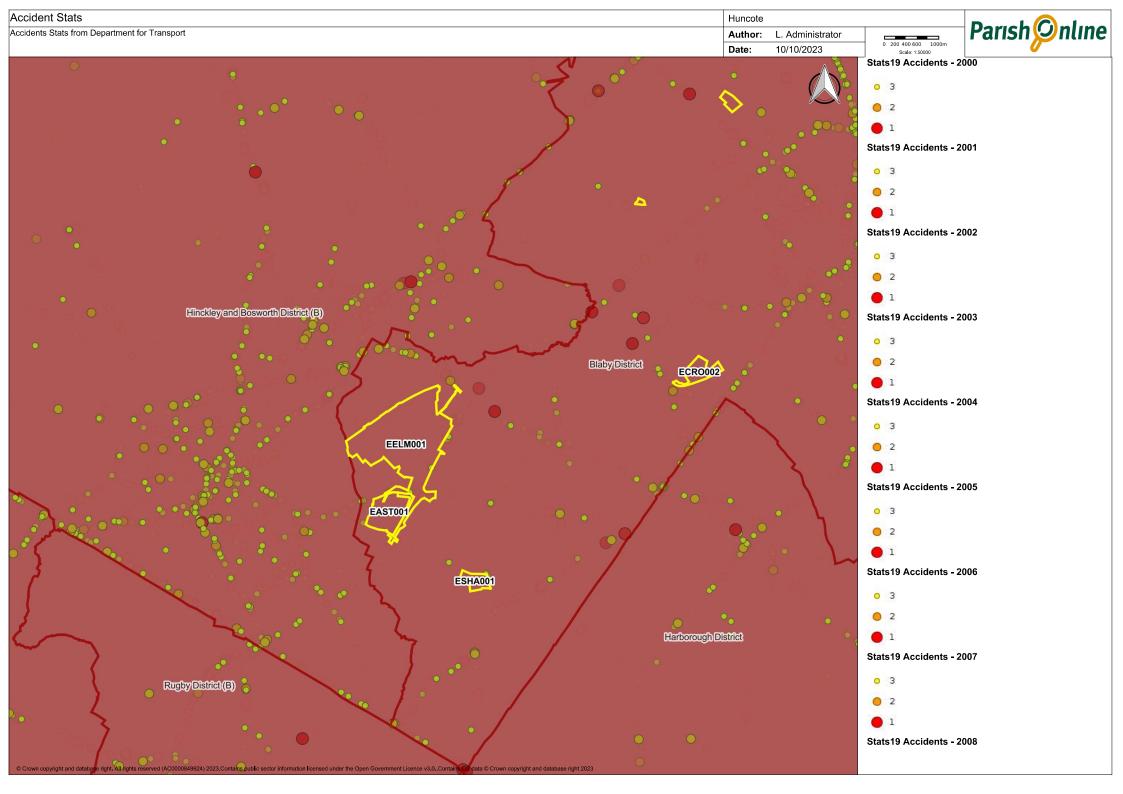
Finally, we draw your attention to Local Planning Policies CS1, CS4, CS6, CS9, CS10, CS11, CS12, CS14, CS15, CS17, CS18 and CS22, which we believe should all be considered in connection to this application. These proposals call into question Blaby District Council's ability to ensure compliance with strategic objectives i, iii, vi and xi of their Core Strategy (2013), which the Local Planning Policies are supposed to support.

We would really encourage the Secretary of State to reject this application.

Yours sincerely

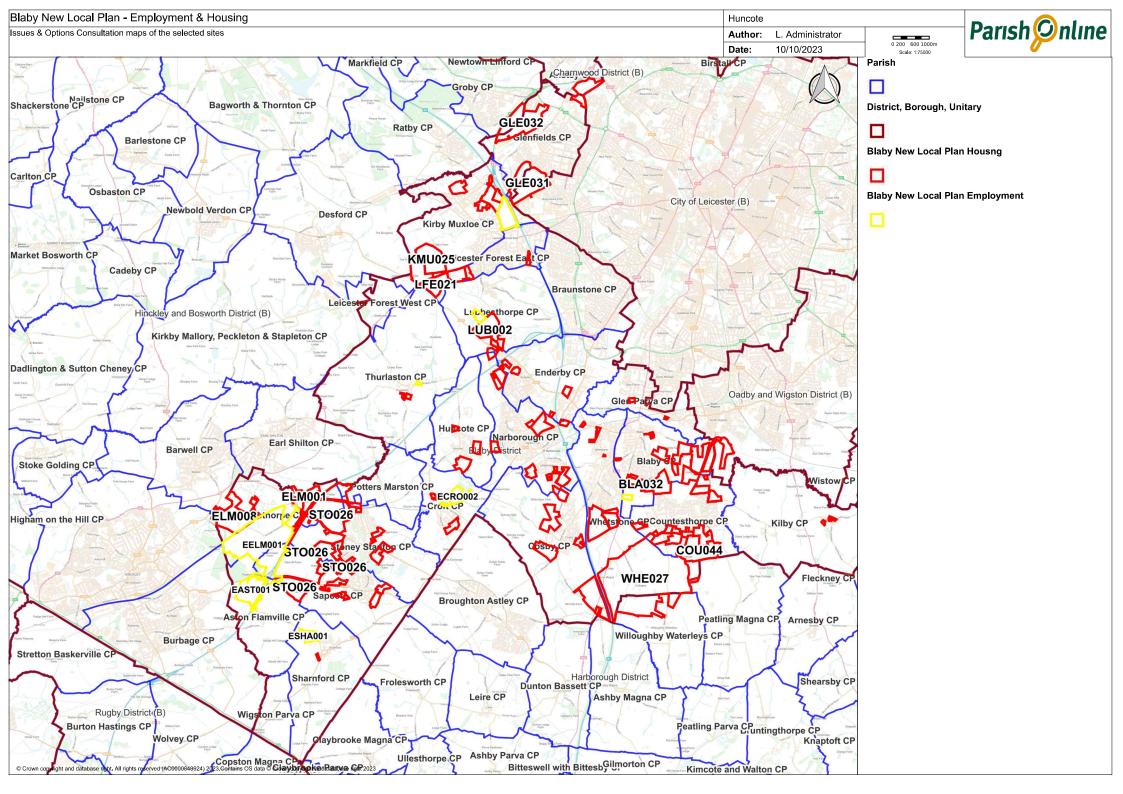
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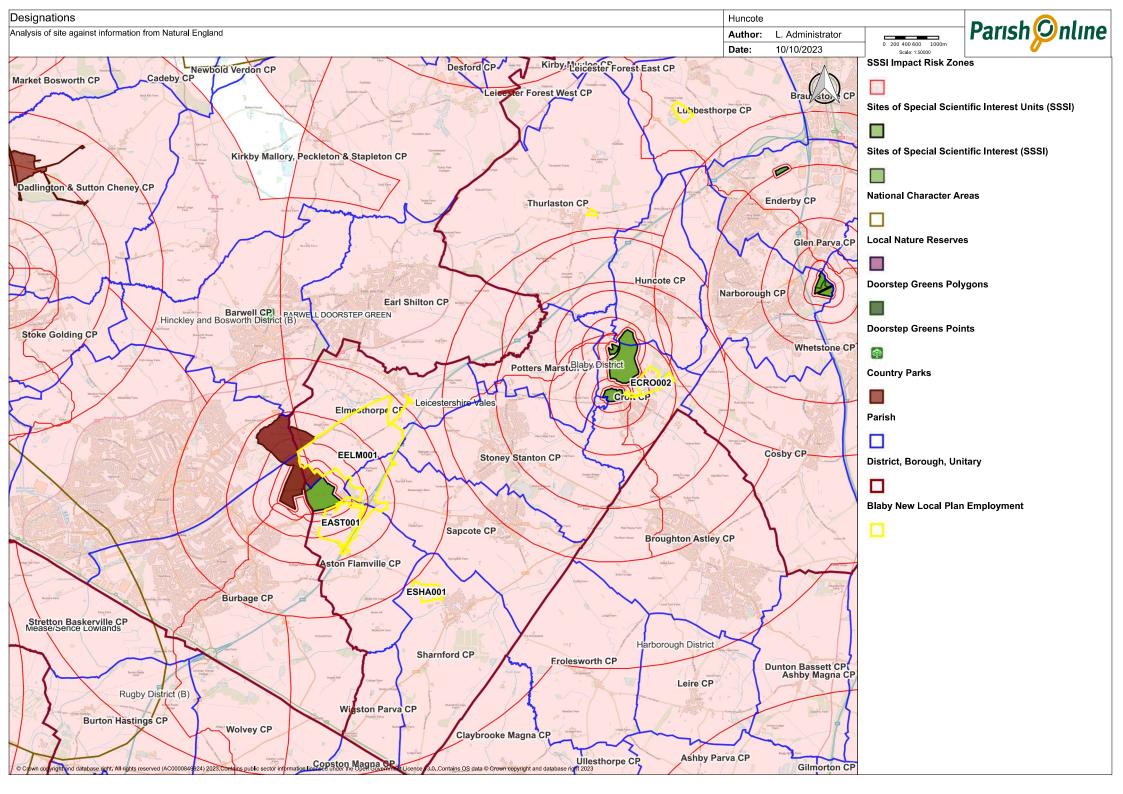
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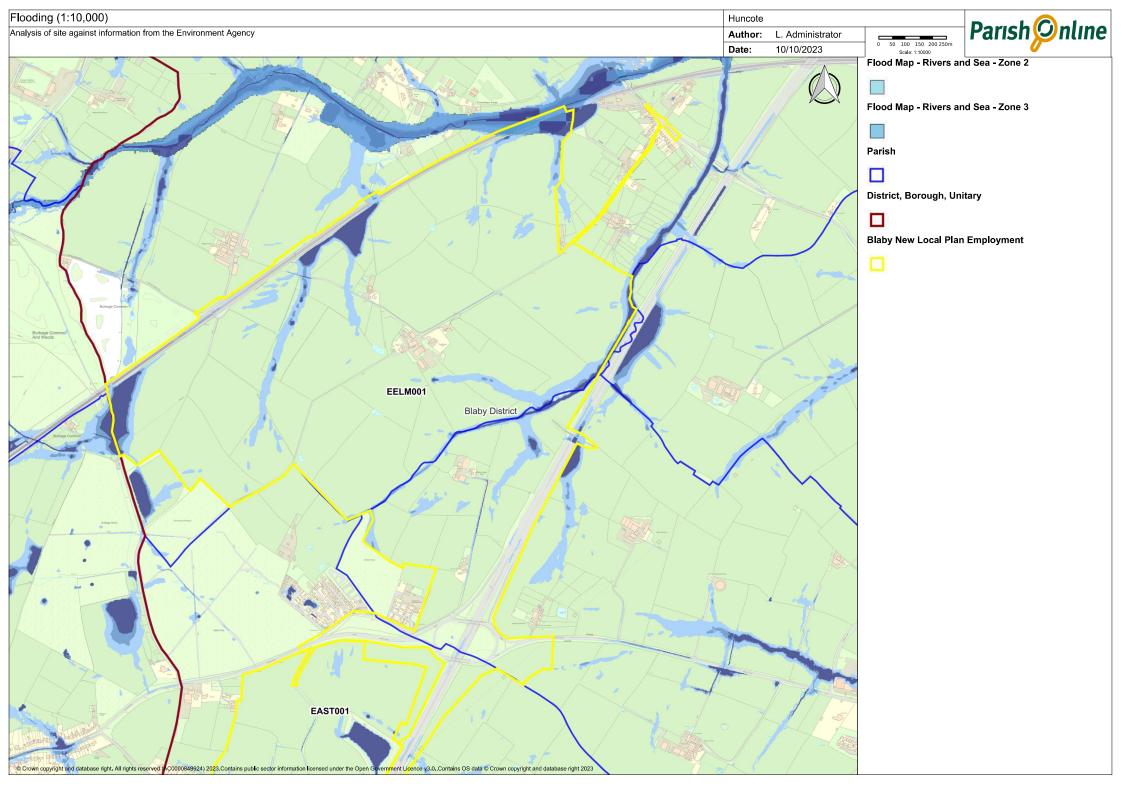


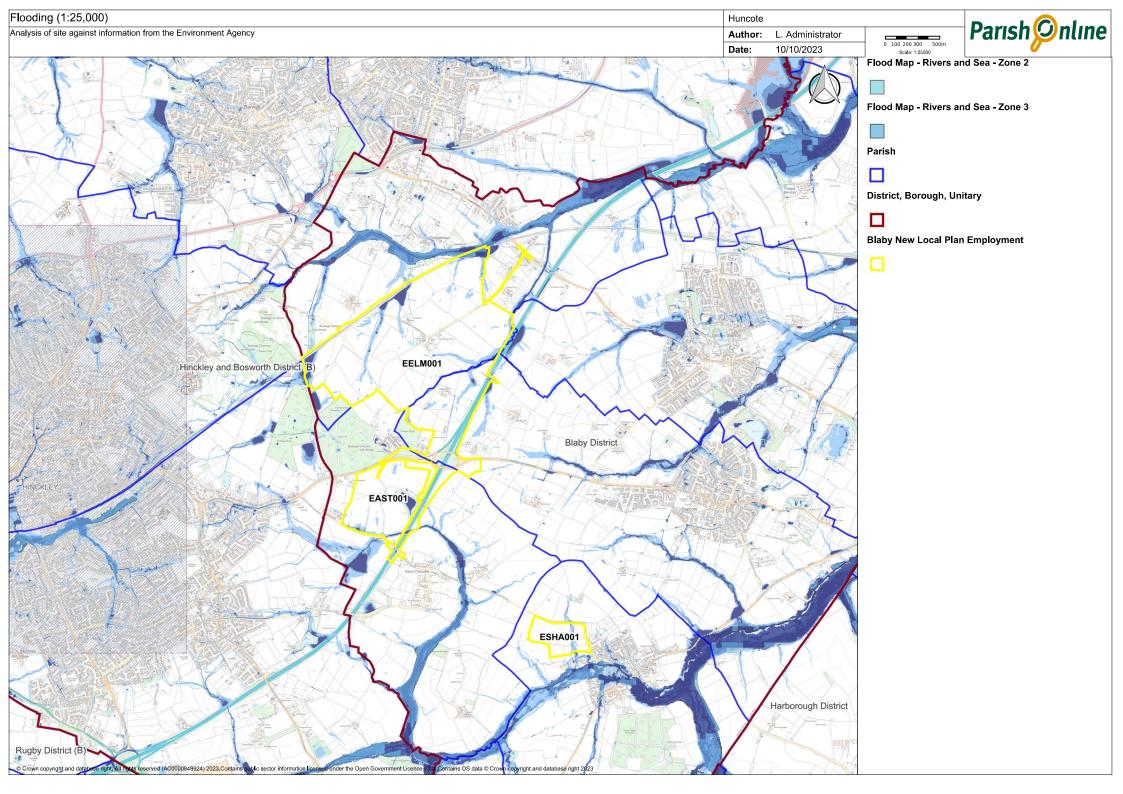


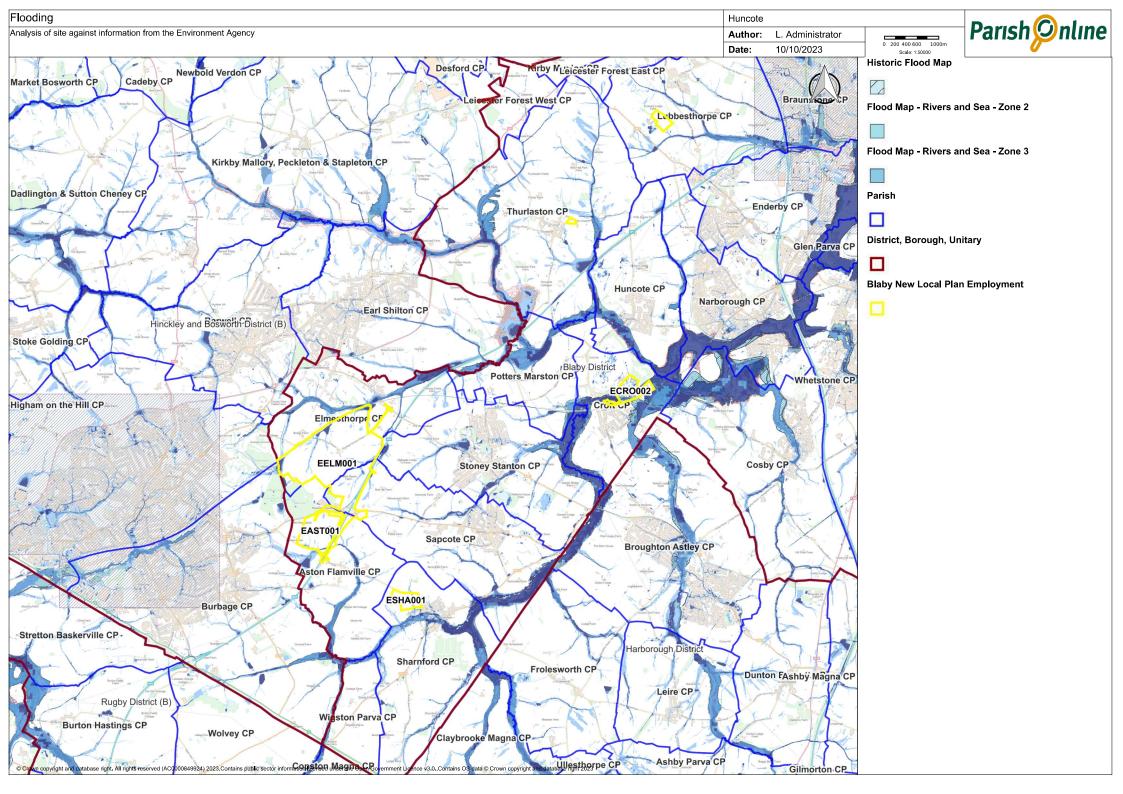


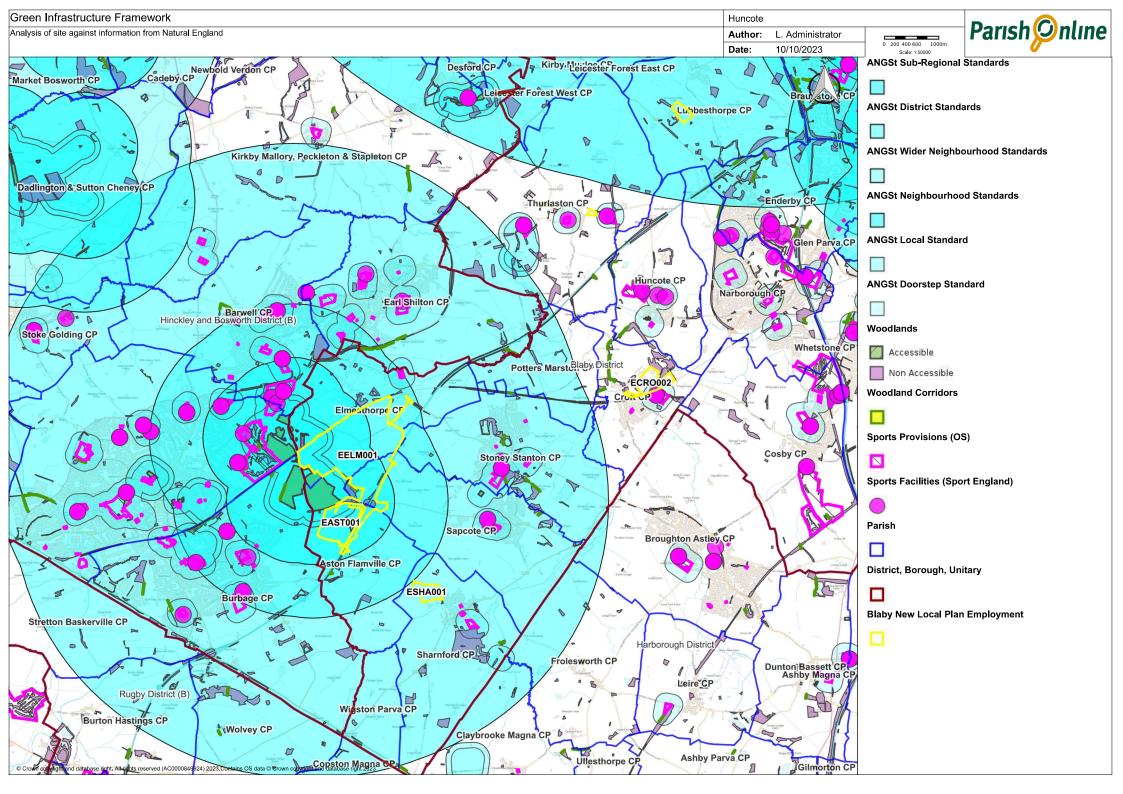


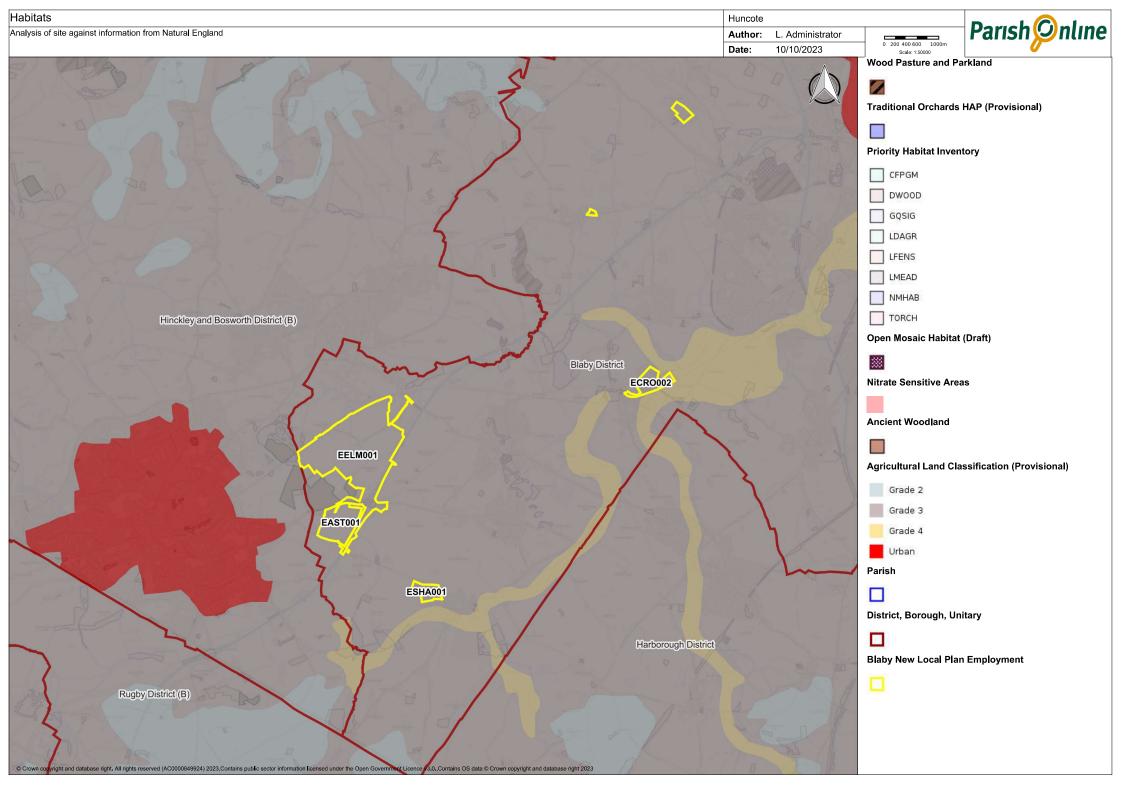


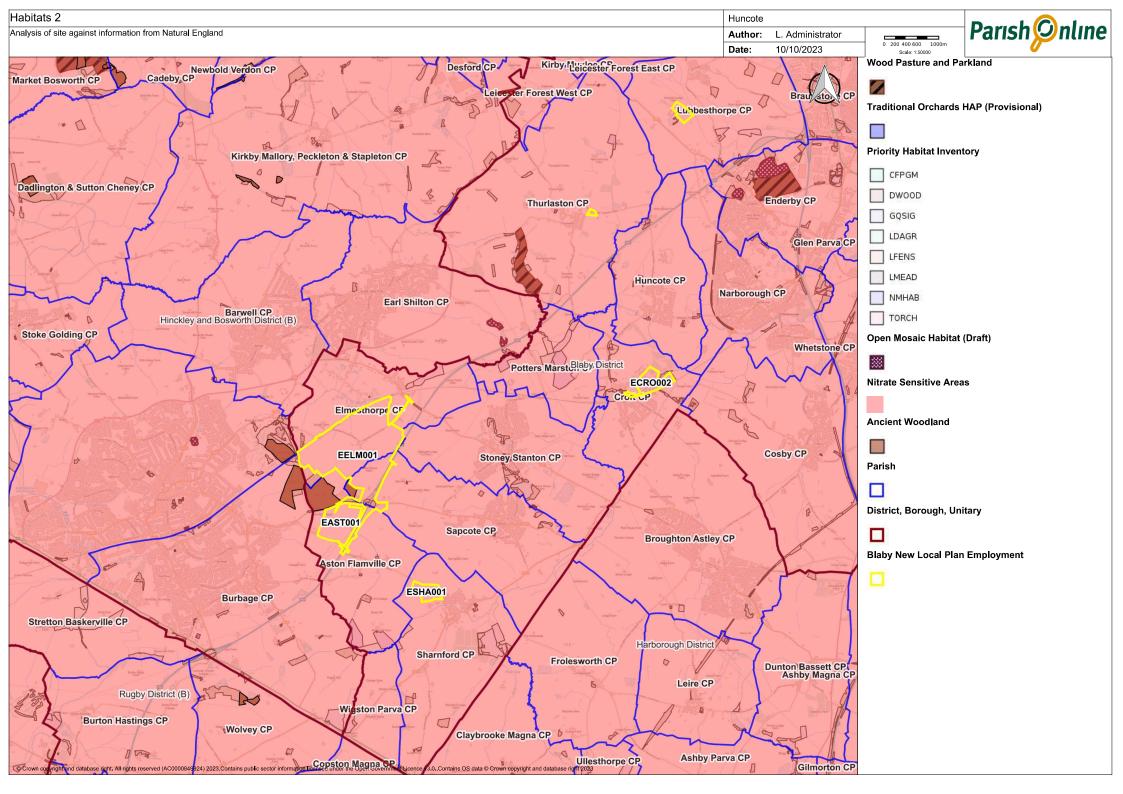


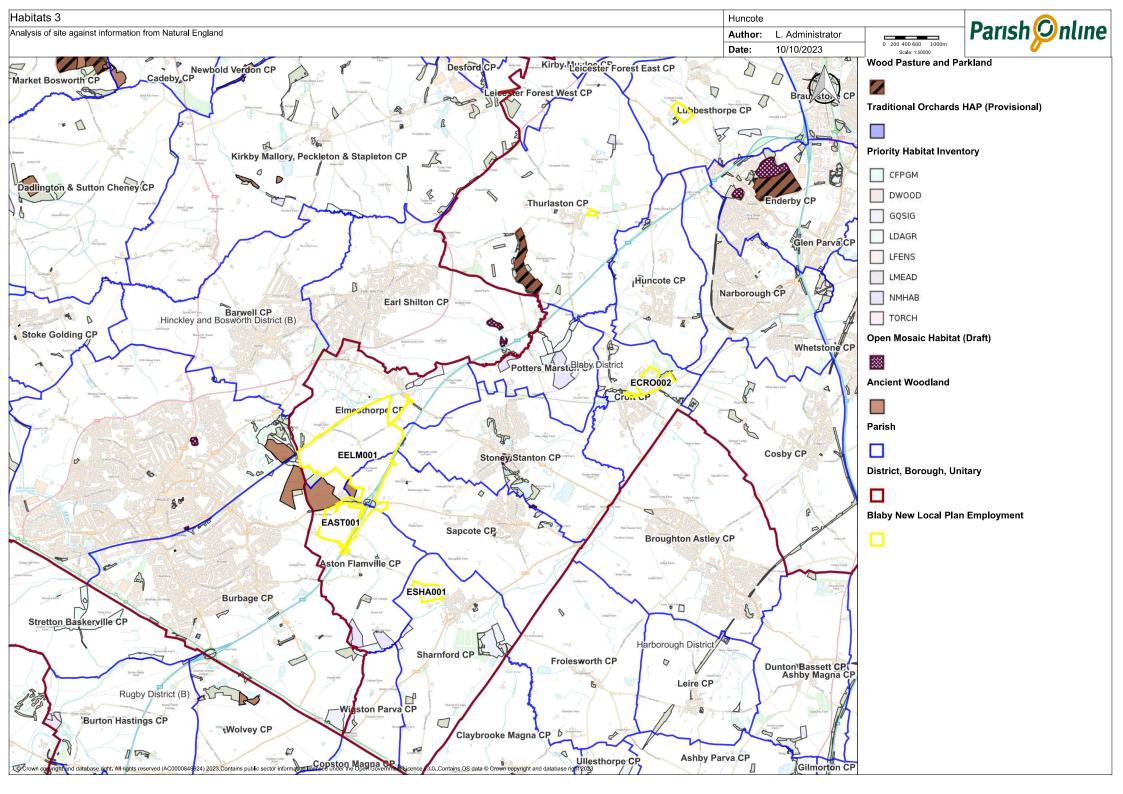


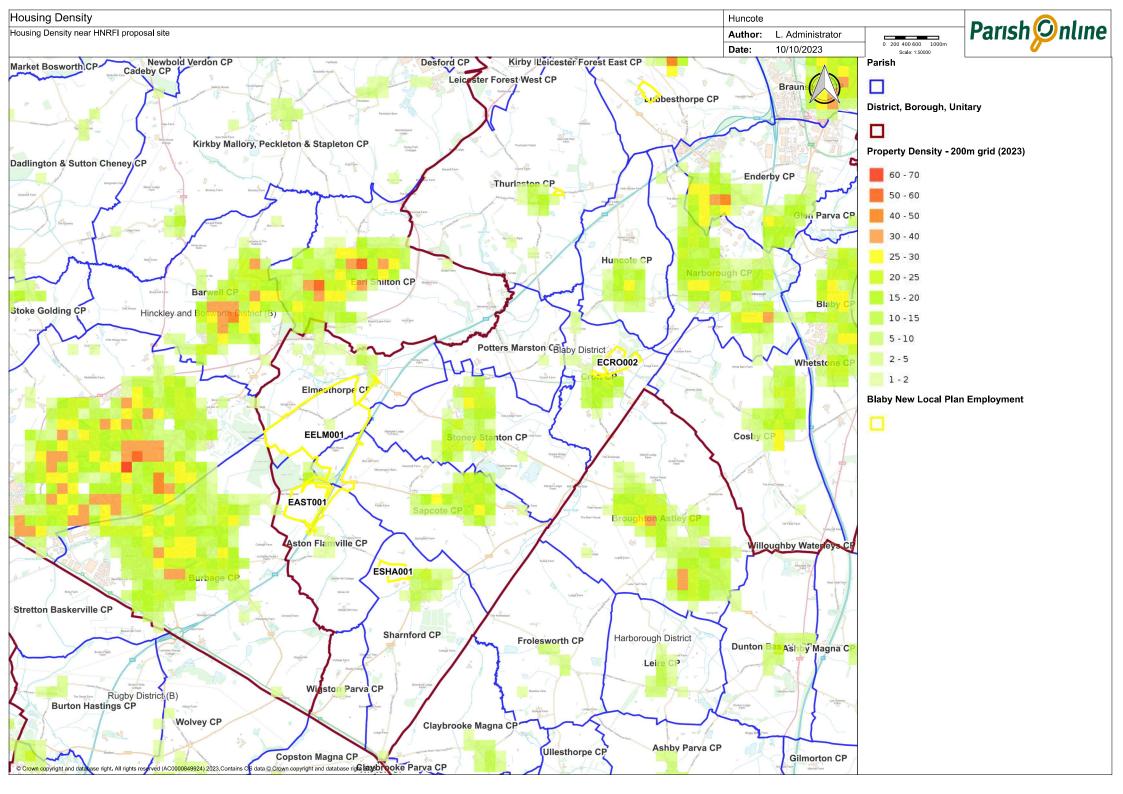


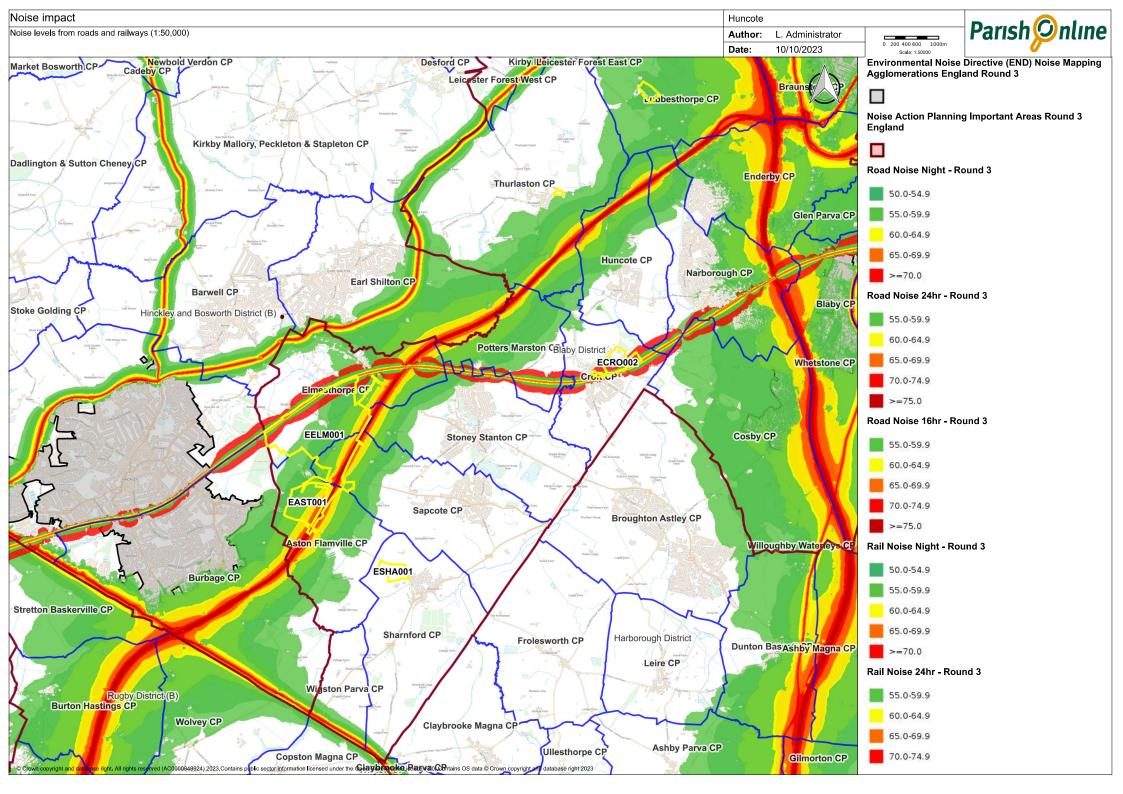




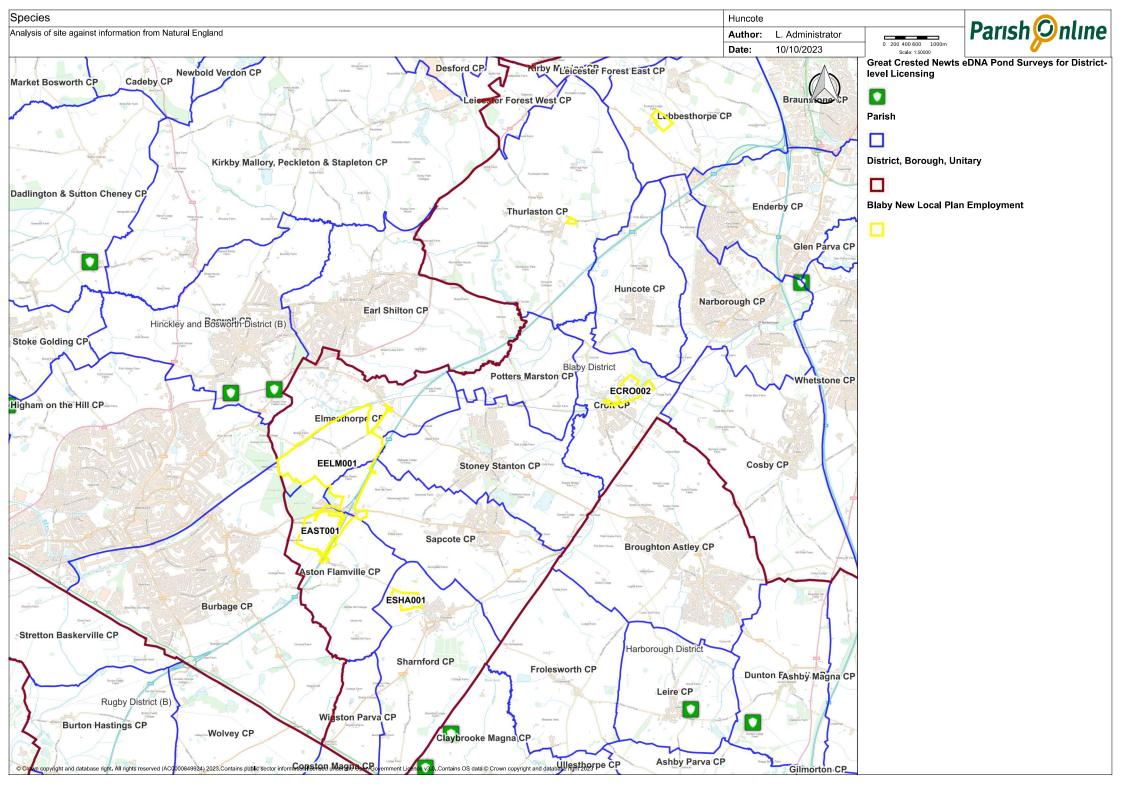


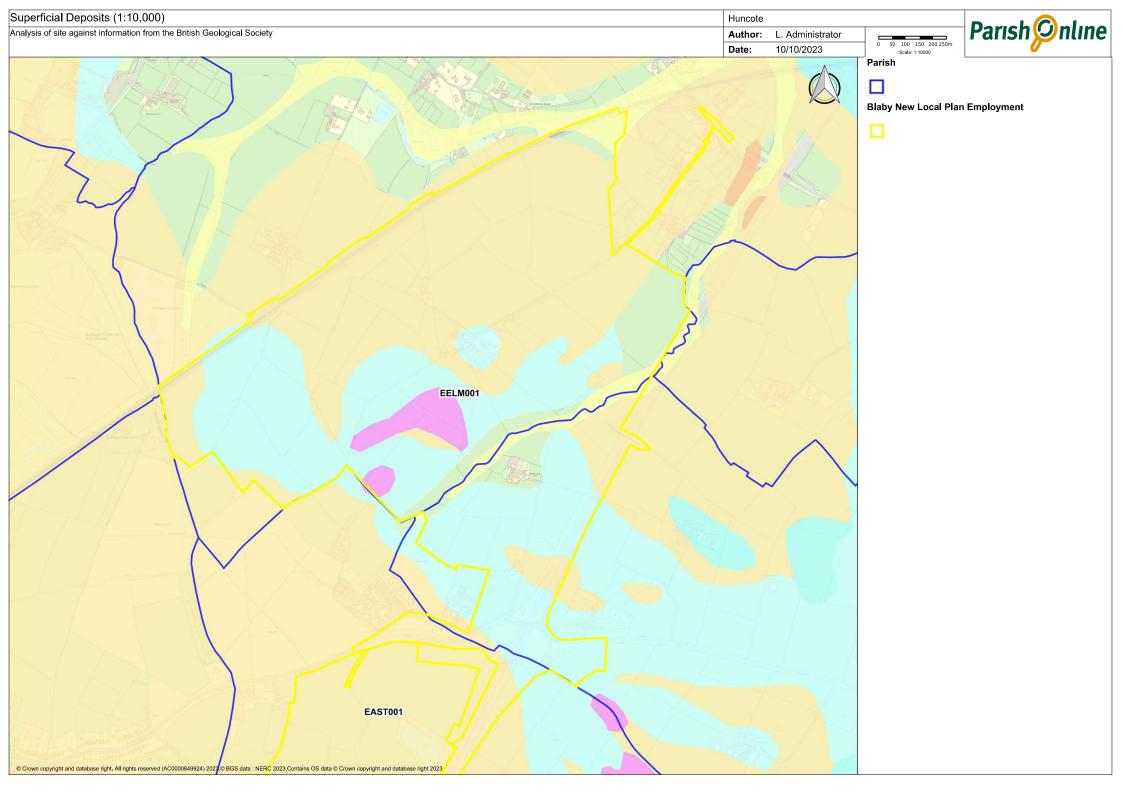












# Huncote Parish Council's relevant representations to the Hinckley National Rail Freight Interchange proposal

Huncote Parish Council (HPC) has considered the application submitted by Tritax Symmetry (Hinckley) Limited (the Applicant) for an Order Granting Development Consent for the Hinckley National Rail Freight Interchange (HNRFI) and considers the following should be deemed among the main issues and impacts. Matters are categorised by technical areas and are only in summary form. These will be developed in HPC's further responses during the Examination of the application.

## Highways and Transport

There is no agreement to the following elements of the proposed development:

- Proposals indicate a varied level of employment (8,400 and 10,400 jobs) for the site, with no consistent measure of impact. The scheme also fails to specify the nature of the businesses. This issue is considered important to ensure that the Scheme operates principally as a rail-linked facility and not a road-served distribution centre.
  - These inconsistencies don't accurately reflect the greatest impact of jobs on the site, and surrounding area. Who will be coming to the site, where do they live and how will they get there?
  - All logistical businesses will require vehicle movements to move products along the supply chain. It isn't unreasonable to suggest that more jobs, means more vehicle movements. We don't believe the Transport Assessment adequately reflects these variances.
  - Limited analysis of the housing market has taken place, with any new housing development proposed to deal with the impact of the site further compounding the impact on local roads and congestion, as well as health & welling impacts.
  - The addition of a lorry park also is inadequately assessed, for trip generation and draw.
- The overall design, capacity, phasing and access infrastructure for the site cause great concern.
  - Routing of the A47 link road, impact on local roads and early dismissal of a southern by-pass option have shown inadequate mitigation, and haven't been agreed with the local Highway Authority.
  - There also seems to be insufficient consideration of the impact on the site should the road network; both strategic and local, not be operating at optimal conditions.
    - M1 J21 often sees closures with traffic backing up to the site (M69 J2). This will impact worker access to the site and strategic vehicle movements, as well as significantly increase demand on the proposed lorry park facilities.
  - Visual, health and wellbeing, and amenity impact on local countryside seem inadequately dealt with within the reports, and are inconsistently reviewed.
- Mitigation proposals for the impact of movements on both local and strategic junction assessments and design have shown inconsiderate consideration of travel impact between impacted sites.
- Impact on existing passenger rail and freight movement proposals, and knock-on impacts at Narborough crossing.
- Travel management issues
  - Impact of Narborough Rail crossing closures
  - HGV routing strategies and enforcement

- o Staff travel strategies to/from Hinckley Station and Narborough Station for the site
- Cycle network impact of the site
- Public Rights of Way strategies and walking, cycling and horse-riding assessments.
- o Construction traffic management plan and strategy
- Sustainable transport policies and solutions
- Consideration of lane improvements to the M69 between J1 and M1 J21 seems to have been inadequately considered and assessed.
- Cycle network infrastructure seems to have been insufficiently considered
  - Insufficient safe, lockable parking provision for bicycles at Hinckley or Narborough stations.
  - Lack of consideration for e-bike schemes
- Opportunities missed to utilise the local public transport network to shuttle staff to the site in line with determinable shift patterns, from both Hinckley and Narborough rail stations.
- There seems to be an insufficient explanation for the site selection in open countryside, away
  from significant current warehousing operations, when greater utilisation of sites near
  Magna Park/Rugby, and the Solent and Felixstowe lines connecting close to Nuneaton,
  provides the opportunity for a single facility to serve two ports which may represent a more
  suitable location.

#### Public Health

- Air quality management, noise impact assessments and lighting impacts both during construction, development and operation haven't been adequately considered for human and wildlife health.
  - It would also be helpful to know if the assessments will be revised once the Government publish revised Air Quality Objectives later this year.
- Stress management impact and mitigation both during construction, development and operation (diversions, interruptions to utilities, dust, noise)
- Health impacts on neighbouring residents across the wider area of South Leicestershire insufficiently assessed.
- Some details remain unconfirmed regarding levels of anticipated noise generation, i.e., gantry crane impact.
- Impact on amenity sites in the wider locality has been satisfactorily considered, particularly noting vehicle movement pattern changes once development of the site commences through its operation.
- Concerns about capacity and impact on health service provision both during construction, development and operation.
- Impact of landfill gas on the site, leaching from any of the many waste landfill sites operating in the vicinity of the site since the 1950s, hasn't been properly considered.
- Impact of barrier downtime on air quality for pedestrian traffic, residential impacts and school children from idling vehicles, adjacent to the Narborough crossing.
- The impact of the various lighting proposed around the site on residential windows and amenities such as Burbage Common should be further assessed.
- An assessment of nighttime noise levels from the site for the wider community is required.
- Proposals for de-restricted road speed limits within the site are not welcomed, with concerns over the audible changes in engine revs and potential for tyre screeching as limits change near significant bends near the railway.

### <u>Ecology</u>

- Impact and extent of mitigation measures such as acoustic fencing on nearby residential properties.
- Planting schemes fail to ensure existing communities are protected from increased noise and air pollution, by not ensuring high tree/hedge planting levels are provided along major strategic routes, to limit impacts on communities both in their current form and as they expand in the future.
- Failure of lighting strategy to show maximum lighting plans impact across the local area on sensitive wildlife receptors.
- Hours of operation for the site cause concern for the impact on wildlife and the residential environment of the surrounding area, with issues of noise, vibration, non-natural lighting and traffic disruption impacting the area.
- The impact of hedgerow removal seems to have lacked significant consideration for the impact on wildlife.

#### <u>Net-Zero</u>

- Designs allowing for electric car charging points at only 20% of spaces are insufficient and mitigation does not facilitate the transition to ultra-low emission vehicles or decarbonised road freight.
- Insufficient consideration for alternative fuel consideration (i.e., hydrogen) and recharging points being practicably deployable for use on or around the site.
- Insufficient consideration has been given to the use of ground-source heat pumps and airsource heat pumps on the site. Their exclusion from consideration doesn't get adequately explained, especially in light of current and future requirements for their use.
- It is disappointing not to see greater opportunities taken to improve natural energy production within areas of the site such as car parking, where canopies could be deployed to hold solar panels and generate additional renewable energy for the site.
- While many water attenuation ponds are illustrated in plans, there is little proposal for the re-use of harvesting any of this water for simple uses such as lorry washes and flushing toilets.

#### Socio-economics

- Concerns of potential impacts on demand for local housing making ensuring community cohesion unviable for future generations.
  - Limited/lack of analysis of housing market characteristics undermines conclusions about the impact on the housing market.
- Concerns around the benefits of construction for the local population and suppliers will not be appropriately secured.
  - Consideration of a Training Officer within the draft s.106 isn't proposed for long enough.
  - There isn't enough of a guarantee that spending from the site will happen with local businesses.
- Concerns regarding the availability of local workforce to match required skills and how an effective training strategy will be secured.
- Impact of barrier downtime on Narborough businesses, due to increased traffic restrictions.
- Concerns around the timing of rail movements impacting the viability of rail connections at nearby Croft Quarry.

The Applicant has failed to adequately mitigate the Scheme and should propose a comprehensive package of additional s.106 funding should be made available to mitigate all of these concerns.

The Council has concerns that this is not a rail-based scheme and is more likely to end up as a warehousing scheme with potential rail access.



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CHAIRMAN: MR. ALEC KNIGHT

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8<sup>th</sup> April 2022

# Public Consultation response regarding: <u>Tritax Symmetry (Hinckley) Ltd</u> - Proposals for the Hinckley National Rail Freight Interchange (HNRFI) – Area around M69 Junction 2 in Sapcote

Dear Sirs,

We have reviewed your proposal, to install a National Rail Freight Interchange, near J2 of the M69 near Aston Firs/Hinckley/Sapcote/Stoney Stanton and considered the impact on our parish and the local area. We have completed comments in line with your consultation format.

2. Do you agree with the principle of transferring freight from road to rail?

Answer – Not Sure.

**Comments** 

In principle the idea of transferring goods from road to rail has some merit for review, but, and it's a big but, locations need to be well thought through, with excellent access to a variety of road routes and railway lines, allowing for redundancy of services should there be hold ups/closures.

This proposal doesn't seem to yet offer sufficient evidence and justification to sway thinking that the presently proposed scheme has been sufficiently prepared to offer appropriate, and easily accessible alternative travel routes.

3. Do you agree that the transfer of freight from road to rail has an important part to play in a low-carbon economy and in helping to address climate change?

Answer – Not Sure.

**Comments** 

While the proposal to transfer freight from road to rail may have an impact on carbon reduction, there are significant additional risks and further considerations to bear in mind throughout the production and supply processes.

What alternative routes exist? Are goods starting the journey to their destination being produced in the most appropriate location? Are they entering the supply route at the most environmentally friendly place? How does the cost of entering/exiting a supply route at different points compare? How much impact will this rail freight interchange have or reducing the UK's carbon reduction as a % of the UK's overall total?

# 4. Do you think that this is a good location for a Strategic Rail Freight Interchange?

HNRFI is centrally located between the West Coast Main Line and the East Coast Main Line, on Network Rail's Strategic Freight line connecting Felixstowe and London Gateway to the Midlands and the North. Answer – No.

<u>Comments</u>

We would question, in light of the existing 5 RFI sites within 20 miles of this sites proposed location (Birch Coppice, Hams Hall, East Midlands, Drift, and Prologis Park. In addition, West Midlands, Northants Gateway and the Proposed Intermodal sites are within 30 miles of the proposed site.), why is this site even being considered? With the development of the UK's only inland Freeport near Castle Donnington, we would submit that that area would make a better location for freight, because of the potential for also being able to attract a large workforce to commute to/from the site using HS2 and existing national rail links.

Public Consultation response from Huncote Parish Council

If the principle of having National Rail Freight Interchanges is to take freight from the roads and have it on rails, it seems odd that all the UK's Rail Freight Interchanges are collected is such a small area and not spread further about across the country. Surely these sites need to be spread around the country, so that in the event of any area being unavailable for any reason, the load can temporarily spread around other areas.

5. Do you support the proposals for up to 850,000m<sup>2</sup> of logistics floorspace, railway sidings and a rail terminal on the Felixstowe to Nuneaton railway line to the south west of Elmesthorpe? Answer – No.

## <u>Comments</u>

In recognising the description of the site as a Rail Freight Interchange, the figures provided in the accompanying documentation with your application show this will not be the primary purpose of the site, with only between 5% and 25% of the freight interchange will have any rail content, and it will, more likely based on the included data, be a large industrial warehousing/road distribution site. This is extremely disturbing when considering the impact on the local environment and transport network each time the M69 grinds to a halt (something which happens all too regularly – Twitter #M69).

6. Do you support our proposed mitigation that is set out in the <u>Preliminary Environmental Information Report</u> (<u>PEIR</u>)?

## Answer – Not Sure.

# <u>Comments</u>

Mitigation measures are proposed for:

- Land use and socio-economics
- Transport and Traffic
- Air quality
- Noise and vibration
- Landscape and visual effects
- Ecology and biodiversity
- Cultural heritage
- Surface water and flood risk
- Hydrogeology
- Geology, soils and contaminated land
- Materials and waste
- Energy and climate change
- Interestingly, no measures are mentioned for mitigating major accidents and disasters.

Transport and Traffic, Air quality and Noise and vibration are the three measures where Huncote will likely be most affected.

### Transport and Traffic

We believe that the investigation of impact on local roads doesn't go far enough and we would request that the Sapcote bypass is reconsidered to remove the potential for impact on local roads and more measures are considered to improve the B4114.

### <u>Air quality</u>

Additional planting should be encouraged along the full length of the M69 to reduce the spread of vehicle pollutants from local journeys.

### Noise and vibration

Additional planting should be encouraged along the full length of the M69 to shield communities from the noise and vibrations it creates.

We also support the suggestion from Blaby District Council in establishing a community fund for the site impact on local communities, which could mitigate some of the impact it has on the surrounding area. This fund would be seen as over and above any s.106 contributions the site and its developers have to make.

### 7. Do you have any comments on the proposed highway improvements?

We are proposing several upgrades to the M69 including new north and south bound slip roads and the creation of a link road between J2 M69 and the B4468 Leicester Road (known as the new A47 Link). <u>Comments</u>

To enable the site to operate you have proposed adding a Western entrance at J2 of the M69 which would cause considerable extra traffic through surrounding villages, and especially Sapcote, which would be against the condition of the original build approval of the M69. Suggestions for a Sapcote bypass, linking J2 of the

M69 to the B4114 to provide an alternative route for goods vehicles to access the motorway network should J2 be closed (by travelling north to M1 J21 or south to the A5), and to provide a route for the proposed 8,000 staff to access the site by their chosen means of transport, without putting the existing overstretched infrastructure at greater strain. We would also question why Tritax seem unwilling to discuss this.

The B4469 to Hinckley would also have considerable increase in traffic, and we need only look back at the road closures when the Leicester to Nuneaton rail line was containerised causing bridge closures over several months to see some of the problems that would occur.

To approve this proposed development, with such missing, and apparently misleading information would be like signing a blank cheque and the results could be disastrous. As a minimum this application should be sent back for further more detailed studies, and the developers should provide full, accurate and verifiable details on all aspects, and the impacts on existing Leicestershire/Warwickshire highway infrastructure.

The impact of such a development as the one this application proposes on the M1/M69 will be considerable. The existing M1 J1/M69 junction already has regular capacity issues and difficulties with closures. To add a thousand or considerably more H.G.V.'s as well as many L.G.V.'s and cars will create a further burden on the local environment, at a time when the environmental impact of decisions is one of the major global responsibilities. Air pollutants are not insignificant currently in Huncote and the added additional vehicle movements associated with this application will only increase this issue as they spread from the M69 and local roads.

Improvement to the existing M1 J21 and widening the M69 need to be implemented before any work to improve M69 J2 takes place, as well as considering the implications of the approved bridge across the M69 at J21 as part of the New Lubbesthorpe application (11/0100/1/OX). These need to include: -

• The repositioning of the slip road from the M69 to the M1 where lanes merge at the same time as slow uphill traffic enters in a middle lane from Leicester, and with the LFE. service exit only 1km. away; and the congestion at the roundabout with a considerable higher number of long H.G.V.'s which already block the roundabout on a regular basis, so major alterations to this, or a replacement flyover system.

The existing roads through and around Hinckley and Burbage are already struggling with current traffic levels as they are overloaded, particularly at peak times sometimes to the point of gridlock in the Burbage/Hinckley area. This results in considerable delays and roadside air pollution. With the small number of bridges across the rail line in Hinckley this is difficult to avoid, but to add a large amount of extra traffic, both commuters to and from the site, and some H.G.V. and L.G.V. traffic would result Greater consideration should be given widening all the roads where the roads/railway line meets.

Widening the roadways at bridge points gives improved future capacity, and means traffic levels might be able to move more freely, reducing congestion.

The traffic projections are based on computer modelling if the information provided at the consultation is correct. The computer part of the modelling is likely to be accurate, but no information has been given on the criteria on which this modelling was based, and whether this modelling is based on absolute facts or whether statistical analysis, has been used, and if so whether this conforms to the statistical and experimental accuracy of B.S. and I.S.O. standards.

The suggested route to the A47 is noted, though this should be dual carriageway with laybys for vehicles returning to the rail freight interchange who cannot readily access their intended depot upon arrival.

8. Do you support the idea of a lorry park with welfare facilities and HGV fuelling facilities in this location? Answer – Yes

<u>Comments</u>

It is nationally recognised that there are insufficient lorry parks for the existing logistical movements of goods. Anything that can be done to improve welfare conditions for lorry drivers should be seen as an improvement for them. This does in turn create a significant potential for further lorries visiting eh area to utilise these facilities, over and above the necessary vehicles for the Rail Freight Interchange. Any lorry park should as a minimum be high security, with 24-hour security staff, a securely fenced site and food/drink/welfare facilities available 24/7, including bank holidays and national lockdowns.

9. Do you support the proposed landscaping incorporated into HNRFI?

Answer – Not Sure

Comments

The landscaping proposals try to mitigate the impact of the development, but these could go significantly further. While seeking energy efficiencies' the proposal to have outdoor lights which turn on/off through the night as they detect movement might seem a good idea, the impact on the skyline from these changing night conditions affecting the sleeping patterns of anyone who's window can see the light change in the night sky from the surrounding area doesn't seem to have been considered.

It's a widely recognised fact that during the bombing of Coventry in WW2, residents of Leicester could see the light from the flames in the night sky. To think the light from this site will be visible from anywhere within a 15-mile radius would not be unreasonable, with the present example of Calor Gas on the other side of Stoney Stanton as a comparison, for a far smaller site.

10. Do you have any other comments about the proposals?

### Comments

As this is supposed to be primarily a rail hub, although this seems to be very much a minority activity, surely to improve the track, possibly to 3 or 4 track on some or all of the Leicester to Nuneaton line should have been considered. Can any such consideration, if it happened, be made public?

The time frame and disruption likely to be caused by the construction phase has not been mentioned as far as we can establish. What levels of road closures, extra traffic, noise, etc. are likely to be present? We also note the development proposal doesn't conform with the policies of the Fosse Villages Neighbourhood Plan.

Yours sincerely

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Stuart Bacon Clerk to the Council