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3 October 2023

Dear Mr Jackson

## **Hinckley National Rail Freight Interchange**

### **Response to Rule 17 Letter**

On 22 September 2023, the Examining Authority (“ExA”) issued a letter (the Rule 17 letter) setting out a Procedural Decision requesting the Applicant to respond to a number of matters at this stage of the Examination.

This letter responds to the Traffic and Transport matters raised in the Rule 17 letter, as set out below. The ExAs comments are set out in italics within the letter.

### **Environmental Assessment Chapter 8: Traffic and Transport**

*Table 8.3 of Chapter 8 of the Environmental Statement [APP-117] sets out a list of the Links to be assessed and Paragraph 8.292 sets out roads where there would be adverse effects from the Proposed Development. The ExA has asked if these could be shown graphically on maps to an Ordnance Survey base at a scale of 1:10,000 or less, with the end points of the links made clear. Table 8.3 of Chapter 8 of the Environmental Statement [APP-117] a list of the Links to be assessed is set out and at Paragraph 8.292 roads where there would be adverse effects from the Proposed Development are described. The ExA has requested that these both be shown graphically on maps to an Ordnance Survey base at a scale of 1:10,000 or less, with the end points of the links made clear. The Applicant confirms that these maps will be provided as requested for Deadline 2.*

### **DfT TAG Unit M4 – Forecasting and Uncertainty and New Traffic Estimates and IEMA guidance ‘Environmental Assessment of Traffic and Movement’**

*The ExA advises that three documents have recently been published which affect traffic forecasting:*

The Applicant confirms it will review these documents and provide its commentary at Deadline 2.

## **Traffic Models**

The ExA raises two points on Traffic Models, the first being in relation to modal split:

The ExA identifies that the “*modal split for traffic is based on that for the Middle Super Output Areas (the MSOA) (see Figure 6-2 of the TA [APP-138]) for the Application site. However, the locations of the Employee Trip Generation are different (see Figures 6-3 and 6-4) and may not have the same modal split*”.

The ExA has asked if the Applicant could further justify the use of the modal split for the application site rather than the modal split for where it is anticipated employees will live?

The Applicant has also been asked to “*undertake a sensitivity analysis of the effect of using modal split from where employees may live rather than that of the Application site. If this shows a material difference, then the Transport Assessment will need to be re-assessed based on using this modal split.*”

The Applicant does not consider that the ExA’s request requires further information because the TA was undertaken using a bespoke gravity model not influenced by the modal shift figures. Accordingly, the applicant does not consider that sensitivity testing requested by the ExA is necessary or appropriate. The Applicant explains its reasoning further below.

The HNRFI is located within the MSOAs shown in Figure 6-2 of the TA: document reference 6.2.8.1 Part 1 of 20, APP-138. The census data for anyone with a workplace in these areas has been used as a starting point to provide an initial indication of how many people travel to work in the area (i.e. including commuting from outside the area) by each mode.

The people trips and modal split referred to above has no direct correlation to the traffic generation and/or the distribution of vehicles assessed in the TA or the range of employee numbers. It is used here simply as a starting point in developing a sustainable transport strategy and to set initial targets for the Travel Plan. As the modal splits indicated here are not the basis of the TA there will be no need to re-assess the effects if a different modal split is assumed.

The approach that was used for the TA is summarised below:

There are two alternative approaches that can be used. The Census journey to work information can be used to inform a gravity model for vehicular commute trips using either the home location of the people in the Journey to work data set for this employment area or a bespoke gravity model can be created. For the purposes of HNRFI a bespoke gravity model was created by AECOM (who act as transport consultant to LCC) and not by the Applicant. This used census journey to work data for DIRFT and Magna Park to inform likely trip length and this was calibrated with population data surrounding the HNRFI site. The methodology of how this location bespoke gravity model was created is set out in detail in document reference 6.2.8.1 Environmental Statement - Appendix 8.1 – Transport Assessment [Part 5 of 20] - Trip Distribution, APP-141.

The light vehicles generated by the development have been entered into the bespoke gravity model developed by AECOM and the resultant Trip Ends from this have been utilised in the

PRTM strategic model for development traffic. The outputs of the PRTM have been used in the Transport Assessment.

This methodology was agreed with the Transport Working Group as being appropriate. Leicestershire County Council approved the Trip Distribution document on 11 March 2021. National Highways agreed to the suitability of the Trip Distribution in an email dated 12 March 2021 subject to the finalisation and agreement of Trip Generation, Uncertainty Log and validation of base model, which were subsequently signed off on the following dates 07/10/21, 05/05/22 and 01/12/2021 respectively, by National Highways.

The ExA has also requested that:

- *the Applicant provide a revised analysis of the effects of the Proposed Development on the basis of the use of AAWT;*
- *the Applicant confirm that the analysis of the various junctions set out in the Transport Assessment [AS-016] has been undertaken on the basis of calculations based on Monday to Friday peaks rather than from whole week peaks;*
- *where calculations have been provided on a percentage change (such as in Table 8.18) these should additionally include absolute numbers so the calculations can be analysed further.*

The ExA notes that the Applicant has indicated that the maximum number of trains will be on weekdays (paragraph 8.203 of Chapter 8 of the ES [APP-117]). The ExA has suggested that it follows that vehicle movements would be reduced during weekends. On this basis the ExA has asked if all the analysis in Chapter 8 of traffic be re-run utilising Annual Average Weekday Traffic (AAWT) instead of Annual Average Daily Traffic (AADT).

The Applicant's view is that it would not be appropriate to provide a revised analysis of the effects of the Proposed Development on the basis of the use of AAWT. This is because the assessment that has been undertaken is already based on the Average Weekday Traffic generated by the development. Further explanation is set out below.

The weekday peak hours have been assessed in the Transport Assessment and the peak day for the ES Chapter. For the ES the base model used AADT and we added AWT (Average Weekday Traffic) for the development to the baseline model to provide a worst case scenario. This is more robust than what has been requested by the ExA and accords with the relevant guidance set out below.

I Applicant draws attention to the different purposes of the Transport Assessment and the Traffic and Movement Environmental Assessment, as outlined in the IEMA Environmental Assessment of Traffic and Movement (2023)<sup>1</sup> paragraph 1.22.

- *Transport Assessments report the overall transport strategy for development sites to maximise accessibility for non-car modes of transport, but also **assess the traffic impact of the proposals based on an assessment of conditions on the highway network in peak periods.***

*Traffic and movement assessments for EIA and non-statutory environmental assessments present the impact of traffic and movement on people and the*

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<sup>1</sup> <https://www.iema.net/resources/blog/2023/07/12/new-iema-guidance-environmental-assessment-of-traffic-and-movement>

*environment – which are initially undertaken with reference to daily traffic flows prior to assessing the time period with the highest potential impact (i.e. degree of change from baseline conditions), which may not be the same as the time period with the highest baseline traffic flows. It is therefore important to ensure that the content of traffic and movement input to environmental assessment fully accords with the requirement of the relevant EIA Regulation*

The IEMA Document also goes on to cover the Rochdale Envelope and states the following in paragraph 1.25.

- *In a traffic and movement context, the Rochdale envelope, when applied to a project description, should ensure **the maximum likely movement demand is assessed**. It is incumbent on the competent traffic and movement expert to ensure that the project being assessed represents the realistic worst case in terms of traffic and movement demand.*

The Traffic and Movement Chapter of the ES is assessed using annual average daily traffic (AADT) flow as set out in the IEMA guidance. The Applicant confirms that the analysis of the various junctions set out in the Transport Assessment [AS-016] has been undertaken on the basis of calculations based on Monday to Friday am and pm peaks.

The Daily (24 hour) Development Traffic Generation (demand) is provided in Table 7 of the Trip Generation Addendum appended to the Transport Assessment (6.2.8.1 Environmental Statement - Appendix 8.1 – Transport Assessment [Part 4 of 20], [APP 141](#)). This Table provides both the peak hour and peak daily generated traffic flows for the development (which in this case is weekday). The Development Traffic envelope set out in Table 7 of the Trip Generation Addendum is a worst-case daily flow for both the B8 and the Rail Terminal (which in this case is weekday daily peak).

- The Applicant confirms that the Rail Terminal Daily HGV Trip Generation has been derived from the weekday daily HGV two-way movements of 1,944 presented in Table 1 of the Trip Generation Addendum, this is then further reviewed in terms of internal and external HGV trips in Table 4 utilising the 30/70 respective split. This results in 1361 weekday daily two-way HGVs movements on the highway network for the Rail Terminal only.

The rail terminal peak daily traffic generated (which is weekday) shown in Table 4 has then been added to the B8 traffic generation which is based on the peak daily movements presented in Table 7.8 of the original Trip Generation Report appended to the Trip Generation Addendum and the total peak daily development traffic is then summarised in Table 7 of this addendum.

As per the principles set out for Environmental Assessment for Traffic and Movement by IEMA, the Development flows for the peak (which is weekday) daily movements have been provided to AECOM who are the PRTM modelling team at Leicestershire County Council to incorporate into the AADT forecast network flows for the Traffic and Movement ES Assessment, which is the worst-case scenario. The Applicant believes that on this basis the ExA should be assured that the Environmental Assessment, using the Rochdale Envelope, when applied to the project description has assessed **the maximum likely movement demand**.

It should be noted that the noise assessment is based on the use of AAWT and the air quality assessment is based on the use of AADT, in accordance with the relevant professional guidance.

In answer to Point 2: The Applicant confirms that the Transport Assessment has assessed highway peak hour periods which are weekday in accordance with Planning Practice Guidance (PPG): Travel Plans, Transport Assessments and Statements (2014) <sup>2</sup> which the IEMA document also refers to in paragraph 1.21 and therefore in turn proposed robust mitigation based on the worst-case scenario.

*Where calculations have been provided on a percentage change (such as in Table 8.18) these should additionally include absolute numbers so the calculations can be analysed further.*

All tables in the ES including Table 8.18 contain absolute numbers. Tables in the TA also include absolute numbers including the MMQ quoted in Table 8.18. The definition of MMQ at paragraph 8.8 will be clarified in the next version of the TA to be submitted.

### **Narborough Level Crossing**

The ExA has requested that the Applicant *provide three tables setting out, by hour over the 24-hour period, the information set out in the Schedule to this letter in relation to the Narborough level crossing. This should be on a 'worst case' scenario to allow assessment of the effects (it is therefore likely to involve more than the proposed maximum number of trains (32) to and from the Application site to allow for variations in timetabling).*

The Applicant understands that the ExA is seeking information to assess the impact of additional barrier downtime outside of the peak and shoulder peak periods that have been assessed, however the applicant notes that only 10 trains per day passes through Narborough not 16 as per paragraph 3.3 of the Rail Operations Report (document reference 6.2.3.1 APP-131). The applicant is currently working towards completing the table with this modification. The Applicant will obtain rail path information from Network Rail to further confirm the likely timing and spacing between trains and likely maximum frequency of additional trains in any hour. Subject to this information being provided to the Applicant, this will be submitted at Deadline 2.

It is noted that the ExA has requested that the Applicant provide an analysis of the Narborough Level Crossing for those on the highway in terms of length of queue in both Passenger Car Units (PCU) and time for each hour in the 24 hour period.

The existing and forecast barrier downtime was included in the AM and PM peak and shoulder peaks (7AM-10AM) and (4PM – 7PM). This was agreed with the TWG as part of the modelling brief part 8 of 20 (document reference 6.2.8.1 APP-145), based on data supplied by Network Rail and at the request of Leicestershire County Council.

Hourly traffic profile is not extractable from the PRTM and is not something that can be predicted in the future without a very significant level of estimation and factoring for every hour over a 24 hour period for both weekday and weekends, entailing several months of modelling effort. This is very unlikely to be achievable during the course of the Examination.

However, queue lengths and delays are contained in and can be extracted from PRTM peak and shoulder peak hours in the without development (Do Minimum) and with development (Do Something) scenarios for 2036. The Applicant proposes to extract this information and correlate it with minimum time between barrier down times to be set out in the schedule requested by the ExA to confirm whether the queue would clear within one or more than one barrier down

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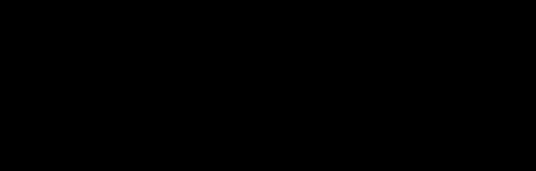
<sup>2</sup> <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements>

times during those hours. The Applicant proposes to provide this information to the ExA by Deadline 2.

As outlined above, the applicant can also provide information on the estimated barrier downtimes outside of the highway network peak hours. This will demonstrate the potential additional downtime due to HNRFI freight trains passing through Narborough. If the total barrier downtime in any hour outside of the peak or shoulder peak hours is less than the barrier downtime for the peak or shoulder peak hours then the analysis is sufficient to assess the worst case. The Applicant would therefore consider that no further analysis would be required in those circumstances. Should total downtime exceed that of the peak and shoulder peak hours then the Applicant would be able to carry out further assessment to provide equivalent information to that set out in the previous paragraph by Deadline 4. Should the information to be submitted at Deadline 2 indicate that this is necessary then the Applicant will set out its proposals for undertaking that assessment at Deadline 2.

**Associated Assessments**

The final transport matter raised by the ExA is a request to update / amend the modelling and application documentation (including any dependent assessments where traffic is involved (eg Noise and Vibration, Air Quality and Emissions, Biodiversity) as necessary, explaining any changes and from where they have been derived in respect of all these matters (the three new documents, employee travel modes, use of AAWT and at the Narborough level crossing). Based on the responses above it is not envisaged that any development assessments where traffic is involved will need to be updated.



Sinead Turnbull  
Planning Director  
For and on behalf of Tritax Symmetry

