Tritax Symmetry (Hinckley) Limited

HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE

The Hinckley National Rail Freight Interchange Development Consent Order

Project reference TR050007

Applicant's Comments on Written Representations [Part 3 of 4 Parish Interest Groups]

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This document provides the Applicant's response to the points raised in the Written Representations made by Parish Councils and Local Interest Groups, which were prepared and submitted at Deadline 1 and subsequently published by PINS. The matter raised is summarised and the Applicant's response is then provided in the following table. In the interests of assisting the ExA undertake the Examination of the Application efficiently, where the same or similar points are raised in multiple instances, the Applicant does not repeat the same response. Where the same point has been made in previous submissions, e.g. Relevant Representations, the Applicant refers back to its previous responses, rather than repeating these again here (document reference 18.2). Where matters are raised by more than one party that are common to several parties, these are grouped and a combined response is provided.

Party	Summary of Representation	Applicants Response
Site Selection and Evolution		
Stoney Stanton Parish Council Stoney Stanton Action Group Narborough Parish Council Elmesthorpe Parish Council Friends of Narborough Station Burbage Parish Council Elmesthorpe Stands Together	The IPs query localised search area to deliver a national need. Consider the search area to be to Leicester focussed. Site selection process concerns raised, no meaningful reasons provided in compliance with NPSNN. Concerns raised by IPs about the limited changes to the site selection process from the consultation phase and tokenism of alternatives considered. Alternative locations suggested by the IPs, including Nuneaton and generally west of Hinckley and expansion of existing RFIs. The IPs state that the alternative locations offer greater opportunities for future expansion, would cause less disruption, have better rail infrastructure and be more suitably placed for locations on the rail network to connect to ports.	The EIA Directive requires an outline of the main alternatives studied by the applicant and an indication of the main reasons for the applicant's choice (NPS-NN 4.26). The Government has not imposed a limit on the number of SRFIs that are required to meet the compelling need for an expanded network of SRFIs (NPS-NN 2.56). The need for rail related warehousing in the region is identified in the *'Leicester and Leicestershire Strategic Distribution Sector Study Final Report'* November 2014. The national need is for a network of SRFI's across Great Britain and in locations of high logistics transport demand, that will enable the transfer of unitised freight (containers and swap bodies) from road to rail, with origin and destination to and from global trading ports and between other rail terminals in other regions. No single terminal location of itself can satisfy a *national* need; that is not the purpose of an SRFI, nor a relevant test.

	IPs raised that importance of connection to Felixstowe overemphasised as existing RFIs in the midlands already connect to it.	Each SRFI has to be capable of offering a viable service as part of a growing network and in doing so will need to serve market demand. HNRFI is exceptional in its rail location and will be particularly well able to support the growth of the national network. The review of sites initially within Leicestershire was driven by the identified demand for Leicestershire and the expressed concern at that time (2014), that the Felixstowe to Nuneaton Line had been developed to take intermodal freight efficiently through the County, but Leicestershire itself would achieve no economic benefit from it. This is a market driven, market funded investment in critical logistics infrastructure of national importance. As such, in the 9 years since the requirement was identified, no other or better scheme in the region has been identified by competing developers, in a highly competitive market. The logistics market and Network Rail recognise that this location is exceptional for its purpose as an SRFI, due to its particular location on Network Rail's Strategic Freight Network; its immediate connection to the Strategic Road Network; and within a catchment of important manufacturing and distribution functions, with dynamic trading possibilities. The site search was initially based on Leicestershire and subsequently checked against areas outside the County.

		The search was for a facility to be part of the national network serving the growth and demand in Leicestershire. The search started in the east and went logically through every possible opportunity, particularly along the Felixstowe to Nuneaton line, being a key Strategic Freight Line of national importance. Most of the railways in the UK were built in the 1800's with low powered steam engines, so wherever possible, they were built in level river valleys, raised just above the flood plains. Flood plains cannot be developed for an SRFI. The number of locations that can also take at least 1km of track between the points on and off the scheme are also very limited (to meet Network Rail's standards and serve 775m trains). The difficulty in finding suitable SRFI sites is recognised in the NPS. These sites have to be delivered by the market and if there is an obvious reason why a site will not work, it has to be discounted. HNRFI is placed on the Felixstowe to the Midlands and the North strategic freight route, perfectly located between the West Coast Main Line, the Midland Main Line and the East Coast Mainline, effectively able to act as a very efficiently located central UK hub and destination with easy access by rail to most of the nation's ports and terminals.

		The route to the Port of Southampton is through Oxford Station, which is currently very restricted and is not a port HNRFI is predicated to serve, other than occasionally, at this juncture. HNRFI has existing access to Southampton and indeed the West Coast Main line through Water Orton and onto the West Coast Main Line south of Birmingham, spurring off at Leamington Spa to Oxford if needed. The suggestion to locate HNRFI west of Nuneaton would seriously compromise the rail connectivity of the site as part of the national network and is not viable on this basis, as set out below. For a location west of Nuneaton, rail traffic to and from the North-West and Scotland would need to negotiate a congested Birmingham rail network, potentially compromising the existing Birmingham terminals, including Hams Hall, which is already located to the west of Nuneaton. There is a national need to grow the use of rail freight and the Midlands has the largest concentration of logistics operations in the UK, with no coast, so virtually everything has to be moved by road or rail out of and into the region. Both new and expanded existing rail freight terminals are required if government targets and indeed industry demand to grow rail freight are to be achieved. All of the

		building at East Midlands Gateway have been let and all the occupiers are using rail. HNRFI will be providing private sidings on the mainline and the capacity studies undertaken with Network Rail have allowed for the additional passenger services proposed. HNRFI will use a maximum of two train paths per hour. There is ample capacity on this line for additional passenger traffic. The connections to Felixstowe, London Gateway and the Port of Liverpool / the North-West are all identified as important for HNRFI, with its location in a central hub location and immediate access to the Felixstowe to the Midlands and the North Strategic Freight Line. This makes it possible to maximise the use of traction and rolling stock with fast turnaround and shorter running times. This reduces the operating costs and increases the competitiveness of rail to and from these locations and offer a hub capability for new smaller locations, essential to increase the use of rail and assist with levelling-up nationally. Felixstowe has considerable potential to move more freight by rail.

		The additional proposed passenger trains have been taken into account in assessing capacity. HNRFI will have very limited impact at Narborough at peak times, indeed if any, as there is only one path that might be used in the AM peak between 7:00 and 10:00; and two in the afternoon peak, between 16:00 and 19:00 and no certainty that they will be used or required by trains running to and from HNRFI at all.
	Principal of Need and Site Assessment	
Stoney Stanton Parish Council Burbage Parish Council	The principle of the need for the facility as purported by the Applicant is predicated on two published documents: • a general 'national need' and support for the transfer of goods from road to rail, as setout in the Department for Transport's National Policy Statement for National Networks (NNNPS) (December 2014); and • a Leicestershire based need to maintain and strengthen the county's position in respect of the logistics sector, as set out in the Leicester and Leicestershire Enterprise Partnership's Strategic Economic Plan 2014 – 2020 (LLEP-SEP) (March 2014). This was updated by the Wider Market Developments: Implications for Leicester and Leicestershire (Jan 2017) in terms of the required need. It is not disputed that there are benefits to encourage the transfer of logistic goods from road to rail, but clearly this needs to be in the correct locations, as	Comments below are made to the specific points raised.

	outlined in detail through-out both the adopted NNNPS and the draft NNNPS (March 2023). It is not considered however that the Application fulfils the aims intended to reduce traffic and generate carbon benefits of the NNNPS through a number of substantive failures of the proposal. These are picked up within the subsequent sections where appropriate, with the principal issues considered here. Overall, it is not considered that the Application represents sustainable development.	
Stoney Stanton Parish Council Burbage Parish Council	The IPs acknowledge the benefits to encourage the transfer of logistic goods from road to rail, but it needs to be in correct locations. IPs do not consider that the application represents sustainable development.	There seems to be an underlying assumption that the site was identified and then the alternatives reviewed to justify the application. This is simply not the case. Leicestershire was reviewed from east to west, in that order, to identify a suitable site for an SRFI, which by its rail connection requirements and the nature of the rail infrastructure often being built only just above the flood plain, makes it very difficult to find suitable sites for. Surrounding areas were also considered beyond Leicestershire, not least as part of due diligence, because there would be little point in promoting a scheme if a better site could come forward promoted by a competitor. In the 9 years since this work commenced, there have been suggestions of alternatives, including those assessed and some well beyond the market area, by lay people,

		which the Applicant has respectfully addressed on each and every occasion. In that 9 years there has been no alternative site proposed by either an experienced rail freight professional, or indeed a market competitor to the Applicant. Had there been a better site, the market would have come forward with it. The Applicant is well aware of the geographical scale of consideration, from national, to local, including the development of a network of rail terminals serving a region with a high concentration of logistics movements - with no ports. The Applicant is also well aware of the complexity of the national rail network, which does not provide simple access to routes, unlike a road junction. This is very material to the site selection process and is not well understood or is being ignored by advisors to those making representations. The rail connectivity of HNRFI is exceptional and this has been explained on numerous occasions at consultation events, subsequent meetings with Council Officers and in the Application. The development potential of consented and existing terminals is set out in the Market Needs Assessment – Rail Freight Market Demand and Supply 5.24 – 5.36 (Document reference 16.1 PINS ref APP357) and clearly also identifies the distinctive role of HNRFI within this.

Stoney Stanton Parish Council	Essentially, the appraisal of alternative site options has only covered a very narrow area to conclude that the Application Site is the best available opportunity. As noted above, the scale of infrastructure proposed needs to influence the scale at which the assessment needs to be undertaken. Selecting an arbitrary short section of land along the railway line to meet a national infrastructure project cannot be considered a robust approach. It does not accord with the requirements of the NNNPS paragraphs 4.26 and 4.27 on alternative site considerations.	This is not accepted. The application site was not identified by an arbitrary or narrow selection of land. It was selected as part of a thorough site search to find a site that was suitable for an SRFI in Leicestershire and checked against the possibilities of alternative sites outside Leicestershire to meet the same need. The importance of the rail network and how it operates for freight at Nuneaton is critical. Network Rail's considerable investment in the Nuneaton Chord connection to the West Coat Main Line, completed in 2012, fundamentally changed the potential for Leicestershire to benefit from rail, providing it could have an SRFI located on the line. HNRFI will be an exceptionally well-located rail terminal of national importance, with very significant local benefits.
Stoney Stanton Action Group	The applicant has stressed the importance of the connection to Felixstowe, however a look at the Felixstowe freight timetable will show that there are already many regular services operating from Felixstowe to RFIs in the Midlands (e.g. East Midlands Gateway, Hams Hall, Birch Coppice, Birmingham Landor Street and recently announced, DIRFT), with more services to existing RFIs in the region planned.	The connections to Felixstowe, London Gateway and the Port of Liverpool / the North-West are all identified as important for HNRFI, with its location in a central hub location and immediate access to the Felixstowe to the Midlands and the North Strategic Freight Line. This makes it possible to maximise the use of traction and rolling stock with fast turnaround and shorter running times. This reduces the operating costs and increases the competitiveness of rail to and from these locations and

		offer a hub capability for new smaller locations, essential to increase the use of rail and assist with levelling-up nationally. Felixstowe has considerable potential to move more freight by rail.
Stoney Stanton Action Group	The IPs highlight concerns on the reports and reliance placed upon them, that have been used to provide evidence on need for the application, including: - Warehousing and Logistics in Leicester and Leicestershire: managing growth and change (April 2021) - Leicester and Leicestershire 2050 Our Vision for Growth (2018)	The Applicant's case is not dependant on a single report, although it does highlight consistently with all other reports and policy conclusions, that there is a need for another SRFI in the area. This is agreed by the Relevant Planning Authorities in their draft Statements of Common Ground and should be accepted as a matter of fact. The Warehousing at EMG is fully let and occupied with all the occupiers using the rail freight terminal. The rail terminal is indeed now operating and primarily serves EMG occupiers, Leicester North, Nottingham and Derby markets, as set out in the Market Needs Assessment 6.12 (document reference: 16.1, APP-357)
Burbage Parish Council	IPs raised concerns in relation to specific points on the application documents on need and demand and supply.	In response to each item: a. The published studies identify HNRFI as satisfying the identified need for an SRFI. This position is agreed by the Relevant Planning Authorities in their Statements of Common Ground. b. This is the basis of Government policy for growth. HNRFI is uniquely placed on the rail network to assist in the development of SRFI's and smaller terminals around the country, as set out in the Market Needs Assessment 4.28 – 4.32 and Diagram 4.1 HNRFI - NATIONAL INTERMODAL HUB. (Document Ref 16.1 –

		PINS Ref APP-357) c. Noted as a comment. d. The specific benefits of the HNRFI location are set out extensively in the Market Needs Assessment (document reference: 16. 1, –APP-357). e. Logistics Demand and Supply Assessment (document reference: 16.2, APP-358) clearly establish the needs case for the HNRFI. The Applicant has responded to this point through RR-0110 of 18.2 Applicant's Response to Relevant Representations(document reference: 18.1.8, REP1-026). This document has been prepared to assess the specific need for large scale B8 premises in the relevant Property Market Area for the HNRFI. The "Warehousing and Logistics in Leicester and Leicestershire: Managing growth and change" April 2021 on the other hand is a sub-regional study to help inform Local Plan making for local authorities in the sub region. While the conclusions of this study are relevant to the HNRFI, Document reference: 16.2 APP-358 is specific to the HNRFI. f. The segmentation of the B8 distribution market is addressed in the Market Needs Assessment – Freight Movements – 5.1 – 5.10 (document reference: 16. 1, –APP-357). It does have a material impact and this is taken into consideration. g. The Market Needs Assessment – Freight Movements – 5.1 – 5.10 (document reference: 16. 1, –APP-357) sets out the need for HNRFI. h. HNRFI is in the centre of the national rail network, on the Felixstowe to the Midlands and the North Strategic

		Freight Line, connecting Felixstowe, the East Coast Main Line, the Midlands Main Line and the West Coast Main line together. No other terminal is so well located to be able to achieve both north south and east west rail services directly onto a Strategic Freight Line. j. There is no reliance on the proposed Nuneaton 'dive under' coming forward and no predication in the market assessment or capacity study that this is critical.
Stoney Stanton Action Group	Relying on trends that seem to have been exacerbated by Covid19 for future development is not a reliable approach for forecasting warehousing need. Some habits may reverse with the strong will to retain high streets and meet other demands on our country to protect green space, the environment and social well-being. A conservative shared approach across the country should be adopted for warehouse unit building and supply.	Most commentators agree that online retailing will continue to grow from a higher base than before the pandemic due to behavioural changes such as increased home working and continued demand for rapid parcel deliveries. This is discussed further in Section 3.3 of Document reference: 16.2 APP-358. It should also be noted the National Infrastructure Commission (NIC) noted in its 2019 report, 'Better Delivery: The Challenge for Freight,' that ecommerce could reach 65% of all retail sales by 2050.
	Compliance with Rail-Linked Definition/National Infrastructure Objectives	
Stoney Stanton Action Group Elmesthorpe Parish Council Stoney Stanton Parish Council Burbage Heritage Group	IPs state that the development does not comply with national policy including NPS NN on the following matters: - Harm will not outweigh value. - Rail line is not electrified - Distance from target market - Size of site too small to accommodate necessary	The Environmental Statement submitted with the application assesses the effects of the Application against all relevant aspects, including traffic and transport, air quality, ecology, landscape, noise, health and social amenity. It follows accepted professional good practice to consider effects during construction and operation. In the Applicant's view it is clear that the benefits, including the strategic benefits of transferring freight from road to rail

Elmesthorpe Stands Together	infrastructure - Sustainable development principles - Connection to strategic rail network and capacity of the network - Climate change - Co-location and minimizing road distribution distances - Located in an area of low unemployment so not supporting disadvantaged areas The existence of an available and economic local workforce	outweigh the impacts, in accordance with Government policy. It is agreed that the Nuneaton to Felixstowe line is not electrified. The Rail Report (document reference 6.2.3.1, APP-131) paragraph 4.12 makes reference to the future opportunity for electric hauled freight trains. It is Government policy to promote the transfer of freight from road to rail to 'help' reduce transport carbon emissions (NPS-NN 2.40). This aim is achieved by optimising the use of rail in the freight journey by maximising rail trunk haul and minimising some elements of the second distribution leg (NPS-NN 2.44). Hence the need for SFRIs to be well located to the markets they serve. Analysis has been undertaken by the Applicant to demonstrate that the full operation of HNRFI – sixteen 775m freight trains per day – will have the effect of avoiding 83m road freight miles per annum. The Planning Statement (document reference: 7.1, APP-347) explains (paragraph 3.122) that some 55% of the total ground floor space at HNRFI could be 'rail connected'. All buildings would be 'rail served' in accordance with the meaning given to these terms by the ExA. In the deporting on West Midlands Interchange – and as applied to HNRFI. The market for 'rail connected' warehousing is highly specialised,. East Midlands Gateway has no rail

		connected buildings, yet all the occupiers are using rail, as 'rail served' buildings. The market area served by HNRFI is also a reflection of the rail route and service that can be provided. Magna Park users will use HNRFI for some services and DIRFT for others. This is set out in the Market Needs Assessment 6.3 - 6.15 (document reference: 16.1, –APP-357). The Planning Act 2008 was purposefully enacted in order to create a different planning regime for the delivery of national infrastructure. The NPS-NN acknowledges that by reason of the locational requirements of a SRFI that a countryside location may be required (NPS NN paragraph 4.84). The Applicant has engaged with the Local Highway Authorities and used the recommended models with full agreement on the inputs to these. Mitigation is based on outputs from LCC's PRTM 2.2 model which covers both the strategic road network (SRN) and the local road network (LRN). The Applicant maintains that with the proposed access infrastructure and wider highway network and junction improvements that the impact of the proposed development has been mitigated effectively. Sustainable transport has been considered as part of the application and continues to be developed alongside the

		Local Highway Authorities. Public Transport proposals include a fixed route service enhancement and an extensive Demand Responsive Bus Service.
Stoney Stanton Parish Council Elmesthorpe Parish Council	IPs raised concern about masterplan and layout and limited changes from consultation. Concerns that layout fails to maximise rail linked units leaving it potentially to operate as a logistics park.	The Design and Access Statement describes the evolution of an illustrative masterplan for HNRFI, Necessarily the development of a SRFI requires provision of a rail port – with intermodal loading/unloading facilities, and the requirements for large scale warehouse buildings on a large site. These principles for the functionality of a SRFI that is fit for purpose are consequential upon the form of development of a SRFI. The Planning Statement (document reference: 7.1, APP-347) explains (paragraph 3.122) that some 55% of the total ground floor space at HNRFI could be 'rail connected'. All buildings would be 'rail served' in accordance with the meaning given to these terms by the ExA. In the reporting on West Midlands Interchange and as applied to HNRFI. The market area served by HNRFI is also a reflection of the rail route and service that can be provided. Magna Park users will use HNRFI for some services and DIRFT for others. This is set out in the Market Needs Assessment 6.3 - 6.15 (Document Ref 16.1 – PINS Ref APP-357). The Planning Act 2008 was purposefully enacted in order to create a different planning regime for the delivery of national infrastructure. The NPS-NN acknowledges that by reason of the locational requirements of a SRFI that a

		countryside location may be required (NPS NN paragraph 4.84). The Design and Access Statement (Document reference: 8.1, APP-349) Regulation No. 5 (2) (q)) explains the reason why the rail port is repositioned alongside the railway at paragraph 5.3.5. The site levels dictate development in this form, given the need to access the mainline railway at relatively fixed points. The rail port design has been developed to maximise the efficient use of the mainline connection as well as loading and unloading of trains. The ExA's attention is drawn to the Written Representations submitted on behalf of Network Rail Infrastructure Ltd which explains that a technical evaluation of HNRFI has been undertaken including assessing: a. Strategic fit b. The viability of connecting the terminal to Network Rail network c. Affected level crossing assessments d. An assessment of indicative network capacity to support the proposed level of train improvements. Thereafter it is stated: *Network Rail is therefore satisfied that strategically the Hinckley proposal … will support Government and rail industry targets for intermodal rail freight growth and delivering freight mode shift from road to rail. Having satisfied itself in a strategic context Network Rail has entered into a Basic Services Agreement with the*

		promoter to support development of the rail works (excluding the integral rail terminal itself) in support of the promoter making an application via NSIP process for a DCO to develop and build the terminal. It is submitted that in the context of these submissions from Network Rail, and on the basis of consistency with the NPS NN, the Applicant's view of the benefits of the scheme are unchallengeable. HNRFI will operate as a SRFI, with intermodal freight movement, and no as alleged by the IP a potentially road based logistics park. The NPS-NN specifically acknowledges that while visual appearance is a key factor in the design of new infrastructure, so is functionality, fitness for purpose, sustainability and cost (NPS-NN 4.29). In this context, the form of a SRFI comprising a rail port, intermodal movement of freight especially in shipping containers, and the requirements of occupiers for large scale warehouses, with volumetric efficiency for storage, is necessary to fulfill the national network function. The NPS NN acknowledges that particularly for SRFIs there may be a limit on the extent to which it can contribute to the enhancement of the quality of the area. This starting point must be accepted, within which the form and layout is then judged. The Applicant has responded to the Landscape Design Review of HNRFI as Appended to the Written Representations issued by Blaby District Council. The

		Applicant does not accept the contention that HNRFI has not respected the criteria for good design for national networks, which includes but goes well beyond landscape considerations, which are important and have been taken into account but are not the primary design consideration.
Stoney Stanton Parish Council	IPs concerned that scheme not designed to be zero carbon. Including: - On-site energy generation (49.9 MW) appears to be deliberately curtailed to ensure that it does not trigger the requirement for a second DCO. No justifiable reason why additional solar panels could not be accommodated on the roofs, or other renewable sources installed on site to remove the need for fossil fuel reliance. - A substantial number of charge points will be required for the car parks and fast chargers for the HGVs. Given the site supplement for its electrical supply from gas powered generation, then the offset the new technology requirements is not factored and indeed would be burning fossil fuels in order to charge EV's. Provision should be made for substantial connection to the overhead national grid power supply that runs within less than 0.5kM of the site.	The energy hierarchy seeks firstly to minimise demand; then maximise energy efficiency and thereafter utilise low carbon energy. The roofs of the buildings are to be provided with roof lights to reduce energy demand. A 'man-safe' area has to be safeguarded for maintenance purposes. All of the remaining roof space is available for solar PV panels. The CHP plant is proposed as a back up facility for building occupiers. Requirement 29 limits the extent to which the CHP may be used in each calendar year (max 35% of the hours). In practice it will operate for less than 35% of the year. It is designed to be able to operate on low or zero carbon gas if and when this becomes commercially viable, driven by national carbon budgets and government policy. Table 1 within the Energy Strategy (document reference: APP-217, 6.2.18.1) demonstrate that power requirements for electric passenger and operational vehicle charging have been taken into account as part of the overall electrical power requirement calculation. When first constructed, 20% of car parking spaces will be provided with an electric vehicle charging point.

		Ductwork provision for future car charging points to all remaining car parking spaces will be provided to be installed by the building occupier if and when necessary. In addition to the above, ductwork will be provided to HGV parking spaces to facilitate the installation of chargers in future depending on the building occupiers' requirements and technology availability. Electric HGV battery technology is still very much under development and it is not necessarily the case that HGVs will require a large power capacity in order to charge. It will be dependent on individual occupier's operation but many will have the facility to slow-charge over night or on and alternative site unrelated to the HNRFI Paragraph 4.36-4.47 of NPS NN is directed by the statutory provision to have regard to the *'desirability of mitigating and adapting to climate change.'* HNRFI has been designed to *'avoid increased vulnerability to the range of impacts arising from climate change.'* (NPS NN 4.38) Chapter 18 of the environmental statement (Document reference: 6.1.1, APP-110) addresses: – The resilience of HNRFI to climate change – The influence of HNRFI on climate change .
Stoney Stanton Action Group	IP indicates that the new draft NPSNN looks to a national network, not all clustered in the Midlands.	The Rail Freight Market Demand and Supply Report (document reference: 16.1, APP-357) explains at paragraph 6.12 the business market which will be served

		by HNRFI distinctly from the markets served by existing and committed SFRIs. The optimal maximum distance for the road leg of a SFRI is c20 miles/45 minutes travel time. 'Good road access' is a locational criteria for a SRFI. It is accepted that the secondary distribution leg will be by road but it should be acknowledged that HNRFI provides rail to rail, as well as rail to road and road to rail capability. Thus onward transport by rail for both import and export is possible, in addition to export by road to rail and import by rail to road. The main source reduction in road freight miles is the long haul leg (the 'rail trunk haul') (NPS-NN paragraph 2.44). NPS-NN paragraph 2.57 is a statement of fact and a response to the location of manufacturing industry and centres of population. The LAs have identified a need for rail related warehouse development within Leicestershire (Leicester and Leicestershire Strategic Distribution Study) and has accepted the need within the respective SoCGs on planning matters. HNRFI is to be determined pursuant to the policies in the 2015 NPS. The Government considers that there remains a compelling need for an expanded network of SRFIs. The draft NPS does not suggest that there should be a restraint to the number of SRFIs in the Midlands. The draft NPS does state that consideration should be given to existing SRFI locations – which has been taken into account in the

		Rail Freight Market Demand and Supply (document 16.1, APP-357) (paragraph 6.12).
Burbage Parish Council	IP highlights the 'Green Wedge' policy in the Hinckley & Bosworth Local Plan 2006-2026. Concern expressed by both Burbage Parish Council and Hinckley & Bosworth Borough Council about the cumulative impact on Burbage and other communities within Hinckley & Bosworth of all the proposals contained within the emerging Blaby Local Plan. Taken together with the Rail Freight development, and all the other potential sites, there could effectively be total development of what is now open countryside and farmland all the way from Earl Shilton to Stoney Stanton and Sapcote.	The provision of the Core Strategy Policy 6 Green Wedge has been addressed in the response to the HBBC Written Representation submissions. In the publication of the Blaby Local Plan Options for Spatial Strategy Sites and Policies, it is stated that the document is 'not a draft plan' (paragraph 2.28). Paragraph 5.2.2 makes clear '*it is important to note that at this stage no decision has been made about which sites are to be included as allocations in the Local Plan*'. No planning weight can be placed upon the site options identified.
Stoney Stanton Action Group	IP concern relating to if housing is scarce (Leicester's unmet need) and expensive, how will people doing basic warehousing jobs afford to live in the area. A review of the latest Local Plans and Monitoring Reports has revealed that these documents do not specifically refer to employment created by HNRFI or by the logistics sector to define housing need.	Paragraphs 10.20 of the Blaby LIR states '*It is unlikely that the operation of the Proposed Development would generate additional pressure on the Leicester and Leicestershire housing market area'*. In the Applicant's view HNRFI will not adversely impact upon the existing housing market.
	Locational Impact	
Stoney Stanton Action Group Stoney Stanton Parish Council Elmesthorpe Stands Together	IPs state that the proposal is totally out of character with the existing area rural in character, with relatively small-scale settlements scattered across the landscape. Specific concerns raised in relation to: - Fear of crime - Building height and impacts upon character and tranquility	It is acknowledged that necessarily by reason of the built form of the SRFI, that there is a limit on the extent to which HNRFI can contribute to the enhancement of the quality of the area (NPS-NN 4.30). There will be residual visual and landscape impacts (after mitigation) that are not fully mitigated. At the same time the site is well contained and screened by topography and existing tree

	- Scale and grain in relation to wider area - Existing local congestion - Proximity to Elmesthorpe and Aston Firs Reference made by IPs to existing relationship between Magna Park and Lutterworth.	belts from views in many directions. The landscape mitigation helps screen views from other locations. Junction upgrades and safety improvements are proposed in both Sapcote and Stoney Stanton. The creation of the new south facing slips at M69 J2 and the link road to the A47 will draw more traffic to the M69 away from the B4114. There will be an increase in vehicles through Sapcote, which has been acknowledged. Improvements are proposed within the existing highway envelope to address this. Further discussions are ongoing with the Highway Authority in connection with Sustainable Transport and access. This will build on the work already done in the Sustainable Transport Strategy Part 15 of 20 (document reference 6.2.8.1, APP-153), which is a living document.
Stoney Stanton Parish Council	IPs recognise the need to accommodate some growth and acceptance to change where necessary providing undertaken in a strategic and joined up manner. HNRFI provides no obvious benefits to local community.	It has to be recognised that the primary policy consideration for determination is the NPS-NN i.e., the provisions within the NPS carry more weight than any other statement of national or local policy. The Government has established a critical need in the overall national interest for improvements to the national networks (NPS-NN paragraph 2.2). A '*compelling'* need has been established for expanded network of SRFIs (NPS-NN 2.56). It is of course acknowledged that there will be some residual impacts (after mitigation) upon the host

		community. But the development of HNRFI will contribute towards a prosperous economy and procure significant economic benefits to the surrounding community. The surrounding community will also benefit from the contribution HNRFI achieves in the decarbonisation of transport. The provision of the A47 Link has further benefits in reducing the amount of traffic that passes through Hinckley and Burbage. It is submitted that there are obvious benefits to the local community and the residual impacts have been minimised.
	Socio-Economic Effects	
Stoney Stanton Action Group	IP raises concerns about the use of farmland for employment rather than food production.	The LPAs accept that there is a need for a SRFI, and such a form of development cannot be located within existing urban areas. The NPS NN acknowledges a countryside location may be required and notes the relatively limited current use of the land for food production.
Stoney Stanton Action Group Stoney Stanton Parish Council Elmesthorpe Parish Council	IPs raise concern about availability of workforce to fill proposed jobs created once operational, concern raised in the following areas: - employment rates in local area higher than average - Potentially future automation might require highly skilled workforce, in area with poor graduate retention levels - Employees travelling in from outside the area (lower house prices, higher unemployment levels) leading to increased traffic congestion and local infrastructure effects Limit to availability of midlands based logistics	The Applicant has responded to this point through RR-0731 of document reference 18.2, REP1-026 Applicants Response to Relevant Representations submitted at Deadline 1 (document reference: 18.2, REP-1026) and Matters not Agreed of the Blaby District Council and Hinckley and Bosworth Borough Council SoCG under Land Use and Socio-Economic Effects. These considerations were also addressed in the ES Chapter 7 Socio-economics (document reference: 6.3.7, APP-116). The source of employment is not confined to the immediate locality of HNRFI. Jobs will be taken from

	workforce	residents in Leicester, Hinckley, Nuneaton and Bedworth and Rugby, where there are higher levels of deprivation. Trip distribution work on the spread of employees is included in the PRTM Trip Distribution Model part 5 of 20 (document reference 6.2.8.1, , APP-142). This identifies key areas of likely workforce origins. The Sustainable Transport Strategy part 15 of 20, (document reference 6.2.8.1, APP-153) sets out the public transport provision to these key areas. This continues to be developed with the Local Highway Authorities and is strongly linked with the measures proposed in the Framework Travel Plan (document reference 6.2.8.2, part 1 of 4, APP-159). The Applicant's response to the matter regarding availability of the logistics workforce is provided in Matters not Agreed Blaby District Council and Hinckley and Bosworth Borough Council SoCG Land Use and Socio-Economic Effects submitted at Deadline 2.
Stoney Stanton Action Group	IP highlights that Leicester and Leicestershire's Strategic Economic Plan states the area's relative weaknesses are: congestion on the roads and railways poor economic productivity per head of population, low pay structure and high levels of commuting	Leicester and Leicestershire's Strategic Economic Plan is reviewed and considered in the Environmental Statement Chapter 7: Socio-Economic Effects (document reference: 6.1.7, APP-116).
Stoney Stanton Parish Council Elmesthorpe Parish Council	IPs request clarification on the extent of these direct and indirect employment benefits and the harms that result from the proposal.	The Applicant has responded to this point though RR-0731 of 18.2 Applicants Response to Relevant Representations submitted at Deadline 1 and Matters not Agreed of the

		SoCG under Land Use and Socio-Economic Effects submitted at Deadline 2.
Stoney Stanton Parish Council Stoney Stanton Action Group	IPs identify that there are already a substantial number of significantly sized warehouse and logistic parks, including a number that are rail-linked. These include those that are operational or with existing planning consent. All the existing logistic warehousing means that there are already issues with securing staff in some locations. The IPs state that If the demand for the facility is nationwide, then there is scope for it to be located at another position in the country where there is not already a high concentration of such facilities and a recognised shortage of employees.	The Applicant's response to this matter is provided in RR-0134 and RR-1416 of 18.1.1, Applicants Response to Relevant Representations submitted at Deadline 1.
Stoney Stanton Parish Council Stoney Stanton Action Group	IPs identify that there are already a substantial number of significantly sized warehouse and logistic parks, including a number that are rail-linked. These include those that are operational or with existing planning consent. All the existing logistic warehousing means that there are already issues with securing staff in some locations. The IPs state that If the demand for the facility is nationwide, then there is scope for it to be located at another position in the country where there is not already a high concentration of such facilities and a recognised shortage of employees.	The Applicant's response to this matter is provided in RR-0134 and RR-1416 of 18.1.1, REP1-018Applicants Response to Relevant Representations submitted at Deadline 1.
Stoney Stanton Parish Council Burbage Heritage Group	The IPs state that the socio-economic assessment insufficiently assesses the impact on human health. Physical and mental health are important considerations and the generation of jobs cannot	All tangible changes in environmental and socio-economic circumstance directly attributable to the proposed development have been explored through the planning process; assessed within the PEIR; informed through

Friends of Narborough Station Save Burbage Common Burbage Parish Council	simply be considered to usurp this impact. The Health and Equality Briefing Note provided by the Applicant includes no clear reference to human health, well-being or equality being considered.	engagement and written response; and refined through the final DCO with the objective to prevent, minimise and manage any potentially significant impact and associated disruption to local communities.
Stoney Stanton Parish Council Elmesthorpe Parish Council	IPs raise concern that there is an inconsistent and over-estimation of the number of HGV miles being removed from the public highway. These figures are massively misleading but are integrated into the benefits delivered; the HGV miles saved should be considered much lower, and whilst still a benefit needs to be weighted accordingly, and in particular balanced off against the additional congestion harm created to the local area.	The transport assessment that accompanied the application did not remove HGV trips from the network, so the strategic benefit of the transfer from road to rail has not been accounted for in the local and regional transport modelling. This means that the assessment is a worst case and the mitigation proposed is robust. This is considered appropriate, conservative and robust. The Transport Position Statement (document reference 18.2.1) provides a summary of the agreed inputs and assumptions, together with the agreed methodology using LCC's PRTM model.
Stoney Stanton Parish Council Stoney Stanton Parish Council Burbage Heritage Group	IPs raise concern that socio-economic assessment does not consider the negative impacts to the area e.g. transport (travel times, fuel etc). The harms as well as the benefits need to be adequately balanced.	The potential socio-economic effects to the businesses in the Study Area that could be affected by the HNRFI are assessed in Environmental Statement Chapter 7: Socio-Economic Effects (document reference: 6.1.7, APP-116) T Environmental Chapter 8: Traffic and Transport (document reference: 6.1.8, APP-117) and its appendices consider the wider transport impacts of the scheme.
Narborough Parish Council Friends of Narborough Station	Station Road is a vital link to the residents of Littlethorpe as all the main services, GPs, pharmacies, schools and shops are all located in Narborough. Request that provision for a scoping study be funded to	Any existing concern about the scale of local severance caused by Narborough Level Crossing is a matter for the highway authority, Network Rail and the local planning

	look at options for eliminating the community severance caused by the level crossing.	authority. The application has no material effect at this location. Blaby District Council has commissioned an assessment of the impact of barrier down time on Social, Health and Wellbeing (LIR Appendix 4). The report concludes that: *'the increased downtime of the barrier at Narborough Crossing is not considered to have an overall material impact on quality of life of residents'* This reinforces the findings in the DCO.
	Transport	
	General	
Stoney Stanton Action Group	The IP highlights a number of queries relating to references in chapter 8 of the ES, including: Subsections 8.95 and 8.96: The Leicester & Leicestershire 2050: Our vision for growth (2018) document. The reference to this is flawed and misleading. This last part of the sentence was omitted because that plan was dropped from the Midlands Connect Strategic Transport Plan. It was called (in the Leicester and Leicestershire growth plan) "The A46 Expressway", and was claimed to be "critical to our strategy" (page 48 of the plan), however as it has been abandoned, then the logic for placing the HNRFI in this location (where the A46	The A46 Expressway was dropped by LCC following their own reviews at a county-wide level, so it is no longer appropriate to refer to it. The mitigation and access proposals for HNRFI are intended to proportionately address the impacts of the development and the reassignment of traffic as a result of the new infrastructure. The M69 J2 upgrade and A47 link provide a significant improvement to highway infrastructure in and around Hinckley itself. Other highway improvements that are included are set out in the Works Plans.

	Expressway would have joined the M69) is negated.	
Stoney Stanton Action Group	Subsections 8.95: The Leicester & Leicestershire 2050: Our vision for growth (2018) document: Page 49 – references the East Midlands Gateway (strategic rail freight terminal), where the M42 meets the M69. Omitted from ES Chapter 8.	The East Midlands Gateway site is located adjacent to the M1 J24 which is a significant distance from the HNRFI site.
Stoney Stanton Action Group	Subsections 8.123 to 8.187 Baseline conditions: clear that a lot of the significant features that will affect or be affected by additional traffic are not included, frequently leading to the dismissive erroneous statement "It is therefore considered that the sensitivity of …. Is negligible" or similar.	IEMA Guidance to produce transport related ES Chapters sets out criteria for assessing impact. Paragraph 8.41 sets out the initial Rules for thresholds when reviewing Environmental Impacts specifically. Paragraph 8.52 onwards describes in detail how the criteria are assessed the use of 'therefore' refers to the application of the requisite criteria. This differs from the Transport Assessment (document reference: 6.2.8.1, AS-016) which focuses on worst case impacts at peak hour periods.
Stoney Stanton Action Group	subsections 8.92 to 8.99 selectively choose statements from various documents which emphasize the importance of rail freight. The importance of improving or providing new rail services for passenger traffic is also talked about in these documents. We believe the line between Leicester and Nuneaton could not take as much additional freight as proposed by HNRFI as well as increased passenger services.	The ES Chapter has been produced to assess the impact of an RFI. RFI based policies in local plans need to be quoted in such sections. Network Rail have undertaken a capacity analysis and confirmed that there is capacity for both HNRFI and the planned growth in passenger services. HNRFI can only serve a maximum of two trains an hour from Leicester and three an hour overall, leaving ample time for additional passenger services.
Stoney Stanton Action Group	The IP raises concerns that during the consultation period there was little mention of the use of HNRFI as a rail freight hub, however this possible use was	There is no expectation that additional train paths will be required as the pathing required is also a factor of the time taken to load and unload trains at the terminal. It

	emphasized more in the Examination documents (e.g. train from a port carrying containers for multiple rail destinations in, loads separated out and sent on to different rail freight terminals out). This seems a good concept, however in order to be efficient this would require more paths to be allocated along the Leicester to Nuneaton line, which seems to be unlikely. There seem to be little evidence that paths for this have been included in any rail traffic considerations	will simply mean a wider variety of origin and destinations in the early years and bringing forward maturity of scheme The proposition is that smaller terminals can hub through HNRFI which will be able to consolidate loads to key ports, also adding a wider range of origin and destinations for occupiers at HNRFI. The effect should be that rail freight growth and viability for smaller terminals will be improved; and time taken to reach maturity will be shorter.
Stoney Stanton Action Group	The IP has queried how a "Strategic" Rail Freight Terminal can be allowed to be built without a guarantee of required rail paths.	This relates to the regulation of the railways by the Office of Rail and Road. Network Rail has identified that there is capacity but is not allowed to tie up paths prior to being required. At this juncture it is not known what the origin or destination of a particular flow will be; and at what specific time it would be required.
Stoney Stanton Action Group	Subsection 8.137: The A5 through this area is already problematic, especially given the recent increase in large logistics sites along its path. Saying that sensitivity is expected to be minor is very dismissive. The A5 itself should be prioritised for improvements and these should take place before any work is allowed to commence on any more new logistics sites in the area.	IEMA Guidance to produce transport related ES Chapters sets out criteria for assessing impact. ES Chapter 8 (document reference: 6.1.8, APP 117) Paragraph 8.41 sets out the initial Rules for thresholds when reviewing Environmental Impacts specifically. Paragraph 8.52 onwards describes in detail how the criteria are assessed. Impacts on the A5 were reviewed through the Transport Assessment (document reference: 6.2.8.1, AS-016) following outputs from LCC's PRTM2.2 model and further

		assessment through WCC's Rugby Rural Area Model. Further discussions are ongoing regarding sensitivity on the A5 with the respective Highway Authorities.
Stoney Stanton Action Group	The IP raises concerns that dismissing the construction phase as being "short term" therefore will have an insignificant effect is wrong. It will have significant impact for years.	Construction Traffic will be subject to the Construction Traffic Management Plan which will be developed by the Principal Contractor. The CTMP submitted (document reference: 17.2, APP-364) provides a framework for minimising impacts on local roads.
Stoney Stanton Action Group	The IP states that Statement 7.70-71 identifies growth areas as Leicestershire International Gateway, Melton Mowbray, A46 Priority Growth Corridor (Expressway downgraded) and A5 Improvement Corridor. This report admits (7.71) that A5 has been suffering from increased congestion, and details the removal of A5 Dodwells to Longshoot widening scheme (Chapter 8 traffic and transport 8.15), thus sustaining the strictures along the route This scheme is under current consideration in Parliament: "Investing in the improvement of the A5 will also support growth in advanced manufacturing and logistics developments in the area, as well as housing delivery" SGP 2018. Project in decision phase (23/24) Publication of RIS3 May 23. Decision making is ongoing, but to grant permission for HNRFI to go ahead without the improvements necessary on the A5 and surrounding roads would seem unthinkable.	Impacts without the upgrades on the A5 have been tested through LCC's PRTM model, as agreed with the Transport Working Group. Further discussions on additional sensitivity analysis are ongoing, but these will not alter the modelling that has been undertaken to support the application.

Stoney Stanton Action Group	IP concerned that the peak time capacity of the M69 seems to have been underestimated, particularly at J2, where it meets Fosse Park traffic and the M1.	The Applicant has responded to this point through the Appendix A Highways Position Statement (document reference 18.2.1, REP1-033).
Stoney Stanton Action Group	IP states that the new A47 Link Road is misleadingly named, the proposed route would join to the B4668 which is a smaller road linking Hinckley to the A47. This road is not classified for the volume of vehicles that would be proposed to use this route. The proposed link road must connect directly to the A47, not by intermediate roads that are not suitable for the increased volume of traffic, both from the HNRFI but also as a result of opening the South Bound facing slip roads to the M69	The A47 link connects to the B4668 a short distance from its junction with the A47. Land constraints mean this is the most appropriate location for the new junction. The B4668 arm of the A47 roundabout is proposed to be upgraded.
Stoney Stanton Action Group	The IP is concerned that the proposed A47 Link road is also adjacent to the Hinckley Sports Facility which is used by many residents and is busy with children and activities most days into the evening andaccess is already difficult with the existing volume of traffic.	The new link road junction allows for improved pedestrian crossing facilities and footways in the vicinity of the sports club.
Stoney Stanton Parish Council Burbage Parish Council	The IP has concerns in respect of the highway information presented in support of this Application. The highway model and mitigation is still not agreed with any of the statutory highway bodies. If the model and mitigation is not yet agreed, then clearly the public is at a serious disadvantage to provide comment.	The Applicant has responded to this point through Highways Position Statement (document reference 18.2.1, Appendix A).
Stoney Stanton Action Group	The IP raises concerns in regarding to identifying the tables describing sensitivity that were presented in the PEIR to confirm that the comments raised have been addressed.	The ES Chapter 8 (APP-117) provided a more detailed approach to each type of impact when compared with the PEIR Chapter (which was not a DCO submission document), with individual tables such as Table 8.20

		defining the sensitivity along each route and the difference above the baseline. This is the approach set out in the IEMA standards.
Stoney Stanton Action Group	The IP is concerned that there is no mention here of Stanton Lane / Hinckley Road (in Stoney Stanton village) which connects the B4669 to Stoney Stanton and already has severe problems.	Stanton Lane/ Hinckley Road is fully considered in the baseline and with development assessments for each type of impact. (Links 39 and 41).
Burbage Parish Council	Residents are extremely concerned that they still do not fully understand the impacts of the RFI next to Burbage Common on the village road network.	Impacts on Burbage are generally beneficial as the new slips and the A47 link draw traffic away from existing routes to M69J1 through Burbage. Further visual representation of the change in traffic flow is within the Forecast Model Report (APP-148), Figure 3.5 and the Environmental Statement Chapter 8 (APP-117) Figure 8.4 and Table 8.27.
Burbage Parish Council	IP raises concerns that the methodology determines 101 links to be assessed and that many not well described to enable judgement of reasonableness and appropriateness. Given there are so many links which can't be correctly identified analysis of the resulting tables on severance Annual Traffic Flows, driver stress, delay levels and facilities is meaningless. Full detail on specific links and queries are provided in the WR.	IEMA Guidance to produce transport related ES Chapters sets out criteria for assessing impact. ES Chapter 8 (APP 117) Paragraph 8.41 sets out the initial Rules for thresholds when reviewing Environmental Impacts specifically. Paragraph 8.52 onwards describes in detail how the criteria are assessed. For specific links changes in flow have been registered or the area is identified as sensitive therefore the link is investigated. On review of the figures the changes in absolute terms are not significant. To assess the wider network thousands of links are reviewed from the PRTM outputs. Sense checks have

		been extensively carried out. Impacts on Burbage are generally beneficial as the new slips and the A47 link draw traffic away from existing routes to M69J1 through Burbage. Additional mapping information is to be provided through the examination process.
Burbage Parish Council	IP concerned that only 5 highway junctions for Burbage have been considered. Analysis extremely difficult to follow given low map resolution. In table 7-2 of APP-117 for each junction only the total flow is quoted for both the AM and PM Peak Hours. The flow on each leg of the junction is not separated out and is therefore very difficult to understand from this table the resulting change in traffic flows which would affect the village of Burbage.	A full detailed review of the junction assessed is included in APP-138 Transport Assessment.
Burbage Parish Council	IP concerned that introduction of this road will be profound and have a major impact on the flows of traffic both North/South and East/West. Modelling suggests that these impacts would be entirely beneficial to the traffic flows in the Burbage area. Opinion is that more validation (including engagement with local people) should be carried out. No attempt to engage with the public on this modelling validation. Locals very sceptical that traffic volumes through Burbage will be reduced.	Full technical engagement with Leicestershire County Council on the inputs to the LCC PRTM modelling was carried out. Public consultation events were held to discuss the general points
Burbage Parish Council	IP concerned that additional traffic is not created on this highway until the improvements currently considered as	PRTM modelling is based on a reassignment model. Impacts without the upgrades on the A5 have been

	part of the next round of strategic highway improvements (RIS3).	tested, as agreed with the Transport Working Group. Further analysis is ongoing.
Burbage Parish Council	The IP raises concerns with regards to scenarios and names set out in the TA.	All assessment has been based on the difference between 'without development' and 'with development'. The latter includes the new infrastructure proposed for the development (slips and A47 link). A third scenario (theoretical) was used to understand the background redistribution of traffic this was labelled WoDWS (without Development With Scheme). Though this was not used in the mitigation development. 6.2.8.1A Transport Assessment v8 submitted at Deadline 1 has amendments to clarify specific issues with naming within section 8.
Burbage Parish Council	IP concerned over presentation of model outputs in consultation material and provides some examples in the WR. The presentation of this information to the public at this resolution is considered to be an insult to the engagement process and challenges the transparency of the process. It is believed that these figures show the modelling of the AM and PM peak hour changes with the thickness of the red lines show the level of increase and the thickness of the green lines show the level of reduction compared to the current road layout. With the broad	More detailed model outputs are to be shared at Deadline 2. Broadly, however, traffic is drawn away from Burbage because of the new slip roads and the A47 link. Small increases will be detected in places by the model as local traffic re-routes and this might occur within Burbage, but the effects are associated with re-routing rather than any overall increase in traffic. The Bullfurlong Lane link is not identified within the modelling as being an impacted link. Further changes in traffic flow can be found within Chapter 8 of the Environmental Statement (APP-117).

	conclusion that traffic in Burbage is reduced, there appears to be pockets of increase within the middle of the village, are these anomalies of modelling? A single link has been highlighted in the figure in WR, believed to be Bullfurlong Lane a residential cul-de-sac of 40 properties. Which continues via an unmade track to a single farm. This shows following the introduction of development an increase in traffic, difficult to understand how any material impact could be modelled for this street. The general reduction to traffic in Burbage is fundamental to no mitigation being provided in Burbage, anomalies within the modelling results can give an indication of more fundamental errors in the modelling process. Of particular concern to Burbage are - Impact of traffic through Aston Flamville and the T junction on Sapcote Road - The impact of traffic on Lychgate Lane and the crossroads in the centre of the village adjacent to Burbage library - HGV traffic through the village especially Church Street	
Burbage Parish Council	IP requests to understand what percentage of the daily peak hour flow will arrive via the Burbage road network	

	and travel along Sapcote Road to join the site entrance at the M69 J2 roundabout For residents in Burbage and south Hinckley, the Sapcote Road route is the obvious first choice for the AM arrivals. We believe other locations such as Wolvey, Bulkington, Nuneaton, Atherstone, Tamworth may also choose a route through Burbage particularly in the event of peak hour queues to exit M69 north bound J2. Unsure of the assumptions made in the modelling.	
Stoney Stanton Parish Council Elmesthorpe Parish Council Elmesthorpe Stands Together	The IPs raise concerns in respect of the highway impact upon Stoney Stanton, Elmesthorpe and the surrounding area, including the overall approach towards development in this location; the incomplete modelling information and accuracy of the data incorporated; and the effectiveness and appropriability of the mitigation proposed. From a highways perspective, the following issues are noted with the existing information presented:	Please refer to the responses in line with the bullet point comments below.
	• Methodologies for the calculation of employee counts requires a critical review in terms of the captured peak hours and employee shift patterns.	The Applicant has responded to this point through the Highways Position Statement (document reference 18.2.1, Appendix A).
	• Necessity of the furnessing methodology requires additional information; explanation as to what the methodology seeks to achieve as well as reasoning for the diversion from typical assessment methodologies.	The Applicant has responded to this point through the Highways Position Statement (document reference 18.2.1, Appendix A).

	• All methodology and trip generation should be fully approved by the statutory consultees that have raised issues.	The Applicant has responded to this point through the Highways Position Statement (document reference 18.2.1, Appendix A).
	• A full analysis and modelling of the M1 Junction 21 is necessary to get an understanding of the present capacity and future year scenarios. Distribution from this junction into the local villages if more traffic is added to the strategic road network will need logical consideration.	The Applicant has responded to this point through the Highways Position Statement (document reference 18.2.1, REP1-033).
	• Consideration to amend HGV trips to correctly reflect what is presented within Appendix 3 should be actioned.	HGV trips will be reviewed as part of the update to the HGV Routing Strategy (APP 362) for Deadline 3 submission.
	• Formatting errors require amendment in regard to linked reference and data values within tables to ensure the structural integrity of the data being presented.	This has been updated with Transport Assessment v8 (document reference: 6.2.8.1A, AS-019)
	• Comments surrounding redistribution of traffic along Hinckley Road / B4669 in regard to the eastern villages should not be written relative to one another as a positive towards Sapcote and Stoney Stanton. Relative to the villages own prior carriageways, traffic redistribution is explicitly negative to residents and this should be excluded as a concluding point.	The points made are that traffic does increase through this part of the network, but that these are driven by demand from the local area for access to the south of J2. This is evidenced within the PRTM Modelling Report Figure 3-12 for flow origins through Sapcote (document reference: 6.2.8.1, APP 148).
	• Clarity on the 'benefit' of traffic not being fully diverted to Sapcote at the Stanton Lane / B4669 priority-controlled T-junction in relation to Stoney Stanton; comment that this will lead to only other	Future traffic movement through the network is predicted by LCC's PRTM model this allocates traffic based on speed-flow of the route. Traffic is predicted to find the fastest route based on time and cost. At the Stanton Lane/B4669

	traffic routing option is through Stoney Stanton.	junction a new signal junction is proposed for safe movement of traffic to either village.
	• Comment and potential modelling regarding the balancing of traffic in the vicinity of Stoney Stanton is required to fully estimate the impact on the eastern villages. It should be considered that the only routes directly east are through the eastern villages and thus balancing of the traffic would not be sufficient contextually as the choices are either to travel through Sapcote or Stoney Stanton. The statement posing the balancing as a resolution to the significant redistribution should be contextually analysed in regard to the location of routes to the east; the balance of traffic here is unachievable so it should not be posed as a solution.	The commentary within the Transport Assessment (document reference: 6.2.8.1, AS-016) is based on the outputs from LCC's PRTM model. Significant discussion and agreement went into defining the base model, its validation and the subsequent inputs from the HNRFI site. The output from the model is the best predictive tool we have available to understand movement through the villages, within which there are increases and decreases across the network. The commentary reflects this.
	• The reference to the Eastern villages now being more accessible should be portrayed as a detriment to the Eastern villages. This conclusionary statement should be reviewed contextually against the routing out of Stoney Stanton to nearby locations to understand that the new 'access infrastructure' scheme will not benefit the resident's accessibility and will rather be a detriment, via more through-routing traffic being funnelled towards the village.	The ability for residents to access the M69 to and from the south and to the A47 to the west without routing through existing urban routes around Hinckley and Burbage present better accessibility to the Eastern Villages. There is acknowledgement of impacts in these areas with proportionate mitigation proposed.
	• Pedestrian, cycle and bus route trip data should be reviewed contextually to the accessibility of the development and these trips should be distributed accordingly through other modes of travel. This change would alter car trips so further modelling	The Sustainable Transport Strategy is to be developed further ahead of Deadline 4 and in discussions with the Local Highway Authority.

	would have to be considered.	
	• Stating that the software used to produce the capacity assessment models requires amendments to correctly reflect the processes used throughout modelling.	Paragraphs 8.2-8.12 within the Transport Assessment (document reference: 6.2.8.1, AS-017) provide a description of the industry standard software packages used.
	• Further comment regarding the criteria process chosen is required on junctions that did not meet initial capacity criteria but now require further mitigation schemes is required; the criteria process should be reviewed in these instances.	The criteria used within Section 8 of the Transport Assessment is more onerous than that agreed within the Model Brief (document reference: 6.2.8.1, APP 145) to fully test the network especially in sensitive locations
	• Formatting errors in regard to references and comments outlining incorrect carriageway names requires review to uphold the structural integrity of the reporting.	Minor amendments have been made and an updated Transport Assessment (Version 8) has been submitted at Deadline 1 (document reference: 6.2.8.1A, AS-019)
	• Speed survey data should be provided to back up speed restriction changes to quantify the benefits of such mitigation.	Further discussions are ongoing with the Local Highway Authority regarding the speed restrictions.
	• Reference to the mitigation measures to be provided within Stoney Stanton be listed; the location of features should be specifically outlined within Stoney Stanton as physical restrictions in the village may not allow for features to be enhanced or added.	Highway Works Plans have been submitted (document reference: 2.4G, APP028, further larger scale plans will be submitted at Deadline 3.
	• The conclusion that traffic calming would deter traffic from the most direct routing through the eastern villages when Stoney Stanton and Sapcote are the main, and only, two routes eastwards needs to be analysed with context to the local area and	The analysis within the Transport Assessment (AS-017) is based on the outputs from the PRTM modelling.

	further expanded upon.	
	• Further mitigation on the junction should be proposed or an outline of contributions to the local area made to support pedestrian and cycle movements affected by the increasing flow of traffic through the area.	The Sustainable Transport Strategy is to be developed further ahead of Deadline 4 and in discussions with the Local Highway Authority.
	• Explanation of why the Junction 38 LinSig model was conducted should be outlined as physical constraints within the village make signalising the junction not a feasible option.	Options were tested at this location to investigate the feasibility of the introduction of signals. As concluded, this would not be achievable within the envelope of the highway boundary.
	• Mitigation for Junction 38 needs to be put in place otherwise the junction is not considered solved and no such conclusion that all overcapacity junctions have been addressed can be made.	Capacity enhancement potential at this junction is extremely limited, signals were investigated, but land constraints and the lack of betterment this proposal brought meant that conclusions had to be drawn on the existing layout.
Stoney Stanton Parish Council	The IP highlights that the MEC report concludes that: "it is clear that the reporting for Stoney Stanton requires further contextual analysis in terms of routing through the village, appropriate mitigation strategies and benefits to Stoney Stanton's residents. It is evident that the TA requires further time spent focused on formatting, methodologies and ensuring the correct carriageways are referenced to not damage the integrity of the reports. Further modelling is a requirement for Junction 37 and Junction 38 is at present not resolved; the mini-roundabouts are central junctions through Stoney Stanton and thus it is necessary they are considered critically with mitigations	The wider context of the assessment is provided by the PRTM analysis both the Forecast Modelling (document reference: 6.2.8.1, APP-148) and Section 7 of the Transport Assessment (document reference: 6.2.8.1, AS-017). Clear conclusions on both Junction 37 and 38 have been drawn in the Transport Assessment. With enhancements in safety and land-take at Junction 37 evident. As noted minor amendments have been picked up in the revised TA submission 6.2.8.1A, AS-019 at Deadline 1.

	provided."	
Stoney Stanton Parish Council	The IP considers that the Applicant has not adequately considered transport impacts through the modelling work and thus cannot generate appropriate mitigation.	The Applicant has responded to this point through the Highways Position Statement (document reference 18.2.1, REP1-033).
Elmesthorpe Parish Council	Request clarification on Works Plan 18 and reserve comments on this until information received.	Works Plans (document reference: 2.2A to 2.2H, APP-008 to APP-015) have been submitted with the Application.
Elmesthorpe Parish Council	The IPs highlight concerns of HGVs using B581 through Elmesthorpe. Included a traffic report at appendix 2. There is concern that increased frequency of HGV use of the road would lead to increased probability of serious incidence in these two areas. Frequently used as a hacking route by equestrian community connecting them to SSSI. Have been incidences of injury to horses. Higher volume of traffic would deter and exclude the equestrian community from using this route and potentially pose danger to their safety.	Traffic is predicted to reduce on the B581 through Elmesthorpe evidenced within the Transport Assessment (document reference 6.2.8.1, AS-017) Figure s 5-8 and 5-9 and additional information within the Forecast Model Report (document reference 6.2.8.1, APP-148). HGVs will have direct access to the SRN or the A- Road LRN.
Elmesthorpe Parish Council	Requested information regarding location 51: Station Road mentioned in table 8.3 of chapter 8, reserve comment until this has been received.	Analysis of Location 51 is included within the ES Chapter 8 including Severance Analysis and Driver Stress and Delay.
Elmesthorpe Parish Council	The IPs request either double yellow lines, 'no stop' routes or other measures are considered for B581 through Elmesthorpe, any incidence of parking along this road would cause considerable traffic flow problems.	Parking on site will be managed by Site Management team. No uncontrolled parking connected with the site will be permitted.

Elmesthorpe Stands Together	The IPs raise concerns in regard to the lack of traffic information overall but in particular that relating to Elmesthorpe, there is on average 1 accident a year on the B581 some of which have included significant injury or fatality, with narrow footpaths and an already busy road, further investigation requested.	Further updated accident analysis data (document reference: 6.2.8.1B) is to be submitted at Deadline 2.
Burbage Parish Council	The IP highlights that Table 6-8 of TA shows total combined 24 hour LGV and HGV flows for full operation in 2036, it would be expected that on average the number of arrivals will balance to the number of departures otherwise a 'stock' of vehicles at the site will develop over time.	Arrival and departures will vary across a 24 hour period, the figures have been based on agreed rates with LCC and other Highway Authorities. These are derived from similar sites.
Burbage Parish Council	The IP is concerned that HGV vehicles travelling through the centre of the village on the B578 is currently inappropriate, however, they are told there are no suitable alternative routes. Request that, should the development receive approval, that this route (B578) carried an HGV ban as the proposed scheme would provide an alternative route for HGVs between the A5 and the Sapcote Road, following the additional south facing slip roads being commissioned.	The creation of the slips will remove traffic from the B578. As HGVs will stay on the A5 to join the M69 and be able to exit/access direct at Junction 2.
Stoney Stanton Action Group	IP raises concerns with regard to the use of GEART and the correct application of sensitivity in the PEIR and subsequent application.	GEART has been updated by IEMA in 2023. The Applicant has checked the outputs against the requirements within the new document. Sensitivity is assessed for each output in the baseline and with development conditions. ES Chapter 8 (document reference 6.1.8, APP-117) Tables 8-4 to 8.6 contain the matrices used to define the impacts.

Stoney Stanton Action Group	The IP is concerned that the ES Chapter 8 has numerous places where the information supplied is insufficient to draw a conclusion, however frequently the conclusion "it is therefore considered that the sensitivity of … is negligible" has been made. This renders it impossible for a reader to check or understand the conclusion.	IEMA Guidance to produce transport related ES Chapters sets out criteria for assessing impact. ES Chapter 8 (document reference: 6.1.8, APP 117) Paragraph 8.41 sets out the initial Rules for thresholds when reviewing Environmental Impacts specifically. Paragraph 8.52 onwards describes in detail how the criteria are assessed. For specific links changes in flow have been registered or the area is identified as sensitive therefore the link is investigated.
Stoney Stanton Action Group	about the IP highlights routes from the M69 Junction into Hinckley. The document states that "there is likely to be no significant effects on Traffic and Transport due to their short-term temporary nature (2 years)". The interpretation of "no significant effects" is not the same as ours as there are already regular tailbacks which can take 10s of minutes to get through starting from 3:00 p.m. till 6:00 p.m. most working day afternoons (tailing back from the Brookside, Burbage, traffic lights). Any increase will be significant	IEMA Guidance to produce transport related ES Chapters sets out criteria for assessing impact. ES Chapter 8 (document reference 6.1.8, APP 117) paragraph 8.41 sets out the initial Rules for thresholds. These thresholds are for traffic over an Average Annual Daily Flow. Which looks at traffic increases across 24 hour period. Congestive impacts are reviewed within the Transport Assessment as an Appendix.
Stoney Stanton Action Group	IP raises concerns with regard to presentation of mapping for links.	Further clarification on mapping will be provided for Deadline 2.
Stoney Stanton Action Group	The IP is concerned that roads have been missed out due to an assumption that they will not be badly affected by traffic, however in some cases they are so close the site (e.g. B581 Station Road through Elmesthorpe) that their significance is due to their	Traffic is predicted to reduce on the B581 through Elmesthorpe evidenced within the Transport Assessment (document reference 6.2.8.1A, AS-017) Figures 5-8 and 5-9 and additional information within the Forecast Model Report (document reference 6.2.8.1, part 11 of 20, APP-148).

	location. The approach (or at least the documentation provided) is flawed.	
Stoney Stanton Action Group	IP highlights that ES Chapter 8 Subsection 8.140 to 8.166: These paragraphs contain a very general description of the roads in the area. They do not mention any of the significant factors that will affect traffic flow, such as the difficult and narrow S bend in the centre of Sapcote and also the difficult junction and narrow S bend in Stoney Stanton and the tight bend on the road from Stoney Stanton to Huncote at the edge of the village.	The text provides a narrative of the surrounding highway network. It is acknowledged within 8.146 that: 'Footway provision is generally provided on both sides of the carriageway within the urban area of Sapcote, though these are limited in width at certain locations. In Sapcote, and at key junctions, the carriageway is lit. However, in the rural settings the carriageway is generally unlit. It is therefore considered that the sensitivity of the B4669 is moderate to major upgraded from minor due to public feedback'
Stoney Stanton Action Group	IP concerned that ES Chapter 8 Subsection 8.149: ignores the B581 through Stoney Stanton and its junction where the Stanton Lane / Hinckley Road traffic joins.	The junction is reviewed in detail (Junction37) within the Transport Assessment (document reference 6.2.8.1, AS-017).
Stoney Stanton Action Group	The IP highlights that the choice of a "future baseline" of 2036, which itself pre-supposes that traffic will increase year on year till then without the development going ahead, has the effect of apparently minimising the effect of HNRFI.	The future year was fully agreed with the Local Highway Authorities prior to the forecast model run. See document reference 6.2.8.1, APP-145 Forecast Model Brief.
Stoney Stanton Action Group	The IP highlight ES 8.48 Table 8.3: Is this table the definition of the "Link Nos." used in later tables? Some of the definitions are not unique enough and this causes wasted time and uncertainty when reviewing the vast number of tables.	Further mapping information is to be provided at Deadline 2.
Stoney Stanton Action Group	The IP highlights that ES Chapter 8, 8.267, 8.276: These tables list simulated effects of the development on 101	IEMA Guidance to produce transport related ES Chapters sets out criteria for assessing impact. ES Chapter 8 (APP

	links. It is clear that some links, suffer adverse effects on many of the tables, but this is always treated as if it is irrelevant. The cumulative effects of these ought to be considered	117) Paragraph 8.41 sets out the initial Rules for thresholds. These thresholds are for traffic over an Average Annual Daily Flow. Which looks at traffic increases across 24 hour period. Congestive impacts are reviewed within the Transport Assessment as an Appendix.
Stoney Stanton Action Group	The IP has concerns that the presentation of results of traffic modelling seems to be too simplified to convey the true overall picture. On top of this traffic flow disruption scenarios (which happen frequently) are not shown or dismissed, there is just an indication that a plan will be put in place	The ES Chapter (APP-117) has twenty supporting appendices with detailed information contained within them. These relate to congestive impacts which are quantified within the transport Assessment (AS-017)
Stoney Stanton Action Group	The IP highlights that all of the proposed improvements depend on agreements with the operators and are therefore not guaranteed. There needs to be a guarantee in order for such a huge, disruptive development to go ahead.	Discussions with Bus operators have taken place with plans formed from these meetings. The Sustainable transport Strategy is to be developed further in conjunction with the Highway Authorities ahead of Deadline 4.
Stoney Stanton Action Group	The IP notes that the proposed A47 link road does not join onto the A47, but onto a smaller road which has many amenities directly fronting onto it.	The A47link joins the B4668 south of itsjunction with the A47 as this was the optimum position in terms of land, visibility and avoidance of third party amenity.
Stoney Stanton Action Group	IP highlights that ES Chapter 8: 8.319 doesn't take into consideration reasons for the opening of the M69 South Facing Slip roads not being installed in 1976 when the motorway opened, which was due to the traffic impact on the surrounding villages.	No evidence of the 1976 decision has been retrieved. The modelling carried out is based on the latest data available and significant upgrades in forecasting software.
Stoney Stanton Action Group	IP highlights that ES Chapter 8 8.327 to 8330: Whilst it is good that schemes are proposed to "encourage" HGV	HGVs from the development are proposed to be banned from routing through particularly sensitive locations. This

	drivers to use key strategic routes, it is also clear that they cannot be prevented from going through the sensitive village areas	is outlined within the HGV Routing Strategy (APP 362) and is to be further developed ahead of deadline 4 with the Local Highway Authorities.
Stoney Stanton Action Group	IP highlights that ES Appendix 8.1 Table 9.1, Also Table 8.32 within TR050007-000746-6.2.8.1: Adding a traffic light control junction (J37) to the centre of the village to remove the existing roundabout will mean traffic issues. The effect of traffic lights would be to make this area much more difficult for residents and users of the facilities in the area	The mitigation to Junction 37 is proposed to improve capacity and highway safety for non-car users.
Stoney Stanton Action Group	IP highlights that ES Appendix 8.1 Table 9.1, Also Table 8.34 within TR050007-000746-6.2.8.1: The modelling indicates that junction 38 is already over capacity, will get worse with HNRFI traffic added, but nothing can be done about it, this is not acceptable. If a detrimental impact is apparent, but nothing can be done, an alternative must be found for the increased traffic volumes.	Capacity enhancement potential at this junction is extremely limited, signals were investigated, but land constraints and the lack of betterment this proposal brought meant that conclusions had to be drawn on the existing layout.
Stoney Stanton Action Group	IP highlights that ES Chapter 8 and Appendix 8.1: Along the B581 (leg B of J38) and Long Street (leg A of J37) the pavements are narrow (less than 75cm) which means pedestrians and traffic are dangerously close.	The PRTM Flow Change diagrams as indicated in the update Transport Assessment (AS-016) Figures 5-8 and 5-9 show general change in traffic flow patterns for 2036 from 'without development' to 'with development (including access infrastructure)'. More legible outputs are to be shared at Deadline 3. The figures for the AM forecast a marginal increase of 16 vehicles heading toward J2 on the B4469 and a decrease of -263 vehicles heading into Burbage. In the PM there is

		an decrease of -109 vehicles toward Junction 2 and -148 toward Burbage. Overall the slip roads and the A47 link alleviate pressure on the local road network around Burbage by providing alternative routes to the SRN and the A road network.
Stoney Stanton Action Group	IP highlights that ES Chapter 8 and Appendix 8.1: J37 general: Any increase in traffic from commuters to the facility, traffic to the M69 or HGV traffic will make a known dangerous junction even worse and heighten the risk to injury which is unacceptable.	J37 has mitigation proposed to improve safety for all users. This is evidenced within the Transport Assessment (document reference 6.2.8.1, AS-017) Section 8.
Stoney Stanton Action Group	IP highlights that ES Appendix 8.1 Table 9.1: B3 and B4. Where are "gateway traffic calming" features described? Speed of traffic isn't the issue – it is the difficulty of navigating through the centre of Sapcote where footways are narrow.	Footways are acknowledged to be narrow, constraints exist through the village in relation to building lines. All mitigation is to be delivered within the Highway Boundary envelope. A gateway feature is present on the western side of the village, but no equivalent is present on the eastern access, where speeds change from open roads with 40mph to 30mph within the village.
Stoney Stanton Action Group	IP highlights that ES Chapter 8 8.359 The statement "Running up to 16 freight trains a day will mean a huge switch from road to rail. Each one will remove up to 76 lorries from our roads, meaning 1.6 billion fewer kilometres travelled by HGVs a year" is still on the Tritax Symmetry HNRFI website (under "Overview", "Key benefits" – checked 3/10/2023). The ES now states 83 million HGV miles, with no explanation of how that is calculated. Compared with the Felixstowe port website, which claims that 74 trains a day will remove 100 million HGV miles from the road, then the TSH figures	The submission contains the 83 million figure which is correct. There is an error on the website which is to be rectified.

	are a factor of 4 higher (i.e. on this basis they should quote 22 million HGV miles fewer per year). These figures are not supportable. Estimates by Network Rail talk about lorries or trucks being used for the last 20 miles, which is not the case here	
Stoney Stanton Action Group	IP highlights that APP-141 Doc 6.2.8.1 ES Chapter 8 Appendix 8.1 Part 4 (Trip Generation) the volume of traffic that will enter and exit the M69 J2 roundabout (B4669 junction). Assuming most trips go via this roundabout – as the proposal documentation says, then there will 555,984 additional HGV journeys added per year, and during a normal day up to of 1,767 additional vehicles (494 HGV, 1,273 light) added at the peak hour. This equates to one vehicle every 2 seconds, and included in this would be one HGV every 7.3 seconds. This equates to an absolutely major disruption to the motorists that regularly use this junction	The trip generation figures have been fully agreed and signed off by the Highway Authorities. These are highly robust figures to test the proposed infrastructure in the future year.
	Inadequacy of mitigation	
Stoney Stanton Action Group	IP highlights that mitigations proposed for parts of Stoney Stanton (e.g. traffic lights in the village) and Sapcote are likely to have a detrimental effect on the quality of life for residents of the villages and at the same time will not actually mitigate against the real problems	Mitigation is within highway envelope and designed to improve highway safety for non-car users as well as improve capacity where appropriate.
Stoney Stanton Action Group	IP states ES Chapter 8 Subsection 8.140 to 8.166: It is good that the sensitivity of the B4669 going through Sapcote has been increased from Minor (subsection 8.146) due to our comments (see also 8.29) however	Mitigation is within highway envelope and designed to improve highway safety for non-car users as well as improve capacity where appropriate. There are significant constraints to expansion of the highway with historic

	there seems to be little in proposed mitigation to solve the problems, other than "tinkering" with junctions and traffic calming. These do not solve the problem of increased traffic flow (and corresponding air pollution) through areas where there are children's day care centres, access to schools, access to doctors' surgeries, care homes and shops.	buildings close to the back of footway. Mitigation is intended to be sensitive to the village context.
Stoney Stanton Parish Council	IP has concerns regarding the underestimation of employee trips is maintained within the associated Aitchison Raffety report (October 2023) on behalf of Stoney Stanton Parish Council.	The Applicant has responded to this point through 18.2.1 Appendix A
Stoney Stanton Parish Council	IP highlights concerns raised by Blaby District Council (BDC), Leicestershire County Council (LCC) and National Highways (NH) regarding the accuracy of the model outputs and inaccuracies surrounding employment figures.	The Applicant has responded to this point through Appendix A Highways Position Statement (document reference: 18.2.1, REP1-033).
Stoney Stanton Parish Council	The chronological methodologies of the publication are summarised as follows: • A Pan-Regional Transport Model (PRTM) Core Forecast Model has been applied to distribute the traffic flows throughout the network system; a modelled version with the access infrastructure for the development has been formulated as well to construct the most appropriate example of the highways network with the scheme proportioned in; • The trip generation for HGVs are assessed via calculation of train container capacities verses how	These are correct, however the Applicant highlights that the HGV trips are based on GFA for B8 (warehousing and distribution) from similar RFI sites. In addition to this a further calculation was added as described in the point.

	many HGVs will be produced through the quantity of goods to be shipped; • PRTM 1.0 was utilised to estimate trip making in the future. This took into account the number of people, households, jobs, etc. to provide a generic growth factor for each site. • PRTM 2.2 was utilises to extract trip rates from committed development transport assessments for 13 strategic sites around the Midlands. This was in order to provide a more accurate representation of development impacts on the future year modelling • Modal splits for journey to work trips have been calculated through the 2011 census statistics for regions Blaby 010 and Blaby 012; • The trip distribution for employees used a bespoke gravity model, calibrated to trip length distributions derived from JTW data from comparable developments. Magna Park (west of Lutterworth) and Daventry International Rail Freight terminal (DIRFT) were analysed as a 'proxy' trip length distribution for employees. • Baseline surveys were collected to provide a detailed base for the assessment work. • Growthed traffic flows have been put through a furnessing system. The methodology involved the use of linear interpolation to obtain 2018 PRTM base and calculate absolute differences in link flows between calculated 2018 PRTM and the respective future year PRTM flows. The absolute differences	

	are then added to 2018 observed flows to derive future forecast link flows for each scenario. The base 2018 observed turning counts are then used to furness the future forecast matrices. • Total Flow changes and highway impact was reviewed at each junction. These junctions were then put through a criteria assessment for their volume of capacity. These criteria and total flows inferred which junctions are to be evaluated. Junctions that did not meet criteria may have been included upon request of LCC. Capacity assessments have been conducted through the software JUNCTIONS 10 and LinSig. The M69 Junction 1 and 2 have been modelled in the PTV Group's VISSIM software.	
	HNRFI Traffic Impact	
Stoney Stanton Parish Council	IP notes, referencing errors which does not assist with the structural integrity of the referencing and as such should be amended. Values in Table 7-3 require review as a formatting error overlaps the visuals of results.	Noted, amendments have been made and submitted at Deadline 1 (document references, 6.2.8.1A, AS-019)
	Scoping the HNRFI	
Stoney Stanton Parish Council	Firstly, it should be noted the development has been scoped by the Transport Working Group (TWG); The TWG has considered the scope of the base model inputs and approved the model inputs March 2022. It is considered that due to TA revisions from this time and concerns posed that the model inputs, as well as the methodologies (that are not stated to have been	The Applicant has responded to this point through Appendix A Highways Position Statement (document reference: 18.2.1, REP1-033)

	reviewed) are thoroughly examined by the statutory consultees in regards to any updates and concerns raised. Updates to base model flows, as well as future year flows require review following the discussed concerns surrounding accuracy of the trips and modelling.	
Stoney Stanton Parish Council	The IP highlights that Table 2-2 demonstrates the consultation log of the HNRFI with members of the TWG. This log only runs to August 2022 and should be updated in accordance with Revision 7 of the TA being issued in September 2023.	The revised Transport Assessment has addressed comments received directly from LCC HDM. Discussions have taken place post submission and in the run up to it.
Stoney Stanton Parish Council Narborough Parish Council Elmesthorpe Parish Council	The IP highlights the statutory consultees concern with the consultation undertaken. LCC reference no agreement regarding the following:	Please refer to the below responses to the specific bullet point comments.
	• Trip generation - including discrepancies in employee numbers and addition of a lorry park;	The Applicant has responded to this point through Appendix A Highways Position Statement (document reference: 18.2.1, REP1-033)
	• Access infrastructure including its design, capacity and deliverability;	The Applicant has responded to this point through Appendix A Highways Position Statement (document reference: 18.2.1, REP1-033)
	• Strategic model outputs including furnessing methodology and lack of phased testing;	The Applicant has responded to this point through Appendix A Highways Position Statement (document reference: 18.2.1, REP1-033)
	• Impact of the development and role of the access infrastructure in the interpretation of modelling results;	The Applicant has responded to this point through Appendix A Highways Position Statement (document reference: 18.2.1, REP1-033)

	• Mitigation strategy and package, including local and strategic junction assessments, design, and lack of testing of mitigation strategy in strategic model;	The Applicant has responded to this point through Appendix A Highways Position Statement (document reference: 18.2.1, REP1-033)
	• Impacts on rail including Narborough crossing and future passenger provision;	The Applicant has responded to this point through Appendix A Highways Position Statement (document reference: 18.2.1, REP1-033)
	• HGV Management Plan and Route Strategy including method of enforcement	The Applicant has responded to this point through Appendix A Highways Position Statement (document reference: 18.2.1, REP1-033)
	• Public Right of Way Strategy including rail crossings;	See response to LCC LIR
	• Construction Traffic Management Plan and construction traffic routeing impacts	Further work to develop in conjunction with LHAs ongoing
	• Framework Site Wide Travel Plan;	Further detail to be provided by Deadline 3
	• Sustainable Transport Strategy, and;	Further detail to be provided by Deadline 3
	• Walking Cycling and Horse-Riding.	Further detail to be provided by Deadline 3
	• National Highways also expressed that whilst trip generation was agreed during pre-application discussions the additional submission of a lorry park facility that was not accounted for; thus, the present trip generation has not been agreed by NH as this element has not been considered by strategic modelling methodology or assessments. NH stated that the furnessing methodology, discussed later within this review, has not been agreed preventing them from considering the suitability of the strategic modelling undertaken at present.	The Applicant has responded to this point through Appendix A Highways Position Statement (document reference: 18.2.1, REP1-033).

	• It is clear that statutory authorities have not agreed the trip generations and modelling methodologies; thus, this will need to be reviewed with the TWG as relevant representation registration comments outline the insufficiency of the initial consultation period and lack of agreement that the TA suggests was received.	The Applicant has responded to this point through Appendix A Highways Position Statement (document reference: 18.2.1, REP1-033).
	Impact of the 'Access Infrastructure' on the Eastern Villages	
Stoney Stanton Action Group	The IP highlights that ES Chapter 8 subsection 8.22: The applicant states that there was considerable local opposition to bypasses for Sapcote and Stoney Stanton, but less opposition to an A47 link road. These proposals were not mutually exclusive. A solution to the Stoney Stanton / Sapcote traffic problem that HNRFI would cause is still needed as the proposed development would be damaging and detrimental to the villages. The feedback that was submitted was that in their proposed format they were poorly conceived and in the wrong location, with others proposed.	The bypasses were not agreed with LCC at the time of the consultation. Further discussion on Access Infrastructure and inputs to the modelling were held and the approach agreed with the TWG. Impacts from the option tests in the initial models suggested further induced demand through the villages due to the presence of the bypasses with congestion impacts at either end of the proposed links.
Stoney Stanton Parish Council	The IP notes that models formulated results regarding the distribution of traffic through the eastern villages both with and without the development in the 2036 future year. An extract of the document demonstrating the models can be found in **Appendix A** The IP makes reference to paragraph 5.104 and states that the distribution, as a direct result of the	The commentary within the Transport Assessment (document reference 6.2.8.1, AS-016) is based on the outputs from LCC's PRTM model. Significant discussion and agreement went into defining the base model, its validation and the subsequent inputs from the HNRFI site. The output from the model is the best predictive tool we have available to understand movement through the

	development, will impact routing at the Stanton Lane / B4669 priority-controlled T-junction. The IP state that it is identified as a benefit for Sapcote that not all diverted traffic is impacting the village however comment is needed to the distribution of the diverted traffic up Stanton Lane in relation to Stoney Stanton. The IP states that further diverted traffic to either village should not be written as a relative benefit of lower impact in comparison to a differing carriageway; overall impact will be greater than previous substantially in both villages.	villages, within which there are increases and decreases across the network. The commentary reflects this.
Stoney Stanton Parish Council	The IP state that models demonstrate significant increases in traffic flow along Huncote Road which funnels traffic through the Long Street / Broughton Road / New Road priority-controlled mini roundabout in central Stoney Stanton. Additionally, the IP report that modelling displays that the traffic that previously ran west down the B581 is now opting for travelling south down Stanton Lane as per the witnessed reduction in distributed traffic along this route and growth down Stanton Lane with the development. The IP note that this is due to the fact that the development routing is more direct travelling south down Stanton Lane and west to the M69 Junction 2 to join the access infrastructure entering the HNRFI.	As above. Mitigation has been developed based on the changes in flows and traffic impacts output from LCC's PRTM model.
Stoney Stanton Parish Council	The IP questioned whether the future year models in the TA are reflective of accurate future flows. The IP refers to an ATC performed by Stoney Stanton Parish Council which demonstrated base flows to be	The commentary within the Transport Assessment (document reference 6.2.8.1, AS-016) is based on the outputs from LCC's PRTM model. Significant discussion and agreement went into defining the base model, its

	similar to the flows presented within the 2036 future year scenarios and notes that this is logically incorrect. The IP states that models have been completed to support the most direct routes to the development site, with detriment to the eastern villages.	validation using contemporary traffic observations, projected growth and the subsequent inputs from the HNRFI site. The output from the model is the best predictive tool we have available to understand movement through the villages, within which there are increases and decreases across the network. The commentary reflects this.
Stoney Stanton Parish Council	The IP note that more explanation is required regarding the redistribution of traffic if the highways network is 'to balance as traffic finds most convenient routes'.	As above, the PRTM is the best current software package available to predict the future traffic distribution across the Leicestershire network.
Stoney Stanton Parish Council	The IP states that it is demonstrated by the models that there is more re-routing traffic going into and out of Stoney Stanton. The IP notes that accessibility to the village is improved but more traffic is re-routed. The IP states that the accessibility of Stoney Stanton would not change for residents due to the fact that residents commuting west to Hinckley would travel south out of Stoney Stanton and cross the M69 Junction 2 and go back onto the B4669 into Hinckley. Trips to Elmesthorpe, Barwell, and Earl Shilton would be achieved by the more direct route west out of Stoney Stanton along the B581. The IP states that the introduction of the 'access infrastructure' linking the A47 to the M69 Junction 2 is not an accessibility boost for the Eastern Villages, but rather allows routing of traffic, whether existing or from the development, to increase traffic through Stoney Stanton. The IP concludes to state that accessibility	Access south on the M69 to the M6 and beyond as well as access west to the A47 is significantly improved for both Sapcote and Stoney Stanton through the introduction of the access infrastructure.

	should not be portrayed as a benefit to Stoney Stanton, but a detriment.	
	Trip Generation	
Stoney Stanton Parish Council	The IP states that it is not possible to sustainably walk to work from Stoney Stanton, or even Sapcote, per the Guidelines for Providing for Journeys on Foot (GPJF). Thus, these trips should be distributed among other modes of travel which increases the number of car trips throughout modelling.	Further development of the Sustainable Transport Strategy (document reference: 6.2.8.1, APP-153) is to be submitted at Deadline 3
Stoney Stanton Parish Council	The IP states that bus travel to the HNRFI may prove challenging due to the distance to the closest bus stop, which is located at the Caravan Park west of the M69 Junction 2. The length of the access infrastructure should be considered as it would be above the threshold for suitable walking distances to a bus stop. Trips to Coventry, Hinckley and Leicester are provided by the X6 bus service which skips multiple locations identified within the report that employees will commute from.	Further development of the Sustainable Transport Strategy is to be submitted at Deadline 3
Burbage Parish Council	Reference made to the X55 bus service which was withdrawn 6 months before the TA was finalised. More recently Arriva has withdrawn services 1 and 2, which was post the document being published but needs to be considered	The site is not reliant on these services. Indeed there is discussion within the Sustainable Transport Strategy that Arriva were considering the future of the X55 at the time of publication as the route was not viable.
Stoney Stanton Parish Council	The IP states that Blaby 010 and Blaby 012 would not reflect an accurate representation of method of travel to work for the development of this scale. The HNRFI	Further development of the Sustainable Transport Strategy is to be submitted at Deadline 3.

	would attract employees from as far as Coventry, Tamworth, Leicester, Rugby, Nuneaton and Harborough. The trips identified from these areas cannot critically be split by that of Blaby 010 and Blaby 012 and should be considered as either car trips or bus trips (when appropriate routes are available).	The trip generation is highly robust to test infrastructure in the worst case future year. LCC's PRTM model has been used to estimated future traffic flows and was signed off at the time by the Transport Working Group.
Burbage Parish Council	The IP questions use of the correct MSOA given the split of the site over two zones and request that sensitivity is carried out using the zones for Burbage and Hinckley given the proximity of the site to the boundary of the zones.	Further development of the Sustainable Transport Strategy is to be submitted at Deadline 3
	HGV Trips	
Stoney Stanton Parish Council	The IP states that full efficiency should be considered within any trip generation. The value of HGV trip generation and the efficiency of one and two-way lifts requires justification within the TA for robustness of methodology explanation. Table 6-1 within the TA should be amended to reflect values of 81% efficiency, as well as corrections surrounding container values to reflect what is actually listed within Appendix 3 surrounding the HGV trips.	The trip generation was agreed with the LHAs and reflects a robust worse case. It must be noted that the trip generation also includes for the whole site area GFA 850,000sqm as a multiplier for the HGV trip rates in the peak hour. The rail freight trips are additional to this and are therefore highly robust. There is no discounting for the freight element applied. The trip generation was agreed with the LHAs and reflects a robust worse case. Further detail is in the appendices of the Trip Generation Addendum Note (document reference 6.2.8.1, APP-141)
	Junction Modelling	
Stoney Stanton Action Group	The IP states that stage one RSAs ought to be extended to "for junctions affected", not just where mitigation is proposed. This is especially required as one of our	RSAs and their briefs are subject to further discussion with the LHA.

	major concerns is that mitigation is inadequate and insufficient.	
	Modelling Methodology	
Stoney Stanton Action Group	APP-117 ES Table 8.27 shows that B581 Station Road will have a decrease in traffic for 2036 predicted levels with development compared to predicted levels for 2036 without development. I do not believe this can be correct, and therefore question the validity of the model. In general, conclusions drawn are too simplified as there would be a range of possible predicted traffic levels. Situations where traffic needs to be diverted, either in a controlled way or an uncontrolled way, are not included.	The commentary within the ES Chapter 8 (document reference XXX, APP-117) and Transport Assessment (AS-016) is based on the outputs from LCC's PRTM model. Significant discussion and agreement went into defining the base model, its validation using contemporary traffic observations, projected growth and the subsequent inputs from the HNRFI site. The output from the model is the best predictive tool we have available to understand movement through the villages, within which there are increases and decreases across the network. The commentary reflects this.
Stoney Stanton Action Group	The IP suggest that figures used for modelling are out of date. Latest figures from traffic modelling should be used.	A further commentary is being provided by the strategic modelling team ahead of Deadline 3
Stoney Stanton Action Group	The IP states that there is no documentation for traffic flows in the event of incidents, and where the traffic will flow if the arterial trunk roads are closed.	Traffic models account for typical weekday traffic periods. Emergency scenarios cannot be tested through the PRTM. National Highways manage emergency procedures on their network.
Stoney Stanton Action Group	The IP states that there is no mitigation for the use of Burbage Common Road as an emergency access point to the site nor consideration of how this traffic will impact the village of Elmesthorpe in the plans.	The emergency access is only to be used in exceptional circumstances.
Stoney Stanton Action Group	Elmesthorpe is not mentioned, in the in the description of the B581, a road that runs straight through the	The A47 link draws significant amounts of traffic away from the B581 as evidenced within the Forecast Modelling Report (document reference 6.2.8.1, part 8 of 20, APP-

	middle of the village. Sensitivity Receptors are also not mentioned.	145) and the Transport Assessment (document reference 6.2.8.1A, AS-016)
Stoney Stanton Action Group	The IP is concerned that there had not been an agreement between the Leicestershire County Council's Highways Authority and the applicant about traffic modelling data and mitigation plans.	Noted, discussions are ongoing with the Local Highway Authorities throughout the Examination period, there are issues which are resolvable and others where there is disagreement. The Applicant maintains that the information submitted has been appropriate to the scale of the impact from the development and its associated infrastructure.
Stoney Stanton Action Group	ES Chapter 8 Subsection 8.28 implies that agreements have been reached with Highways Authorities about data used in modelling this seems to be at odds with the comments made by these authorities in their Procedural Decision Deadline A Submissions.	There is clear paper trail of evidence documenting the agreement on all inputs to the strategic modelling.
Stoney Stanton Parish Council	Paragraph 9.1 outlines that the modelling software was JUNCTIONS 9; this is contradictory to the methodology listing of software used to conduct the modelling. It should be defined thoroughly which software was used throughout the process and be correctly reflected through the report.	All models have been updated where appropriate.
	Junction Selection Process	
Stoney Stanton Parish Council	The IP states that it is clear that Junction 15 is overcapacity with queues running down the M69 already present at peak hours. Blaby District Council highlights the issues on the M1 Junction 21 and notes 'the ability of the SRN to accommodate the Scheme's impact without further mitigation, particularly in respect of Junction 21 of the M1, is doubtful'.	The approach to the mitigation is subject to further discussion with the Highway Authorities. The mitigation strategy has been formulated on the provision of local junction upgrades due to the diversion of non-strategic traffic.

Stoney Stanton Parish Council	The IP states that a review upon the validity of the 5% threshold needs to be completed. Junctions that are greater in traffic flow already will have to be affected by a greater amount of development traffic to meet modelling criteria; thus, it is not considered accurate that large strategic network junctions may be over capacity at present.	Junction 21 M1 has been an existing problem on the network for a number of years. There have been no planned upgrades at the junction to address underlying capacity issues on the J21 roundabout itself. Options to proportionately mitigate impacts are not evident aside from non-infrastructure based interventions, suggested through the Sustainable Transport Strategy (document reference 6.2.8.1, part 15 of 20, APP 153)
Stoney Stanton Parish Council	The IP considers that the New Road / Long Street / Broughton Road priority-controlled mini roundabout (Junction 38), the Pingle Lane / Huncote Road / Stanton Lane priority-controlled T-junction and the Hinckley Road / New Road / B581 priority-controlled mini roundabout have been selected to undergo a detailed capacity assessment.	Detailed modelling has been carried out at the junctions identified and reported in Section 8 of the Transport Assessment (document reference 6.2.8.1A, part 1 of 20, AS-016)
Stoney Stanton Parish Council	The IP states that further comment should be provided on junctions that are detrimental enough to be included within mitigation schemes and did not initially meet criteria; the criteria process should be reviewed in these instances.	The criteria used to filter the results was more onerous than the agreed approach in the Modelling Brief. This was to ensure junctions on the local network were fully picked up.
	Traffic Flow Inputs	
Stoney Stanton Parish Council	The IP states that the flows at the junctions are clearly valued and scenarios are understood to be growthed using TEMPro to future years. Evaluating the base turning counts demonstrated within Appendix A of the report, it is calculated that Junction 38 received 1368 vehicle movements in the AM and 1588 movements in the PM. These base flow values are worse	The values used with the Transport Assessment (document reference 6.2.8.1, AS-016) are taken from the PRTM 2.2 model which is projected to the future year assessment using detailed Uncertainty Log information, growth figures and uses turning count data to furness the turning flows. Projected redistribution and changes to the overall network have been accounted for in the model

	than the growthed values demonstrated within the TA.	which may result in flows at certain junctions differing from contemporary counts.
Stoney Stanton Parish Council	The IP states that it is to be noted that the furnessing methodology is stated to not be agreed with the statutory consultees and as such should be discussed further with the TWG and agreed with all statutory consultees.	The methodology is appropriate. It was largely accepted by NH and LCC at the time of modelling. However, it is acknowledged that full sign off was not achieved. This is based primarily on use of post Covid traffic figures.
	M69 Junction 2 roundabout	
Stoney Stanton Action Group	The IP states that adding 1,767 vehicles to the M69 J2 roundabout at the peak hour is an absolutely major disruption to the motorists that regularly use this junction and is unacceptable	The Applicant proposes a substantial upgrade to the junction proposed, this is set out in Highways Plans (document reference 2.4D, APP-025) and VISSIM Model report (document reference, APP 151)
	Junction 37 - Hinckley Road / New Road / B581 mini roundabout	
Stoney Stanton Parish Council	The detailed capacity assessment of Junction 37 has been undertaken using the Department of Transport TRL program JUNCTIONS 10. This program is recognised as "industry standard" traffic modelling software packages used for assessing the capacity of roundabout junctions and T-junctions. The junctions output produced is demonstrated below in **Table 3.3**. As stated within the publication**, Table 3.3** highlights that the development would operate over capacity in all 2036 scenarios. It is highlighted that without the development there would be a queue of 87.7 along the B581 (W); this is a severe queue length which with the development only improves to 60.5. Redistribution of traffic, discussed previously, alleviates some RFC	Table 8.34 within the Transport Assessment (document reference, AS-016) shows the proposed mitigation results operating within capacity for a signal controlled junction as suggested for mitigation.

	between the 2036 Without Development scenario and the 2036 With Development scenarios; despite this the arms are still over capacity.	
	Junction 38: New Road / Long Street / Broughton Road mini roundabout	
Stoney Stanton Parish Council	The detailed capacity assessment of Junction 38 has been undertaken using the Department of Transport TRL program JUNCTIONS 10. The junctions output produced is demonstrated below in Table 3.4. The existing junction is operating over capacity however the development will increase the RFC value along Long Street (N) in the AM from 113% to 123%. In the PM, the development increases the RFC value at the Broughton Road (E) arm to 91% from 79%; the RFC value at the New Road (W) arm is seen to increase to 106% from 88% in the PM with the introduction of the development.	Capacity enhancement potential at this junction is extremely limited, the Applicant investigated the potential for signals, but due to land constraints and the lack of betterment that signals would bring meant that conclusions had to be drawn on the existing layout.
	Junction 48: Pingle Lane / Huncote Road / Stanton Lane T-junction	
Stoney Stanton Parish Council	The modelling on Junction 48 is demonstrated to be within capacity range and thus no further assessment is considered; this is appropriate for the review of the Pingle Lane / Huncote Road / Stanton Lane T-junction.	The Applicant notes the Parish Council's view on this junction.
Stoney Stanton Parish Council	Within the publications modelling section the carriageway Pingle Lane is referred to as 'Pringle Lane'; it is recommended that this is reviewed and amended.	This is noted by the Applicant.

	<u>Mitigation Proposals</u>	
	Link Scheme and Traffic Calming	
Stoney Stanton Parish Council	Whilst it is noted that a speed limit change may be beneficial to Stoney Stanton, there is no ATC speed survey data to back up the need for the change. At present, without good reason for the mitigating measure, its benefit to Stoney Stanton cannot be considered and quantified. Stoney Stanton Parish Council commissioned an Automatic Traffic Count (ATC) to formulate the speeds outside of Stoney Stanton. The results demonstrated that the average 85th percentile speed northeast bound into Stoney Stanton along Stanton Lane / Hinckley Road is 52.6mph with regular averages of 45.8mph speeds achieved. Whilst this is above the 40mph speed restriction mitigation proposal, Stanton Lane / Hinckley Road is under a national speed limit at present. It is clear that the average vehicle movement is considerably under the speed restrictions despite the relatively even elevation and long lines of visibility. A review of Crash Map demonstrates 0 collisions along Stanton Lane / Hinckley Road in the most recent 5- year period (2017-2021); thus, the already reduced speeds and lack of collisions should infer that no further speed restrictions are to be applied. The reasoning for this link scheme should be clearly stated and backed up by data to quantify and measure the benefit to Stoney Stanton.	This is noted by the Applicant. Average 85th percentile speeds are above the recommended speed restriction- a graduated approach to speed reduction was suggested by the Applicant to improve highway safety.

Stoney Stanton Parish Council	As it is presently written, Paragraph 9.14 discusses a 'village' rather than referencing both villages; as the B4669 Hinckley Road and the Church Street junction reside within Sapcote it is considered that only Sapcote is discussed. Reference to the mitigation measures to be provided within Stoney Stanton should also be listed; the location of features should be specifically outlined within Stoney Stanton as physical restrictions in the village may not allow for features to be enhanced or added.	The Applicant clearly indicates the mitigation for Stoney Stanton in the document, this includes the speed restriction on approach and the signalisation of Junction 37.
Stoney Stanton Parish Council	Paragraph 9.13 defines the link scheme to act as a deterrent for through traffic. The expectation that traffic will avoid the most direct and only feasible route eastwards due to a few traffic calming measures should be revaluated. With logic from the report, as Sapcote is listed to have more traffic calming measures it should be considered that rerouted traffic will divert to Stoney Stanton. Thus, considerations should be made to provide explanation to the requirement for the speed limit change, define which measures are to be added within Stoney Stanton, and contextually review the conclusion that traffic calming would deter traffic from the most direct routing through the eastern villages.	The commentary within the Transport Assessment (AS-016) is based on the outputs from LCC's PRTM model. Significant discussion and agreement went into defining the base model, its validation using contemporary traffic observations, projected growth and the subsequent inputs from the HNRFI site. The output from the model is the best predictive tool we have available to understand movement through the villages, within which there are increases and decreases across the network. The commentary reflects this.
	<u>Junction Mitigation Proposals</u>	
	Junction 37 - Hinckley Road / New Road / B581 mini roundabout	
Stoney Stanton Parish Council	A mitigation to the junction being over capacity was put forwards in the form of signalising the junction and	The PRTM flows use growth and uncertainty logs to predict traffic flows to 2036. The mitigation proposed by

	instead creating a signal-controlled T-junction. **Table 3.3** demonstrates that the mitigation for Junction 37 would alleviate the capacity for the assessment. In the PM peak hour, the PRC would be 1.3% which defines that the junction may need even further mitigation with additional developments. For a future year of 2036, not all committed flows can be calculated so there is the potential that the junction could be pushed over capacity in 2036; this as well as increased inaccuracy of growth data in future years may impact capacity. However, within this modelled form it is considered that signalising the junction would be considered appropriate to resolve capacity from specifically this development.	the Applicant is intended to address the traffic volumes that are predicted in the future year with development. The output from the model is the best predictive tool we have available to understand movement through the villages, within which there are increases and decreases across the network. The commentary reflects this.
Stoney Stanton Parish Council	The IP states that a discussion of how the HNRFI impacts the PRC should be considered. Thus, the 'Without Development' scenarios within the appendices should be evaluated here fully to ensure Stoney Stanton is not limited from the option for future developments in its own local area as a direct causation by the HNRFI.	The modelling undertaken by the Applicant is designed to test the HNRFI development's impact and to mitigate any effects accordingly.
	Junction 38: New Road / Long Street / Broughton Road mini roundabout	
Stoney Stanton Parish Council	An analysis of Junction 38 being signalised was proposed and modelled within LinSig as a potential mitigation to the junction being overcapacity. Thus, it is outlined that signalising the junction would not be an appropriate option to alleviate the capacity concerns.	This is moted by the Applicant, both options had been tested to check the viability and capacity. The presence of buildings to the back of footway prevents a realistic improvement on the capacity at this junction.

	There is no physical mitigation proposed at Junction 38; it is considered that without further clarity on what mitigation will substitute the result of the capacity assessment, that Junction 38 is presently without a solution. Either further mitigation on the junction should be proposed or an outline of contributions to the local area made to support pedestrian and cycle movements affected by the increasing flow of traffic through the area. The constraints around the carriageway would not allow for appropriate infrastructure to signalise the junction and not disrupt pedestrian movements so it is unclear why this mitigation was considered as viable option. Explanation as to the reasoning behind conducting this modelling should be outlined.	
Stoney Stanton Parish Council	In relation to Junction 38 Paragraph 9.1 is false, no mitigation schemes have been developed to support the overcapacity junction so this will require review.	As noted above, solutions have been investigated by the Applicant. Local constraints are a significant issue in bringing additional capacity to this junction
	Junction 48: Pingle Lane / Huncote Road / Stanton Lane T-junction	
Stoney Stanton Parish Council	The IP notes that modelling on Junction 48 is demonstrated to be within capacity range and thus no further mitigation is considered; this is considered appropriate for the review of the Pingle Lane / Huncote Road / Stanton Lane T-junction.	The Applicant notes the Parish Council's views on this junction.
	Narborough Crossing	
Narborough Parish Council	The IP states that down time at Narborough level crossing is a major problem; at peak times the main	In accordance with the ExA's request for a 24 hour - 7 day analysis based on the 'current situation', a full video

Stoney Stanton Action Group Friends of Narborough Station Elmesthorpe Stands Together	road route between Littlethorpe and Narborough can be closed for as much as 20 minutes or more in an hour with vehicles queued in both directions, the resultant congestion having an impact on AQ, journey time to Leicester and Coventry, access to services and local businesses. The IP states that barrier can be down for significant periods in the non-peak daytime and evening. Recent residents survey showed it was down more than 16 minutes in the hour. IP states that planned increases in passenger services, other rail freight journeys and the inevitable increase in car journeys from additional housing in the next Blaby Local Plan will exacerbate and unacceptable situation. (Photos provided of queuing).	survey was taken for 7 days from the 11th October 2023. The data from this is being extracted and is being used, working with Network Rail, to provide a comprehensive analysis for the whole week, which will be provided in writing as a Technical Paper on completion and submitted to the ExA as soon as possible.
Friends of Narborough Station	The IP has has submitted a Freedom Of Information Request to Network Rail, in order to ascertain if barrier timings are electronically recorded. The IP note that the request is for for full transparency over the numbers used to calculate line availability and barrier downtime. The IP also note that data on the average speed and length of current freight trains, against what is expected of the Applicant's services is essential.	A Narborough Level Crossing Note covering all matters raised on Narborough level crossing in written representations and the Rule 17 letter will be submitted at Deadline 3.
Narborough Parish Council	The IP acknowledge that the crossing down time already an issue and not of the Applicants making. The	A Narborough Level Crossing Note covering all matters raised on Narborough level crossing in written

Friends of Narborough Station	IP notes that the RFI proposal with a planned maximum of 12 additional closures (dispute 2 minute downtime, believe it to be over 6 minutes) will make a significant difference. The IP proposals have not been assessed to include linger term and cumulative impacts in respect of this as the NPS requires or their impact in combination with other likely changes, nor are there any measures to avoid or compensate for adverse impacts or to reduce community severance.	representations and the Rule 17 letter will be submitted at Deadline 3.
Friends of Narborough Station	The Applicant have taken no cognisance of the impact these half mile long and heavy trains will have on the operation of the crossing, the effect on the village and the overall effect on the community itself.	A Narborough Level Crossing Note covering all matters raised on Narborough level crossing in written representations and the Rule 17 letter will be submitted at Deadline 3.
Friends of Narborough Station	The IP notes that there is a "Right Side Failure" process in place, which means that on occasions when the barriers have failed, the Signaller at the Railway Operating Centre in Derby is not aware there is a problem, until advised by a member of the public.	A Narborough Level Crossing Note covering all matters raised on Narborough level crossing in written representations and the Rule 17 letter will be submitted at Deadline 3.
	Rail	
Friends of Narborough Station Stoney Stanton Action Group	The IP note that the railway line at the entrance to the site is at present on a 1:162 gradient. Railway Rolling Stock unless properly braked can "Run Away" on a gradient of 1:330. This tends to happen in private yards but thankfully not often on running lines, but there have been plenty of instances where it has happened. IP raise this matter as the Rail Accident Investigation	The rail terminal yard and associated rail lines will be developed on a virtually level platform.

	Branch has indicated its concern in their latest Annual Report. IP questions whether there would be a guarantee that a locomotive will always be attached to a train during container handling, and will there be a clearly specified procedure that the fixed brakes are always applied to the train at all other times. The IP questions whether the the Operator or Network Rail be responsible for ensuring that the running lines are protected by catch points or a sand drag arresting facility	
Friends of Narborough Station Stoney Stanton Action Group	The IP states that for safe access, trains will almost certainly be slowed to a stand or to a maximum of 10 mph before being cleared to enter. The IP notes that depending on the direction the train is coming from, will mean crossing over the opposite running line. The IP notes that t his will cause a prolonged obstruction of both eastbound and westbound lines, until the train is fully clear of the main running lines and safely into the terminal.	The Applicant has designed the connection to allow the trains to arrive at 25 mph, they will not normally be slowed to a stand.
Friends of Narborough Station	The IP notes that the trains leaving the terminal will inevitably cause similar delays to passenger trains during the cross over process. The IP notes a 1:162 gradient to climb and state that this will require extended occupation while the train gets to line speed.	Network Rail's review of the capacity study has taken into account the arrival and departure times of trains, as well as the aspirations of Midlands Connect.

	The IP note that delays to passenger trains will have to be accepted and will certainly compromise aspirations by Midlands Connect and others, to provide a more frequent service and thus improve connectivity between the East and West Midlands.	
Friends of Narborough Station	The IP note that all Freight Train Rail Heads in this country have what is called a "Cripple Road". They note that these are situated for instance at Power Stations, Mines, Collieries, Oil Terminals, Quarries and other locations where freight trains are loaded and unloaded. The IP note that these facilities are where "Red Carded" Wagons and Containers are shunted out of the way in order to prevent delays to both freight and passenger trains. The IP question whether these facilities will be covered and provided for the inspection, maintenance and repair of both locomotives and wagons and if so, what will be the level of noise emitted? The IP questions whether wagons have to be lifted by crane making its own noise or will below ground inspection pits be provided?	A cripple siding will be provided. It is not proposed to be covered. The detailed design will be addressed by the Terminal Operator in due course. The operation of this facility will be consistent with the noise assessment submitted with the application i.e. within the envelope of the noise assessment.
Friends of Narborough Station	The IP questions whether the terminal has an auditable "Fitness to run Certification" procedure in place for all Locomotives and Wagons that depart from the Interchange?	All trains have to be inspected before they are allowed back onto the network. There will be an operating procedure agreed in detail between the Terminal Operator and Network Rail
Friends of Narborough Station	The IP questions how many containers, at up to 40 feet long and 8 foot 6 inches high, will be on one train.	This route is cleared for 9'6" high containers. Ecoefret and Shortliner wagons are in sets, allowing for between 96 and

		100 twenty-foot equivalent (TEU) containers. The actual number will depend on the mix of 20's to 40's on each train.
Stoney Stanton Action Group	The IP raises concerns in regards to the fact that no rail freight services or paths are guaranteed or reserved. The SRFI should not be allowed to be built if there is no concrete guarantee of rail freight services.	The Applicant has responded to these points in the sections above.
Friends of Narborough Station	The IP note that the South Leicestershire Line is not a main line and was not built as a main line and that it only has three aspect signalling, as opposed to four aspect signalling on a main line. The IP notes that there are no refuges, no passing loops and no facilities for Bi Directional working. Putting that simply, it means that any breakdown or other incident could close the line for hours or days. The IP states a likelihood ho would pick up the bill for its effect on the country's economy?	This line is Network Rail's Strategic Freight Route between Felixstowe the Midlands and the North and Network Rail are continuing to invest in this route. The Applicant notes that any serious incident on the railway or the strategic road network will cause delays.
Friends of Narborough Station	Further constraints are the fact that both Wigston North and South Junctions were some years ago, reduced to single rather than double lead layouts.	This has been factored into Network Rail's assessment on capacity.
Friends of Narborough Station	Additional trains that were introduced by East Midlands Railway have resulted in a capacity problem between Wigston Junction and Syston Junction, the route trains to and from HNRFI are planned to use. The IP is concerned about the lack of capacity along this route.	The long and heavy freight trains referenced comprise nationally important intermodal train services between the UK's global trading partners via the coastal ports; and the Midlands Engine of manufacturers and distributors, who would otherwise have to use much less environmentally friendly HGV's. HNRFI is designed to accommodate electrification of the rail network. Network

		Rail has confirmed that the network has capacity to serve HNRFI.
Friends of Narborough Station	In addition this stretch of line will be subject to long delays and closures, when MML electrification is under way north of Market Harborough. This will be a far more definite project than any plan to electrify the South Leicestershire Line.	The timing of this section of MML electrification is likely to be ahead of HNRFI, but HNRFI will work with any network upgrade constraints in consultation with Network Rail.
Stoney Stanton Action Group	The IP is concerned that there will be considerable difficulty in securing adequate train paths both sequentially along the route. A key problem will be sequential pathing with trains operating at widely differing speeds. Add to that slower freight services and junction pathing conflicts with Midland Main line trains. The consequences of even slight delays will cause either the need for extensive recovery time allowances in timetabling or frequent and widely disruptive delays, which could affect West Coast Main Line (WCML) and Midlands Main line (MML) services.	This capacity of the line has been reviewed by Network Rail and intermodal trains are already operating on this route.
Stoney Stanton Action Group	The IP states that the effect of this proposal will be extremely negative on railway operations on the route.	The route has been designated a Strategic Freight Route by Network Rail and the Applicant will be using it for that purpose.
Stoney Stanton Action Group	A report has been produced by Network Rail, "Leicester Area Strategic Advice" dated July 2020, also titled "How can growth and partners' aspirations be accommodated in the Leicester area over the coming decades?". The strategic advice paper does NOT mention HNRFI. It does not appear that the HNRFI has	The Felixstowe to The Midlands and The North is a key Strategic Freight Route which Network Rail is continuing to invest in, in the national interest. HNRFI is already imbedded in Network Rail's internodal freight strategy and is not introducing a new use. As such there is no need

	been looked at holistically, considering new traffic generated by other strategic developments, therefore it is unlikely that the rail network will ever have the capacity to run many trains to HNRFI.	for HNRFI to have been mentioned in a future scoping of new initiatives by Network Rail.
	Noise, Vibration	
Stoney Stanton Action Group	IP raises concerns that The recreational experience will be impacted by the noise at the Construction stages. At Year 1 and Year 15 – the visual amenity will not have improved with such limited mitigation landscaping proposed and inadequate screening of the A47 link road.	The results of the construction phase assessment indicate, that for the average case (i.e construction plant operating in the approximate centre point of the closest area of construction), the noise levels are predicted to be below the adopted criteria of 65dB LAeq,1h. However, the assessment is based on both an average and worst-case scenario and does not take in account any screening afforded by onsite buildings once they are built out or any mitigation. It is possible that the effect could be lower than this, and any major adverse effect would be short-term. It is acknowledged that the construction phase is likely to be undertaken over a period of up to 10 years. However, it is considered unlikely that construction would take place close to receptors over a prolonged period. For the worst-case scenario, exceedances are predicted for elements 1, 2 and 3, which relate to ground preparation and road surfacing. It is unlikely that these elements would take place for a significant amount of time without

		some screening being afforded by other phases of the Proposed Development as it is built out. The results of the noise assessment indicate that minor adverse impacts are predicted at the majority of receptors including Burbage Common Woods and Aston Firs SSSI, as a result of the proposed A47 link road, with mitigation in place. The exception is NSR1, Bridge Farm, where a major adverse impact is predicted as a result of road traffic on the A47 link road in the short-term. Although noise levels fall between the Lowest Observed Adverse Effect Level and Significant Observed Adverse Effect Level, and noise levels have been mitigated and minimised as far as practicable in line with the Noise Policy Statement for England.
Stoney Stanton Parish Council	IP raises concerns regarding the baseline information given issues noted with highway information. Further concerns raised in relation to omission of night time monitoring at a number of noise sensitive receptors (NSR) (5,9,18 and 19), unclear how mitigation can be specified without baseline. No assessment for NSR 28, yet acoustic fencing is specified, no justification provided.	On the basis that the transport figures are considered a robust basis for assessment as set out in the Employee numbers and trip generation note (document ref 18.1.1, REP1-018), the assessments for traffic related noise effects are therefore deemed to be robust. Existing night-time noise levels have been captured at locations considered representative of the identified receptors. Notwithstanding this, NSRs 5, 9, 18 and 19 have not been identified as being sensitive during the night-time periods and therefore the night-time periods have not been assessed at these receptors.

		The future dominant source of noise at NSR28 is likely to be noise from road traffic on the A47 link road. The future noise levels as a result of the link road have been predicted at NSR28 and mitigation has been recommended to reduce noise levels from the proposed road. Therefore, we do not agree with the statement that there is no factual basis for the conclusion.
Stoney Stanton Parish Council	Concerns raised by IP in relation to acoustic fencing, including: - The quantum of acoustic fencing required and its position underlines the unacceptable proximity of the site to noise sensitive locations, essentially on all sides this includes for receptors at Aston Firs caravan park and the 1.55km fencing to the north and west much of which is on bunds. Fencing on an elevated bridge augments the inappropriate level of noise needing to be mitigated. - Fence represents an uncharacteristic feature for the area that will act as a clear barrier to ecology and pedestrian movements and set within a flood zone Location difficult to ascertain as not indicated on the indicative masterplan	Figure 10.10 of the ES (document reference: 6.3.10.10, APP-279) shows the proposed barrier heights and locations.
Stoney Stanton Parish Council Burbage Heritage Group	IPs raise concerns that the impact of the noise extends to important nature areas which are frequently used for leisure purposes. Extra traffic through the villages, will cause congestion and thus idling vehicles will add to the noise and air quality issues in the settlements.	The Applicant has responded to this point through RR-1228 and RR-1311 of 18.2 Applicants Response to Relevant Representations (document reference 18.1.1, REP1-018.

Friends of Narborough Station		
Stoney Stanton Parish Council Burbage Heritage Group	The IP states that Stoney Stanton already experiences lower levels of 'clean air', due to its proximity to Hinckley and the M69, given the prevailing wind direction and local topography. Increasing traffic flows within the immediate area, as well as on the Strategic Highway Network and from activity on the Application Site itself, will simply augment the existing issues.	The Applicant has responded to this point through RR-1228 and RR-1311 of 18.2 Applicants Response to Relevant Representations (document reference 18.1.1, REP1-018).
Friends of Narborough Station	IP raises concerns in regard to night time noise for local residents.	As set out in Chapter 10 Noise and Vibration (document reference: 6.1.10, APP-119), noise associated with the operational phase of proposed development has been considered at nearby receptors, which has included noise associated with fixed plant and break-out noise from units, HGV loading/unloading activities, SRFI operations, additional train movements, the A47 link road and additional road traffic. The results of the assessment indicate that with mitigation in place, noise levels are predicted to fall below the Significant Observed Adverse Effect Level at all nearby receptors in the assessments undertaken.
	Noise Levels to Wider Area	
Stoney Stanton Parish Council Burbage Heritage Group Save Burbage Common	The IP states that many areas around the Application Site already experience high levels of background noise. Sadly some of the areas affected and/or not fully monitored include the important Burbage Common Woods and Aston Firs SSSI (NSR 18 and 19 respectively). The only manner in which a perceived relationship is	In Chapter 10 Noise and Vibration (document reference: 6.1.10, APP-119), the effect of noise on Burbage Common Woods (NSR 18) and Aston Firs SSSI (NSR 19) have been fully assessed and, where appropriate, mitigation measures have been included to protect these areas for people.

	considered to be achievable from a noise perspective is to install an acoustic fence on the new bridge on the A47 link road. This will appear as an uncharacteristic floating screen in the middle of what is currently a verdant view northward from these ecological / public amenity areas; the only item that will make it appear slightly less jarring is the uncharacteristic warehouse buildings being proposed alongside it.	The proposed development site has been defined by the parameter plans and it is inevitable the creation of an SRFI site, in an environment that has been used for agricultural purposes will create a new aesthetic and character that does not accord with the existing character and vernacular.
Stoney Stanton Parish Council	The IP states that there are outstanding substantive issues with the transport data, and thus clearly there is likely to be errors rolled into the modelling for noise and vibration as a result.	The Applicant refers to Deadline 1 submission 18.2.1 Appendix Highway Position Statement for further detail.
Stoney Stanton Parish Council Narborough Parish Council	The IP has concerns over the assessment of transport noise and vibration.I If the level of movements are under-played, then the level of congestion in locations will be under represented. This has particular concerns for vehicles through Stoney Stanton, Sapcote and Elmesthorpe, as well as through Narborough due to the additional barrier down time. In respect of this latter point, no meaningful assessment has been made in respect of the impact upon this community. Noise and air quality will clearly be affected in these locations by idling vehicles and the impact of vehicles stop/start movements as greater levels of noise and emissions occur. These same issues apply to the air quality assessments' conclusions.	The Applicant has responded to this point through RR-1228 and RR-1311 of 18.2 Applicants Response to Relevant Representations (document reference 18.1.1, REP1-018). In addition, average speeds used in the air quality assessment were obtained from the Pan Regional Transport Model 2 (PRTM2.2). (Document reference APP-118).
Stoney Stanton Parish Council	The IP considers that significant consideration in respect of the impact of the construction phase needs to be given, due to the expected 10+ year construction	Chapter 10 Noise and Vibration (document reference: 6.1.10, APP-119) considers the length of time over which the construction phase is likely to take in determining

	timeframe for the development. Appropriate constraints on operational hours of construction and how vehicles route to site need to be imposed.	effects and residual effects. The mechanism for controlling the construction phase noise is the CEMP. This will include appropriate constraints on hours of construction, vehicle routing and other controls.
Elmesthorpe Stands Together	Those that live close to the development already experience some vibration and there are concerns that this will increase not only with operation of the RFI but also during construction. In general, vibration is only perceptible in residential situations when the building is close to a railway, construction site or very close to a road that carries large and heavy vehicles' Therefore we would like to obtain further information on this.	The ES noise and vibration chapter includes an assessment of both construction phase groundborne vibration from onsite activities and operational phase groundborne vibration associated with rail movements. With the proposed mitigation in place, it is considered that the effects of construction vibration would be reduced at existing NSRs to between temporary, minor adverse significance and temporary, moderate adverse significance at worst. Following a vibration survey of the existing line, it is considered that the resultant effect as a result of the train movements on the sidings, would be permanent, negligible adverse.
	Air Quality Impacts	
Stoney Stanton Action Group	No precise detail behind what the CO2 volumes emitted locally will be from the build and operation and fails to consider the increase in other gaseous pollutants and particulate matter. Industrial plant equipment that will be in use extensively during the build and operation is significantly worse than that of passenger cars and HGV's, due to the regulations regarding treatment of exhaust gas and emissions. As there will be many	The Applicant has responded to the point regarding CO_2, other gaseous pollutants and particulate matter through RR-1102 of 18.2 Applicants Response to Relevant Representations (document reference 18.1.1, REP1-018). The Institute of Air Quality Management guidance states:

	vehicles using the site the pollution from the operation and transport of employees to work will further decrease the already poor air quality. Traffic leaving the site will emit significantly higher levels of pollutants as engines warm up	*"Experience of assessing the exhaust emissions from on-site plant (NRMM) and site traffic suggests that they are unlikely to make a significant impact on local air quality, and in the vast majority of cases they will not need to be quantitatively assessed."* Plant and equipment used during the construction of HNRFI will for the most part be contained within the site where members of the public will not be present, so there is no relevant exposure. There are few areas of poor air quality and the impact of construction traffic on air quality has been assessed in ES Chapter 9 Air Quality (document reference: 6.1.9, APP-118), Emissions during the construction of the HNRFI will also be controlled through a Construction and Environmental Management Plan (CEMP). The air quality assessment has been undertaken in accordance with latest guidance and methodologies (document reference 6.1.9, APP-118) and used the latest Emissions Factor Toolkit (v11.0) published by Defra.
Stoney Stanton Action Group	IP raises concerns with regards to ensuring that as emissions legislation is adapting and with the imminent release of EU7, the emissions from tyre and brake particulates are included in measurement and in many instances the 10 and 23um particulates generated that are deemed hazardous to heath are significantly higher than that produced from a modern efficient internal	Emissions from tyre and brake particulates are included within the vehicle emission factors utilised in the air quality modelling. Emission factors from the latest version of Defra's Emission Factor Toolkit (v11.0) was utilised in the air quality modelling in accordance with the latest guidance and methodologies.

	combustion engine. The emissions from tyre and brakes are directly correlated to vehicle starting and stopping activities, as well as during routine normal operation. This is not considered and must be taken into consideration.	
Stoney Stanton Action Group	IP highlights that Studies (e.g. Leicestershire Joint Strategic Needs Assessment 2018-2021, Air Quality and Health Chapter) have shown that in general Leicestershire has higher levels of Particulate Matter than averages for England. Placing a large SRFI in this area will make this worse. The prevailing wind in the area and indeed the United Kingdom is generally from the West and will therefore tend to blow the pollutants toward Stoney Stanton	An assessment of particulate matter has been undertaken in the ES Chapter 9 - Air Quality (document reference 6.1.9, APP-118). The air quality assessment provided identified no significant impacts with regard to the current air quality objectives, across the whole study area. The Applicant has responded to the point regarding prevailing wind in the area through RR-1228 of 18.2 Applicants Response to Relevant Representations (document reference 18.1.1, REP1-018).
Stoney Stanton Action Group	IP raises concerns regarding presentation materials for receptor locations.	Receptor locations are shown in documents APP-245 to APP-250. The Applicant has responded to the point regarding effects specific to Stoney Stanton through RR-1311 of 18.2 Applicants Response to Relevant Representations (document reference 18.1.1, REP1-018).
Stoney Stanton Action Group	IP highlights that as the technology for HGV propulsion moves forwards, coupled with the government requirements to make HGV zero tailpipe emissions by 2040 the local journeys would be ideally suited to EV powered HGV. In order to facilitate this however a significant number of high-power chargers would be	As described in the Energy Strategy (document reference 6.2.18.1, APP-217), power for the site will come from on site generation using PV with an electric grid connection to cater for load imbalances. The proposed gas powered CHP plant is solely for emergency use in the event of a supply failure.

	required, that in turn needs a large power supply. There appears to be no recognition of this. We are aware of the addition of 43MW PV capability with batteries in the examination documentation (which wasn't in the consultation documentation) however it seems this is required for site operations and does not make provision for fast charging of HGVs. By installing a 5MW gas powered generator for electrical provision this merely generates CO2 and other pollutants. Within 0.5km of this site is a National Grid high voltage line, this should at least be considered for power rather than local generation from fossil fuels; it appears that it has not been factored.	When first constructed, 20% of car parking spaces will be provided with an electric vehicle charging point including a minimum of two accessible spaces for each building. Ductwork provision for future car charging points to all remaining car parking spaces will be provided to be installed by the building occupier if necessary. In addition to the above, ductwork will be provided to HGV parking spaces to facilitate the installation of chargers in future depending on the building occupiers requirements and technology available.
Stoney Stanton Parish Council	IP highlights the existing air quality issues in Stoney Stanton, taking into account prevailing wind and topography Stoney Stanton receives much of the pollution generated from the M69 and Hinckley area. All the pollution from the Hinckley NRFI, including associated transport movements would travel in the direction of Stoney Stanton. This would further reduce the air quality in the settlement. Stoney Stanton already has higher than average rates of respiratory diseases (especially asthma); further development without appropriate mitigation would augment this.	The Applicant has responded to the point regarding prevailing wind through RR-1228 and RR-1311 of 18.2 Applicants Response to Relevant Representations (document reference 18.1.1, REP1-018).
Stoney Stanton Parish Council Narborough Parish Council	IPs raise concerns that information provided is considered flawed as it is set against incorrect baseline transport information.	The Applicant does not agree. It has responded to this point through RR-0134 of 18.2 Applicants Response to Relevant Representations (document reference 18.1.1, REP1-018).

Narborough Parish Council	IP request that long term AQ monitoring be put in place so any future intensification can be more readily assessed	The Applicant has responded to this point through RR-0134 of 18.2 Applicants Response to Relevant Representations (document reference 18.1.1, REP1-018).
Burbage Parish Council	IP raises concerns regarding impact on air quality at a time of peak construction traffic vehicle movements will be determined as 'not significant', being described as 'temporary'. No real figures are give as to a reliable air quality assessment when the site is up and fully running in 2026. Besides a 'normal use' approach to air quality assessment, the study should also include an assessment of the impact of traffic congestion upon air quality, for example when the M69/A5 is blocked.	An assessment of the impact of the HNRFI on air quality during its operation in 2026 has been undertaken in ES Chapter 9 - Air Quality (document reference 6.1.9, APP-118). The traffic data utilised in the 2026 Opening Year assessment assumed the full operation of the HNRFI; however, in reality only a small proportion of the HNRFI may operate in the Opening Year. It is considered to represent a conservative scenario assuming the entire HNRFI is operational in the earliest possible year where road traffic emissions and background concentrations are higher than later years. The operational phase 2026 Opening Year scenario therefore represents a robust and conservative scenario. Average speeds used in the air quality assessment were obtained from the Pan Regional Transport Model 2 (PRTM2.2). (document reference 6.1.9, APP-118).
Burbage Parish Council	IP raises concerns that the proposed road across Burbage Common to link up with the A47 will do little to reduce air pollution. Due to the level of congestion at the M69/M1 junction, especially during peak am/pm times, it can be envisaged that traffic leaving the site, especially during peak time, will use the A47 route to Leicester, causing further congestion on this route.	The A47 link provides additional capacity to the local network, in tandem with the south facing slips at Junction 2. This alleviates congestion within Hinckley itself and provides better connectivity to the Strategic Road Network. There is no evidence from the PRTM model and the Transport Assessment (document reference 6.2.8.1 AS-017) that congestion will be significant on the A47. Mitigation is proposed on junctions which are forecast to experience capacity based delay.

	Ecology and Biodiversity	
Stoney Stanton Action Group	IPs raise concern with regard to night time lighting and effects upon wildlife	The Applicant team has considered the potential effect of lighting on wildlife – see ES Chapter 12 Ecology and biodiversity (document reference 6.1.12, APP-112).
Stoney Stanton Action Group	IPs raise concern with regard to the ecological impact of re-routing of natural waterways.	ES Chapter 12 Ecology and biodiversity (document reference 6.1.12, APP-112) considers the potential effect on ecology.
Burbage Parish Council Stoney Stanton Action Group	IPs raise concerns in relation to ecological impacts on Burbage Woods and Aston Firs SSSI.	No significant impacts on the SSSI nor any other designated sites in the local area are predicted. Where potential impacts have been identified, suitable mitigation has been proposed. Where off-site woodland immediately abuts the site, the removal of an intensively managed farmland edge and replacement with natural ecotone planting is seen as notable improvement. The various assessments have shown that there is unlikely to be any significant adverse impacts as a result from air quality, pollution, recreation, noise or vibration.
Stoney Stanton Action Group Burbage Parish Council	IPs raise concerns about the effectiveness of mitigation strategies. In particular if mitigations fail to achieve desired results, who is to be held accountable.	The monitoring and management of the mitigation strategies will be secured in the long-term through detailed LEMPs (Requirement 20). The LEMP must be implemented as approved as part of the authorised development and must be reviewed on the 5th anniversary of commencement of the authorised development and at 5 yearly intervals thereafter for the lifetime of the authorised development. Where mitigation is found to be lacking, remedial action will be triggered.
Stoney Stanton Action Group	IP raises concerns in relation to impact on ecology, including:	The Ecology and Biodiversity Chapter of the ES (document reference 6.1.12, APP-121) demonstrates that there will

	- Negative effect on aquatic wildlife, bats and badgers - Displacement of nesting sites, some of red listed birds, will cause permanent loss.	be no significant adverse impacts on these groups/species. The value of the existing ponds and stream on site are ecologically limited given the agricultural context. A series of new ponds will be created, including ponds outside the SuDS network, which will be of value to a range of aquatic species. Opportunities for bats will be maintained, with new foraging, commuting and roosting opportunities proposed. Similarly, new sett building and foraging opportunities for badgers will be created. The proposals provide new nesting opportunities for red listed birds. Whilst there will likely be some displacement of red listed birds (such as farmland specialists), the overall impact is not considered significant when considering factors such as the local context of the site (i.e. set within a mostly arable context) and population trends of the particular species involved.
Stoney Stanton Action Group	IP raises concerns in relation to ecological effects associated with loss of five ponds and re routing and part culverting stream. Including effects on: - Common frog - Smooth newts - Common toads - Great crested newts	Impacts will be temporary, as new habitat creation and management will be of benefit to local amphibian populations. Should a breeding population of GCN be identified on site, then a mitigation strategy will be devised and approved by Natural England.
Stoney Stanton Action Group	The IP states that he removal of 14km of hedge will reduce carbon capture on the site. Using the figures quoted previously, 1km of hedge can store between	The loss of hedgerows and trees will be mitigated for by the provision of large areas of woodland and tree planting. Woodland habitats will allow trees to grow to

	600-800kg of CO2 per year. Taking the average of 700kg, this will result in a loss of 9,800kg per year of potential carbon capture capability. Although some new hedgerows will be planted, a growth period of a minimum of 5 years is necessary for them to become established, during which carbon capture will be reduced. Trees also have an important role in carbon capture. Exact amounts vary with size and age of tree, but an average tree captures 25kg CO2 per year. 252 mature trees are to be lost, implying a total reduction of 6,300kg per year of potential carbon capture during the period when the newly planted trees grow and mature. The ability of the hedgerow and trees in existence on the site to absorb 16,100kg of CO2 per year, which will be removed if work commences, should be factored into any CO2 and net zero targets of the development. There is no reference to this loss of carbon capture potential in ES 12	maturity, and although the temporal factor is significant, the overall effects are considered to be beneficial in the long-term, including in terms of carbon capture. Moreover, the removal of managed arable land will also a remove a source of carbon release. Trees have varying rates of CO_2 removal, depending on their rate of growth and stage of maturity. There are significant landscape proposals associated with the application, including proposals for BNG. The carbon balance associated with trees and vegetation is a small component of the overall carbon balance associated with the proposal. The Applicant will consider incorporation of a carbon balance for trees and vegetation as part of the LEMP (document reference: 17.2, APP-360), which is the subject of Requirement 20
Stoney Stanton Action Group	Site Description and proximity to SSSIs – insufficient separation from site	No significant impacts on SSSIs nor any other designated sites in the local area are predicted. Where potential impacts have been identified, suitable mitigation has been proposed. Where off-site woodland immediately abuts the site, the removal of an intensively managed farmland edge and replacement with natural ecotone planting is seen as notable improvement. The various assessments have shown that there is unlikely to be any significant adverse impacts as a result from air quality, pollution, recreation, noise or vibration.

Stoney Stanton Action Group	IP concerned regarding effects associated with the direct loss hedgerows and mature trees, assume that even allowing for new tree planting, the imbalance between loss of mature trees and replacement with younger trees supporting less biodiversity will have a negative impact.	The loss of mature trees is identified as a negative impact within the assessment, however the delivery of large areas of woodland and new trees will sufficiently mitigate such losses, despite the temporal factor.
Stoney Stanton Action Group	IP identifies the loss of 350 acres of farmland. Reference to recently published Natural England 'Building Partnerships for Nature's Recovery' (October 2020). This identifies the farming sector as a key partner in the aim to make the farming industry a net zero greenhouse gas producer. Farming methods are being proposed, which aid carbon capture. The ability to take advantage of these methods of carbon sequestration and contribute more towards net zero will be permanently lost if the area is built on.	
Stoney Stanton Parish Council	The IP requests the need to ensure appropriate baseline information is undertaken, the impact upon the surrounding ecological designations and the effects upon the migration of ecology are important. Currently, the IP considers that there are a number of concerns in respect of the certainty of the impact upon ecology and biodiversity.	No significant impacts on any designated sites in the local area are predicted. The strategy established within the Woodland Management Plan (WMP) (Document reference 12.4A, APP-REP1-015) ensures that the construction and operation of the authorised development will be undertaken in such a way that off-site woodland habitat will be protected. The woodland creation, management and maintenance measures outlined within the WMP are designed to fully mitigate any potential adverse impacts to off-site woodland which may arise through the construction and operational phases of the developments. Buffers to off-site designated are proposed (including adjacent Burbage

		Common LNR), which will comprise new species-rich planting. Overall, negative effects have been avoided or reduced through inherent mitigation incorporated into the parameters plan (see (document reference: 6.3.3.2, APP-231) and Illustrative Landscape Strategy (document reference 6.3.11.20, APP-304).
Stoney Stanton Parish Council Burbage Parish Council	IPs raise concerns in regards to the full baseline position for the whole DCO, no baseline assessments outside the main order limits, remainder of the area, is simply stated to be 'typically of negligible ecological importance'. The full suite of Phase 2 surveys should be undertaken on this land, given it will be impacted upon both the imposition of new highway infrastructure and used to establish the baseline for the biodiversity enhancement assessment.	As stated within the Ecology Baseline (document reference: 6.2.12.1, APP-197), the Main Order Limits includes the Main HNRFI Site, contiguous areas to the north-west, south and east, respectively to contain the corridor of a proposed link road that would cross the Leicester to Hinckley railway and connect to the B4668/A47 Leicester Road (the 'A47 Link Road'), the proposed works to M69 Junction 2 and a section of the B4669 Hinckley Road towards the village of Sapcote. The DCO Site also includes additional non-contiguous areas of land which will be subject to highway enhancements, traffic management measures, and pedestrian level crossings. An extended Phase 1 survey was undertaken on 14 April 2022 of the additional areas included for the highways works. A review of the proposals for these non-contiguous areas found them to be ecologically insignificant, given that they typically involve development of already developed areas. Where impacts on semi-natural habitats are required (i.e. the construction of the pedestrian

		footbridge across the railway), impacts to habitat will be temporary and minimal in nature to allow for work zones, and will not significantly impact protected species (e.g. no impacts to trees with bat roost potential, commuting bats, badger setts etc). As such, no Phase 2 surveys are proposed in these areas. Update surveys, including habitat walkovers and badger surveys, are scheduled for 2024/2025 and will include all areas where the proposals will impact semi-natural habitats. Management Plans (i.e. Construction and Environmental Management Plans (CEMPs) secured by Requirement 7) will ensure appropriate working methodologies for any removal of habitat to ensure no adverse impacts on ecological features. The scope of surveys was agreed during initial consultations with Leicestershire County Council, and the scope of surveys was not raised by local authorities during the PEIR consultation stage.
Stoney Stanton Parish Council Stoney Stanton Action Group	IPs are concerned that there is a lack of consideration for habitat fragmentation within the proposal. The scheme seeks to remove all the existing connecting wildlife corridors on the land through the removal of all the hedgerows. Existing ponds on site are also removed. The provision of a single narrow corridor along the western edge adjacent to the M69 is not considered sufficient to offset the loss of the existing migration corridors. This arrangement will clearly have a negative impact upon the fauna within the area, including	It should be noted that the site is already between the confined between the M69 and railway, which coalesce to the north-east of the site. As such, dispersal north-east is already confined to a degree. The proposals maintain connectivity from the south-west to the north-east at the site boundaries. The assessment of the likely impacts includes fragmentation. As per paragraph 12.151 of the Ecology and Biodiversity chapter (document reference: 6.2.12, APP-121), the Proposed Development has been designed to incorporate the hedgerow network and

	protected species.	minimise its fragmentation where possible, particularly around the perimeters. It is acknowledged in the assessment that the direct loss and fragmentation of the existing hedgerow network is considered to be of high magnitude and extent, with appropriate mitigation proposed on that basis. Currently the net gain calculations show an on-site 7.12% net linear gain, before any local or off-site solutions have been implemented. Corridors will be maintained at the boundaries of the site and support a variety of habitats, including a number of new ponds. This will allow continued connectivity southwest to northeast.
Stoney Stanton Parish Council	IP raises concerns in regard to the lack of clarity in respect of the night time illumination meaning it is impossible to accurately determine the impact upon ecology. Areas affected are all areas with a dark sky and illumination will affect the breeding and foraging habits and opportunities for many animals, including owls and bats.	The bat assemblage recorded is considered to be relatively typical for an urban edge farmland site in central England with common and widespread generalist species accounting for the vast majority of foraging and commuting activity. The most commonly recorded bats (*Pipistellus pipistrellus, Nyctalus noctula*), are not considered to be particularly sensitive to lighting impacts when foraging or commuting. The latest obtrusive light technical note lighting plans (Document reference: 6.2.3.2.1, APP-TBC) demonstrate that light spill has been kept to a minimum. The vast majority of open space will be maintained as dark, allowing continued commuting opportunities post development. Whilst some light spillage occurs at the railway and railway bridge (considered unavoidable given the nature of a SRFI), lux levels are generally low, and still allow commuting

		opportunities for bats (with the northern edge of the railway at 1lux or below). Continued and new opportunities will be present for owls, including species-rich foraging habitat, currently not present within the site boundary.
Stoney Stanton Parish Council Stoney Stanton Action Group	IPs raise concerns over the ability to deliver BNG on site. Lack of baseline for whole DCO site means that it is impossible to accurately calculate the level of improvements necessary. Given the scale of the development and its position next to a number of national statutorily designated ecological and landscape areas, there should be a strong drive to ensure that the biodiversity is replaced in this area and not displaced elsewhere.	The Applicant has committed to delivering 10% however, and the mitigation hierarchy has been followed. Where gains cannot be provided on site, they will be delivered through other land in the Applicants control in the local vicinity. Where a shortfall remains, this will be dealt with by obtaining off-site credits. Opportunities to maximise gains and minimise losses are still being explored. The scope of surveys, quantum of land, and designated sites are discussed above.
Stoney Stanton Parish Council Narborough Parish Council	IPs concerned there is a lack of appropriate assessments to allow a full baseline position to be established. The exact harm upon wildlife, including protected species, cannot therefore be confirmed or biodiversity calculation for enhancements to be appropriately calculated. This is contrary to the policy requirements for proposals. The fragmentation of habitats and removal of transfer corridors also represents a significant concern to the overall ecological value of the area. Light spill has also not been fully analysed to enable the impact upon night-time fauna activity to be considered. The lack of information results in unresolved harm to ecology. Should be a	Impacts on designated sites are not considered significant subject to the proposed mitigation being secured. As stated within the Ecology Baseline (document reference: 6.2.12.1, APP-197), the DCO Site also includes additional non-contiguous areas of land which will be subject to highway enhancements, traffic management measures, and pedestrian level crossings. An extended Phase 1 survey was undertaken on 14 April 2022 of the additional areas included for the highways works. A review of the proposals for these non-contiguous areas found them to be ecologically insignificant, given that they typically involve development of already developed areas.

	requirement that measures remain in place for the lifetime of the development.	Where impacts on semi-natural habitats are required (i.e. the construction of the pedestrian footbridge across the railway), impacts to habitat will be temporary and minimal in nature to allow for work zones, and will not significantly impact protected species (e.g. no impacts to trees with bat roost potential, commuting bats, badger setts etc). As such, no Phase 2 surveys are proposed in these areas. Update surveys, including habitat walkovers and badger surveys, are scheduled for 2024/2025 and will include all areas where the proposals will impact semi-natural habitats. Management Plans (i.e. Construction and Environmental Management Plans (CEMPs) secured by Requirement 7) will ensure appropriate working methodologies for any removal of habitat to ensure no adverse impacts on ecological features.
Stoney Stanton Parish Council	IP states that there should be sufficient land available on site to offset the losses incurred. This does not appear possible in this instance, reflecting again the overdevelopment of the land. Scheme not in compliance with central government policy steer on ecology.	The principals of the mitigation hierarchy and the mechanism of biodiversity net gain (BNG) are well established, and there is no specific PINS or BNG requirement to offset all losses on site, nor is there a requirement to deliver 10% net gain. The Applicant has committed to delivering 10% however, and the mitigation hierarchy has been followed. Where gains cannot be provided on site, they will be delivered through other land in the Applicants control in the local vicinity. Where a shortfall remains, this will be dealt with by obtaining off-site credits. Opportunities to maximise gains and minimise losses are still being explored.

Elmesthorpe Parish Council	Requested clarification on Works Plans 12 and 19 from the Applicant and reserve comments until this is received.	
Stoney Stanton Action Group	The intended mitigation methods are provided in the LEMP 17.2 (Landscape and Ecological Management Plan) , the CEMP 17.1 (Construction Environmental Management Plan)1 , and, in the case of the SSSIs, a Woodland Management Plan. These strategies are recognised and accepted but it is difficult for the lay person to trust that in 25 years' time, all will have been so incredibly effective and result in no negative outcomes. To support this concern, an article evaluating ecological mitigation measures has highlighted evidence gaps in evaluating their effectiveness – specifically empirical evidence (Evidence shortfalls in the recommendations and guidance underpinning ecological mitigation for infrastructure developments, S Hunter, S Ermgassen et al, July 2021 British Ecological Society) As infrastructure expansion creates a very significant pressure on biodiversity around the word, it is vital that accepted Mitigation Strategies are effective in reality, not just theory. The study looked at ecological reports taken from 50 housing developments dated from 2011 to 2020. Analysis revealed that of 446 recommended measures using 65 different mitigation methods, over half of the recommended methods had not been empirically evaluated and only 13 measures were deemed beneficial. Furthermore, it was found that the measures employed often lacked reference to	The monitoring and management of the mitigation strategies will be secured in the long-term through detailed LEMPs (Requirement 20). The LEMP must be implemented as approved as part of the authorised development and must be reviewed on the 5th anniversary of commencement of the authorised development and at 5 yearly intervals thereafter for the lifetime of the authorised development. Where mitigation is found to be lacking, remedial action will be triggered.

	supportive scientific evidence and what was used was often out of date or based on circular referencing. These findings raise concerns about the efficacy of methods currently in use that are designed specifically to offset any negative effects on the biodiversity of large developments of which HNRFI would certainly be one. It begs the question - if the development goes ahead and the mitigating effects fail, at least to some degree, who will be responsible for rectifying any negative impact and what will happen if any negative effects cannot be rectified?	
Stoney Stanton Action Group	IP identifies that scheme is not in compliance with NPPF paragraph 180. For the following reasons: - The buffer zone between the SSSIs and the proposed RFI is, minimal - Its proximity will give rise to increased noise - Visual impact on the rural horizon. The statement that the benefits of the proposed HNRFI development clearly outweigh its likely impact on the features of the site is not proven by the evidence.	The application responds to and is consistent with the NPPF.
	General	
Stoney Stanton Parish Council	IP requests confirmation that Rochdale Envelope approach of presenting worst case scenarios has been applied in light of a highways model that underestimates level of vehicle movements.	There is no underestimation of vehicle movements, as set out in the Transport Assessment (document reference 6.2.8.1, AS-016) and Highways Position Statement (document reference 18.2.1).
Stoney Stanton Parish Council	In terms of a worse-case scenario, one would expect that this requires all employees to work at the site, rather than a split home/work arrangement. If the end	A clarification on employee figures is included within Deadline 1 documentation. Document Reference 18.1.1

	users are not known, then exact working arrangements cannot therefore be known, reinforcing this necessary assumption. Within the Transport Assessment (TA) (original and updated Sept 2023 versions) at paragraph 6.36 and 6.37 it is stated that 20% of employees will be office/management staff, working a standard 0900 – 1700 pattern. This would mean that this 20% of staff would be arriving within the AM peak to accord with their 0900 start to their workday. Table 6-10 of the TA notes the arrival of 1,199 journeys in the AM peak in association with the site. It is not unreasonable to assume this equates to the 20% of office/management staff, given the stated shift patterns for warehouse staff/drivers falling outside this timeframe, and the 10% support staff (cleaners, catering, security etc) will work various work patterns [in essence this would present a best case scenario as some of the support staff may also be included within the 1,199 movement figure stated]. If 20% of the staff generate 1,199 journeys, then this figure multiplied by 5 logically equates to 100% of the movements for all taff. 5 x 1,199 = 5,995 staff.	Post Hearing Submission ISH1 and CAH1 Appendix A Employee Numbers and Trip Generation Note.
Stoney Stanton Parish Council	A TA figure equating to 5,995 staff, is therefore below the previously assumed figure of 8,400 employees that was incorrectly included in the report. The shortfall of the traffic generation is therefore likely to be greater than previously considered, as there is between 2,400 and 4,400 staff journeys absent from the data (assuming between 8,400 – 10,400 staff on site as per the Socio- Economic Report). This could represent shortfall in the number of expected movements	A clarification on employee figures is included within Deadline 1 documentation. Document Reference 18.1.1 Post Hearing Submission ISH1 and CAH1 Appendix A Employee Numbers and Trip Generation Note. Employment at the main site is estimated to be between 8,400 – 10,400 employees.

	compared to employee numbers by up to 73% (4,400 / 5,995). Highways, and as a result the Air Quality and Noise Assessments that utilise the transport information within the reports, illustrates serious inadequacies in the reports conclusions and thus the mitigation required. This undermines the credibility of the whole scheme and the ability for anyone to accurately provide comment on the proposals.	
Stoney Stanton Parish Council	Furthermore, the whole highways approach appears to be fundamentally flawed. A nationally significant infrastructure project should be seeking to direct traffic primarily towards the trunk roads. Recognising that there are significant issues with key nodes on the important surrounding highway network but not proposing any improvements (e.g. M69/M1 interchange) simply forces all associated employee traffic to rat run through the villages and other lower order roads. This as an approach cannot be considered logical, even if upgrades to junctions on these roads are proposed. The essential point underpinning the Applicant's proposal is its proximity and accessibility to the trunk road network, which it is then not seeking to ensure unimpeded traffic flows so that it can be used.	The estimation and assessment of vehicle movements, as set out in the Transport Assessment (document reference 6.2.8.1, AS-016) and Highways Position Statement (document reference 18.2.1) is robust and was agreed with the Transport Working Group, including Leicestershire County Council (LCC) and National Highways. The assessment utilises LCC's PRTM model.
	Landscape and Visual Impact	
Stoney Stanton Action Group	IP states that despite the Applicant's efforts to minimise the visual impacts with their artists' impressions, these huge structures will dominate what is at present a rural landscape.	Landscape considerations have been a part of the design evolution since the land was first considered for development by TSH in 2016. The impact on the landscape

Stoney Stanton Action Group	IP concerns that the HNRFI proposal is in direct conflict with the NPPF, particularly: - Paragraph 130. - Paragraph 174	has been considered at various stages including the initial extent of the development and the scale of detail of the design. The photomontages provided at figures 6.3.11.12 and 6.3.11.16 are based on 3D models of the scheme and provide a realistic indication of what the proposed development would look like at varying stages of the development. A methodology for the Photomontages produced is contained within the Landscape and Visual Baseline (document reference 6.3.11.1). The proposed development site has been defined by the parameter plans and it is inevitable the creation of an SRFI site, in an environment that has been used for agricultural purposes will create a new aesthetic and character that does not accord with the existing character and vernacular. It is acknowledged that there would be significant adverse residual effects on identified representative landscape and visual receptors and character, as noted at paragraphs 11.189, 11.190 and 11.191 in the Summary and Conclusion of Chapter 11: Landscape and Visual Effects of the ES (document reference: 6.1.11, APP-120), which cannot be fully mitigated. The proposed development site has been defined by the parameter plans and it is inevitable the creation of an SRFI

		site, in an environment that has been used for agricultural purposes will create a new aesthetic and character that does not accord with the existing character and vernacular. It is acknowledged in the NPS NN that SRFI will have this type of impact, so this is consistent with government policy. With the potential exception of matters that are specific to SRFI, the application responds to and is consistent with the NPPF.
Stoney Stanton Action Group	The IP highlights that the visual impact from the north of the site will be harsh high boundary fencing to lessen the noise from the site; this offers negligible mitigation as the additional noise from the site will be an increase in what is present today. Likewise, the fencing itself is not in keeping with the current landscape character of the area.	See above. Noise barriers are proposed where necessary. This is not the purpose of boundary fencing, which are provided for security.
Stoney Stanton Action Group	IP raises concerns in regards to site sections, including: - Proposed vegetation will only screen just over half the height of the buildings - Limited screening from noise bund - Limited screening of container yard to the west Container stack height and lack of screening to Burbage Common.	
Stoney Stanton Action Group	IP raises concerns with regards to a number of viewpoints / photomontages, including: - Lack of photomontage for top 8-10m of the buildings would be visible in the directions of	See above. A methodology for the Photomontages produced is contained within the Landscape and Visual Baseline (document reference 6.3.11.1A, APP-191).

	Stoney Stanton/Sapcote - Misleading photoviewpoints at consultation and in relation to nighttime Scale of this development warrants photo montages of all viewpoints at construction stage, Year 1 and Year 15	
Stoney Stanton Action Group	IP raises concerns in relation landscape character, including: - Impact on Stoney Stanton, large scale warehousing B8 will be 'high' sensitivity to Stoney Stanton rolling farmland LCA 15 (Local Character Area) The visual amenity for footpath and bridleway users	See above.
Stoney Stanton Action Group Elmesthorpe Stands Together Stoney Stanton Action Group	IPs raise concerns on effectiveness of mitigation, the scale of the proposed development results in it occupying the majority of the main site area resulting in little room for meaningful landscaping to negate the visual impacts of the development from the north, south and east.	See above.
Stoney Stanton Parish Council Burbage Heritage Group Save Burbage Common	IPs raise concern over night-time lighting assessment is also limited, and clearly fails to appropriately consider the impact upon this current dark sky from a number of viewpoints, including numbers 9, 12, 20, 24, 25 and 32. These issues underline the fact that the significant harm at Year 15 may still be an under-representation of the level of damage this site may cause to the surrounding area.	See above.

Stoney Stanton Parish Council	Table 11.21 outlines 26 public viewpoints, covering a number of public rights of way and amenity areas, including from Burbage Common and Woods Country Park (PVP42) and St Mary's Church, Elmesthorpe. The latter is a Grade II Listed Building, illustrating an impact upon heritage assets. This level of impact still underlines the concerns noted in Section 4 (Socio-Economic Effects) as it is clear that the Applicant acknowledges the negative impact it will have upon users of key public rights of way within the surrounding area (mainly in the countryside), and general enjoyment of Burbage Common, a key amenity facility.	The effects of the Proposed Development on the heritage significance of the Grade II Listed St Mary's Church, Elmesthorpe, are set out in ES Chapter 13: Cultural Heritage. The impact on this asset is agreed with Blaby District Council in the SoCG.
Elmesthorpe Parish Council Stoney Stanton Parish Council Save Burbage Common	IPs raise comments in relation to PROW, including: - Proposals for T89 footpath give rise to specific safety concerns involving the B581 - Bridleway V29/7, redirection squeezes it within a narrow landscaped corridor, on an embankment with the rear/side of units 1 – 4 in close proximity. New footpath traversing east-west across the development site adjacent to the link road. Scale of development means that the link road is squeezed towards the south of the site and the new public right of way is then set to the south of this road link. Proposals do not offer an integrated public route, but a marginalised route with little outlook and a distinct lack of any legibility that it is within the countryside. This will create a safety issue, including graffiti to the acoustic fencing due to a lack of overlooking. This safety	The proposals would provide new, safe routes including broad natural green ways within which a shared use bridleway would be routed providing off-road access to Burbage Common and Country Park from Burbage Common Road North. Within the centre of the site permissive shared footpath/cycleways would be routed alongside the main internal road system within broad tree-lined avenues with verges.

	concern, given the truncation of other public rights of way, may lead to a perception that residents to the east of the Application Site cannot reach the public recreational nature areas to the west.	
Stoney Stanton Parish Council	The IP notes that 20 locations have significant effects at Year 15 which illustrates the failure of the development to appropriately assimilate itself into the area, namely with the settlements in this instance.	See above.
Stoney Stanton Parish Council Stoney Stanton Action Group Save Burbage Common	IP questions accuracy of assessment, the substantive issues are considered to be as follows: - There is a lack of clarity in respect of judgements provided within the assessment on how susceptibility and value has been derived for all the landscape and visual receptors, and how this has been applied in practice. In line with GLVIA3. - Justify why the right of way across the site is not a selected viewpoint (bridleway V29/6) - Clarification that the measures provided to mitigate the harm are the most appropriate options available and the maximum that can be delivered within the available land. The quantum of information provided in respect of assessing night time and lighting effects on residents and ecology.	See above. The methodology that has been utilised is in accordance with GLVIA3 and is set out in ES Chapter 11 Landscape and Visual Effects. The Applicant has provided further clarity on how these conclusions were reached via document reference: 6.1.11A, APP-120), submitted to the ExA at Deadline 1. The conclusions are unaltered.
Stoney Stanton Parish Council	IPs conclude that the information that has been provided by the Applicant outlines that there is still a significant impact at Year 15, even once the mitigation proposed has become established. Therefore that the	See above.

Stoney Stanton Action Group Elmesthorpe Stands Together	scheme cannot be adequately mitigated as currently proposed and thus causes significant landscape harm to the whole area, affecting both the countryside and settlements.	
Stoney Stanton Action Group	The IP states that the proposal will have a detrimental effect on people mental health and wellbeing	All potential changes in environmental and socio-economic changes, including changes in access and accessibility, amenity and visual effects have been assessed and addressed through the DCO process to protect the environment and health, and minimise disruption, stress and anxiety to local communities. It is acknowledged that the planning process is complex and typically not geared to local communities, (written for a technical audience to meet a complex regulatory assessment process). This can reduce transparency of which can compound community stress and anxiety. To help address this, a Health and Equality Briefing Note has been provided to signpost to how and where health has been assessed and addressed, and offer additional narrative to respond to risk perceptions, stress and anxiety.
Elmesthorpe Stands Together	Whilst the standard Tritax colour palette will help to blend with bleak winter weather, it will still be very visible the majority of the time, consideration should be made as to whether there is a more suitable colour palette.	Different aesthetic appearances of built form have been considered throughout the design process. The units have been designed to 'blend' within their surroundings, particularly in winter when they would be more visible. In other locations such as at Symmetry Park

		Aston Clinton, different colours have been used. However, the standard Tritax colour palette is considered the most appropriate in this location.
	Surface Water and Flood Risk	
Stoney Stanton Parish Council Elmesthorpe Parish Council Stoney Stanton Action Group Elmesthorpe Stands Together Narborough Parish Council Elmesthorpe Stands Together	IPs raise concerns in respect of the flood risk and drainage strategy of the application. Referred to evidence of local flooding which demonstrate that the local area is prone to flooding if waterways are not managed properly, including: • 2019 flooding and issues associated with Severn Trent. • River Soar in the vicinity of Littlethorpe • Stream to the rear of homes in Bostock Close • Properties to the south of the Bridle Path Road crossroads	The Flood Risk Assessment 6.2.14.1 (APP 209) acknowledges that there is currently a surface water flood risk within the Main HNRFI Site, which is generated by rainfall that is unable to drain into the ground or into the downstream watercourses quickly enough. To address this on-site risk, new surface water drainage infrastructure is proposed which will intercept and store storm water falling on the development, before discharging it to the surrounding watercourses. With the rainfall intercepted, the flood risk to the Main HNRFI Site will be reduced to an acceptable level. The Applicant has worked with the Environment Agency and Lead Local Flood Authority to ensure that flood management and surface water drainage strategies are robust. The Environment Agency and Lead Local Flood Authority have confirmed that proposed scheme seeks to appropriately mitigate flood risk and manage surface water in line with best practice guidance. The Applicant is working in collaboration with Severn Trent Water to agree details of foul water flows in order to inform their upgrade programme. Surface Water from the site does not enter the STW sewer network.

		The discharge rate from the development will be fixed at the pre-development (greenfield) rate, so that the rate of water leaving the site does not exceed the existing conditions. Therefore, the flood risk from the River Soar at Littlethorpe, and downstream of the site, including at Bostock Close and Bridle Path Road will not be adversely affected.
Stoney Stanton Parish Council	IP raises issues in relation to the rail port and the connections being set above flood level, this will ensure that the facility operates even during flood events, but raises concerns about the impact of the additional infrastructure provided within Flood Zones 2 and 3. The rail port will need to be set on embankments like the existing railway line which creates two key alterations to flood events which do not appear to be fully accounted within the information provided: - Raising the ground level significantly to allow the creation of the rail port reduces the storage capacity in the flood zone. - The rail port embankment will act as a barrier to the natural flow of flood waters over the land. The IP raises a key concern in that there does not appear to be compensation incorporated on site to offset the loss of storage capacity from the flood plain itself. This would mean that the proposal does not accord with the Environment Agency's Flood Risk advice and the NPPF/PPG on ensuring that there is no	The connection to the existing railway line will need to be made through an area currently at risk of flooding. This flooding is a product of surface water runoff from within the site, which ponds on land to the south of the railway line. This is due to the restrictive nature of the culverts though the railway embankment and the poor permeability of the underlying ground. To address this flood risk, new surface water drainage infrastructure is proposed which will intercept and store storm water falling on the development before it reaches the railway line. With the rainfall intercepted, the floodplain to the south of the railway line will be reduced. I.e.: The surface water runoff that generates the existing flooding will be relocated into surface water storage features within the development. This proposed approach was analysed within an Environment Agency approved hydraulic model which identified a reduction in peak flood levels to the south of the railway line, as well as on the northern side near to Elmsthorpe, i.e.: floodplain will not be adversely displaced.

	increased risk of flooding created off-site as a result of a development.	The existing railway embankment already acts as a barrier to overland flows leaving the site, but there are a number of existing culverts that provide connectivity to the downstream watercourses. The surface water drainage strategy has been designed to make use of the existing culverts so that the distribution of surface water runoff from the site is not adversely altered, and the capacity of the existing culverts is not exceeded. Surface water runoff will be discharged at the equivalent greenfield (pre-development) annual average discharge rate. This will ensure that under normal rainfall conditions there is no increase in the rate of water leaving the site. In larger storm events this will represent a reduction in the peak flow leaving the site, offering some downstream betterment. The Environment Agency and lead Local Flood Authority have confirmed that proposed scheme appropriately mitigates flood risk in line with best practice guidance.
Stoney Stanton Parish Council	IP raises concerns on the drainage strategy, whether it is appropriate to direct a large proportion of surface water towards below ground crate storage. Concern that this could place the surface levels close to ground water levels. Serious concerns in respect of the deliverability of the drainage scheme are raised.	Intrusive site investigations have been undertaken which have identified groundwater at over 3m below ground level. However, some shallower localised groundwater was also encountered. The shallow groundwater on the site is a product of impeded drainage conditions brought about by the cohesive underlying geology. The cohesive geology means that there is not a significant groundwater reservoir beneath the site. Where the shallow groundwater is encountered during construction, it can

		be safely addressed through localised dewatering. Therefore, the potential risk of groundwater ingress into the below ground storage components can be mitigated.
Stoney Stanton Parish Council	The IP states that the site is also the subject to significantly more surface water flooding than that indicated from the flood risk maps. Photographic evidence has been provided of the site being flooded on multiple occasions in recent years. This surface water flooding issue needs to be integrated into the drainage strategy to protect the wider area from flood risk.	The flood risk maps were prepared following a methodology agreed with the Environment Agency to identify the floodplain associated with the key watercourses. While the flood risk maps do not illustrate the overland flow pathways or waterlogging away from these watercourses, the contributing runoff from the surrounding catchment, including the site, is reflected in the flood flows applied to the watercourses. The Flood Risk Assessment 6.2.14.1 (APP 209) acknowledges that there is currently a surface water flood risk within the Main HNRFI Site, which is generated by rainfall that is unable to drain into the ground or into the downstream watercourses quickly enough. To address this on-site risk, new surface water drainage infrastructure is proposed which will intercept and store storm water falling on the development, before discharging it to the surrounding watercourses. With the rainfall intercepted, the flood risk to the Main HNRFI Site will be reduced to an acceptable level.
Elmesthorpe Parish Council	Requested further information from the Applicant, will reserve comment until this has been received.	Elmesthorpe Parish Council have raised a number of questions through consultation, relevant representation,

		and written representations. It is believed that appropriate responses have been provided.
Elmesthorpe Parish Council Stoney Stanton Action Group	IPs raise concerns that the drainage and sewerage infrastructure locally will be exacerbated once the site is developed. In particular at the pumping station on Bostock Close.	Surface water from the proposed development does not enter the Severn Trent Water sewer network. The applicant is working in collaboration with Severn Trent Water to agree details of foul water flows in order to inform their upgrade programme, this includes consideration of works to Bostock Close pumping station.
Stoney Stanton Action Group	IP raises concerns relating to Burbage Common SSSI and the impact of the development because the water cannot flow from the SSSI through the site as it currently does, means the site will be impacted from the development and will change the characteristics of drainage and water table.	Burbage Common Woods currently drains towards a watercourse that flows in an approximate northerly direction alongside Smithy Lane. This watercourse enters the western corner of main Orser Limits, before being culverted beneath the railway line and entering Burbage Common. The Proposed Scheme will not alter the catchment draining into the woods, and the flow route through the site and beneath the railway line will be preserved. Therefore, it will not adversely change the characteristics of drainage and water table.
Stoney Stanton Action Group	IP raises concerns in regards to extent of surveys and reliance on data, including the following paragraphs of ES chapter 14: - Paragraph 14.28 - Paragraph 14.32 - Paragraph 14.64 - Paragraphs 14.91-14.98 - Paragraph 14.128	Paragraph 14.28 of ES Chapter 14 6.1.14 (APP123) refers to the topographical survey of the local watercourses in and around the Main Order Limits which was undertaken to facilitate the creation of a hydraulic river model for this area. A hydraulic model was developed for this area as there was no existing flood data on which to base a site-specific assessment. It was not necessary to develop a hydraulic model for the other areas outside of the Main Order Limits (e.g.: for the highway junction and railway

	- Paragraph 14.147 - Paragraph 14.149 - Paragraphs 14.154-14.156 - Paragraph 14.158 - Paragraph 14.180 - Paragraph 14.191 - Paragraph 14.197 Paragraph 14.110	alterations), as these proposed works were identified to not be significant in terms of flood risk. To confirm, the flood model includes appropriate representation of the catchment hydrology and hydraulic interactions. The model has been peered reviewed by the Environment Agency who have confirmed that it is fit for purpose. As set out in paragraph 14.33 of ES Chapter 14 6.1.14 (APP123), it was acknowledged that the Flood Map for Planning did not give an accurate representation of fluvial flood risk in the local area. Therefore, a detailed hydraulic model was developed to address this gap in the data. The hydraulic modelling is based upon topographical surveys of the ground, watercourse channels, and hydraulic structures. This has been supplemented with asset data from Network Rail, Leicestershire Highways, National Highways, and Network Rail, as well as aerial LiDAR survey. This is a standard approach for developing hydraulic models. The hydraulic model was extended beyond the Main Order Limits so that potential hydraulic interactions with the wider area were accounted for, and it includes appropriate representation of the hydrological inputs from the wider catchment. The model has been peered reviewed by the Environment Agency who have confirmed that it is fit for purpose. Paragraph 14.64 of ES Chapter 14 6.1.14 (APP123) identifies the current Preliminary Flood Risk Assessment in Leicestershire at the time of writing. This remains the

		current Preliminary Flood Risk Assessment in Leicestershire. Leicestershire have published a series of flood investigation reports into specific areas in Leicestershire, which includes an investigation of the 2019 flooding in Stoney Stanton. However, the proposed development does not propose to discharge surface water though Stoney Stanton. Therefore, it will not affect flood risk in Stoney Stanton. Reference to the local plan was made as an acknowledgment of local flood risk policies. To confirm, paragraphs 14.91-14.98 of ES Chapter 14 6.1.14 (APP123) discuss the fluvial flood risk to the site. It was concluded that that the majority of the land inside the Main HNRFI Site is located outside of the floodplain and is at low risk of fluvial flooding. However, it is acknowledged that there are localised areas where water can pond, as well as an overland flow route near Burbage Common. Paragraph 14.128 of ES Chapter 14 6.1.14 (APP123) discusses the Flood Zone classification of the site. It identifies that the Flood Maps for Planning show that the majority of the site falls within Flood Zone 1. The Flood Maps for Planning are based on fluvial flooding in this location. The hydraulic flood modelling was prepared following a methodology agreed with the Environment

		Agency to identify the fluvial floodplain associated with the key watercourses. While the flood maps do not illustrate the overland flow pathways, surface water ponding, or waterlogging away from these watercourses, the contributing runoff from the surrounding catchment, including the site, is reflected in the flood flows applied to the watercourses. The model has been peered reviewed by the Environment Agency who have confirmed that it is fit for purpose. The Flood Risk Assessment 6.2.14.1 (APP 209) acknowledges that there is currently a surface water flood risk within the Main HNRFI Site, which is generated by rainfall that is unable to drain into the ground or into the downstream watercourses quickly enough. To address this on-site risk, new surface water drainage infrastructure is proposed which will intercept and store storm water falling on the development, before discharging it to the surrounding watercourses. With the rainfall intercepted, the flood risk to the Main HNRFI Site will be reduced to an acceptable level. Paragraph 14.110 of ES Chapter 14 6.1.14 (APP123) identifies that the Main HNRFI Site current drains via infiltration into the ground where geological and hydrogeological conditions allow, and then via runoff at surface level once the infiltration capacity of the ground has been exceeded. As set out in the Sustainable Drainage Statement 6.2.14.2 (APP210) the existing catchments in the site direct surface water runoff to the on-site sub tributary of the Thurlaston Brook, as well as to the watercourses to the north of the site via a number of

		culverts beneath the railway line. The proposed drainage strategy seeks to retain these outfall locations and preserve the distribution of surface water – i.e.: not all surface water runoff from the development will be directed to watercourse realigned to the east of the site. As set out in the Flood Risk Assessment 6.2.14.1 (APP 209), the discharge rate from the development will be fixed at the equivalent greenfield (pre-development) annual average discharge rate. This will ensure that under normal rainfall conditions there is no increase in the rate of water leaving the site. In larger storm events this will represent a reduction in the peak flow leaving the site, offering some downstream betterment. Paragraph 14.149 of ES Chapter 14 6.1.14 (APP123) follows on from paragraphs 14.147 and 14.148 which together confirm that the Main HNRFI and the A47 link road will be raised or reprofiled to address the current flood risk in these areas, but that measures to prevent an adverse impact on third party flooding are also included. This includes appropriate culverting beneath the A47 link road, and realignment of the watercourse in the site. This is also set out in the Flood Risk Assessment 6.2.14.1 (APP 209). The Flood Risk Assessment 6.2.14.1 (APP 209) acknowledges that there is currently a surface water flood risk within the Main HNRFI Site, which is generated by rainfall falling on the site that is unable to drain into the ground or into the downstream watercourses quickly enough. To address this on-site risk, new surface water

		drainage infrastructure is proposed which will intercept and store storm water falling on the development, before discharging it to the surrounding watercourses. With the rainfall intercepted, the flood risk to the Main HNRFI Site will be reduced to an acceptable level. The discharge rate from the development to the downstream watercourses will be fixed at the equivalent pre-development (greenfield) annual average discharge rate. In storm events up to the annual average storm (approximately equal to a 1 in 2.3-year event) the discharge rate from the site will remain as existing. In larger storm events this will represent a reduction in the peak flow leaving the site. This will mitigate the potential impact of the development on downstream flood risk, and also offer a marginal reduction in downstream flood levels. There will be no adverse impacts at Burbage Common Wood, the motorway, Aston Firs, Sapcote, Stoney Stanton, Elmesthorpe or Hinckley. The Flood Risk Assessment 6.2.14.1 (APP 209) includes analysis of the proposed conditions in the hydraulic model which demonstrates that the development will have no adverse impact in the surrounding area. The Environment Agency and Lead Local Flood Authority have confirmed that proposed scheme seeks to appropriately mitigate flood risk and manage surface water in line with best practice guidance. Paragraph 14.158 of ES Chapter 14 6.1.14 (APP123), identifies that the site is predominantly at low risk of flooding from fluvial and pluvial sources, but acknowledges that some areas of higher risk near

		watercourses on the Main HNRFI Site, A47 Link Road corridor and certain offsite highway and railway works. The hydraulic flood modelling was prepared following a methodology agreed with the Environment Agency to identify the fluvial floodplain associated with the key watercourses. While the flood maps do not illustrate the overland flow pathways, surface water ponding, or waterlogging away from these watercourses, the contributing runoff from the surrounding catchment, including the site, is reflected in the flood flows applied to the watercourses. The Flood Risk Assessment 6.2.14.1 (APP 209) acknowledges that there is currently a surface water flood risk within Site, which is generated by rainfall that is unable to drain into the ground or into the downstream watercourses quickly enough. A drainage strategy plan has been prepared to illustrate the potential surface water drainage strategy for the development, including the use of SuDS. This forms Figure 14.4 of the ES 6.3.14.4 (APP339). Further information on the drainage strategy is set out in the Sustainable Drainage Statement 6.2.14.2 (APP210). As stated in paragraph 14.22 of ES Chapter 14 6.1.14 (APP123), STW was also consulted in March 2021 to obtain records of existing water mains and to understand the capacity of the network to meet the demand of the

		Proposed Development. STW confirmed that the Proposed Development could be supplied from an existing trunk main which would include sufficient capacity for construction works. Paragraph 14.197 of ES Chapter 14 6.1.14 (APP123), refers to the profiling of ground levels with respect to the internal layout of the development, to ensure that surface water is directed away from buildings and towards the nearest drainage point. To confirm, ground levels will not be profiled to shed surface water out of the development in an uncontrolled manner. Surface water discharges from the development will be only made via formal outfalls. Intrusive site investigations have been undertaken which have identified underlying cohesive geology. The cohesive geology means that there is not a significant groundwater reservoir or flow pathway that could be negatively impacted by the development. Paragraph 14.110 of ES Chapter 14 6.1.14 (APP123) identifies that the Main HNRFI Site currently drains via infiltration into the ground where geological and hydrogeological conditions allow, and then via runoff at surface level once the infiltration capacity of the ground has been exceeded. However, it has also been acknowledged that infiltration is limited on the existing site due to the cohesive underlying ground conditions.

		Paragraph 14.150 of the ES Chapter 14 6.1.14 (APP123) identifies that the development would introduce a significant area of impermeable surfaces on to a currently greenfield area, and that without mitigation this has the potential to increase surface water runoff. In paragraphs 14.180 to 14.185, the chapter goes on to discuss the management of surface water runoff and the limitation of surface water discharge rates, as appropriate mitigation.
	Ground Conditions and Geology	
Friends of Narborough Station	IP query relating to underlying geology being able to support proposed trains and who will be responsible for the additional cost of maintaining tracks.	This line was specifically upgraded by Network Rail including the development of the Nuneaton Chord, completed in 2012, to take intermodal trains on the now designated Felixstowe to the Midlands and the North Strategic Freight Route. Network Rail anticipate that there will be very little additional maintenance required to the track, it is already maintained at Category 1 status. Additional track maintenance due to freight trains is covered by their individual ORR regulated Track Access Agreements. Freight trains in the UK are commercial private enterprises. Any additional costs of maintaining the turnouts and associated signalling will form part of a standard ORR regulated Connection Agreement paid for by the Terminal Operator.

	Health and wellbeing	
Stoney Stanton Action Group	IPs raise concern regarding impact on wellbeing of local residents by virtue of noise, pollution, scale of the development, traffic, light pollution, vibrations, loss of tranquillity, damage to ecology and traffic congestion in local area. Concern it will not improve the quality of life of those living locally (requirement of NPSNN), the local area does not require 'levelling up' - there are areas in the country where a development such as the one proposed would be welcomed as it would offer local much needed jobs and help to raise living standards. Concern regarding effects on Burbage Common and Woods and change in character and loss of tranquillity for important open space for the community.	All potential changes in environmental and socio-economic changes, including changes in access and accessibility, amenity and visual effects have been assessed and addressed through the DCO process to protect the environment and health, and minimise disruption, stress and anxiety to local communities. A Health and Equality Briefing Note has been further provided to signpost to how and where health has been assessed and addressed, and offers additional narrative to respond to community health concerns. The fundamental objective of planning and the regulatory assessment process is to protect the environment and health, and facilitate sustainable, vibrant and cohesive communities. All environmental changes directly attributable to the proposed development have been assessed and addressed through the regulatory assessment process, including visual, noise, air quality, light and transport impacts. Once operational, the facility aids the transport and distribution of products, items and materials important to maintaining sustainable development, community health and wellbeing, and presents significant socio-economic opportunities.

		The potential change in air, noise, visual and lighting effects have been assessed and addressed through the DCO process. As noted, the proposed development will not result in the loss of, or access to Burbage Common, and potential impacts on setting and use are addressed through the overlapping technical disciplines protective of the environment and health. While the project will result in change, the environmental impacts are addressed and the amenity value remains.
Stoney Stanton Action Group	IP raises concerns over 24/7 operation and impact on residents in summer months with open windows and noise and light concerns.	As detailed in ES Chapter 10: Noise and Vibration, and summarised in the Health and Equality Briefing Note, following mitigation, the increase in operational noise levels for the daytime and night time periods range between +0.1dB and +0.5dB on a weekday, and +0.4dB and +1.7dB on the weekend. This is below what is regarded a perceptible change in noise, and not of a nature or magnitude to result in any health outcome. Matters pertaining to lighting have reached an agreeable position in the BDC draft SoCG subject to the inclusion of an updated requirement in the dDCO submitted at Deadline 2.

Stoney Stanton Action Group	IP concern regarding mental wellbeing associated with local people feeling undervalued throughout consultation and associated uncertainty related to proposed development.	The consultation programme has run parallel to the entire DCO process, feeding into every technical discipline and applied to inform and refine the PEIR and the final DCO, including detailed responses to relevant representations, written representations and the Local Impact Reports. All consultation feedback is valued and applied to refine the application, its assessment and mitigation. It is acknowledged however, that the planning process is complex and typically not geared to local communities, (written for a technical audience to meet a complex regulatory assessment process). This can lead to community stress and anxiety. To help address this, a Health and Equality Briefing Note has been provided to signpost to how and where health has been assessed and addressed, and offer additional narrative to respond to risk perceptions, stress and anxiety. All tangible changes in environmental and socio-economic circumstance directly attributable to the proposed development have been explored through the planning process; assessed within the PIER; informed through engagement and written response; and refined through the final DCO with the objective to prevent, minimise and manage any potentially significant impact and associated disruption to local communities.

Burbage Parish Council	IP raises concerns regarding quality of this new open space to be provided. This is important, as good quality open space is known to improve both mental and physical wellbeing.	Landscape considerations have been a part of the design evolution since the land was first considered for development by TSH in 2016. The impact on the landscape has been considered at various stages including the initial extent of the development and the scale of detail of the design. Over 22ha of publicly accessible green space would be delivered adjacent to Burbage Common and Woods Country Park. In addition, Green Infrastructure corridors up to 50m wide and more are provided around the boundaries of the development to maintain green connectivity across the site and provide buffering to adjacent woodland. The Green Infrastructure proposals are illustrated on the Illustrative Landscape Masterplan (document reference 6.3.11.20). Overall Green and Blue Open Space accounts for approximately 28% of the Main HNRFI Site and A47 Link Road Corridor.
Burbage Parish Council Stoney Stanton Action Group	IPs raise concern regarding health assessments contained within the application. Specifically assessment appears to be focussed on rural rather than urban areas, and that the assessment does not identify any significant health effects.	Each technical discipline within the DCO provides a topic specific baseline, including the identification for topic specific sensitive receptors. This is needed as the hazard nature, geographic and temporal distribution vary by discipline, as does receptor sensitivity. An additional health baseline is included within the Health and Equality Briefing Note to offer additional context,

		including how the geographic scope and nature of the health baseline follows the varying sphere of influence for the key overlapping technical disciplines (air, noise, transport etc). This included communities living several wards including Croft Hill; Hinckley de Montford; Burbage St Catherine's & Lash Hill; Stanton & Flamville; Barwell; Broughton Astley-Primethorpe & Sutton; Cosby with South Whetstone; Lutterworth West; Ullesthorpe; and Revel and Binley Woods. This is then supplemented and contrasted against date from Blaby; Hinckley & Bosworth; Harborough; and Rugby Districts, as well as national data where appropriate. The DCO is therefore appropriately scoped, and a proportionate and robust assessment has been provided. The Health and Equality Briefing Note, is a summary of all pertinent technical assessments in the DCO with the potential to influence health, and includes the impact significance conclusion drawn and supported within each of these technical assessments. Please note that each technical discipline constitutes an individual health determinant (air, noise, transport etc), and focuses on removing and managing potential hazards, such that they do not constitute a significant risk to the environment or health.

	Heritage	
Elmesthorpe Stands Together Stoney Stanton Action Group	The IPs identify that the impact on the archaeological and heritage areas are of importance to the local community and concerns that it will not respond to local character and history nor reflect the identity of the local surroundings.	The impact on cultural heritage receptors and the historic environment, including relevant designated and non-designated heritage assets within and around the DCO Site, is set out in ES Chapter 13: Cultural Heritage (document reference: 6.1.13, APP-122).
	Climate change	
Stoney Stanton Action Group	IP concerned over limited mitigation identified to address the huge challenges of Climate Change for their employees, will affect the workforce when travelling, and the operating conditions on site.	See The Flood Risk Assessment 6.2.14.1 (APP-209) which allows for the predicted effects of climate change and sets out any robust mitigation measures required from a flood perspective to the development and surrounding areas. This also considered the accessibility of the site during an extreme flood event. See also the Energy & Climate Change chapter 6.1.18 (APP-127) and the corresponding Appendix to the chapter 6.2.18.9 (APP-225), which consider other effects of climate change more widely and scheme's resilience to those effects.