



The countryside charity
Leicestershire

Charity Number: 1164985

HINCKLEY RAIL FREIGHT TERMINAL

Comments on Written Submissions

CPRE Leicestershire

Unique Reference: 20038675

(With Sapcote (UR 20039514))

Oct 2023

1. CPRE Leicestershire has read with concern the comments submitted for the 10 October, particularly by Leicestershire County Council, which suggest significant transport omissions from the evidence, as well as material which has been shared with the Transport Working Group (TWG) but not submitted for the hearings which could materially impact on the ability of residents and interested parties to reasonably comment on the proposals.
2. The appended list is not comprehensive but identifies some of those notable missing elements as well as elements not included in the submission but shared with the TWG.
3. This would include material which is fundamental to determining whether access is 'safe and suitable' according to the NPPF, such as the select link information for Sapcote.
4. As we have already set out, some evidence currently presented is not open to proper interrogation, for example the location of traffic counts (Table 8.3, EA Transport) and the figures behind the diagrammatic red and green traffic lines (Fig 5.10/5.11 TA) and there is no draft emergency plan (Para 8.322 EA).
5. Given what now appears to be the case in relation to other incomplete evidence, we have serious concerns as to how reliable the submitted evidence should be considered to be.

6. We would also urge that relevant material shown to the TWG, such as the Sapcote Select Link data, be submitted to the hearings with an opportunity for third parties to comment on it.

Appendix: Notable Information Gaps (not comprehensive)

Leicestershire County Council Summary Document (TR 050007-001349)

- 1.5 no stage 1 road safety audit (RSA) and designer's response to the access link. to show access road safe and suitable
- 1.7 no junction assessment of access roads link
- 1.8 no continuous 3m footway/cycleway on the link road
- 1.9 no structural assessment of Junction 2 of the M69
- 1.14 furnishing data out of date.
- 1.15. development at Padge Hall Farm not been included in the model
- 1.18 strategic impact of the HGV strategy unknown and not reflected in either the strategic or local models
- 1.20 no detailed select link analysis to identify the severity of the impact on Sapcote.
- 1.23 Only 21 of the 45 junctions which are over capacity assessed
- 1.24. no assessment of M69 Jn3
- 1.31 no stage 1 road safety audit (RSA) and designer's response to mitigation
- 1.32 no modelling of mitigation
- 1.34 mitigation at Sapcote does not relate to the impact
- 1.35 not evident that the HGV routing strategy, and associated Requirements, is comprehensive, robust, implementable, or enforceable.
- 1.37 no evidence on PROW standards
- 1.38 Construction Environmental Management Plan and Construction Traffic Management Plan not drafted in any detail

Leicestershire County Council Main Document (TR 050007-001348)

Additional Points

- 2.27 no vehicle tracking provided for HGVs
- 2.39 collision data from 2015-2019
- 2.44 furnishing relies on 2017-2019 counts
- 2.51 lorry park movements not included
- 2.55 Padge Hall 20% more traffic on A5
- 2.67 modelling information provided to the TWG included details not in the submission.
- 2.68 no unconstrained development modelling
- 2.72 detailed select link information on Sapcote shown to TWG but not in submission. Assessment of village not provided
- 2.89 basic design information for off-site mitigation missing from submission
- 2.100 route strategy enforcement not discussed with HA.
- 2.116 construction traffic routing limited info