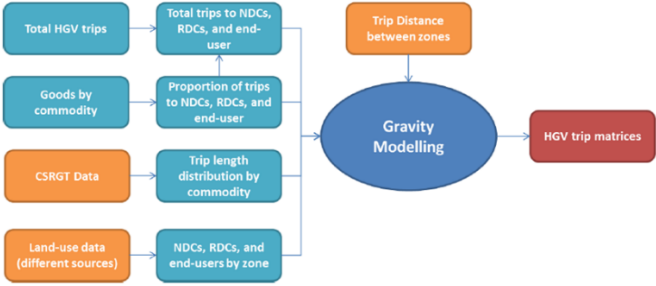


Hinckley & Bosworth Borough Council
Interested Party Reference Number: 20039546

Deadline 3 Submission:
Response to Written Representation Comments

**Application by Tritax Symmetry (Hinckley) Limited for an
Order Granting Development Consent for the Hinckley
National Rail Freight Interchange**

(ref. TR050007)

Response Page Reference	Matter	Applicant's Deadline 2 Response	Hinckley & Bosworth Borough Council Response
	Transport & Traffic		
58	The strategic modelling has not included any sensitivity tests around HGV routing or the employment distribution.	Refer to Applicant's response to Relevant Representations; Appendix A Highways Position Statement (document reference: 18.2.1, REP1-033) and the Applicant's response to the Hinckley and Bosworth Local Impact Report (document reference: 18.4).	<p>The applicant's response does not address the Council's issue, which was raised very early on in the process at the Transport Working Group. The point remains the same; HGV routing is very important to HBBC, as seen by the use of the A47 to the site, and in relation to movements at J21 of the M1. The strategic modelling used a complex set of assumptions to derive an HGV distribution, (See Figure 13 of the Trip Distribution Note applicant document 6.2.8.1 below)</p>  <p>Figure 13: Proposed Overall Approach to Developing NRFI HGV Matrices</p> <p>However, there will be a wide variation around each of these layered assumptions. No attempt has been made to undertake sensitivity testing or even obtain good local data (for example from DIRFT via mobile phone data) to substantiate the estimates.</p> <p>In addition, it seems that the distribution used contradicts the needs case for the scheme.</p> <p>Applicant doc 16.1 Market Need states the following: It is important to note that the dependence on the Leicester market which is accessible via the</p>

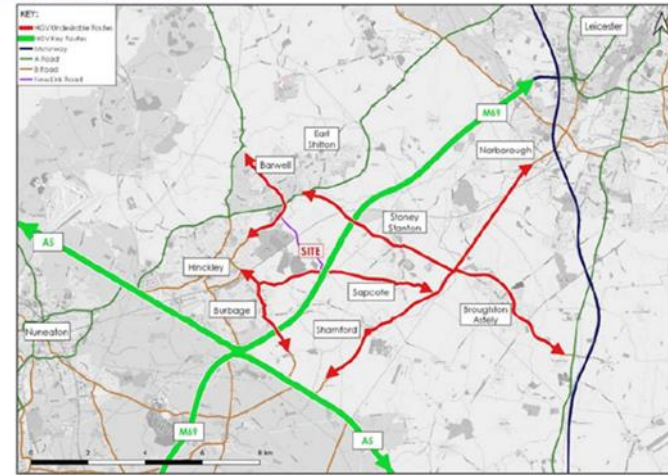
			<p>congested J21 of the M1 and the statement that ‘the optimal maximum distance for the road leg is c 20 miles</p> <p>6.10 Its location within the Midlands region enables a network of rail terminals to work together allowing each to be used for the most efficient local distribution by electric HGV and increase the overall transfer of more freight to rail from long haul HGV.</p> <p>6.11 In terms of onward distribution, the rail element is one leg, with the next being either into an adjoining warehouse on the SRFI development, or into the surrounding region. For HNRFI, having worked with terminal operators with road haulage services⁴¹, the optimal maximum distance for the road leg is c20 miles / 45 minutes drive time.</p> <p>6.12 This means that the Midlands market will primarily operate such that:</p> <ul style="list-style-type: none">• West Midlands Interchange, will serve the Black County, Southern Staffordshire• Hams Hall will serve north Birmingham and along the M42, to Solihull.• Landor St will serve Central Birmingham,• BIFT will serve Tamworth and North,• HNRFI will serve Coventry through to Leicester South, including Magna Park for deep sea / east coast, west coast and domestic time sensitive flows. <p>However, in the applicant’s Traffic Distribution report (applicant document 6.2.8.1), Figure 18 indicates that only 20% of HGV trips from the HNRFI facility are in the 0-25 mile distance range from the facility . This implies that either the distribution is incorrect, or that this particular element of the needs case has not been included in the HGV trip distribution method used.</p>
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			<p>Figure 18: Observed vs Modelled TLDs: All HGV Movements</p> <table border="1"> <thead> <tr> <th>Distance Range</th> <th>Target (CSRG)</th> <th>To NRFI AM_2026 (Calibrated)</th> <th>From NRFI PM_2026 (Calibrated)</th> </tr> </thead> <tbody> <tr> <td>0</td> <td>0%</td> <td>0%</td> <td>0%</td> </tr> <tr> <td>0-25</td> <td>18%</td> <td>20%</td> <td>20%</td> </tr> <tr> <td>25-50</td> <td>18%</td> <td>18%</td> <td>16%</td> </tr> <tr> <td>50-100</td> <td>25%</td> <td>27%</td> <td>27%</td> </tr> <tr> <td>100-150</td> <td>13%</td> <td>10%</td> <td>10%</td> </tr> <tr> <td>150-200</td> <td>12%</td> <td>17%</td> <td>17%</td> </tr> <tr> <td>200-300</td> <td>11%</td> <td>7%</td> <td>7%</td> </tr> <tr> <td>>300</td> <td>3%</td> <td>2%</td> <td>2%</td> </tr> </tbody> </table>	Distance Range	Target (CSRG)	To NRFI AM_2026 (Calibrated)	From NRFI PM_2026 (Calibrated)	0	0%	0%	0%	0-25	18%	20%	20%	25-50	18%	18%	16%	50-100	25%	27%	27%	100-150	13%	10%	10%	150-200	12%	17%	17%	200-300	11%	7%	7%	>300	3%	2%	2%
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58	Little underlying source data, and there are no actual surveys of similar facilities to provide good information on the likely distribution of freight trips.	Refer to Applicant’s response to Relevant Representations; Appendix A Highways Position Statement (document reference: 18.2.1, REP1-033) and the Applicant’s response to the Hinckley and Bosworth Local Impact Report (document reference: 18.4).	These responses do not deal with the issue, which is that the HGV distribution method uses outdated data and that information, using for example mobile phone data from nearby strategic rail freight interchanges such as DIRFT, could have been used to at the least ‘sense check ‘ the distribution used.																																				
58	The Council requested the applicant undertake an LTN 1/20 audit of the links (and proposed mitigation) for cycling (and walking) between the site and key local residential areas and the station, and this	Refer to Applicant’s response to Relevant Representations; Appendix A Highways Position Statement (document reference: 18.2.1, REP1-033) and the Hinckley and Bosworth Local Impact Report (document reference: 18.4).	The Council notes that the proposals are for a nationally significant development with some 8-10,000 jobs and costing in the region of £850m but proposes no real connections by cycling to urban Hinckley and the railway station some 3-4km away, and very little improvement to walking and cycling connections to nearby Earl Shilton and Barwell. Public transport proposals to these areas are not adequate. This is critical as the best opportunities of encouraging sustainable transport lies with these nearby settlements in the borough.																																				

	will clarify if the proposals are adequate- this has not been undertaken.		
59	There is no reconciliation of the parking proposals with the travel generation and the travel plan mode shift objectives.	Relevant Representations; Appendix A Highways Position Statement (document reference: 18.2.1, REP1-033) and the Hinckley and Bosworth Local Impact Report (document reference: 18.4)	These do not respond to this issue; the applicant at the oral hearing on transport made reference to sustainable transport mitigation reducing any impact on J21 of the M1, it is unlikely to achieve this without appropriate parking controls.
	HGV Routing		
66	The applicants' HGV management strategy indicates that HGVs from the site will not use the B4468 Leicester road to the north of the site (and by assumption the link road here); this is welcomed by the Council, but it is noted that the applicant's transport modelling does show HGV's using this	The route is undesirable, not prohibited. Measures to limit HV traffic on these routes are to be communicated by site management, but they are not to be limited as the connection provides linkage to the A47.	<p>Extracts from applicant document Traffic forecasting report:</p> <p>Figure 2.2: Heavy Vehicles Trip Distribution to and from the Hinckley NRF1 Development Site for 2026 and 2036 (in PCUs)</p>

route. This implies that the traffic assessment is therefore incorrect, and these HGVs will be using other routes, and more information is needed to assess the local impact of HGV movements. The Council also has concerns about how the enforcement of the HGV strategy will be secured and undertaken.

Figure 4: Undesirable HGV Routes



Above extract from HGV Management Strategy, Figure 4.

The Council interprets the applicant’s verbal response at ISH2 that this is a mistake, and that HGVs are meant to use the Link road, the B4468 and the A47 to and from the A5. However, this contradicts the text of the report which supports Figure 4. Para 3.11 describes the ‘undesirable routes’; including ‘c) To / from A5 west via: • Link Road, B4668, A47’ – a footnote to this text states that ‘Non-standard height HGVs which require more than 4.6m height clearance will be permitted to use the A47 to connect to the A5(W) at Dodwells as a means of avoiding the low bridge’.

The HGV management Strategy is a core concern of local residents and businesses and the Council, and it is clear that this confusion over a very important matter will have had an effect on how respondents to the public consultations perceived the scheme and responded accordingly.

In the Council’s view it is inappropriate to depend on the A47 and B4468 as a core link from the west to a National Strategic Rail Freight Interchange;

			<p>these vehicles should use the A5 and M69 to and from the site. To do otherwise would mean that while the strategic case of the site depends on SRN access, this is severely compromised from two directions in the west and two North (J21 of the M1).</p> <p>The A47 is an A-road (and the B4468 is a B-road), but is 30mph (or 40mph) for much of its length; it has a shared use walk/cycle path along it and while it has little frontage development, it sits between the main parts Hinckley and new housing and employment areas to the west and the established centres of Barwell and Earl Shilton (as well as growing nearby villages such as Stoke Golding). In addition, the new SUEs (Barwell and Earl Shilton) are to the west of it. It is therefore a key severance element in the urban fabric of Hinckley, and the A47's original function may have been to 'bypass' Hinckley it has now been leapfrogged by development and its nature has changed. The route carries some HGV traffic, and this is expected, as it leads to some key employment areas. However the addition of all north/west bound traffic from the HRNFI will mean a very significant increase in HGVs on the route, to the detriment of the environment of the surrounding communities and the people needing to cross the road, particularly by walking and cycling.</p> <p>The Council notes that in the Traffic forecasting report (applicant document 6.8.1' it states:</p> <p><i>'3.2.3 For heavy vehicles, a greater proportion of the trips from the west is forecast to route via the A5, turning left at the A5 / A47 Dodwells roundabout to continue on the A47 then joining the proposed link road as shown in Figure 3.2. This route is considerably shorter than the M6 and M69 route, and given the higher operating costs for heavy vehicles, this is the more attractive route. In addition, heavy vehicle speeds are lower than those of light vehicles on the M42, M6 and M69 (limited to 60mph), as such heavy vehicles are forecast to route via the A5 rather than the M69.</i></p> <p><i>3.2.4 As shown in Figure 3.3, a small proportion of heavy vehicles is also forecast to route via the A447 Ashby Road to / from the north</i></p>
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			<p><i>(approximately 25 vehicle trips on Ashby Road, immediately north of the A47 in the 2036 AM Peak hour). These trips have an origin and destination in locations including Coalville, Ashby-de-la-Zouch and beyond (including Derby). Routeing via the M1 and M69 is approximately 8km longer from Coalville than routeing via Ashby Road. Journey times between the two routes are comparable for light vehicles, however routeing via Ashby Road is faster than routeing via the M1 and M69 for heavy vehicles given the lower motorway speeds. In addition, vehicle operating costs for heavy vehicles are higher per kilometre than light vehicles, making Ashby Road more attractive’.</i></p> <p>It is clear that without effective HGV management, HNRFI HGVs will avoid the SRN and have a greater impact on local roads. The impact on Ashby Road by HGVs is also of concern to the Council.</p> <p>The HNRFI traffic should be required to use the A5 and M69, with local access HGV traffic only being permitted to use the link road to the west.</p> <p>The Council notes that the strategy also indicates (para3.12) that ‘In case of an accident on the Strategic Road Network, there will be an emergency plan in place which will include alternative routes to/from the Main HNRFI site. This is likely to make use of the A47 connecting the A5 with the site and the SRN to the north but will be confirmed with the relevant authorities.’ This will have a very significant impact on the A47 and the local communities close by it. We note that the development proposals reduce all residence on the M69 to the north and will impact resilience on the south.</p> <p>The Council awaits with interest the outcome of the ExA request made at ISH2 for the modelling of the impact on the local highway network of a scenario where access to or from the M69 is unavailable.</p>

	Sustainable Transport		
80	The X6 bus contribution is flawed as LCC have rejected it as they do not operate the service. The X6 is impractical as it does not stop at the site	The X6 is operated by Arriva between Coventry and Leicester, these are two significant cities within a short distance from the site and present likely sources of employees at the site. The service is proposed to be enhanced and will enter the site.	The Council requests that evidence is provided to the ExA of the agreement reached with Arriva regarding the re-routing of the X6 service.
80	Demand Responsive Transport (DRT) is understood to be a DfT trial service which cannot be relied upon to continue and for which there is no fallback support in the draft s106 should the trial be withdrawn.	See response to HBBC LIR for further detail (document reference 18.4, response number 41)	The LIR response simply refers back to the Sustainable Transport Strategy which does not address the matter of the DRT being unreliable in the future as it is currently a DfT trial.
81	Figure 13 of the Sustainable Transport Strategy indicates that there is a possibility of fixed bus routes directly into the site from Hinckley, Earl Shilton and Barwell, but there is no explanation as to	Table 6 of the Sustainable Transport Strategy (document reference: 6.2.8.1, APP-153) outlines the approach to the bus operation in the areas indicated in Figure 13. This service would be privately funded by the site.	The Council requests that the ExA be provided with more detail on this matter – what service is to be privately funded by the site and how is that going to be secured into the future?

	how this could be secured, nor is it a provision in the draft s106 and therefore there is no guarantee that suitable bus transport is going to be accessible for commuters to get to the development site.		
81	No additional connectivity between the railway station and the site other than DRT.	See response to HBBC LIR for further detail (document reference 18.4) (response number 41)	The LIR response simply refers back to the Sustainable Transport Strategy which does not address the matter of connectivity to the railway station.
81	Poor walking connectivity to the units within the site and no detail of the buses to stop at the bus stops within the site.	See response to HBBC LIR for further detail (document reference 18.4) (response number 41)	The LIR response simply refers back to the Sustainable Transport Strategy which does not address the matter of walking connectivity to the bus stops.
	Landscape & Visual Effects		
90	The separation between the main site and the Burbage Common and Woods Country Park is not 'generous' achieving natural separation.	The Landscape Strategy includes woodland and tree planting which maintains good visual separation with Burbage Common and Woods Country Park as demonstrated in the Photomontages, Figure 11.16 (document reference: 6.3.11.16, APP-	The proposed development (including the proposed A47 Link Road and overbridge) will be very close to the Country Park. Whilst woodland and the bunding may screen views from some areas of the Country Park, from other areas views of the proposed buildings and lighting columns will remain (e.g. PVP 3).

		300). Over 22ha of publicly accessible green space would be delivered adjacent to Burbage Common and Woods Country Park.	
91	While the site itself is low lying and appears visually enclosed from within, with views partially contained by the woodland backdrop at Aston Firs and the mature trees and hedgerows within the site – it sits as part of a more visually exposed low-lying vale, with settlements on surrounding minor ridges. Apart from Burbage Wood and Aston Firs this is an open, unwooded landscape with a limited sense of enclosure provided by low trimmed hedgerows with mature trees allowing long views, both within and across from	The boundary planting will be very effective at screening views of much of the development over the longer term, particularly the lower active zone where movement of trains, HGV's and containers would otherwise be a distracting feature in views from the surrounding area.	The upper parts of the proposed development (e.g. roofline and gantries) will remain visible above proposed vegetation in the long-term, reflected in the large number of residual significant visual effects reported (agreed within the draft SoCG).

	surrounding higher land.		
92	It is currently unclear as to how offsite BNG and the provision of a green area as an extension to Burbage Common will offset the loss of habitat while maintaining habitat connectivity.	Requirement 30 will ensure the development delivers a 10% net gain. Whilst BNG assessments are ongoing, current calculations show there is sufficient scope to deliver net gains on site, with options to deliver additional through off-site solutions. Green corridors at the site boundary will maintain connectivity across the site.	As per SoCG further detail is required regarding refinement of the on-site calculations and confirmation of the offsite BNG proposals
	Design		
100	HBBC feels the proposals do not constitute 'Good Design' and have jointly commissioned a Landscape Design Review with Blaby District Council within which the merits of the proposal are considered taking into account the applicant's submitted 'design code' and the National Design Guide, National Model Design Code and the HBBC Good	The matter of design and the applicant's response to design is addressed in a detailed document appended to the Local Impact Report response as Appendix A (document reference: 18.4.1). Should this work have been presented during consultation and ahead of submission it would have been considered in the proposals, nevertheless the Applicant has considered the recommendations of the Landscape Design Review and has updated the Design Code (document reference: 13.1, APP-354) and Design and Access Statement (document reference: 8.1, APP-349) accordingly.	The design code lacks clarity in any detail of what is being proposed. Additionally, there is not enough detail in the document to comment on how the feedback has shaped the design code. Conversely It is evident that a substantial portion of the modifications to the design code aims to reduce prescriptiveness and introduce greater vagueness.

	<p>Design Guide SPD. The design of the Proposed Development has significant deficiencies and fails to meet the criteria for 'good design' set out in paragraphs 4.28 – 4.35 of the NPSNN. BDC would go as far as to consider the scheme constitutes poor design.</p>		
	Health		
102	<p>Within the DCO Appendix 7.1 Health and Equalities Briefing Note, the applicant has presented some of the national and local legislative and policy requirements pertinent to the assessment of health and equality. However, the Leicestershire 2022-2032 Joint Health and Wellbeing</p>	<p>The JHWS is not included in the legislative and policy review section of the Health and Equality Briefing Note, as it is not legislation or policy. The health and wellbeing baseline included in the Health and Equalities Briefing Note (document reference 6.2.7.1A) does however apply the data which will have informed the JHWS and presents a consistent message on local health circumstance.</p>	<p>While the JHWS might not be legislative or policy, it is a key document that identifies the strategic priorities to improve health and wellbeing outcomes and impact on the wider determinants of health for Leicestershire and therefore provides relevant and appropriate local context to inform assessment of health impacts.</p>

	<p>Strategy (JHWS) has not been included in this analysis. This is a key health focused document that provides an overview of the current health and wellbeing of the County as well as send the overarching vision for the health of the County's residents and the strategic priorities.</p>		
104	<p>Further, the Council considers that insufficient regard has been given to identify vulnerable groups who will be affected by the proposal – the gypsy and traveller community located to the south of the development site; older people (using the Council's study area over 20% of the population are over 65) and people suffering from poor mental health</p>	<p>Each technical discipline provides an appropriate baseline and receptor sensitivity to inform the assessment. The traveling community are noted as receptors, as are all present residential receptors, where nationally recognised assessment protocols are then applied to protect the environment and health.</p>	<p>The Council's concern remains. It is acknowledged that the traveling community are noted receptors in certain technical assessments but not all of the relevant areas for example, Socio-economics.</p> <p>As per the Health Impact Assessment Spatial Planning Guidance (as referenced in paragraph 1.42 in the updated Appendix), the need to identify characteristics is important to understand how sensitive population groups or areas are to the impact of a development project. The appendix has not included analysis on these groups.</p>

	(within the study area GP data indicates a higher than average problem with mental health, including depression).		
104	Based on the QoF NHS Digital data, half of the GP practices surrounding the Development Site have higher than the national average prevalence of obesity. Providing secure, convenient, and open/green space could lead to more physical activity and reduce levels of obesity along with heart disease, strokes and other ill-health problems that are associated with both sedentary occupations and stressful lifestyles. The proximity of the development to Burbage Common	The proposed development does not materially impact opportunities for physical activity or recreation, and the mitigation seeks to manage any potential disruption that might alter user experience (including alternative green space).	The Council's concern remains that the impact of the development on the attractiveness of the Common and Woods as a recreational amenity will be detrimental and is likely to lead to fewer people using it, thus diminishing the availability of recreational amenities for the local population where there is a greater prevalence of obesity. The Council is concerned about the quality of the additional proposed green space as a recreational resource, both due to its proximity to the HNRFI facility and as it is meant to serve a BNG purpose and public accessibility will therefore need to be very limited compared to the access over the Common.

	and Woods is likely to reduce their awareness as a recreational resource and exacerbate the existing health related issues.		
105	As expressed above although the proposal will provide 22ha of new publicly accessible green space south of the proposed link road, which will be provided with permissive public access, the quality of the proposed space is questioned. This is important as good quality open space enhances community wellbeing by offering areas for recreation, relaxation and social interaction which contribute to physical and mental health. Overall, based on the information provided by the applicant	The reprovision of a bridleway that will now pass through an urban setting will not materially impact access to physical activity or mental wellbeing on the basis that several nearby alternative routes which also pass through natural setting exist and can be used if that is the preference.	Clarification is required on how the conclusion of “not materially impact to physical activity or mental wellbeing” has been achieved. No analysis which examines alternative routes has been provided. It is argued that qualitative assessment, informed by consultation would be appropriate.

	there is a limited understanding of how the adverse effects on Burbage Common will impact residents' use of the open space.		
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