

HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE

*Blaby District Council (IP ref.
20040018) Written statement of
oral case at ISH4 (ref. TR05007).*

Deadline 3 - November 14, 2023

1 Agenda Item 1 - Introduction

- 1.1 This document contains a summary of Blaby District Council's (BDC) oral submissions at Issue Specific Hearing 4 (ISH4) held on 1 November 2023.
- 1.2 Where the comment is a post-hearing comment submitted by BDC, this is indicated. This document uses the headings for each item in the agenda published for Issue Specific Hearing 4 [EV8-001] on 24 October 2023 by the Examining Authority.
- 1.3 BDC is the planning authority for Blaby District and has a statutory function in the geographic area of the Proposed Hinckley National Rail Freight Interchange (the Proposed Development), promoted by Tritax Symmetry Limited (the Applicant).
- 1.4 BDC was represented at ISH4 by Duncan O'Connor, Partner, BDB Pitmans LLP (DO), DO introduced the following BDC representatives to the Examining Authority (ExA):
 - 1.4.1 Edward Stacey, Major Schemes Officer, BDC (ES); and
 - 1.4.2 Matt Kinghan, Director, Icen Projects Limited (MK) (also representing Hinckley and Bosworth Borough Council (HBBC) and Leicestershire County Council (LCC)).

2 Agenda Item 2 - Purpose of the Issue Specific Hearing

- 2.1 BDC did not make any submissions under this agenda item.

3 Agenda Item 3 – Conformity with National, Regional and local Policy

- 3.1 DO raised points in relation to conformity with the National Policy Statement for National Networks (NPSNN) and the Draft National Policy Statement for National Networks (dNPSNN). Specifically in relation to rail connectivity and paragraphs 4.83 – 4.89 of the NPSNN and paragraphs 4.78 and 4.83 – 4.87 of the dNPSNN.
- 3.2 DO submitted that the national need for SRFIs as identified in the NPSNN is based around the role played by SRFIs in facilitating the transfer of freight from road to rail. Such transfer is recognised as being important for reducing trip mileage of freight movements on both the national and local road networks and supporting the development of a low carbon economy helping to address climate change.
- 3.3 DO noted that whilst requirement 10 of the draft Development Consent Order (dDCO) secures the delivery of a rail connection *capable* of handling a certain number of freight trains per day, there is nothing in the dDCO which secures the *use* of that rail connection or requires a proportion of freight handled by the proposed development to be moved by rail. Accordingly, there is nothing in the dDCO itself which secures the transfer of freight from road to rail which is the

basis of the national need identified in NPSNN. Rather, the ExA is being asked to rely on evidence from the Applicant as to the existence of a market for rail freight and the operation of other SRFI's.

4 Agenda Item 4 – Assessment/Catchment areas

4.1 BDC made no submissions on this agenda item.

5 Agenda Item 5 – Evidence Base and Employment Trends

5.1 ES stated as a general update that BDC have reviewed the updated skills and training programme provided by the Applicant and will be submitting a joint version at Deadline 3 from BDC, HBBC and LCC (See Appendix 1 of BDC's comments on Deadline 2 submissions). Overall, BDC's key priority is that if the DCO is granted, to ensure that Blaby's residents receive the socio-economic benefits purported by the Applicant.

6 Agenda Item 6 – Market Interest

6.1 BDC made no submissions on this agenda item.

7 Agenda Item 7 – Potential Housing Growth and Local Impacts

7.1 MK made submissions on behalf of BDC as well as the other host authorities, HBBC and LCC.

7.2 MK raised a concern on the independence and objectivity of the 2021 Warehousing Needs Study (the "2021 Study") as the Applicant is listed as a stakeholder. MK noted that the Planning Practice Guidance on Housing and Economic Needs (PPG) assessment states:

How can authorities assess need and allocate space for logistics? ... Where a need for such facilities may exist, strategic policy-making authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas. This can be informed by: engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies.

7.3 In light of the above guidance, MK noted that there is a difference in methodologies in terms of need between the 2021 Study and the Applicant's Market Needs Assessment [[APP-357](#)]. MK noted that the 2021 Study draws notably on completions trends with a margin for flexibility. This reflects the PPG which states:

"How can market signals be used to forecast future need? ... analysis based on the past take-up of employment land... It is important to consider recent employment land take-up and projections (based on past trends) and forecasts

(based on future scenarios)... analysis of market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies.”

- 7.4 The 2021 Study draws on the confirmed Functional Economic Market Area (FEMA) for plan making purposes. The Applicant’s Market Assessment is scheme specific and has an alternate although not dissimilar area coverage. It also incorporates a ‘suppressed demand’ model that attempts to ‘top up’ the need based on the previous decade’s modelled undersupply, a technique not clearly recognised in the PPG but more recently brought forward by Savills and the British Property Federation.
- 7.5 MK then directed attention to employment and unemployment figures. MK noted that the assumptions on the catchment for jobs mean it is likely that in commuting will be greatest from the urban areas of Leicester, Coventry and Rugby. A local skills programme should seek to maximise local labour and other mitigation to minimise unsustainable in commuting.
- 7.6 MK then discussed the Host Authorities position on the Proposed Development’s impact on housing need. MK noted that the 2022 Leicester & Leicestershire Housing & Economic Needs Assessment (table 8.3) estimates that the standard method housing requirement will provide a labour supply supporting approximately 89,000 jobs by 2036. The aspirational growth scenario (table 6.3) suggests only 63,000 jobs would be created by this point. MK submitted that even with the Proposed Development it is unlikely that a housing need shortfall will arise at the Housing Market Area (“HMA”) level.
- 7.7 Notwithstanding the above, MK noted that there is some inconsistency between the Applicant’s assessment of the origins of labour supply in the Environmental statement (TRIP model) and their assessment of impact on the HMA, the two assessment areas are different. However, MK noted that the Proposed Development is unlikely to lead to an undersupply of labour at the HMA level.
- 7.8 MK submitted that the Host Authorities key concern is the Proposed Development’s impact on housing affordability, with below average wages anticipated for the Proposed Development meaning housing affordability for ownership will be unachievable. MK noted that there is a very limited rental market in Blaby, Hinckley and Bosworth, indicating greater in commuting from urban areas such as Leicester, Rugby and Coventry, which needs to be reflected and mitigated against.
- 7.9 Finally in relation to skills the worker profile, it is likely to reflect those in urban areas rather than of those in Blaby and Hinckley and Bosworth. The Applicant’s assessment is inconsistent in terms of skill requirements with the TRIP model assuming low skills but the ES outcomes assumes a higher skills base. MK concluded that this needs to be clarified through the emerging skills and training programme.

- 7.10 To conclude BDC's submissions, ES confirmed that BDC will outline the anticipated impact on local services in writing (Action Point 104). This is being provided in a separate response for Deadline 3.