

Hinckley & Bosworth Borough Council
Interested Party Reference Number:
20039546

Deadline 4 Submission:
Response to Sustainable Transport
Strategy & Plan (REP3 – 016)

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

(ref. TR050007)

1. This representation is made by Hinckley and Bosworth Borough Council in response to the submission of REP3 – 016 (Sustainable Transport Strategy and Plan) submitted by the applicant at deadline 3.

2. The Council has already made its views known on the shortcomings of the originally submitted Sustainable Transport Strategy (APP – 153) in the Local Impact Report REP1 – 138 and Written Representations REP1 – 135. The changes made to the Strategy at deadline 3 are relatively minor and do not change the Council's view of the inadequacy of the delivery of sustainable transport options to support the development.

3. The Council's concerns are summarised as:
 - a. The mechanism for the delivery of the sustainable transport provisions is inadequate and raises doubts about what exactly is to be delivered and how and when it is to be delivered. The present proposal to secure the delivery of sustainable transport solutions is by way of Requirement 9 of the draft DCO which simply states that:

9.—(1) The sustainable transport strategy must be complied with following the first occupation of any warehouse floorspace on the authorised development.

However, the Strategy itself lacks the necessary precision and clarity to give complete and adequate certainty as to exactly what it is that the applicant is going to 'comply with'.

 - b. In terms of cycle access to the HNRFI site, the strategy refers to existing cycle infrastructure and local cycle routes, but fails to provide sufficient clarity on what measures are proposed to ensure that the local communities around the HNRFI site can safely and satisfactorily access the site from the surrounding networks. The existing provision between the site and Barwell/Earl Shilton and into these settlements is variable, with some quite narrow shared use footways and some dedicated elements, and very few suitable and safe crossings. The Council has requested for some time an LTN1/20 audit of the routes to key local destinations and targeted interventions to deal with key issues. The strategy implies that the existing cycle provision is adequate to meet the needs of the development and suggests that cycle useage in the locality of the site is currently low, but that does not mean that demand would remain low once the development takes place. The applicant fails to demonstrate any specific additional measures to enhance access to local communities such as Barwell, Earl Shilton, Elmesthorpe or villages to the east of the M69. Para 4.45

of the strategy refers to 'on road' cycle lanes on the A47 travelling north from the site, but these are not continuous and are not adequate to provide safe access to the site for cyclists in large numbers – for example on the dualled part of the A47 immediately off the B4668 roundabout there are no cycle lanes at all. The applicant should be required to put forward a comprehensive scheme of cycle infrastructure improvements to ensure safe passage for cyclists to and from the site for those communities lying within cycling distance. The strategy does suggest some infrastructure improvements which are currently under consideration, but these are only possibilities or options and again referring to 3a above this is not sufficient clarity or detail to be relied upon for delivering any improvements.

- c. Reference is also made to e-bikes which the strategy says "*have the potential to be introduced in later stages of the development phasing and will be reviewed through the travel plan coordinator and the required updates to the plan*" (para 4.56). However, only Narborough is mentioned in terms of a docking facility; this should be extended to include Hinckley Rail Station as well. The strategy also raises the possibility of bike sharing and bike hubs, but all of these proposals are merely suggestions as to what might be provided and is another example referred to in 3a above where it is simply too imprecise to have any certainty regarding future provision.
- d. In terms of bus services, the applicant has introduced the Arriva 8 service between Hinckley and Lutterworth as a suitable existing service that the site could rely on. It is noted though that this service is not shown in figure 9. However, whilst this service runs to and from Hinckley bus station and has stops in Burbage, its destination is Lutterworth via Magna Park, which runs nowhere near the HNRFI site itself, so it is difficult to understand how this benefits the site. None of the services the applicant relies upon give direct access to the HNRFI site and do not connect the local communities into the site and the strategy fails to provide any clear proposals for enhancements to any existing services to connect the HNRFI site to them. The outcomes of the discussions with the bus operators are 'wooly' at best and offer no certainty as to what is actually being proposed and again para 3a above is referenced.
- e. At the hearings the applicant made assertions that a key mitigation for capacity issues created at J21 of the M1 was buses and mode shift; however, there is no indication that these mode shift targets will deliver this. The development is very close to the urban areas of Hinckley, Barwell and Earl Shilton and Hinckley Rail Station and the mode shift targets should reflect this opportunity and be more aspirational.

- f. Table 6 and Figure 14 set out the proposed bus strategy; it is clear from Figure 14 that there is extremely limited provision proposed from the large urban areas of Hinckley/Barwell/Earl Shilton. Services 8 and 158 are still a significant distance from the site, and there is no clear picture of what will be provided and how it will be secured. If bus to bus interchange to the site is planned, what time constraint will that impose on passengers? Dependence on DRT services (for Hinckley or villages) is not regarded as a viable option in that the level of service is not set out, and most experience of DRT services is that they fall away after subsidy runs out. DRT is also unlikely to be sufficiently responsive to meet multiple conflicting demands from different locations by passengers wanting to get to or from the site at the same time due to the shift patterns. There is also mention of internal shuttle bus services taking staff from bus stops into the development itself, but no clarity as to if this is a definite proposal and how it will be secured.
- g. Demand Responsive Transport (DRT) is still relied upon as a means of transporting passengers to the site locally, but again there are no details in the strategy as to how this will be achieved. The existing DRT scheme is a time limited Defra trial and when funding runs out there is no certainty that it will be retained and therefore should not be relied upon. Figure 13 still suggests a 'fixed route' serving Hinckley, Earl Shilton and Barwell, but again no detail of this is provided. The idea of a 'fixed route' also seems at odds with the idea of the service being 'demand responsive' covering a much wider area and it is very unclear how a fixed route that is also demand responsive could be delivered reliably. Table 6 indicates that there will be a DRT subsidy for buses increasing in years 1-3, but no information is provided after year 3, nor any information giving certainty as to how the subsidy is to be secured.
- h. Regarding walking to the site, the accuracy of the figure 15 2km isochrone is queried as it does not appear to accurately depict the distances from the site. This brings into doubt the accuracy of para 8.3's assertion that there is little population within walking distance of the site. The screenshot below shows a distance of 2km from the centre of the site with the yellow line.



- i. No proposals are provided for enhancing walking access to the site, rather the applicant proposes to provide the County Council with an audit of existing substandard paths which the County Council will be expected to improve. This is not considered to be an acceptable approach.