

**National Infrastructure Project
for:
Hinckley National Rail Freight
Infrastructure
Project Reference TR050007**

**Written Representation
(Deadline 4 Submission)**

**On behalf of:
Stoney Stanton Parish Council**

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1. INTRODUCTION / SUMMARY

- 1.1 Stoney Stanton Parish Council (SSPC) provided extensive objections and comments to the Tritax Symmetry submission as part of the original Written Representation. This response should be read in conjunction with the original submission, with comment provided within this statement limited solely to the information submitted by the Applicant at Deadline 3/through the Issue Specific Hearing notes.
- 1.2 Overall, it is considered that there are still substantive unresolved issues in respect of the highway modelling and thus the impact of the proposal upon highway, noise, air quality and amenity for local residents as a result. The additional information provided in respect of need for the facility does not alter the non-planning reason for reducing the site search area; insufficient justification is provided for reliance upon fossil fuel to power the facility; whilst the additional lighting information and clarification essentially that decked car parking will be required to meet maxima standards means that the visual impact will be greater than that outlined in the Landscape and Visual Impact Assessment (LVIA); the LVIA has not been updated to reflect these additional harms. The application should therefore still be refused, as the additional information does not allay concerns and shortcomings in the information submitted.

2. PRINCIPLE OF NEED AND SITE SELECTION

Logistics Demand and Supply Assessment Document Reference 16.2A (Rev 04)

- 2.1 This document simply alters all the size references from square foot to square metres. It provides no meaningful addition to the justification for the facility. Consequently, the lack of an identified need for the facility in this location as set out within Section 2 of the SSPC Written Representation is still considered to stand.

Written Statement of Oral Case ISH4 [Appendix B – National Policy Options Assessment Note and Alternatives Assessment] Document Reference 18.8.2 (Rev 01)

- 2.2 The Written Statement of Oral Case (WSOC) summarised the need for the facility and the site selection process. In terms of the Stage 1 Option Development, this is set out from paragraph 10 onwards. Importantly, at paragraph 17 it confirms a key issue identified in the previous SSPC Written Representation at paragraph 2.5. This is the fact that a national infrastructure project has arbitrarily drawn an area of search to align with the local authority administrative boundary of Leicestershire. This decision is noted at paragraph 17 of the WSOC ISH4 that Leicestershire was selected as there was no comparable study for rail-connected logistic need within the administrative area of Warwickshire. This is a clear recognition of the use of a non-sound planning reason to arbitrarily limit the scope of search for a suitable site; this is for a national infrastructure project, not one just for Leicestershire.
- 2.3 The proposal is therefore considered to continue to remain contrary to paragraphs 4.26 and 4.27 of the National Networks National Policy Statement (NNNPS).

3. HIGHWAYS

Environmental Statement Volume 2: Appendix 8.1 – Transport Assessment (Part 1 of 20)
Document Reference 6.2.8.1B Rev 09

Environmental Statement Volume 2: Appendix 8.1 – Transport Assessment (Part 12a of 20)
Document Reference 6.2.8.18 Rev 09

HGV Management Plan and Strategy
Document Reference 17.4 Rev 09

Appendix A – Transport General Update Note
Document Reference 18.6.1 Rev 1

- 3.1 The Transport Assessment work has been updated with additional modelling of two junctions noted as J5: Rugby Road/Brookside and J9: A47/B582 Desford Crossroads. The assessment concludes that no improvements are required at either location, despite the increase in PRC at J9 by 0.6% and 2.1% in the AM and PM peaks respectively. In respect of the junctions within Stoney Stanton (J37 and 38), no updates are provided and the assessment work remains unchanged despite concerns previously in respect of the lack of mitigation in particular at J38 B581 New Road/Long Street mini-roundabout. J38 operates over capacity in future year scenarios, which is made worse by development traffic, but no mitigation is put forward to address the impact of the development at this junction.
- 3.2 It is noted from the Transport General Update Note prepared by BWB that a Highways workshop took place between the applicant and all relevant highway authorities on 13th November 2023, the day before the original deadline 3 submission date. There are no agreed minutes from this meeting but it is clear within the note that there is a commitment to updated traffic surveys and modelling to be undertaken and submitted at deadline 4. It is disappointing this assessment work is not available but given the timeframe between the Issue Specific Hearing 2 (ISH2) on Transportation issues on 31st October 2023 and the deadline 3 submission date of 14th November 2023 there was not enough time to commission new surveys and update the assessment work based on the new survey data. It is acknowledged within the BWB note that further Bus Improvements to/from Nuneaton are agreed along with an internal site shuttle service between the furthest units on site and the onsite bus stops, which will be entirely developer funded.
- 3.3 The BWB update note also suggests updated modelling at the M1 Junction 21/M69 Junction 3 interchange has been undertaken with an assessment based on the Lutterworth East Urban Extension model carried out by AECOM for LCC and signed off in May 2022. It remains the Applicant's view is that the development impact in this location is not severe, however, it is considered the applicant continues to not assess the development impact at this junction in sufficient detail to determine any likely rerouting onto the local highway network as a result of existing (and proposed increase) congestion at this junction.
- 3.4 It is noted within the HGV Management Plan and Route Strategy that the reference to "Undesirable" HGV routes has been amended to "Prohibited" HGV routes within the

document which is welcomed, but note this document is awaiting approval by the relevant authorities.

- 3.5 The assessment work therefore submitted at Deadline 3 continues to be unsatisfactory in relation to highway impact and the general methodology is not considered to be appropriate for the scale of development impact.

4. CAR PARKING

Written Statement of Oral Case ISH2 [Appendix D – Car Parking Strategy Note] Document Reference 18.6.4 (Rev 1)

- 4.1 Prepared to specifically address concern raised over how the car parking would be accommodated on site, it denotes that the illustrative masterplan shows parking levels *below* the maximum recommended figures set out by Leicestershire County Council Highways Policy. It also confirmed that the previous revisions of the Design and Access Statement and the Design Code did not specifically state that decked car parks would not be included.
- 4.2 As evidenced by the discussion to date in respect of highway matters, it is a common view of interested parties that the countryside location of the site means that there would be a reliance on travel by the private motor vehicle. The limited infrastructure proposed to enhance alternative modes of transport means that in reality, the maximum car parking standards should be applied to this site. Being located adjacent to classified highways which will be used by significant number of HGVs in association with the development, the potential for over-spill car parking onto the A47 Link Road or other surrounding classified roads would pose a significant safety risk and impede the free flow of traffic. The only logical conclusion should be that the full parking requirement needs to be accommodated on site.
- 4.3 This conclusion on highway safety grounds in respect of parking level, means that the visuals of the scheme are inaccurate and the assumptions made in respect of the visual impact and perceived appearance of the site are misleading at best, or to put it simply, just wrong. In recognition of the need to include decked car parking to accord with standards, the LVIA needs to include this within its assessment, in order to consider the 'worse case scenario', the position expected by LVIA's. This additional harm augments the concerns already outlined within sections 7.

5. LIGHTING

Written Statement of Oral Case ISH3 [Appendix G – M69 Lighting Proposals and Associated Effects] Document Reference 18.7.7 (Rev 01)

- 5.1 This statement prepared by BWB deals specifically with the requirement for the need and standard of additional lighting associated with the upgrading of Junction 2 of the M69. On the basis that the main M69 carriageway is not to be lit, paragraph 3.3 states that the following lengths of slip road will be lit:
- 156.5 metres of the divergent slip roads on the approach to the conflict area; and
 - 97.0 metres of the merge slip roads on the exit from the conflict area.

- 5.2 However, these distances do not appear to fully represent the extent of new lighting required, as visually shown on drawing HRF-BWB-GEN-XX-SK-CH-SK130 at Appendix A of document 18.7.7 (Rev 01). This identifies an extra 429 metres of lighting to the existing and new slip roads onto the M69, plus additional lighting along the B4669 to the east of the junction. Upgrading of the lighting to the west is also required.
- 5.3 The quantum of lighting required is not diminutive. It will expand the existing lighting further into the dark sky of the area, adding to the substantive lighting proposed for the main employment site. This additional impact will affect the landscaping and ecology using this areas. However, no comment from a landscape or ecological perspective is provided anywhere within the updated information. This additional harm augments the concerns already outlined within sections 7 and 8 of the SSPC Written Representations.

6. ENERGY

Environmental Statement Volume 2: Appendices Appendix 18.1 Energy Strategy Document Reference 6.2.18.1A (Rev 03)

- 6.1 During the hearings, significant concerns have been levied at the Applicant by the Inspectors and numerous interested parties in respect of the extent to which green energy opportunities on site for generation have been explored. In particular concern has been raised in respect of the limiting of solar generation to 49.9 MW and the reliance upon fossil fuels as part of the CHP. Despite this, the updated Energy Statement incorporates only minor changes to the text and offers no valid additional justification or explanation for the need to rely on outdated technologies and how the system will deal with increased demand for future electric vehicle charging stations.
- 6.2 All of the concerns set out in the SSPC Written Representations at paragraphs 2.20 -2.23 remain, and thus it is considered that the proposal does not comply with the NNNPS paragraph 4.36 requirements on climate change.

7. NOISE

Written Statement of Oral Case ISH3 [Appendix F – Noise Assessment Update Note] Document Reference 18.7.6 (Rev 01)

- 7.1 This note was prepared by BWB to address a number of points raised in the Hearing Session, including missing information for Acorns Café and play area, and the absence of night-time information at a number of locations.
- 7.2 This additional information is helpful in providing a more complete dataset of information. However, it is all still predicated on an unconfirmed highway model, given that much of the noise to the surrounding area is generated by vehicle movements. If the number and pattern of movements alters, then there will be a requirement to re-run the noise modelling in order to provide an meaningful set of results.

- 7.3 In light of the on-going highway modelling issues, no confidence can be provided in the noise information being accurate. The extent of noise mitigation required to ensure the development accords with standards is also still considered to underline the inability for the site to appropriately assimilate itself with the wider area without generating significant landscape harm even at Year 15. The concerns set out within the SSPC Written Representations Section 6 are therefore still considered stand.