

Tritax Symmetry (Hinckley) Limited

## **HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE**

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### **The Hinckley National Rail Freight Interchange Development Consent Order**

Project reference TR050007

### **Applicant's response to deadline 3 submissions [Part 6 - Action Groups]**

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Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009  
Regulation 5(2)(q)

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	<p><b>STONEY STANTON ACTION GROUP</b> Written Statement of Oral Case presented by the Stoney Stanton Action Group at OFH2</p>	
<p><b>1</b></p>	<p><b>Alternative Option for Rail Freight in the Area</b> Given the unsolvable traffic problems that HNRFI would cause if it were allowed to go ahead, and given the complete devastation of the rural nature of the area in question that it would cause, wouldn't a better solution for the country be to distribute the demand for rail freight we have been told about around existing nearby RFIs by increasing their respective capacities accordingly? Here we are thinking about the East Midlands Gateway (EMG), Daventry International Rail Freight Terminal (DIRFT), Birch Coppice, Northampton SRFI and the West Midlands Gateway, all of which in combination have better direct access to sea ports than HNRFI would have.</p>	<p>The Market Needs Assessment (document reference: 16.1A) sets out the differences between the different SRFI's in the region and how they will interact.</p> <p>Unlike HGV movements, which can route virtually at free will using available roads, intermodal freight trains must use a fixed network of rail routes, cleared to take containers. This means that each terminal has prime rail routes which go on to define the nature of the market it serves. It is not simply a case of being able to fill one terminal at a time.</p> <p>Historically the main routes through the Midlands have been north - south focused, such as the West Coast Main Line, Midland Main Line and East Coast Mainline.</p> <p>The November 2012 opening of the Felixstowe to Midlands and the North Strategic Freight Route was the first cleared Cross Country, east west route, to be able to take intermodal containers into and out of the Midlands. This transformed the viability of moving freight by rail, particularly from Felixstowe, which otherwise has to go via London. This frequently becomes commercially and operationally unviable as a route, adding considerable rail miles.</p> <p>HNRFI therefore will be a game changer, as it is situated in the middle of the country, directly on this Cross-Country strategic freight route, able to take trains to and from virtually any location nationally, with a single train set able to do two round trips in a day to ports such as Felixstowe, London Gateway and Liverpool.</p> <p>This fundamentally changes the operating costs of rail compared to road and provides an opportunity to support smaller and emerging regional terminals with mixed destination traffic, by acting as a rail hub. In so doing, occupiers at HNRFI would have a wider choice of terminals that they too can deliver to via rail, significantly increasing the potential to use rail for secondary distribution as well as primary distribution.</p> <p>No other terminal in the Midlands can replicate this level of connectivity combined with operational efficiency.</p> <p>There is a need to considerably increase the use of rail freight and all the terminals will need to be utilised as fully as possible to serve the Midlands, for exports and imports as well as between regions, by rail. Rail is considerably more energy and CO2e efficient than HGV and will be increasingly critical to achieve NetZero.</p>
<p><b>2</b></p>	<p><b>Proposed mitigations for traffic in Stoney Stanton and Sapcote</b> The applicant has recognised, after comments during the consultation from our group and others, that there will be traffic problems within Stoney Stanton and Sapcote caused by HNRFI. At a late stage they have proposed some mitigations which consist of (those affecting Stoney Stanton): Traffic lights at the B4669 / Stanton Lane junction (listed as B2 in Table 8.28 of APP-117 ES Chapter 8); traffic lights with</p>	<p>The mitigation proposals were part of plans submitted with the PEIR in 2021.</p> <p>There have been three consultations as part of the HNRFI pre-submission process.</p>

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	<p>signals at the Hinckley Road / Station Road / New road junction in Stoney Stanton (listed as B1 in Table 8.28); but interestingly no mitigations proposed for the Long Street / New Road junction in Stoney Stanton (APP-138 ES Appendix 8.1 Junction 38) because it is not possible to do anything. The public and in particular residents of Stoney Stanton, have not been informed of these or consulted about them. Our feeling is that the traffic lights in the centre of Stoney Stanton (B1) would cause severe problems for the nearby school, the doctors' surgery, nearby churches and for motorists in general. Hinckley Road already has problems with queues due to legitimate resident parking which causes problems for HGVs. The addition of traffic lights will add to the build-up of traffic and cause very long queues which could cause grid-lock. This may well cause nearby residential areas to be used as rat-runs. These mitigations, especially B1, have not been properly considered and should not be allowed as they will have undesired consequences.</p>	<p>The junction of Long Street and New Road was assessed within the Transport Assessment. Signals at this junction are not possible due to the presence of listed buildings at the back of footway.</p> <p>The new signalised junction improves the balance of traffic throughput between the three arms of the Station Road/New Road/Hinckley Road Junctions. Pedestrian safety is also improved through the provision of crossing facilities.</p>
	<p><b>STONEY STANTON ACTION GROUP</b>  <b>Receipt of Written Statements of Oral Cases at ISH2, ISH3, ISH4, CAH2, OFH1 and OFH2- Open Session 2</b></p>	
3	<p>I speak on behalf of Stoney Stanton Parish Council, a very nearby parish and settlement that will be substantially affected by this proposal. I am Chair of the Parish Councillor, as well as the District Councillor for Fosse Stoney Cove (which include Stoney Stanton, Croft, and Potters Marston), and, having lived in Stoney Stanton for 4 years, have seen the impact that a number of various proposals have had upon the village and surrounding area. I think it would be fair to say that this proposal will have by far the greatest impact and has raised significant concern on a number of topic areas to residents. I will use the time today to seek queries to additional questions that have arisen during the course of events and matters to which Stoney Stanton Parish Council do not consider have been adequately addressed through the hearing sessions. Many of the outstanding concerns run to the heart of the proposal and its ability to accord with the National Policy Statement for National Networks, to which at present it is considered that the proposal should be rejected. To someone reviewing the proceedings to date it feels very much as though the application has been submitted too early and the applicant is simply looking to paper over and retro-fill gaps in their evidence base.</p>	<p>The Applicant maintains that the submission aligns with the National Policy Statement for National Networks, this is set out in detail in the Planning Statement (document reference: 7.1B)</p>
4	<p><b>Highways</b></p> <p>A fundamental issue is the highways modelling. I am somewhat dismayed that the modelling has still not yet been agreed, and yet we are all here at the Examination discussing matters. This matter simply has to be bottomed out, otherwise it becomes impossible for the impacts of the development to be truly analysed.</p> <p>Our Written Representation outlined a significant concern in respect of the potential under provision still of the highway movements expected versus the staff levels on site during the AM peak. It is noted that it has been stated by the appellant that these are created using different approaches, but shouldn't the two systems roughly correlate? Our analysis suggests that the highway movements may be misrepresented by as much as 74% (SSPC WR paras 1.6 – 1.7). Any comment the applicant has on this matter would be welcomed.</p> <p>A pre-requisite of the site selection process is the ability to utilise the Strategic Road Network (NPSNN para 2.45). Much has been made about the importance of the location of the application site and its</p>	<p>The modelling hierarchy is consistent at each level of our assessment. The PRTM Strategic Model provides countywide data and contains complex distribution data for the development traffic. The model is the best tool available to predict future traffic demand and distribution of background traffic. This data is then used at a more detailed scale for individual junctions and networks through capacity models (junction level) or micro-simulation models- connected junction networks.</p>

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	<p>ability to connect directly to this network. Yet it has simply been stated by the applicant that key nodes on the SRN is over capacity and no mitigation is proposed. Importantly this includes the M69/M1 interchange, resulting in the traffic modelling rerouting vehicles onto lower order roads. This flies in the face of the aims of national infrastructure projects and the location justification for this specific site.</p> <p>Reference was made to there being a mitigation scheme prepared for the M1 Junction 21 but this has never been discussed with any of the Statutory Highway consultees. Why has this not occurred, as it should be the first option towards mitigation of the impacts from this development?</p> <p>With no mitigation to the motorway interchange, it has led to the model showing a number of junctions on the lower order highways operating over capacity. Many junctions, even though expected to operate over capacity, are simply being ignored. As an example of this, I refer to the roundabout in Stoney Stanton – junction 38 in the applicant’s assessment. With rat running vehicles, it is expected that highway movements through this mini roundabout will increase significantly, yet no mitigation is proposed. How can this be considered a robust solution? This is not an isolated solution – many junctions have not been assessed or mitigation proposed. The highway solution is simply flawed.</p>	<p>Direct access to the M69 is a key consideration in the site selection. Few sites have direct access to both rail and SRN networks.</p> <p>M1 Junction 21 is subject to ongoing analysis and discussions around proportionate mitigation of impacts.</p> <p>The mitigation scheme referred to here does not form part of the application, like many schemes, various iterations of proposals are assessed some are taken forward for further analysis and some ultimately form part of the application submission. In this case this scheme was not submitted as part of the DCO nor shared with the TWG as it was not a useful proposal. It was part of the early land referencing process where a number of additional areas were looked at on a precautionary basis for land referencing as well as understanding any time constrained survey work such as archaeological assessment rather than technical proposals.</p> <p>A full review of the PRTM outputs and the differences in traffic flow in the with development scenario has been carried out for over 56 junctions and is discussed within the Transport Assessment. The displacement of traffic from J21 has been accounted for within the junction assessments and mitigation developed accordingly. Junction 38 is an exception as outlined above. Existing constraints make mitigation impossible to deliver within reasonable parameters of the highway boundary.</p>
5	<p>Alternative Options and Need</p> <p>Paragraphs 4.26 and 4.27 of the NPSNN sets out a requirement for applicants to undertake an appropriate alternatives and options appraisal. Discussion was undertaken through the hearing sessions about options principally being considered in Leicestershire given the economic report published to support a rail linked logistic park. However, it was also stated verbally by the applicant that sites further to the west, north and south were considered. Where is this evidenced within the submitted information, as it seems to be missing?</p> <p>It has been stated verbally that the proposal will not compete with DIRFT, as it serves a different type of function, with DIRFT serving a European base for more rapid turnover products, whereas Hinckley Hub will serve a worldwide deep seaport transporting larger/slower goods. There are however many other rail linked logistics parks in the Midlands, including East Midlands gateway, Birch Coppice (Tamworth) and Hams Hall rail Terminal (Colehill). Clarification on whether there will be any competition with these other centres would be useful to understand.</p> <p>Finally on need, it has been indicated that this will act as a hub location, serving the local industrial manufacturers as well as a centre to combine rail freight from other locations...what other rail freight locations is Hinckley Hub expecting to service in this manner?</p>	<p>As stated at the ISH4: ‘Need and Socio-Economic Matters’, the genesis of the site search for land to function as a SRFI was the evidence base prepared for the Leicester and Leicestershire Planning Authorities in 2014 (<i>‘Leicester and Leicestershire Distribution Sector Study’</i> Chapter 4 Site Selection and project evolution (document reference: 6.1.4, APP-113). This research recorded a very substantial space requirement for rail-related warehousing.</p> <p>SFRIs are to be delivered within a commercial framework – which includes consolidation of the availability of an evidence base at a sub-regional level to support the principle for the delivery of a SRFI. In short form the principle of HNRFI ‘chimes’ with the evidence base for rail related warehousing that has been prepared – not for the private sector – but for the local planning authorities in Leicestershire who commissioned the study. It is entirely reasonable in the commercial framework for SFRIs that TSH would seize upon this evidence base in providing confidence for the substantial financial investment that is required in making a DCO application.</p> <p>Chapter 4 of the ES (document reference: 6.1.4, APP-113) identifies the alternative sites considered by TSH in this sub-regional context. In so far as reference was made to other potential locations, no comparable evidence base of rail related warehousing need was in existence. As such no further consideration was given to these locations. ES Chapter 4 (document reference: 6.1.4, APP-113) sets out the ‘main alternatives’ considered by the Applicant.</p> <p>In the context of commercial due diligence and in relation to representations made at consultations and in relevant representations, the Applicant has investigated whether there could be any sites that might</p>

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		<p>be promotable within the area to the west of Hinckley and as previously stated, there are not. Land between Hinckley and Nuneaton is Green Belt and would need all its traffic to utilise the already constrained A5. The urban form of a SFRI necessarily would cause substantial harm to the purposes of the Green Belt – and its essential characteristics of its openness. An applicant would have to demonstrate the existence of ‘very special circumstances’ to justify development of the Green Belt. Undoubtedly a fundamental consideration would be whether land outside the Green Belt is suitable and available for a SRFI. HNRFI is located on land <b>outside</b> the Green Belt. In a commercial framework no prudent developer would pursue a development on land in the Green Belt in circumstances where the development need can be met on land beyond the Green Belt – particularly in a county where robust evidence has been published by the local planning authorities as to a very substantial need related rail warehouse development.</p> <p>Land to the west of Nuneaton is beyond the Nuneaton Chord and does not have direct access to the WCML north, to the North-West and Scotland, it would need to run around Birmingham. Land to the south of Nuneaton, north of Coventry (if available) would not have ready access to the east coast ports by rail, because of the direction of the connections to the Felixstowe to the Midlands and the North strategic freight route.</p> <ol style="list-style-type: none"> <li>1. The Market Needs Assessment (document reference: 16.1A) at paragraph 6.12 sets out the consideration of the business markets served by existing and committed SFRIs in the Midlands.</li> <li>2. The Market Needs Assessment (document reference: 16.1A) considers that the potential to act as a ‘national rail hub for ports’ is unique to HNRFI (paragraph 5.36). Paragraph 5.35 states: <p><i>‘HNRFI, with its opportunity to additionally act as a national rail hub, consolidating loads from different ports in the east, into trainloads for running into terminals in the west, including Wales and the South West, as well as the North West and Scotland (and vice versa) also benefits other nation states.’</i></p> </li> </ol> <p>As such the ‘hub function’ is in a national context rather than as suggested a local business market context.</p>
	<b>Renewable Energy</b>	
6	<p>Much debate has been undertaken in respect of the incorporation of a CHP plant and the provision of only 49.9 MW of renewable energy on site. It seems clear that there is additional roof space to be able to increase the level of on-site energy generation? Why has this not been increased, and would the applicant be willing to have an appropriate regulation attached allowing this to be reviewed and increased?</p>	<p>Fossil fuels are certainly not a main source of energy provision. The energy infrastructure design expressly optimises the path to net zero operations and minimises reliance on fossil fuels. Onsite renewable energy will be used directly when generated as the first point of supply. In addition, future provision will be made for occupiers to store surplus energy in batteries. Electricity sourced from the grid electricity will generally be the second source of supply. The future provision for battery storage will encourage and enhance the ability of occupiers to use only renewable grid energy. Any CHP or standby generation would only be used in exceptional circumstances during a failure of supply. The Energy Strategy Appendix 18.1 (document reference: 6.2.18.1A, REP3-024) concludes that 83% of the</p>



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	<p>Clarification as to why there is a back-up reliance on out-dated CHP system needs to also be provided. There are numerous options for modern renewable systems allowing it to essentially operate as an off-grid scheme of truly net zero credentials. Why has this not been proposed?</p> <p>In terms of the growing need for energy on the site, through the rapid growth of electric cars, and potentially commercial vehicles in due course, has the expected extra energy demands for charging vehicles been robustly incorporated into expected energy demand? If not, then the reliance on the CHP will increase.</p> <p>Failure to maximise renewable energy generation is contrary to NPSNN paragraphs 4.26 – 4.47 and thus the Inspector’s need to be confident that all options have been thoroughly explored by the applicant.</p>	<p>peak operational energy requirements would be produced by solar photovoltaics (PV) with 100% of the total available roof space (excluding areas required for rooflights, drainage and safe access) to be covered by PV cells.</p> <p>The proposed infrastructure allows the future deployment of current and emerging technologies in an economic manner for occupiers, strongly encouraging their adoption and the progressive improvement in energy performance through the operating life of the site. The proposed infrastructure already maximises onsite renewable solar generation, includes the provision for substantial electricity storage and pooling through a microgrid. Further, it is adaptable and allows for further development at unit and central areas. The initial expectations will not prejudice or constrain future technological developments. The CHP system will be hydrogen ready.</p> <p>The Energy Strategy (document reference 6.2.18.1A, REP3-024) covers all means of renewable energy that have been considered for the Proposed Development.</p>
7	<p><b>Visual Impact</b></p> <p>It is considered that many of the issues in respect of the scheme are generated by the proposal simply including too much development. Landscaping has needed to be marginalised, protective fences increased in height due to the proximity to noise sensitive receptors, footpaths on site are marginalised creating environmental concerns over their use, shortage in biodiversity gain, and issues over flood risk and drainage due to additional structures within the flood plain reducing storage capacity and affecting the flow of waters (to name but a few). It is recognised that there needs to be a minimum quantity of development provided to Justify the level of investment proposed? Has this viability assessment been undertaken to identify the minimum floor area required, and if so, is this the underlying factor that has driven the layout and proposal tabled?</p>	<p>By definition in the Planning Act 2008 a SRFI is large scale development in the context of the land required and the form of development providing large scale warehouses to meet the needs of the logistics sector and the scale of the railport.</p> <p>The Illustrative Masterplan has identified an anticipated form of site development making adequate provision for buildings; service yard; car parking; roadways and landscaping. The Parameters Plan shows Development Zones which do not identify the provision for additional on-site landscaping, including tree planting.</p> <p>The scale of development proposed at HNRFI is derived from the land available to the Applicant, and has not been pre-determined by a viability assessment. Clearly the infrastructure costs are substantial and the development needs to make an efficient use of the land available. The proposed floor space at HNRFI is broadly similar to other SRFIs in the wider Midlands, including East Midlands Gateway, Northampton Gateway, DIRFT and West Midlands Interchange.</p> <p>HNRFI is sufficiently large to accommodate the scale of the proposed development in the DCO, while insuring that the visual impact responds to the criteria for ‘good design’ as set out in the NPS-NN (paragraphs 4.28-4.35).</p>
8	<p>It is considered that a smaller scheme may well address many of the concerns highlighted in respect of the proposal. It would not however overcome the in principle objections considered to occur due to the gaps in the evidence base, or the incomplete highway assessment.</p>	<p>It is considered that an appropriately evidenced application has been submitted for examination, an application which has been accepted by PINS for examination. It is understood that the information contained in DCO applications by their nature are detailed and technical. The Applicant has offered assistance to the Stoney Stanton Action Group to locate and understand information.</p>
	<p><b>Friends of Narborough Station</b></p>	
9	<p>FONS consists of a user group of volunteers, whos main aim is to promote and protect the interests of the Users of Narborough Station. Although getting freight off the roads and on to our railways is an obvious necessity, its location is in the wrong place and has serious implications not only on the</p>	<p>The Crossing Down Time has been taken from when the red lights flash and legally restrict the use of the crossing, through to the barrier being raised, as stated in The Narborough Level Crossing Note (document reference: 18.5.3, REP3-044) para 2.2 and in the appended Excel worksheets under IMPORTANT NOTES. This is the period FONS considers appropriate to be analysed.</p>

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	<p>environment and green belt, but on the roads and railways in our area. The wider effect on the whole South Leicestershire railway line is what I want to address here.</p> <p>Firstly I would like to refer to the “Explanation of the Narborough Level Crossing Table” produced by Tritax and issued last Friday 27th October 2023. As the data states it could not be analysed to provide the highway closure times ie. red light to raised barrier times as required, can I respectfully suggest that this information is therefore meaningless. Referring to paragraphs 2 and 3, as some of the dates for the video surveys coincide with local school half term holidays, I consider this to be hardly representative. With reference to paragraphs 4 and 6, any information provided should be compared to data from the Real Time Trains system, in order to ensure it is correct.</p>	<p>These times are taken from the 7-day video recording of the level crossing. Network Rail’s data does not include the timing of the red lights coming on to restrict the highway, which is why the video survey has been used.</p> <p>Notwithstanding there is a video record, the train movements recorded were checked against Real Time Trains system, which relies on Network Rail data.</p> <p>The initial 7-day video survey period was started at the earliest date possible to secure data for Deadline 2. It did mean that whilst the rail paths showed no significant changes in weekday utilisation, the highway use included normal working days and weekday holiday traffic.</p> <p>The Narborough Level Crossing Note (document reference: 18.5.3,REP3-044) has been updated at Deadline 4 (document reference: 18.5.3A) following further surveys of the highway impacts carried out in November, a full school term time week. The additional analysis of the new survey data (including queues)(Saturday 25 November and Friday 1 December 2023) confirms that the assessment carried out was robust and therefore the conclusions reached remain valid and unchanged. Neither the traffic nor trains associated with HNRFI would materially exacerbate queuing at the Narborough Level Crossing.</p>
10	<p>The information contained in paragraph 5 states it is a “Work in Progress”, therefore it is inconclusive. I was interested to read that closure time for the level crossing at Narborough is maintained at 2:31 seconds for freight trains travelling at 75mph. I assume this is a mistake and should read 2 minutes 31 seconds. I was also interested to read that further detail will be provided as part of the Technical Note to be submitted in due course, which relates in part to improvements underway at the Derby Control Centre. My question is; What are these improvements and who will pay for them.</p>	<p>The time is 2 minutes 31 seconds, or 00:02:31 in Excel.</p> <p>The improvement at Derby relates to the splitting of a Signaller’s Screen into two screens, to reduce workload. This is going to happen regardless of HNRFI and we understand it is due to be implemented in November 2024.</p>
11	<p>At the junction leading into and out of the site from the Leicester to Nuneaton railway line , a considerable amount of track and point work will need to be worked on and new connections made to the existing signalling system, We assume Network Rail will carry out this work, with the cost picked up by Tritax. The carrying out of this work will require possessions of the line. Will this mean a loss of business for XC and will replacement ‘buses be needed. When replacement ‘buses are in operation, this puts a lot of people off from using rail. Will XC be compensated by Tritax through Network Rail for this loss of business and indeed the cost of hiring replacement ‘buses. The foregoing is detail, but needs to be considered in order to protect the tax payer through Network Rail, from picking up any costs.</p>	<p>The methodology and requirement for possessions for the construction of the connections to the Leicester to Nuneaton railway, including the crossovers, will be agreed with Network Rail through its PACE programme and with Asset Protection Agreements in the normal way.</p> <p>The Applicant is incentivised through cost ramifications, to minimise adverse impacts on other rail users.</p>
12	<p>We at FONS have carried out timings at the Level Crossing and we estimate that barrier down times if HNRFI goes ahead, will be up to 40 minutes per hour. Traffic congestion now is a serious problem, but will get significantly worse, badly affecting the villages of Narborough, Littlethorpe Whetstone, Cosby, Enderby, Huncote and the B4114 road.</p>	<p>HNRFI scheme does not significantly impact the downtime at Narborough.</p> <p>Network Rail undertook a detailed analysis of Narborough Station and the barrier downtime at a peak weekday time (7:00 – 10:00 and 16:00 – 19:00) as requested by the Transport Working Group of the local authorities. The ExA asked for a 24/7 analysis of the current position. This has been provided along with analysis of the impact of 4 and 10 trains each way serving HNRFI, as per the Application, which has been provided at Deadline 3. (document reference: 18.5.3, REP3-044).</p>

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		<p>The highway modelling demonstrates that the effect of the increased traffic or additional trains on queuing and delay associated with HNRFI would be negligible throughout most of the day. The largest increase in queue clearance being between 0800 to 0900 hours and 1600- to 1700 hours. However, the resulting clearance time is still well within the average available barrier uptime during that period. Therefore, it is concluded that neither the traffic nor trains associated with HNRFI would materially exacerbate queuing at the Narborough Level Crossing.</p> <p>It is clear from both NR’s original study and the 24/7 analysis, that the impact is nominal. In the morning peak, the worst case goes from 70% open to 68% open; and in the afternoon peak, from 73% open to 70% open. There are indeed other routes drivers can use to avoid the level crossing, if they so choose.</p> <p>The Applicant has noted and advised the ExA that some Cross-Country passenger services are variable in their timing through Narborough, which can lead to longer downtimes if they pass the crossing one after the other. This may be a cause of frustration if it is the peak hours, but it is unrelated to HNRFI. The intermodal services by comparison tend to run to time.</p>
<p><b>13</b></p>	<p>There is no doubt that these long and heavy freight trains will have an effect, on both the operation and geology of the South Leicestershire line. Whatever Tritax may say, the South Leicestershire line is not a main line and was not built as a main line. The vibration from existing freight trains is far greater than that from the presently operated lightweight turbostar passenger trains. The maximum length of the present freight trains using the line and causing this vibration is 600 metres, we see that Tritax freight trains will be 30% longer at 775 metres. Who will pay for any damage caused, remembering that Tritax have said that their project will incur no cost to the tax payer.</p>	<p>As discussed in Chapter 10 Noise and Vibration (document reference: 6.1.10A), baseline vibration measurements have been undertaken approximately 12m from the nearside rail of the closest rail line.</p> <p>The measurements indicate that there will be a maximum Vibration Dose Value (VDV) of 0.05m/s<sup>1.75</sup> ((z -axis) during the daytime period, and a maximum VDV of 0.04m/s<sup>1.75</sup> (z-axis) during the night-time period.</p> <p>These measured VDV levels are low and fall within the threshold criteria for ‘low probability of adverse comment’ as set out in BS 6472:2008. Given that the existing line will be located between the HRNFI and the nearest receptors, and that the nearest dwelling to the Proposed Development is located approximately 90m from the proposed sidings, rail vibration is currently at levels considered to be low, to the extent whereby the additional vibration generated by the Proposed Development is likely to result in a low level.</p> <p>HNRFI is designed to accommodate up to 775m trains which is a requirement of new SRFI’s and a Network Rail standard to future proof the Network. This section of railway can already handle trains in excess of 600m.</p> <p>The Applicant has been working closely with Network Rail since Dec 2017 and as such that work has informed the design as well as operational and capacity viability analysis. Network Rail’s report which will be used to support the Statement of Common Ground has been provided at Deadline 3 (document reference: 18.6.5, REP3-050).</p>



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14	FONS has posed many questions in it's response to Tritax about it's proposed railway operation, none of which have been answered. These questions relate to both safety aspects concerning rail access to the site, and rail operations at the site. For instance the railway line at the entrance to the site is on a 1:162 gradient. Railway rolling stock unless properly braked, can "Run Away" on a gradient of 1:330. Thankfully it is a rarity, but it is a concern that has been raised recently by the Rail Accident Investigation Branch.	The rail terminal design includes a virtually flat platform (at no more than 1:500 gradient in accordance with Network Rail standards) at a minimum length of 775m to hold and service trains. They will not be stabled at the current line gradient.
15	The rail junction into the site, will be situated between Elmsthorpe and Hinckley. For safe access, trains will almost certainly be slowed to a stand or to a maximum 10mph before being cleared to enter. Depending on the direction the train is coming from, will mean crossing over the opposite running line. This will cause a prolonged obstruction of both eastbound and westbound trains, until the train is fully clear of the main running lines and safely into the terminal	The connections have been designed to allow for trains to arrive and depart at up to 25 miles per hour, having been cleared to run straight into the terminal. It would be exceptional for them to be stopped before entering. These movements, including necessary crossovers have been allowed for in Network Rail's review of the capacity assessment. See Network Rail's Summary Rail Report v4.2 section 7 for Network Connectivity and Section 9 for Network Capacity. (This was also contained in its draft report (document reference 18.6.5 REP3-050).
16	Trains leaving the terminal will inevitably cause similar delays to passenger trains, during the cross over process. Restarting a 1,500 tonne half mile long train is not a quick process, particularly in winter time and during adverse weather conditions. The fact there is a 1:162 gradient to climb, will require extended occupation while the train gets up to line speed. Delays to passenger trains will be inevitable and will thus compromise aspirations, to improve connectivity between the East and West Midlands	Please see the answer above at 15, which relates to both arrival and departures.
17	FONS has a good relationship with Network Rail, however there are a number of issues we have raised with Tritax which will directly affect Network Rail. These relate to the; <ul style="list-style-type: none"> <li>- Effect on the Operation of Narborough Level Crossing.</li> <li>- Effect on the Operation of Narborough Station.</li> <li>- Effect on the Operation of the Midland Main Line.</li> </ul>	<p>The Applicant has been working closely with Network Rail since Dec 2017 and as such that work has informed the design as well as operational and capacity viability analysis. Network Rail's report sets out its views on the effects on Narborough Level Crossing in its Summary Rail Report v4.2 Section 8.5. The view of Network Rail has been reinforced by the video survey results separately submitted at Deadline 3 (Doc ref 18.5.3 Rep 3-044).</p> <p>The principles used in assessing the Network Capacity are contained in Section 9 of the same report.</p> <p>The operation of Narborough Station and in particular the announcements system is as previously advised, a matter for East Midlands Railway, who manage this facility.</p>
18	Three basic questions which need to be answered relating to the operation of the proposed Terminal are; <ol style="list-style-type: none"> <li>1. Will Tritax or Network Rail be responsible for the provision of an auditable "Fitness to run" certificate, for all rolling stock that leaves the Terminal.</li> <li>2. Will covered facilities be provided for the inspection, maintenance and repair of locomotives and wagons and if so,</li> <li>3. What will be the level of noise emitted and will wagons have to be lifted by crane making it's own noise, or will below ground inspection pits be provided.</li> </ol>	It will be the Terminal Operator and the Train Operating Companies that will have their usual respective operating liabilities in terms of 'Fitness to Run' requirements. The detailed design within the Planning Parameters will be a matter for the Terminal Operator. Noise assessment have been taken into account in so doing.
19	There is at present a known rail capacity problem between the junctions at Wigston and Syston. This prevents XC trains that are already running, from not calling at Narborough and Hinckley in the morning and evening peaks. A situation we have strongly disputed with XC for a number of years. This we have	T. . Noted. Network Rail has identified that there is only one path that HNRFI traffic could use in the AM peak (7:00-10:00) and two in the PM peak (16:00-19:00) and indeed none of them may be used in

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	been told is a major factor why the Ivanhoe line, has never reopened, although it is used by freight trains. Our suggestions to transfer passengers between trains and Park and Ride 'buses at Meynells Gorse, have always been rejected due to railway line capacity problems in the area.	practice. Therefore, HNRFI traffic will not have an adverse effect on rail movements in the peak hours, which is the noted concern. See Network Rail's Summary Rail Report v4.2 paragraph 8.54).
20	So why will it be acceptable for half mile long heavy freight trains hauled by dirty diesel locomotives, to use that capacity. The operation at Leicester Station which is already busy with EMR and XC trains, will bound to be affected when a Tritax train turns up and has to cross the main line. The South Leicestershire Line only has three aspect signalling, as opposed to four aspect on a main line. There are no refuges, no passing loops and no facilities for Bi Directional working. Putting that simply, it means that any breakdown or other incident, could close the line for hours or days. Who would pick up the bill for it's effect on the country's economy?	Please see answer at 19 above, which confirms restricted access for HNRFI traffic through the morning and evening peak periods.  This line forms a key part of Network Rail's Strategic Freight Line between the Midlands and the North and as such is very much a freight mainline. HNRFI will be constructing crossovers which would allow bi-directional working, should Network Rail consider the investment in bi-directional signalling was of value in the future. The terminal will have the capacity to hold 775m freight trains in reception sidings, from either direction. It is government policy to grow rail freight by 75% (net tonne kilometres) by 2050, announced in December 2023 (Doc ref 16.1.10 submitted at Deadline 4), with intermodal rail freight and the development of SRFI's a key part of the strategy to deliver for the benefit of the economy; and to achieve NetZero.
21	Capacity and resilience is already an issue on the present operation of the South Leicestershire Line and is regularly tested, particularly by freight train failures. Earlier this year for example, the 05.33 GBRF freight train from Hams Hall to Felixtowe South broke down between Nuneaton and Hinckley at 06.15. This closed the line completely until 11.15. This resulted in hundreds of people being heavily delayed, including students who missed their exams. On behalf of FONS, I asked for a full investigation to take place. I received very detailed responses from both Network Rail and XC, for which I was very grateful. These however give no indication that problems with capacity and resilience, have gone away	The development of HNRFI has the potential to remove up to 83 million HGV kms per annum from the long -distance Strategic Road Network. One rail freight incident in April 2023 is not comparable to the number of incidents causing the M1 and A14 to be closed over the same period.  As part of the Government's policy to grow rail freight, it intends to enhance the network with targeted investment that will help grow capacity and resilience, with the major investment to achieve growth coming from the private sector, in the development of SRFI's and other terminals, as well as investment in rolling stock. See the GBRTT Developing options for a Rail Freight Growth Target to 2050 - Evidence Pack (document reference: 16.1.1)
22	Finally, I understand from the English Regional Transport Association that there is a wish to convert the Radlett in Hertfordshire Airfield into a Railfreight Terminal. The M25 motorway crosses the entire site, it could also have direct access to the Midland Main Line on one side and the A5 on the other side. Could we persuade Tritax to move their thoughts in that direction? I am more than happy to take questions and provide more information with particular regards to Tuesday's Agenda Item 4, if you so wish	The Radlett scheme already has consent and SEGRO completed the land assembly required to commence development in Jun 2023. This scheme will serve a different market to HNRFI.
	<b>Elmesthorpe Stands Together</b> <b>Receipt of Written Statements of Oral Cases at ISH2, ISH3, ISH4, CAH2, OFH1 and OFH2</b>	
23	It's been a very interesting week so far and we have appreciated the opportunity to hear other interested parties talk about the proposed development and to hear the many different opinions , concerns and questions put forward to the applicant as well as their answers , although at times it does feel like we come away with more questions than answers , we still feel we are lacking significant information relating to the construction period which in all the documentation is deemed as temporary however in reality those living with it feel the phrase temporary is not appropriate for a period of around 10 years , whilst the applicant has listed the working hours during construction as 7am to 7pm Monday to Saturday ,their is the possibility for additional start up and close down time which would then become 6.30am to 8 pm . Add to that the list of exceptions and types of work that may take place	The Construction Environmental Management Plan (CEMP) outlines the hours of working for the infrastructure activities on the main construction site which are defined as 7am to 7pm Monday to Friday and 7am to 1pm on Saturday, save for during Construction Phase 1 (Earthworks), which will continue until 3pm on Saturdays. No construction activities will take place outside these times save for rail works, National Highway works, and some utility diversions, all of which are dictated by the need to comply with possessions of the networks with the relevant controlling authority (e.g. Network Rail, National Highways).  During the construction of the warehouses, out-of-hours operations will be limited to the powerfloat finishing of the high specification internal floor slabs which typically take 14 hours of continuous finishing

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	outside of these hours we could very well be experiencing 24 hours construction at various points in the construction phase should this occur it would have an additional detrimental effect of those locally. Refer to document CEMP DOC REF 17.1. Point 1.21	work following the laying of the concrete Note this element of work is carried out within the enclosed building's envelope.
24	We already experience overnight rail works annually and on those occasions it is heard even on the far side of the village , despite asking both Tritax and network rail we have still not been advised if this will need to become more frequent	<p>This information was provided at Deadline 3 and Network Rail have advised that this section of track is considered average with the level of this type of works, as it is already a Category 1 route for maintenance purposes. With the forecast increase in tonnage these activities will only increase marginally.</p> <p>As detailed in ES Chapter 10: Noise and Vibration (document reference: 6.1.10) , and summarised in the Health and Equality Briefing Note (document reference: 6.2.7.1C), following mitigation, the increase in operational noise levels for the daytime and night time periods range between +0.1dB and +0.5dB on a weekday, and +0.4dB and +1.7dB on the weekend.</p> <p>This is below what is regarded a perceptible change in noise.</p>
25	Some on our questions and concerns may be due to the sheer amount of documentation and paperwork that the general public have to wade through to try and have an understanding of some of the technical items that you're all talking about, for something that impacts us so much we have to fight to find every bit of information in a sea of reports and plans. however what we do have is a Community of people that feel very strongly about protecting our way of life and our village and as such we will try and do our best to represent ourselves throughout this process, some of us may not have the technical know how and jargon but we do have words with feelings behind them and it can be very difficult to put together a case against the development, based on technicalities and facts when our strongest case is coming from our local knowledge	The Applicant is happy to assist in any reasonable way to aid the Elmesthorpe Stands Together Group to locate information and has made this offer to the group.
26	We feel that since developments were first proposed and throughout the application and examination process the thing that has remained abundantly clear to us all is that it will have a devastating impact on Elmesthorpe in almost every way. We wish we could be stood here today saying that we would welcome the opportunity to work with the developer to discuss further mitigation that could protect our way of life and Village however we genuinely feel that there is no mitigation that can reduce the impact that it would have to the village overall and especially those that live in close proximity to the development.	A package of mitigation measures have been put forward based on the environmental assessment of the scheme, these measures are set out in the REAC, this has been updated to reflect the latest position and forms part of the Applicant's deadline 4 submissions (document reference: 6.2.21.1).