Tritax Symmetry (Hinckley) Limited

HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE

The Hinckley National Rail Freight Interchange Development Consent Order

Project reference TR050007

Applicant's response to deadline 3 submissions [Part 7 - Statutory Bodies]

Document reference: 18.13

Revision: 01

9 January 2024

Planning Act 2008

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

Response Number	Matter Outstanding	Updated Position	Status & Next Steps	Applicants Response
1	National Highways has significant concerns that the proposals for active and sustainable travel have not been fully considered, and what is provided is exceptionally limited. We have therefore concluded it doesn't meet the requirements of the Circular and there is no clear vision or transport strategy for the development proposals. Our concern is that trips to and from the site by employees will be car dominated, having significant impacts upon the operation of the SRN.	National Highways has been working with the applicants on the development of an active & sustainable transport strategy. We have provided impact and case examples to aid the applicants in developing the document.	Discussions on-going: Applicants to provide a draft Active & Sustainable Transport Strategy for Consideration by ourselves and the Local Highway Authorities.	The Applicant provided an updated sustainable transport strategy at Deadline 3 (document reference: 6.2.8.1A, REP3-017), the Applicant has continued to work with NH to develop the plan and assess the impact of its effects and has submitted a further update to the sustainable transport strategy at deadline 4 (document reference: 6.2.8.1B, part 15 of 20).
Furnessing Methodology				
2	Whilst the general approach to applying the Furness process is acceptable, two areas of concern were identified: Where an observed (2018/19) turning movement is zero, or close to zero, the Furness process will not reflect a reassignment of traffic into the corridor where this is indicated as an effect of the scheme by the forecasting scenario outputs from the PRTM v2.2 traffic forecast model. There is a risk of underestimating the demand for a turning movement at an assessed junction. Where a large observed (2018/19) turning movement has had negative growth applied, due to reassignment effects in the PRTM v2.2 forecast outputs, then this could result in the suppression of a flow demand. This might be important to the junction's operational assessment if the suppressed flow demand is (say) a right turn. These two concerns may be addressed by undertaking a sense check using the PRTM reassignment impacts and turn movements; paying particular attention to the magnitude of flows that turn right at an assessed junction. Alternatively, the operational assessments of the junctions could include sensitivity testing of the derived turning proportions.	BWB Consulting Limited (BWB), on behalf of the applicant, has provided an explanation to National Highways on the data sets provided with clarity on the data sets provided to enable us to take a further assessment of the furnessing spreadsheets which have been submitted for our assessment.	Discussions on-going: National Highways to undertake a further review of the furnessing methodology and associated outputs which have been provided by BWB on behalf of the applicant.	Surveys have been commissioned as agreed with NH and LCC, for the mitigated junctions to review the furnessing with contemporary flows. Methodology has not been further questioned following provision of information at Deadline 2 (document reference: 6.2.8.1, APP-146).

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3	3. For those junctions along the Development's spine road, the report contains no description of how design reference flows were derived from PRTMv2.2 forecast outputs (which model loads all development trips at a single zone) combined with a 'first principals' method of distributing trips generated by the development. It is noted that the design of the spine road is not a specific concern for the SRN, such as the M69, A5, M1 corridors.	National Highways has raised this matter with BWB, on behalf of the applicant during the workshop which took place on the 13th November 2023.	Discussions on-going: BWB to look into this matter and provide National Highways and the Local Highway Authorities with a response	The review has been completed and is contained withn Transport 2023 Update (document reference 18.13.2) submitted at deadline 4.
4	4. There is no traffic forecasting set for the scenario 'With development generated trips' demand assigned to a 'Without HNFI infrastructure network'. This forecasting set would identify if all the link and junction improvements are necessary. This forecasting set would also assist in determining construction phase timing and sequencing of improvements.	It is understood that all mitigation will be required up front to support the development and the rerouting of traffic across the SRN and LRN. Therefore, no such scenario would be required.	Matter resolved	Noted
Strategic modelling methodology and outputs				
5	National Highways are not able to fully consider the suitability of the strategic modelling undertaken at present. The justification being that not all parameters which have been used within the PRTM modelling methodology have been agreed with us including the furnessing methodology. This has prevented us being able to fully review and consider the outputs which have been provided to ourselves until our concerns regarding the methodology have been addressed. Furthermore, we have not been able to undertake a full review of all the transport supporting information as a Transport Addendum is awaited which will provide further modelling methodology and outputs based on modelling through Rugby Rural Area Wide Model (RRAM) which is managed and maintained by Warwickshire County Council. This information is crucial for us to fully understand the impacts the development proposals will have on the SRN.	National Highways confirms that the PRTM and RRAM model are the correct tools to be utilised to understand and identify the impact that the development proposals will have upon the operation of the Strategic Road Network. National Highways has been directed to the BWB Sharepoint site to review the furnessing data in light of discussions at the workshop which took place on the 13th November 2023.	Discussions on-going	Noted- There has been agreement to update surveys specific to junctions with mitigation proposed. The surveys were carried out in November (neutral traffic month) and furnessing/modelling is updated for submission at Deadline 4 Commentary is included within the Transport 2023 update (document reference 18.13.2). The RRAM comment is noted as the correct tool for understanding impact on the SRN.
PRTM Reviews				
6	AECOM on behalf of National Highways undertook a	National Highways has been	Discussions on-going	Noted- Sharepoint and full models previously shared with schedule of inputs and dates. A full schedule was shared with the TWG on the 23.11.23.

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	review of PRTM v2.2 Hinckley National Rail Freight Interchange Application: Forecasting Modelling version 3 dated the 3rd May 2022 and supporting additional data and plots provided in September 2022. This review was completed on the 29th September 2022, and the technical note is provided in Appendix C National Highways has requested a further review be undertaken by AECOM of the supporting PRTM modelling reports. This review has highlighted that no further assessments or refinement have been undertaken by BWB. Based on this the following matters need to be addressed.	directed to the BWB Sharepoint site to review the furnessing data and additional PRTM information in light of discussions at the workshop which took place on the 13th November 2023.		
7	1. Whilst the modelled trip distributions appear logical, some of the routeing patterns to and from the development do not use highest standard routes to the destination. If traffic can be persuaded to use the most appropriate roads, this would result in an increase in traffic on some parts of the SRN.	National Highways has been directed to the BWB Sharepoint site to review the furnessing data and additional PRTM information in light of discussions at the workshop which took place on the 13th November 2023.	Discussions on-going	Noted, as above.
8	2. On some roads, particularly the M69 to the north of Hinckley NRFI going up to M1 Junction 21, the increase in traffic flow on the road is less than the assigned traffic from the development. This is a demonstration that development traffic is causing existing traffic to divert away from the preferred route. The roads being used are of a lower standard.	National Highways has been directed to the BWB Sharepoint site to review the furnessing data and additional PRTM information in light of discussions at the workshop which took place on the 13th November 2023.	Discussions on-going	Noted- as above.
9	3. Assuming that all traffic uses the most appropriate roads may mean that more mitigation would be required to avoid adding to congestion at the most congested junctions.	National Highways has been directed to the BWB Sharepoint site to review the furnessing data and additional PRTM information in light of discussions at the workshop which took place on the 13th November 2023.	Discussions on-going	Noted as above
Rugby RAM Modelling				

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10	Based on our consideration of the RRAM modelling outputs provided, National Highways is unable to agree to the modelling at this moment in time until the following matters are resolved.	National Highways have engaged with the applicants consultants, BWB and Warwickshire County Council. We have also undertaken a further review and this matter is now resolved.	Matter resolved	Noted
11	1. The claimed reduction of 22 seconds 'mean delay' benefit obtained from across the RRAM network is substantially less than the range of accuracy that can be obtained from an application of the RRAM traffic model. There is a low level of assurance in stating this conclusion.	National Highways have engaged with the applicants consultants, BWB and Warwickshire County Council. We have also undertaken a further review and this matter is now resolved.	Matter resolved	Noted
12	2. Journey time Route "R1" along the M69 did not validate against observed journey times in the base Year. Without knowing the narrative behind why the RRAM is simulating vehicles as travelling too slowly along the M69, it is difficult to attribute a level of confidence to the tabulated results.	National Highways have engaged with the applicants consultants, BWB and Warwickshire County Council. We have also undertaken a further review and this matter is now resolved.	Matter resolved	Noted
13	3. Similarly, the difference in journey times along the A5 strategic route ("R7") could be due to a number of modelling parameters and might not be attributable to using an alternative forecasting scenario alone.	National Highways have engaged with the applicants consultants, BWB and Warwickshire County Council. We have also undertaken a further review and this matter is now resolved.	Matter resolved	Noted
14	4. The locations where journey times increase are described in bullet points at paragraph 3.5. However, the wording in brackets is confusing. The journey times presented in Table 1 are total journey times for the full route lengths.	National Highways have engaged with the applicants consultants, BWB and Warwickshire County Council. We have also undertaken a further review and this matter is now resolved.	Matter resolved	Noted
15	5. Care needs to be taken when examining journey times along route segments. The average journey speeds were	National Highways have engaged with the applicants	Matter resolved	Noted

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	not validated in the Base Year for links with short lengths.	consultants, BWB and Warwickshire County Council. We have also undertaken a further review and this matter is now resolved.		
16	6. RRAM was built by Vectos using S-Paramics microsimulation software. BWB is using VISSIM microsimulation software. The claimed betterment appears to have been achieved by changing software packages.	National Highways have engaged with the applicants consultants, BWB and Warwickshire County Council. We have also undertaken a further review and this matter is now resolved.	Matter resolved	Noted
17	7. Paragraph 3.8 and Table 2 present journey time changes for the PM one- hour peak. The same comments apply as for paragraph 3.4 and Table 1 above.	National Highways have engaged with the applicants consultants, BWB and Warwickshire County Council. We have also undertaken a further review and this matter is now resolved.	Matter resolved	Noted
Development impact upon the SRN				
18	J4 – A5 The Longshoot Junction: The assessment of the A5 Longshoot junction is not correct. This is because operationally the A5 Longshoot Junction and A5 Dodwells Junction work as one. Therefore, they must be assessed together. In addition, all three Highway Authorities have agreed a modelling protocol for this junction, which we expect applicants to accord with. A copy of this protocol is provided in Appendix E.	At the workshop on the 13th November 2023, it was agreed that the A5 the Longshoot and Dodwells Junctions will be assessed in accordance with the modelling protocol provided in Appendix E of National Highways written submissions.	Applicant to undertake modelling in accordance with the A5 The Longshoot and Dodwells Modelling Protocol.	Noted- the modelling has taken place and has been submitted at Deadline 4 as part of the Transport 2023 Update (document reference: 18.13.2) .
19	In addition, the following information is required to enable us to complete our assessment of the submitted LINSIG model. – Signal Controller not provided so the modelled setup cannot be compared to the on-street setup. – CAD drawings have not been provided so the measurements in the model cannot be checked. – The demand spreadsheets have not been provided	The traffic flow information which will be utilised is still not agreed until National Highways is satisfied with the furnessing methodology.	Discussions on-going	There was agreement within the workshop on 13.11.23 to map the HNRFI PRTM flows onto the Padge Hall Farm data to test the A5 junctions within the VISSIM. This has been included within the Transport 2023 Update (document reference 18.13.2)

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	so the demands in the model cannot be checked. – The Saturation Flow has been calculated using LinSig's built in RR67 calculation, however, turn radii have not been entered.			
20	J13 - M69 Junction 1 The following information is required to enable us to complete our assessment of the submitted VISSIM model. – Signal Controller not provided so the modelled setup cannot be compared to the on-street setup. – CAD drawings have not been provided so the measurements in the model cannot be checked. – The demand spreadsheets have not been provided so the demands in the model cannot be checked. No model has been provided so cannot be checked.	The traffic flow information which will be utilised is still not agreed until National Highways is satisfied with the furnessing methodology.	Discussions on-going	Updating of the MOVA system was discussed on 13.11.23 at the highways workshop. NH and LCC agreed that this is in line with the DPD application site (circa 4 years ago). Furnessing has been reviewed and revised surveys have taken place across all mitigation junctions, including the M69 J1 . Further information is in the Transport 2023 Update submitted at deadline 4 (document reference 18.13.2).
21	J14 - A5 Dodwells Junction The assessment of the A5 Dodwells junction is not correct. This is because operationally the A5 Longshoot Junction and A5 Dodwells Junction work as one. Therefore, they must be assessed together. In addition, all three Highway Authorities have agreed a modelling protocol for this junction, which we expect applicants to accord with. A copy of this protocol is provided in Appendix E. In addition, the following information is required to enable us to complete our assessment of the submitted LINSIG model. – Signal Controller not provided so the modelled setup cannot be compared to the on-street setup. – CAD drawings have not been provided so the measurements in the model cannot be checked. – The demand spreadsheets have not been provided so the demands in the model cannot be checked. – The Saturation Flow has been calculated using LinSig's built in RR67 calculation, however, some turn radii have not been entered. For example, Lane 10/1. – Some of the Saturation Flows are also quite high	At the workshop on the 13th November 2023, it was agreed that the A5 the Longshoot and Dodwells Junctions will be assessed in accordance with the modelling protocol provided in Appendix E of National Highways written submissions. The traffic flow information which will be utilised is still not agreed until National Highways is satisfied with the furnessing methodology.	Discussions on-going Applicant to undertake modelling in accordance with the A5 The Longshoot and Dodwells Modelling Protocol.	Noted, as point on Longshoot above.

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	(in excess of 2000 PCU/Hr). These may be too high to accurately model behaviour on a roundabout.			
22	Junction 26 – A5 / A426 Gibbet Hill (Existing Layout) It has not been possible to verify the roundabout geometry values input into the Existing Layout model without a scaled plan of the junction. This should be provided. Please also supply any traffic flow spreadsheets developed to demonstrate how the traffic flows used in the submitted models have been determined.	The traffic flow information which will be utilised is still not agreed until National Highways is satisfied with the furnessing methodology.	Discussions on-going	Noted- see next response
23	J26 - A5 Gibbet Hill (Proposed Layout) The following information is required to enable us to complete our assessment of the submitted LINSIG model. – CAD drawings have not been provided so the measurements in the models cannot be checked. – The demand spreadsheets have not been provided so the demands in the model cannot be checked. – The Saturation Flows have been entered manually rather than using LinSig's RR67 calculation. The calculations that resulted in these Saturation Flows have not been provided so cannot be checked. – Custom lane lengths have not been entered. This isn't necessary incorrect, however, it would depend on the junction's measurement which have not been provided.	The proposed layout is not being progressed by National Highways nor any other party. Therefore, this assessment is no longer required.	Matter resolved.	Noted.
24	Junction 27 – A5 / A4303 / B4027 Coal Pit Lane Roundabout Although the proposed layout drawing has been provided within the Transport Assessment, it has not been possible to fully verify the roundabout geometry values input into the Existing and Proposed models due to the extent of the junction shown on the plan. Please can further information be provided to demonstrate how the roundabout geometry has been calculated. National Highways requests the provision of any traffic flow spreadsheets developed to demonstrate how the traffic flows used in the submitted models have been determined.	A further workshop meeting between the applicant's consultants, BWB, and National Highways will be taking place on the 13th November 2023. The traffic flow information which will be utilised is still not agreed until National Highways is satisfied with the furnessing methodology.	Discussions on-going	As point above related to additional surveys for furnessing purposes and modelling updates within the Transport 2023 Update (document reference: 18.13.2), submitted at deadline 4.
25	Junction 30 – A5 / Higham Lane Roundabout Chapter 8 of the Transport Assessment does not	The traffic flow information which will be utilised is still	Discussions on-going	This information has been included in previous data drops on the TWG Sharepoint site. As highlighted in the Schedule shared on 23.11.23.

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	summarise the capacity results of this junction. Please clarify its absence from the report and update as necessary. It has not been possible to verify the roundabout geometry values input into the Existing Layout model without a scaled plan of the junction. This should be provided. National Highways requests the provision of any traffic flow spreadsheets developed to demonstrate how the traffic flows used in the submitted models have been determined.	not agreed until National Highways is satisfied with the furnessing methodology.		
26	M69 Junction 1 and M69 Junction 2 Traffic modelling work was previously submitted for review, with comments provided by National Highways within the formal S42 Consultation Response dated 8 April 2022. This response stated that although VISSIM base model validation for M69 Junction 1 and M69 Junction 2 had been agreed, models assessing the with development scenarios were not provided for review. Although we note that the TA summarises results of these assessment scenarios, will require the accompanying model files to be submitted before impacts at these junctions can be agreed.	The traffic flow information which will be utilised is still not agreed until National Highways is satisfied with the furnessing methodology. Discussions on-going regarding the proposed mitigation for M69 Junction 1.	Discussions on-going	Furnessing has been reviewed and revised surveys have taken place across all mitigation junctions, including the Dodswell/Longshoot. Further information is in the Transport 2023 Update submitted at deadline 4 (document reference 18.13.2).
27	M1 Junction 21 From review of the PRTM forecast flows at the junction, TA Table 8-6 shows that the most significant impacts shall be in the PM peak, with an overall increase of 114 vehicles across the junction as a result of the development. 107 of these vehicles however are on the A5460 local road link, with minimal change in demands on the M1 or M69 approaches in either peak period. A merge-diverge assessment has been carried out, which based on these flows demonstrates that the development impacts shall not trigger the requirement for upgrade to the junction's merges or diverges.	The traffic flow information which will be utilised is still not agreed until National Highways is satisfied with the furnessing methodology. National Highways continues to note a considerable concern about the impact at this junction and the lack of mitigation being identified by the applicants at present.	Discussions on-going	Additional assessments discussed at the workshop that took place on 13.11.23. Analysis of the STS impacts have been considered along with revised traffic surveys to feed into the furnessing. Furnessing has been reviewed and revised surveys have taken place across all mitigation junctions, including J21 M1 Further information is in the Transport 2023 Update submitted at deadline 4 (Doc Ref 18.13.2). A review by BWB of the Lutterworth East SUE mitigation proposed by NH has been undertaken.
Development Mitigation Strategy for the SRN				
28	The Applicant and their consultants have not discussed the mitigation strategy with National Highways at this present time. It should also be noted that some locations have mitigation identified whilst others, the documents note, mitigation is required but a scheme has not been identified. At present we are unable to agree the development	National Highways has actively engaged with applicants to identify the range of mitigation being identified to reosvle the development impact. There is agreement that this	Discussions on-going	Noted and agreed. The workshop on 13.11.23 identified work for submission by the Applicant team for Deadline 4. This is included within the revised Sustainable Transport Strategy (document ref 6.2.8.1B pt 15/20) and the Transport 2023 Update (This was document reference 18.13.2)

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	mitigations strategy. This is because we have been awaiting the completion and sign off of the strategic modelling with the Applicant's consultants and other stakeholders to understand the traffic flows at the junction in the base and future year assessments. This data is key to setting the design parameters and design standards and understanding whether any departures from standard are required in accordance with DMRB.	consists of a variety of tools including sustainable and active travel interventions as well as physical mitigation schemes where required. Inclusion of these will be required through the requirements.		
Deliverability of the Railhead and capacity on the Nuneaton & Leicester Railway Line				
29	National Highways is concerned whether the railhead on the Nuneaton & Leicester Railway Line is deliverable as we have not seen the assessments nor agreement from Network Rail. We also have concerns that the acceptance of the scheme would limit future capacity on the line to the detriment of passenger services which are crucial as a viable alternative to car based strategic trips between Birmingham, Nuneaton, Hinckley and Leicester.		Matter outstanding: National Highways awaits the submissions from Network Rail on this matter as part of Deadline 3.	This was delivered at Deadline 3 as draft report (document reference: 18.6.5, REP3-050), it has now been finalised to go with the SoCG which is submitted at Deadline 4 (document reference: 19.7A). The scheme has Network Rail's full support. This scheme can remove up to 83 million HGV miles per annum off the long-distance Strategic Road Network. National Highways should be supporting Network Rail in this endeavor.
M69 Junction 2 – Slips				
30	National Highways has no objection to the principle of the slip roads and their implementation however there are still the following aspects which need to be confirmed, some of which are also linked to environmental matters as well:	A further workshop meeting between the applicant's consultants, BWB, and National Highways will be taking place on the 16th November 2023.	Discussions on-going	Noted. The applicant has engaged positively with National Highways on a number of preliminary design items in the form of drawing and report submissions and workshop meetings. The most recent correspondence was the re-submission of the geometric design strategy record for the new slip roads to NH following receipt of comments on the previous iteration.
31	Agreement of the strategic modelling to agree and identify traffic flow to enable the agreement of the design parameters and required standards or where departures are required in accordance with DMRB	A further workshop meeting between the applicant's consultants, BWB, and National Highways will be taking place on the 16th November 2023.	Discussions on-going	Noted- positive progress made through design discussions. To date, the correspondence with National Highways has accepted the design proposals put forward are subject to agreement of the modelling. Updates to the observed traffic data (2023) for the strategic model outputs have been carried out ahead of deadline 4. These are broadly more favourable than the original data outputs in terms of impacts and can be seen in the Transport 2023 Update (document reference: 18.13.2) submitted at deadline 4.
32	Departure from Standard submitted for approval in principle in regard to the removal of the hard shoulder through M69 J2 to create all lane running for the inclusion and provision of the new slips.	Approval in Principle has been given by SES at National Highways for this departure.	Matter resolved.	Noted
33	Understanding of the suitability of the bridge structures to accommodate the additional traffic and the	A further workshop meeting between the applicant's	Discussions on-going	Record drawings for the structures have been obtained and they have been discussed in design workshops with National Highways, The proposed

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	introduction of the slips, access arrangements and improvements to the circulatory.	consultants, BWB, and National Highways will be taking place on the 16th November 2023.		amendments to Junction 2 do not involve any structural works to the bridges over the M69. The bridges are not widened and therefore will not be subject to additional loading. The new slip roads do not interact with the structures and do not affect access arrangements for maintenance or traffic utilising the circulatory carriageway.
34	Agreement of the WCHAR and RSA Stage 1 Briefs and CVs when National Highways is satisfied with the design of the slips and access arrangements for M69 Junction 2	A further workshop meeting between the applicant's consultants, BWB, and National Highways will be taking place on the 16th November 2023.	Discussions on-going	Interim RSA (document reference: 21.1)have been submitted at deadline 4 , these are subject to confirmation with National Highways.
35	Landscaping: National Highways notes that the introduction of the northbound on-slip and southbound off-slip will impact the landscape in the vicinity of M69 Junction 2. This is mainly due to the removal of substantial and well-established vegetation on the embankments adjacent to the M69. Landscaping has an important role of limiting the impact on the landscape of the visibility of the SRN whilst also having a role in mitigating noise impact of the network.	A further workshop meeting between the applicant's consultants, BWB, and National Highways will be taking place on the 16th November 2023.	Discussions on-going	The vegetation lost as a result of the slip road construction will be replaced by new planting alongside the new slip roads as illustrated on the Illustrative Landscape Strategy, Figure 11.20 (document reference: 6.3.11.20A).
36	Lighting / Lighting Impact: the landscape impact assessments need to consider the potential visual impact that the lighting of M69 Junction 2 will have on the landscape. Whilst the existing circulatory of the junction is lit, the need to accord with the requirements of standards set out in DRMB, may require the new proposed slips, and existing slips to be lit and for this to extend onto the M69 mainline in the interests of highway safety. It should be noted that the existing M69 mainline and existing slips are not lit.	Discussions have taken place between the applicants' consultants and the asset management for lighting and an agreement in principle has been reached regarding to the requirement and extents of lighting.	Discussions on-going	The proposed extents and classification of the lighting at M69 Junction 2 and the proposed slip roads has been shared with National Highways and accepted in principle by the relevant NH asset owner. The agreed extents of lighting are the junction 2 circulatory carriageway as at present and 5 seconds of drive time at the relevant speed on each of the slip roads. The M69 main line and the remainder of the slip roads themselves are to remain unlit. The revised Landscape and Visual ES Chapter 11, includes an assessment of the additional lighting as set out in paragraph 11.181 (document reference: 6.1.11) .
37	Biodiversity: Based on our assessment we would also note that the proposed works at M69 Junction 2, also need to be considered through relevant biodiversity assessments. National Highways also requires details of biodiversity off-setting for the loss of habitats which potentially exist on the	A further workshop meeting between the applicant's consultants, BWB, and National Highways will be taking place on the 16th November 2023.	Discussions on-going	An updated iteration of the metric is included within the revised Biodiversity Impact Assessment (document reference: 6.2.12.2A) (submitted at deadline 4) and includes consideration of the M69 Junction.

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	verges of the M69 at junction 2.			
38	Drainage: National Highways needs to fully consider the full drainage strategy for the development proposals and how it relates to the SRN. However we are unable to fully consider the drainage implications of the proposals related to the SRN until further clarity is provided in the feasibility and development of the highway schemes notable for M69 Junction 2.	A further workshop meeting between the applicant's consultants, BWB, and National Highways will be taking place on the 16th November 2023.	Discussions on-going	It is not considered that the drainage strategy for the Main Site has any impact on the SRN (refer to document reference 6.2.14.2). Document reference 6.3.14.7 shows a drainage strategy for the new M69 Junction 2 slip roads. The applicant has been involved in workshop meetings with NH regarding various elements of the M69 slip roads and has provisional approval for departures from standards. It is the applicant's view that the work undertaken to date adequately demonstrates the feasibility of the new slip roads and that the drainage proposals put forward under document 6.3.14.7 should be considered by NH.
HGV Routing Strategy & Enforcement				
39	National Highways requires further clarity on the proposed HGV routing strategy and notably around its enforcement. At present National Highways cannot agree to this as who is responsible for the strategy and enforcement is not clear. We also require additional information for the potential location of any associated infrastructure and who would be responsible for its maintenance.	National Highways has been working with the applicant's consultants, BWB, to identify the HGV Routing Strategy and suitable routes. National Highways also accepts that none of the infrastructure will be on its network.	Discussions on-going	Updates to the HGV Route Management Plan and Strategy were submitted at Deadline 3. (document reference: 17.4, REP3-038).
Construction Management Plan				
40	National Highways requires further clarity on the construction management plan due to how it will function with the implementation of the development proposals and the associated infrastructure. In addition, the routing of construction traffic also needs to be fully considered during the phasing of the development and implementation of the associated infrastructure. As works to M69 Junction 2 may warrant for this junction to be closed for significant periods to traffic movements whilst works should the development be approved are implemented.	National Highways has been working with the applicant's consultants, BWB, to identify the HGV Routing Strategy and suitable routes. We are also awaiting the publication of the GANNT Chart which has been requested for Deadline 3.	Discussions on-going:	Updates to the HGV MRoute Management Plan and Strategy were submitted at Deadline 3. (document reference: 17.4, REP3-038). Additional data in relation to construction phasing Gannt charts (document reference: 18.6.3, REP3-048) were submitted as part of the Applicant's Deadline 3 response.
Emergency Response Plan				
41	It was noted that during the examination by the ExA about providing details and modelling on what would happen should the M69 be closed.	National Highways and the applicants have discussed the matter. An emergency plan with routes identified is being	Discussions on-going:	The Applicant has submitted at deadline 4, Hinckley NRFI Strategic Road Network Incident Plan (document reference: 17.8.1), this was created in liaison with National Highways.

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		prepared by the applicants. National Highways has submitted a note which sets out our current operational plans for the M69.		

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	CPRE **This note includes a number of comments based on the hearings CPRE Leicestershire and Sapcote Parish Council attended, (ISH 2-4) and has been prepared jointly on their behalf to address a few selected issues where we consider additional comments to our existing statement may be helpful to the examining authority**	
42	2. Transport (ISH2) 2.1 Road Safety Audits	
43	2.1.1 We remain concerned at the lack of a Road Safety Audit and the ability to comment on it at this stage. Such an audit would seem a basic requirement, however, it is still not available, although it is promised.	Interim RSAs have been carried out following a lack of agreement on timing with NH and LCC. Findings have been shared and discussed with LCC as the Local Highway Authority, these also form part of the Applicant's deadline 4 submission (document reference 21.1).
44	2.1.2 It is also not clear what scope the RSA would cover, and whether it would address road safety at critical points on the local network, or in those severely impacted villages where an overall road safety, suitability and amenity assessment has not been undertaken	RSAs review local safety around junctions and links where mitigation is proposed. Designs have been updated for Deadline 4 in line with RSA commentary (document reference: 21.1)
45	2.1.3 It is also unclear that data required to meet the checklist of GG119 are available, in particular, the base data to consider the impact on vulnerable users. The following questions, for example, require an understanding of pedestrian/cyclist usage at sensitive locations: • Have pedestrian/cyclist routes been provided where required? • Is specific provision required for special and vulnerable groups? (i.e., the young, older users, mobility and visually impaired?) • Have the needs of pedestrians/cyclists been considered especially at junctions and roundabouts?	Data to address GG119 requirements and requests from LCC have been picked up in the RSA (document reference 21.1) submitted at Deadline 4 Further work on active travel modes has been included in the updated Sustainable Transport Strategy submitted at deadline 4 (document reference: 6.2.8.1B pt 15/20), this is ongoing. Vulnerable road users are considered within the audit and design process.
46	2.1.4 A further safety issue may arise in terms of Emergency Access. The issue of battery storage fires (particularly lithium storage) was raised at the hearing and this has been a matter of concern at other locations where CPRE has been involved. Although we understand the Emergency Services were contacted initially, it is unclear that they have assessed the access required, particularly in the case of such an incident, and this would seem necessary confirmation	Emergency access has been fully considered, the site is accessible from multiple locations from the surrounding highway network.
47	2.1.5 There is also an on-going concern that the Emergency Plan is still not available (even in draft) and any RSA would need to take account of that	The Applicant has worked with NH and has submitted a Strategic Road Network Incident Plan (document Ref 17.8.1) as part of the Applicant's Deadline 4 submission .
48	2.1.6 Clearly an RSA is needed and the opportunity for interested parties to comment on its scope, applicability and conclusions	As above, an interim RSA has been carried out by an independent Road Safety Consultant (document reference: 21.1). The full RSA brief will be agreed with National Highways, LCC and WCC as per GG119 requirements.
	2.2 HGV Traffic Growth through villages, including Sapcote and Stoney Stanton	
49	2.2.1 The promoter has now finally provided a series of maps showing the links which were modelled in Table 8.19 of the EA.	Noted
50	2.2.3 Indeed, an overall map with bidirectional link data would have given a clearer picture of the model's outputs. That is something we believe would assist the examining body and other interested parties. The schematic (not-to-scale) below may assist in considering this issue for Sapcote, in particular.	Noted, see below response 51 for comments.

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	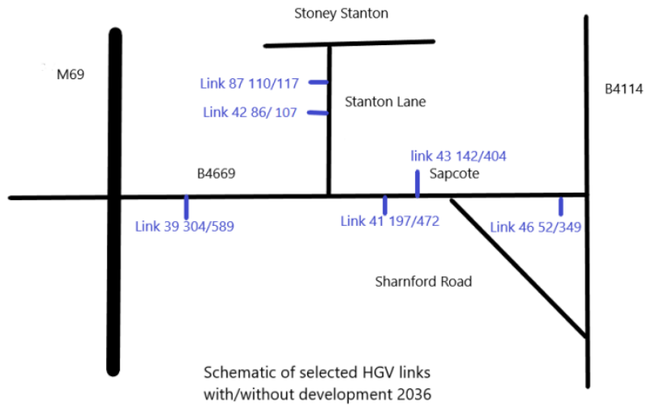 Schematic of selected HGV links with/without development 2036	
51	2.2.4 In our view some of these modelled outputs are not entirely credible, particularly with regards to HGVs. For example, if one considers link 42 and 87, both on Stanton Lane (Link Table 21), the number of HGVs on link 87 in the 'without development' case is significantly higher than 42 (110 compared to 87) but there is no obvious reason for this. In the development case both still increase but that HGV difference reduces, (noting, of course, that there is no figure to say if that number would increase following mitigation at the B4669/Stanton Lane Junction)	Further information was provided in an HGV impact note at Deadline 3 (document reference: 18.6.6, REP3-051). This discusses impacts around the eastern villages as well as other sensitive locations, in relation to redistribution of HGVs and availability of routes to the Strategic Road Network. However, in answer to this query re links 42 and 87 on Stanton Lane, BWB received AADT PRTM flows from AECOM, acting as the Modelling consultant for LCC NDI. It is understood that AECOM determined the AADT flows by commissioning various ATC points situated on roads of different classifications. They then calculated a percentage increase in flows between peak hours and AADT flows for each road classification. The road classifications provided by AECOM are as follows: 1. A Road 2. B Road 3. TRADS (Motorways) 4. Unclassified Roads (Rural) 5. Fixed (Residential) A review of the PRTM link network indicates that the road classification changes from 2 to 5 between Link 42 and Link 87, respectively. Consequently, it is understood that factors respective of the road classifications were applied to each link to calculate the AADT link flows, and therefore presenting a difference in flows. Both links have been assessed in the ES Chapter and as shown above the larger HGV impact is assessed in the area that would have the most impact (northern end of Stanton Lane) as a worst case.
52	2.2.5 It may be that this reflects a problem with the model and in particular the use of a strategic model as the basis for calculation local links.	See the above- response 51 The Model is appropriate and the calculation of AADT is normal practice and appropriate for a strategic model the size of the PRTM.
53	2.2.6 What is more consistent is a comparison of the number of HGVs on the link between the M69 and Stanton Lane (Link 39, Link Table 20) and the split of HGVs on link 41 (B4669 into Sapcote, Link Table 25) and link 42 (to Stoney Stanton). Of	See the above, yes these links are all one road type in the provided data.

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	the 589 in the 'with development' scenario on Link 39, most (472) continue to Sapcote.	
54	2.2.7 Comparing Link 41 and Link 43 shows that HGVs through Sapcote increase by between 262 and 275 per day.	
55	2.2.8 However, something odd happens if one considers Link 46, which is the link on the B4669 close to the junction with the B4114. HGVs have reduced in the 'without development' case to 52, a reduction of 90 on Link 43. However, in the 'with development' case, they have reduced by only 55. The overall increase on Link 46 is increased to 297.	Similarly to the above, the nature of the link changes as it leaves the residential area and therefore there is a road type change on leaving the village hence the drop in traffic (opposite to the above on Stanton Lane as it enters the village, it increases) The environmental assessment is not affected by these reductions as no sensitive receptors are on these links leaving the villages.
56	2.2.9 It is hard to explain a reduction on this link in terms of HGV destinations in Sapcote, which are limited. However, it does imply significant diversion down the very unsuitable Sharnford Road, which is not identified as a link in the model.	Note response to 51 above.
57	2.2.10 One could expect diversion modelled along that route in the 'with development' case to at least reflect a similar split with the B4669 as in the 'without development' case, but it does not.	Note response to 51 above
58	2.2.11 The extent to which diversion down Sharnford Road would in reality be mitigated by its unsuitability, notwithstanding Satnav and other issues, but clearly either alternative route is undesirable.	Note response to 51 above
59	2.2.12 All this highlights our concern that the impact of traffic, particularly HGVs through villages such as Sapcote, and on unsuitable roads such as Sharnford Road, is not properly explained (something which might be clearer if the link data on Sapcote shared with the TWG were submitted to assist the examining authority)	Note response to 51 above.
	2.3 Mitigation for HGV Traffic	
60	2.3.1 Discussion was also had regarding the mitigation of traffic impacts. Stress was placed on three things, 1. the HGV route management strategy (RMS), 2. physical interventions, mainly junction improvements and 3. the provision of Public Transport	Noted
61	2.3.2 While, we dispute the likelihood that PT provision will be successful, (as set out in our previous representations), it is also clear that they would not impact specifically on the level of HGV usage.	Noted
62	2.3.3 Junction Improvements would also not mitigate HGV growth but allow more HGVs on local routes and other gateway proposals would seem to have limited impact (as stated by LCC).	Delay within the network, as created by new signal junction, can act as a deterrent to HGV (and regular traffic). Further measures are discussed in the HGV impact note submitted at Deadline 3 (document reference: 18.6.6, REP3-051).
63	2.3.4 Considering the RMS itself, it would, we are told, rely on a private system operated by the Site Management Company. Para 5.24 allows that LCC/WCC and Local Parish Councils will have a contact number of they consider breaches have taken place	The prohibited routes will be monitored using Automated Number Plate Recognition (ANPR) cameras. Further detail is included in the updated HGV oute Management Plan and Strategy (document reference: 17.4B,).
64	2.3.5 Breaches will be reported to the local authorities (Para 5.34) but not Parish Councils to take formal enforcement action. In the case of persistent breaches	Further detail is included in the updated HGV Route Management Plan and Strategy (document reference: 17.4C, REP3-161.

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	action may be taken against a tenant, although it is unclear what would constitute a persistent breach and what incentive there would be for such action to be pursued.	
65	2.3.6 No monitoring mechanism is outlined to inform the public (or Local Parish Councils) on whether the RMS is being adhered to	Further detail is included in the updated HGV Route Management Plan and Strategy Para 5.1 of the HGV Route Management Plan and Strategy (document reference, 17.4C, REP3-161) sets out that the parish councils will be asked to attend steering group meetings alongside the highway authorities and the local planning authority.
66	2.3.7 Nor does the RMS, if enforced, prohibit development HGVs from going through local villages. For Sapcote, as an example, a breach would only be triggered if more than 67 development lorries went through the village (RMS Table 2). According to Table 8.19 of the EA 472 HGV would use Section 41 and 404 Section 43 in the centre of Sapcote, (275 and 262 respectively are additional to the 'without development' scenario.) No more than 26% of the additional HGVs would, therefore, be anticipated to be development traffic. Moreover, development traffic which did not breach the RMS would on its own increase HGVs through the centre of Sapcote by over 50%.	Further detail is included in the updated HGV Management Plan and Routing Strategy (document reference, 17.4B, REP3-161). The development HGVs can be managed through Sapcote and the HGV Management Plan and Route Strategy (document reference: 17.4, REP3-161) sets out the daily breaches are to be agreed with the Highway Authorities. Prohibited HGV routes include the B4669 through Sapcote for the HNRFI, The Applicant cannot however restrict HGVs through the village as this route is identified as a lorries allowed route in Leicestershire's Network Management Plan, see the extracted Figure 5.1 under paragraph 3.10 of the HGV Route Management Plan and Strategy. This plan is used by hauliers and local businesses such as Croft Quarry in there planning submission in 2019 and subsequent consent.
67	2.3.8 Notably, as well, the RMS would not sanction development HGVs from using unsuitable cut-throughs, such as Sharnford Road. Para 5.15 of the RMS places the ANPR camera between Stanton Lane and Sapcote so that could simply not be enforced.	Further detail is included in the updated HGV Rute Management Plan and Strategy (document reference 17.4B, REP3-161). Development HGVs would need to pass the ANPR in Sapcote or Stoney Stanton to access the B4114. Should other routes and areas be affected by the development HGVs then this can be discussed at the steering group meetings and any further action agreed. AContributions will be set aside by the developer to fund additional measures and for community benefit from the proceeds of the fines received due to HGV routing transgressions. This is secured through the Hinckley NRFI HGV Route Management Plan and Strategy submitted at Deadline 4
68	2.3.9 Furthermore, if the unpublished Emergency Plan allowed lorries to route along the B4669, the figure of 67 may be breached at those times with no repercussions.	The Applicant has liaised with NH and has submitted a Strategic Road Network Incident Plan as part of the Applicant's Deadline 4 submission (document reference: 17.8.1) .
69	2.3.10 One obvious issue for local residents regarding the RMS is that it would be almost impossible for them to identify breaches, even if they monitored HGVs through their village and they would be entirely reliant on the (to them unknown) actions of the management company	The plan is intended to be self-enforcing to place the onus on the operators on the site to take responsibility for routing and communication of prohibited routes. However as noted above the Parish Council will be asked to join the steering group whereby the report and monitoring will be presented and discussed.
70	2.3.11 And, even if one accepts the RMS on face value, it clearly could not mitigate against the growth of HGVs unrelated to the development or those falling within the predicted development HGV usage on local roads	This remains outside of the control of the Applicant. Leicestershire have published an HGV network management plan, which highlights the prohibited routes county-wide. https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2020/12/21/Network-Management-Plan.pdf
71	2.3.12 One further option considered at the hearing was some form of HGV ban on the B4669 and potentially other routes. However, this is not being promoted and is not part of the mitigation package. It would have implications for current (and legitimate) local users of the network and its impacts would need to be modelled and presented to the examining authority for proper discussion. We do not consider this can currently be viewed as necessarily desirable or achievable	. The Hinckley NRFI Construction Traffic Management Plan (document reference: 17.6C) (document reference 17.4B) clearly sets out that the B4669 through Sapcote is a prohibited route and ANPR cameras will be installed on this route to report any development HGVs using this route and a breach will be investigated Also see above for Leicestershire's wider HGV Network Management Plan.

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72	2.3.13 We, therefore, conclude that, as things stand, there is no effective mitigation for the growth of HGVs anticipated in Table 8.19 of the EA and that any impacts on local villages such as Sapote, Stoney Stanton and Sharnford, as well as routes through Hinckley itself are unmitigated.	Noted, the Applicant has made a number of assessments and further analysis on the HGV routing and impact both within the ES chapter (document reference: 6.1.8, APP138) and the HGV impact note submitted at Deadline 3 (document reference: 18.6.6, REP3-051). The conclusions differ from those drawn here.
	3. Environment (IH3) 3.1 Boswell v Secretary of State for Transport	
73	3.1.1 We note the judgement, and the conclusions on cumulative impacts. We also note that these are being challenged at appeal	The Applicant notes the comment and that the outcome of any appeal is currently outstanding. The Applicant understands that the Court of Appeal granted permission to appeal the High Court's decision in October 2023 and that the appeal is likely to be heard on 16 January 2024.
73	3.1.2 However, as we said at the hearing, whatever the outcome, this does not change the test, set out in the IEMA guidance, of whether a project represents a 'business as usual' approach to GHG emissions (see page 25 of Guidance) or the responsibility of the assessor to consider what is a suitable benchmark to test that against.	The principal test, in this context, serves as a robust evaluation mechanism to ensure that projects are thoroughly assessed for their climate change impact, and appropriate measures are taken to address any 'significant effects'. We have considered and applied the IEMA guidance (2022): 'Assessing Greenhouse Gas Emissions and Evaluating their Significance', throughout and note their guidance with respect to a business-as-usual approach. The IEMA guidance notes "a baseline is a reference point against which the impact of a new project can be compared against; sometimes referred to as 'business as usual' (BaU) where assumptions are made on current or future GHG emissions, with The ultimate goal of establishing a baseline being able to assess and report the net GHG impact of the proposed project". A BaU approach to GHG is effectively a "do minimum" approach that does not align with the UK's Net Zero ambitions. The mitigation presented in Chapter 18: 'Energy and Climate Change') of the Environmental Statement (document reference 6.1.18, APP-127) demonstrates a commitment to delivering GHG reductions significantly beyond the BaU approach e.g. facilitating a transition to 100% renewable fuels, maximising on-site renewable energy instead of relying on grid connections and non-reliable sources and a commitment to net-zero construction by limiting and offsetting carbon effects. This proposal is wholly consistent with the UK's Net Zero objectives.
74	3.1.3 In this case, given, as an example, the emphasis on a 20-mile drive time by the proposer, we would call into question the appropriateness of the national carbon target, although we appreciate this may reflect the inconsistent goals being used to justify the project.	The 20-mile truck-drive isochrone is related to defining the Property Market Area (PMA) relevant to the HNRFI. This equates to roughly a 45-minute truck-drive time which most I&L companies would consider a reasonable distance from which to use the rail freight interchange to either collect or drop off materials and goods as part of their supply chain. This recognises that not only the rail-linked units provided within the Proposed Development will use the rail terminal. This is explained in Document Reference 16.2A (REP3-036), Chapter 2 and is focus on property market dynamics relevant to the HNRFI not national carbon targets. National carbon targets are often applied in climate change assessments of this scale for several reasons: the scheme is considered a 'nationally significant infrastructure project', it is expected that vehicular emissions, including rail, will be generated across multiple local and regional boundaries, because GHG emissions are not restricted by geographical areas and a spatially limited study boundary cannot be clearly drawn, and because the impact considered in the context of atmospheric GHG concentrations is global. This explanation is given in paragraphs 18.54, 18.55 and 18.56 of Chapter 18: 'Energy and Climate Change' of the Environmental Statement

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		(document reference: 6.1.18A) and is consistent with the guidance as set-out in IEMA (2022): 'Assessing Greenhouse Gas Emissions and Evaluating their Significance'.
	3.2 Noise and Vibration Assessment	
75	3.2.1 Following the discussion of the Noise and Vibration Modelling we have reviewed the relevant chapter of the EA and concluded that, despite reassurances given, the modelling does not account for the impact of noise and vibration resulting from non-development traffic (particularly HGV traffic) which is rerouted as a result of the development but only for development traffic itself.	All environmental assessments consider two scenarios in terms of traffic, one without development and the other with development, this latter scenario, includes the access infrastructure associated with the development and the traffic generated by the development, the PRTM is a dynamic model and as such allows for reassignment of traffic due to the access infrastructure and the development traffic in the "with development scenarios". The 'with development' traffic scenario which has been included within the assessment of off-site road impacts detailed within the noise and vibration chapter (document reference: 6.1.10A) includes the reassignment of traffic associated with the access infrastructure and the any further reassignment of background traffic as detailed above.
76	3.2.2 Para 10.217 of the EA is absolutely clear that: the results of the traffic assessment were used as the basis for determining the change in road traffic noise levels that would result from development generated road traffic on the surrounding roads. (Our emphasis)	The 'with development' traffic scenario which has been included within the assessment of off-site road impacts detailed within the noise and vibration chapter (document reference 6.1.10A) includes development generated road traffic, reassignment of traffic associated with the access infrastructure and the any further reassignment of background traffic as detailed above.
77	3.2.3 Para 10.348 is also clear that this is what is being mitigated for: The predicted noise impact from development generated traffic with mitigation in place, indicates that there will be between a minor adverse and negligible adverse effect at the majority of NSRs during the daytime in the short-term. The noise impact at NSR1 indicates that there will be a major, adverse effect from development generated road traffic with mitigation in place in the short-term. (Our emphasis)	No mitigation works have been included in the ES assessments and as such the effects are reviewed on the worst-case scenario as per the relevant assessment criteria. The Transport Assessment looks at highway mitigation that is proposed to be delivered before opening of the first unit/rail operations. The Sustainable Transport Strategy and Travel Plan are being developed out to ensure all active travel and public and private bus services are in place prior to occupation and develop over time with the development. In relation to noise, as set out in Chapter 10 Noise and Vibration (document reference 6.1.10A), noise associated with the operational phase of proposed development has been considered at nearby receptors, which has included noise associated with the A47 link road and additional road traffic. The results of the assessment indicate that with acoustic barriers in place, noise levels are predicted to fall below the Significant Observed Adverse Effect Level at all nearby receptors in the assessments undertaken
78	3.2.4 Para 10.134 explains the approach for construction (vibration is similarly addressed in Table 10.29): An assessment of construction traffic has been undertaken based on construction traffic data provided by BWB Consulting for the peak year 2026	Noted.
79	3.2.5 Para 10.146 explain how this was undertaken for the completed development, and this is further underlined by data in Table 10.30: Activities associated with HGV movements, the loading/unloading of vehicles onsite, and SRFI operations have been assessed in accordance with BS 4142.	Noise from onsite HGV movements, onsite loading/unloading of vehicles and onsite SRFI operations have been assessed in accordance with BS4142, which is the pertinent guidance for noise of an industrial/commercial nature.
80	3.2.6 This is then further explained in Para 10.148: For the daytime and night-time periods, the number of HGVs used within assessment for the whole site is based on the worst-case hour provided by the Transport Consultant	This relates to onsite HGV movements i.e. within the redline boundary.

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81	3.2.7 It is also explained how the overall development HGVs were split-up to allow for B8 and rail port usage. The paragraphs following 10.148 outline the technical details of how each element and type of vehicle was measured	See above response (response 80).
82	3.2.8 A number of supporting maps are provided which are clearly labelled 'development generated road traffic' and show contours where there are noise impacts specifically from development traffic. Figure 10.12 and 10.14 in particular show the resulting changes in noise. These, not surprisingly given the methodology, radiate out from the development site.	The noise contour maps shown in Figures 10.12 and 10.14 relate to off-site road traffic movements on the wider road network
83	3.2.9 For reasons which are unclear to us they include noise increases on the Sharnford Road/Aston Lane and not on the B4669 through Sapcote and roads through other villages.	Changes in noise are predicted on the B4669 from Junction 2 of the M69, through Sapcote. However, the majority of these changes around Sapcote are predicted to be between -1.5dB and 2.4dB in the short-term. This equates to a permanent minor, adverse effect at worst, in the short-term, which is not significant. Road traffic on Leire Lane (link approaching the Junction with The Mount) is predicted to result in an increase of 3.2dB, however the absolute noise level as a result of development generated road traffic is predicted to be below the Lowest Observed Adverse Effect Level, which in line with DMRB, results in an effect which is not significant. There are two consecutive road links, Stanton Lane and Hinckley Road, where road traffic is predicted to result in an increase of between 3-4 dB in the short term, which equates to a temporary moderate adverse effect. However, it should be noted that the predicted change in noise level in the long term equates to a permanent minor adverse effect, which is not significant. Further details of these predictions are presented in Appendix C – Update to development generated road traffic noise assessment (document reference 18.13.3) Updated noise contours showing the difference between 'with' and 'without' development for the short-term and long-term has been provided at Deadline 4 (Appendix C – Update to development generated road traffic noise assessment (document reference 18.13.3 document reference 18.13.3)).
84	3.2.10 It is worth also noting that Table 8.19 of the EA projects a rise in traffic on Link 16 (Sharnford Road, Link Table 24) of 2126 vehicles (aadt) and 11 HGVs in the 'with development' case. Whereas Link 41 in Sapcote shows an increase of 4,944 vehicles, including 275 more HGVs (of which as said above only 67 HGVs would be strictly development generated). That is more than double the additional traffic as on the link in the table.	It should be noted that the data and criteria required for the Noise Assessment are inherently different from that required for the Transport Assessment The traffic levels have been taken from the Leicestershire PRTM model and represents the worst case. The HGV Route Management Plan and Strategy (document reference 17.3B) prohibits the movement of development HGV traffic through Sapcote via the B4669.
85	3.2.11 In other words, it is clear from the traffic data that if all traffic, generated and displaced, were included there would be likely to be greater noise and vibration impacts on the B4669 through Sapcote than on the Sharnford Road. Those have not been measured or mapped, which is why Sapcote does not appear (as well as other impacted villages) on the noise maps	As detailed above at points 75 and 76, the 'with development' traffic scenario includes development generated road traffic, reassignment of traffic associated with the access infrastructure and the any further reassignment of background traffic.
86	3.2.12 We cannot find any way of reading the evidence before the examining authority which would support an assertion that the noise and vibration impact of diverted traffic, particularly HGVs, has been included in the assessment. Despite being redirected, this change in traffic is a result of the proposals before the panel.	As discussed above in points 75 and 76, the change in traffic has been included within the data utilised within the noise assessment.
87	3.2.13 Furthermore, as we pointed out at the hearing, the impact of noise and vibration would be among the factors needed to be considered to determine	The NPSNN states in 5.190 "The potential noise impact elsewhere that is directly associated with the development, such as changes in road and rail traffic movements elsewhere on the national networks, should be considered as appropriate.". It goes on to state in 5.193 "Developments must be undertaken in accordance with statutory

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	whether the routing of additional HGVs through Sapcote and other villages was suitable in accordance with the NPPF, as it clearly pertains to NSPNN decisions.	requirements for noise. Due regard must have been given to the relevant sections of the Noise Policy Statement for England, National Planning Policy Framework and the Government's associated planning guidance on noise." In doing this, the applicant must avoid significant adverse impacts on health and quality of life from noise as a result of the new development, and mitigate and minimise other adverse impacts on health and quality of life from noise from the new development. This has been followed in the assessment. The absolute noise levels due to development generated road traffic through Sapcote and the surrounding villages are predicted to fall between the LOAEL and SOAEL levels in the long-term. In accordance with the Noise Policy Statement for England (NPSE) which underpins both the NPPF and NPSNN, noise levels between the LOAEL and SOAEL should be mitigated and minimised as far as practicable. The additional assessment that has been undertaken, detailed in Appendix C – Update to development generated road traffic noise assessment (document reference 18.13.3), demonstrates that receptors will not be subjected to unacceptable noise levels as a result of the proposed development.
88	3.2.14 Neither CPRE nor Sapcote Parish Council have the technical ability to comment on the noise methodology before you, and we are aware of the other criticisms of this, but in the case of diverted traffic it appears the work has simply not been done	The applicant does not agree with this statement. As detailed above in points 75 and 76, the 'with development' traffic scenario includes development generated road traffic, reassignment of traffic associated with the access infrastructure and the any further reassignment of background traffic, which has been included within the traffic data used within the noise assessment.
89	4. Need (ISH4) 4.1 Justification for HNRFI	
90	4.1.1 During the need session a number of justifications for the scheme were given. We noted the following potential justifications. • Allowing for a growth in economic activity for e-commerce companies (for onwards national distribution by road) • Allowing for rail distribution to other rail terminals • Meeting needs for logistics in the immediate Leicestershire area • Interest in sites which had been registered with the proposers • A shortage of sites for logistics which was hindering growth, nationally and locally, even though, in what seemed to us a contradictory fashion, growth in past years has exceeded growth in other sectors of the economy.	With relation to the final point, the Logistics Demand and Supply Assessment (document reference: 16.2B) evidences that logistics jobs have been growing much faster than the wider economy (Figure 3.9). However, the strong demand in the sector is not being met with enough supply. This is evidenced by demand (net absorption) being higher than supply (net deliveries) (Figure 5.3). This has contributed to low levels of availability within the HNRFI PMA (Figure 5.1) and strong rental growth given occupiers are having to compete with one another for limited available space which pushes up rents (Table 5.4).
91	4.1.2 The evidence for much of this seemed to us anecdotal and does not, in our view, override, the need for a balanced approach to logistics need.	The Applicant does not agree with this statement. Detailed and robust market evidence is detailed within Savills Logistics Demand & Supply Assessment (document reference: 20.1.2), XXX). This document covers a diverse range of market demand and supply signals such as net absorption, net deliveries of new stock, availability, rental trends and sectoral demand trends amongst others.
	4.2 Leicester and Leicestershire Logistics Study	
92	4.2.1 CPRE Leicestershire has been critical of the need case as supported by the Saville's need report. During the sessions it was suggested by the proposers that the Leicestershire and Leicester Logistics Study's (LLLS) lower figures represented a 'base case' calculation.	As detailed in Appendix D: Market Need Note(document reference: 18.8.4, REP3-163) (paragraphs 1.20 to 1.22), both the 'Warehousing and Logistics at Leicester and Leicestershire: managing growth and change' (April 2021 amended March 2022), jointly commissioned by the local authorities in Leicestershire and the 'Market Needs Assessment' commissioned by the Applicant (document reference: 16.1, APP-357) identify a need for rail served

<table>
<tr><th>Response Number</th><th>Matter</th><th>Applicants Response</th></tr>
<tr><td></td><td></td><td>logistics sites but the differing methodologies for the studies give different results in terms of the quantum. It is agreed that there is a need for rail served logistics sites and in principle HNRFI would meet this rail-related need.

That the ‘Warehousing and Logistics at Leicester and Leicestershire: managing growth and change’ (April 2021, amended March 2022) will form part of the evidence base for Leicester and Leicestershire planning authorities in the preparation of the reviews of their development plan in meeting future development needs.

Leicestershire County Council has agreed in the Statement of Common Ground (document reference 19.3B) that it has no objection to the principle of SRFIs and accepts the need for a SRFI to be located in south Leicestershire</td></tr>
<tr><td>93</td><td>4.2.2 CPRE Leicestershire has already commented on the LLLS in relation to a number of local plans, most recently, the North West Leicestershire Plan where we raised concerns about double-counting with the HNRFI when it came to the overall quantum of need.</td><td></td></tr>
<tr><td>94</td><td>4.2.3 We would, therefore, like to stress that we do not consider the LLLS should be considered a base case</td><td></td></tr>
<tr><td>95</td><td>4.2.4 Para 10.18 of the LLLS is clear that:
Overall, the use of the Replacement & Traffic Growth model for forecasting appears most reasonable going forwards which in this 2020 study equates to 99,000 sqm per annum rising to 122,000 with a margin for flexibility. The high replacement demand, higher sensitivity traffic growth figure of 2,571,000 is therefore recommended for planning policy development.

Table 48: Forecast New-Build Rates 2020 to 2041 and Associated Land Requirements including margin (000s sqm) - Leicestershire
<table><tr><th>Leicestershire</th><th>2041 base</th><th>5 yr margin</th><th>Total</th></tr><tr><td>High replacement, forecast traffic growth</td><td>1,823</td><td>643</td><td>2,466</td></tr><tr><td>Low replacement, forecast traffic growth</td><td>1,418</td><td>643</td><td>2,061</td></tr><tr><td>High replacement, sensitivity test traffic growth</td><td>1,928</td><td>643</td><td>2,571</td></tr><tr><td>Low replacement, sensitivity test traffic growth</td><td>1,523</td><td>643</td><td>2,166</td></tr></table>Source: GLH</td><td></td></tr>
<tr><td>96</td><td>4.2.5 The options are set out in Table 48 of the study (reproduced above). It should be noted that this includes a 5-year margin based on completion trends. The completions trend (which the study also suggests will not continue into the long term) is higher (2,702 sq m) than any of the projections, so this 5-year margin exceeds anticipated growth.</td><td></td></tr>
<tr><td>97</td><td>4.2.6 The assumptions behind all these figures are further explained in Para 10.26 and include additional e-commerce growth:
The key assumptions are implicitly covered in the method sections but revisited here: Low growth (central traffic model)
• That warehouse units need to be replaced after 40 years of operation.
• That traffic growth occurs in line with the central forecasts High growth (traffic higher sensitivity)
• That warehouse units need to be replaced after 30 years of operation.</td><td></td></tr>
</table>

Response Number	Matter	Applicants Response
	• That traffic growth occurs in line with a 15% increase on central forecasts which allows for faster growth in tonnage shipped which is assumed to be driven by e-commerce requirements and potential stockpiling related to Brexit and COVID-19. Completions trends • That the 2011/12 to 2019/20 is representative of longer-term need.	
98	4.2.7 In other words, the study cannot be said to represent a base-case scenario. The consultants have assumed both high-growth and higher traffic growth (assuming such traffic growth is even possible on such a constrained network). They have then added a generous 5-year contingency. We consider it is a high growth scenario, in line with our previous comments.	
99	4.2.8 It is, of course, perfectly reasonable for the promoters to present their own high-growth scenario and to argue that the LLLC figures are mistaken, but, in our view, it is not, in any sense, a base case scenario	Savills contend that the methods typically used to estimate logistic demand, as specified in the NPPG (i.e. past take up, labour demand etc) and within the Warehousing and Logistics in Leicester and Leicestershire: Managing growth and change study, do not accurately consider lost demand (referred to as 'suppressed demand') due to historic supply constraints, nor current and future growth drivers such as the increase in online spending. Instead, Savills adopt an alternative method which considers market signals as required by Paragraph 31 of the NPPF and relevant sections of the Planning Practice Guidance. Further information is contained in Appendix D: Market Need Note (document reference: 18.8.4, REP3-163) paragraphs 1.44 to 1.48.