

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 8 - Parish Councils]

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)

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| <p>1</p> | <p>Sharnford Parish Council SHARNFORD PARISH COUNCIL SUBMISSION – DEADLINE 3</p> <p>Sharnford has been ignored by the developer Tritax and this was reflected in the lack of information at the HNRFI hearings at the end of October 2023.</p> <p>Background</p> <p>Sharnford straddles the B4114 which was the A46 until the M69 motorway was built in the mid 1970's. The A46 was the main trunk road between Coventry and Leicester and was expected to be relieved by the M69 which would carry most of the commercial traffic travelling between the M6 and M1 motorways. Because of this the A46 was downgraded to a B road, the B4114. As a B road the B4114, between the A5 and the Leicester City border has seen a total lack of investment apart from a short span of dual carriageway which was designed to aid traffic leaving the village of Croft.</p> <p>In 2007 an action group was formed to pressure the local highways authority into coming up with a plan to prevent the increasing number of HGV's, over 1000/day, travelling through Sharnford. The group, named Sharnford Traffic Action Group (STAG), paid for a video to be produced titled "Death By A Thousand Trucks Every Working Day" which reflected the number of HGV's travelling through our village.</p> <p>The video was a success being well publicised on TV and local press and resulted in Leicestershire County Council promising a bypass. The bypass was one of two planned, one around Sharnford, and one around Melton Mowbray. The one for Sharnford was agreed due mainly to the inability for two lorries to pass without mounting the pavement outside the post office, the only shop in the village.</p> <p>Unfortunately, the cost of two bypasses would prove to be too costly and the Sharnford one was dropped. We are no longer at 1000 HGVs plus cars and vans per day but now, in 2003, we are now at nearly 11,000 HGVs plus cars and vans per day, verified by Leicestershire County Council.</p> <p>The village will see a mix of vehicles increasing from 3.5 million movements per year to at least 7 million if the HNRFI development is approved. The increase in HGVs in the last few years has been caused by the unconstrained development of logistics parks such as DPD, Amazon, and Magna Park, the largest logistics park in Europe. This is all in addition to Croft Quarry, which is preparing to move away from granite removal, carried out since 1868, to landfilling one of the largest granite quarries in Europe. The landfill was expected to come from the HS2 spoil and vast quantities of London's waste. The company have stated that they expect to import up to 750,000 cubic metres of inert material per year</p> <p>The Future</p> <p>If the HNRFI is approved and the developer achieves its aims, where will the 8 to 10,000 low paid workers come from and where will the 2,000 HGVs / day go to, every 24 hours, 7 days per week? I am sure this will be announced as progress, but progress for whom? Certainly not for the rural villages of South Leicestershire</p> | <p>We appreciate the concerns of the Village of Sharnford and their concerns with HGV traffic passing through the village and as they state in their written submission.</p> <p>"The increase in HGVs in the last few years has been caused by the unconstrained development of logistics parks such as DPD, Amazon, and Magna Park, the largest logistics park in Europe. This is all in addition to Croft Quarry, which is preparing to move away from granite removal, carried out since 1868, to landfilling one of the largest granite quarries in Europe. The company have stated that they expect to import up to 750,000 cubic metres of inert material per year."</p> <p>The HGV's traffic from the proposed HNRFI development will be prohibited from using local roads such as the B4114 through Sharnford, unless making local deliveries, and the HGV traffic from HNRFI will be tracked with Automatic Number Plate Recognition (ANPR) cameras to ensure compliance. We however cannot manage the routing of HGVs from the other developments or HGV operators in the area if they are not coming from or going to HNRFI.</p> <p>The HNRFI will not cause an increase of 3.5 million vehicles per year through the village of Sharnford as claimed but through detailed traffic modelling undertaken shows a reduction in daily traffic from 758 HGVs to 694 (document reference: 18.6.6, REP3-051) passing through Sharnford village.</p> <p>The Applicant has responded to this point through RR0731 of document reference 18.2, REP1-026 Applicants Response to Relevant Representations submitted at Deadline 1 (document reference: 18.2, REP-1026). These considerations are also addressed in the ES Chapter 7 Socioeconomics (document reference: 6.1.7A, REP3-155). The source of employment is not confined to the immediate locality of HNRFI. Jobs will be taken by residents in Leicester, Hinckley, Nuneaton and</p> |

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| | | <p>Bedworth and Rugby, where there are higher levels of deprivation.</p> <p>The Transport ES Chapter (document reference: 6.1.8, APP 117), Transport Assessment (document reference: 6.2.8.1A, REP1-012) & appendices (document reference: 6.2.8.1A and 6.2.8.2, APP-138-162) contain extensive data on the trip generation, derivation of origins/destinations and modelling of projected traffic demand.</p> |
| <p>2</p> | <p>Burbage Parish Council Burbage Deadline 3 – Response Burbage Parish Council Written Presentation</p> <p>In our Written Representation (WR) we expressed our concerns about the vague and obscure identification of the Highways Links which Tritax Symmetry had provided as part of their consultation and application submission. We note the maps which they have now submitted at deadline 2. These now do provide the necessary understanding of the location of these links. However, such a late delivery of this information has robbed the community of the ability to understand this recent submission and certainly not in time for questions or comments to have been raised at either the open floor hearings or the ISH2 hearing on transport matters. Our comments about the lack of information to engage with the community is proven by the necessity for the publication of these maps as evidence the information was missing from earlier documentation. Our concerns about traffic modelling have not been addressed in their deadline 2 submission as their answer is simply that Burbage traffic is reduced in general by the proposals and therefore “why are we worried?”. In our WR amongst other links we raised the following links:</p> <ul style="list-style-type: none"> • Welbeck Avenue, Burbage (Link 64) • Newstead Avenue, Burbage (Link 63) <p>We now know from the maps supplied that these are the roads in Burbage, that they have no known sensitive receptors and therefore must have a 30% increase in traffic to have been selected. We cannot see how these roads can be subject to such traffic increases (in a scenario where traffic in Burbage is reduced) when they are roads which are unable to be used for ‘Rat Running’ effects or any through traffic. We remain concerned that this is one example of where the traffic modelling has not been proven to be validated. What impact does such potential errors in modelling have not only in Burbage but other communities?</p> <p>Strategic Road Network Closures</p> <p>We would like to record our thanks for the matters raised on this topic at the ISH2 hearing regarding the impact upon Burbage in the event of a motorway closure. This issue is critical to the impact that the development may have on our community and we again ask that the modelling which the ExA has requested that Tritax Symmetry carry-out on these matters are presented in a way the community can understand the effects and have confidence in any results.</p> <p>M1 Junction 21/ M69 Junction 3</p> <p>We were appalled to hear at ISH2 that Tritax Symmetry have taken the view that they do not have to submit any mitigations for this junction due to the additional traffic from the</p> | <p>Link 64 and 63 triggered the criteria for assessment due to having a very low baseline flow value. HGVs over a 24-hour period increase from 25 to 31 in the case of Newstead Avenue and 73 to 88 in the case of Welbeck Avenue which is over the 10% threshold, though in absolute terms are I This is evidenced within Table 8.19 of the Traffic and Transport ES Chapter (document reference: 6.1.8, APP-117)</p> <p>The Applicant has been in discussions with National Highways and their emergency closure plan (document reference: 17.8, REP3-048) is being updated to reflect the new routes provided by the HNRFI site for deadline 4 (document reference: 17.8A)</p> |

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| | <p>development. Our understanding from the hearing was that given the junction is at capacity and that development HGV traffic heading North will be mandated to use the M69 and this junction which will have severe delays, due to operation of the junction above the capacity. The effect in the modelling is that local traffic (including non-development HGVs) will see extended delays at the junction and will therefore use the local road network to achieve a route into Leicester or the North bound routes.</p> <p>If our understanding of the discussions at the hearing are correct, this will add a further, previously not discussed, impact on the local road network and the ability of our local community to go about their normal activities.</p> | <p>Mitigation on the wider local road network has accounted for the displaced traffic from M1 Junction 21/M69 Junction 3. All development traffic has been assigned to the respective SRN routes. Further discussions with the Transport Working Group are on-going in relation to mitigation and the Sustainable Transport Strategy which has been updated at Deadline 3 (document reference: 6.2.8.1A, REP3-016) and is resubmitted at Deadline 4 (document reference: 6.2.8.1B)</p> |
| 3 | <p>Elmesthorpe Parish Council</p> <p>Written Statements of Oral Cases</p> <p>Open Floor Hearing 1 (OFH1): Monday 30th October</p> <p>As the village that stands to be affected by nearly every single area of concern raised with regard to this application, there are many issues that Elmesthorpe Parish Council have raised both to the Applicant and to the Examining Authority in our representations. Many of these issues are technical and tangible in nature, which we will visit in upcoming hearings this week. However there is a more human side that we would like to raise on behalf of our village. The effect of the HNRFI application, on the mental health and well-being of residents of Elmesthorpe, has already been significant and noticeable. Residents are stressed, worried, depressed and incredibly anxious about what is to become of our village, our homes, our livelihoods and surrounding areas. We all have genuine and serious concerns about living with both construction and operational disruptions, and the resulting effects of those within the village. Not only is our way of life now endangered, but there is a very real possibility of Elmesthorpe being physically separated from our beloved Burbage Common, and restricted from access to essential services during construction, such as our children’s primary school and our doctors surgery in Stoney Stanton. This is an entire village of people who stand to have their lives irreversibly altered, in a very detrimental way and we sincerely ask that the Examining Authority takes this into consideration with the weight that these people, our people, deserve. We are real people, and this will crush our community.</p> | <p>The planning of nationally significant infrastructure is comprehensive, highly complex and the reporting is structured to meet the needs of the regulatory DCO process. While robust and fit for purpose, it invariably creates challenges for communities and individuals to navigate the extensive subject matter and interpret the findings that while protective of the environment and health, are largely geared to meet a technical requirement.</p> <p>This can mean that the planning process itself, can lead to the community stress and anxiety that the Elmesthorpe Parish Council representatives refer to in their Oral Response.</p> <p>The only way to respond to and address such concerns and is through the factual investigation and dissemination of robust information.</p> <p>The overarching consultation strategy has been central to this, firstly to catalogue community concerns, informing and refining the scope and focus of every technical assessment, but to also inform and refine the proposed development during the various stages of submission. This then also forms the basis to creating bespoke responses to the concerns raised, explaining how such concerns have been addressed through design, mitigation or wider support initiatives.</p> <p>We note the concerns raised by the Elmesthorpe Parish Council representatives on behalf of the community of Elmesthorpe, particularly regarding the potential for community severance and impacts on access to amenities, resources and facilities central to maintaining good health and wellbeing. These concerns have been raised previously, and applied to inform the Design and Access Statement (document reference: 8.1A, REP2-059) and the Public Rights of Way Appraisal and Strategy (document reference: 6.2.11.2, APP-192), both of which address the concerns they have raised. The Health and Equality Briefing note (document reference: 6.2.7.1C, REP3-012) was further submitted to aid communities in better navigating and digesting the extensive information in the DCO.</p> <p>While it can sometimes feel otherwise, the purpose of planning is to achieve sustainability, balancing different social, environmental and economic issues and needs, for people. People have and will always remain the central purpose to planning, and every technical topic area is linked to people, their health and wellbeing.</p> |

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| 4 | <p>Elmesthorpe Parish Council Written Statements of Oral Cases Open Floor Hearing 1 (OFH1): Monday 30th October Issue Specific Hearing 2 (ISH2)Traffic and Transport: Tuesday 31st October Item 3j: A47 Link Road junctions</p> <p>There is concern that in the event of incidence on the A47 Link Road, which isn't an impossible scenario, a significant volume of traffic will find the most obvious alternative route which is along the B581 Station Road through Elmesthorpe. The B581 runs parallel to the proposed A47 Link Road and traffic will then route through Stoney Stanton and back around to M69 Junction 2. This is a very real and possible scenario and the village infrastructures would not be able to accommodate or cope with that. It is concerning that there doesn't appear to have been any consideration or modelling for this. The B581 will also naturally become a rat run: Traffic modelling assumes perfect knowledge of the network and doesn't account for the 'rat-run' mentality.</p> | <p>The Applicant has been in discussions with National Highways and their emergency closure plan submitted at Deadline 3 (document reference 17.8, REP3-043) is being updated to reflect the new routes provided by the HNRFI site and is to be resubmitted at deadline 4 (document reference: 17.8A).</p> |
| 5 | <p>Elmesthorpe Parish Council Written Statements of Oral Cases Open Floor Hearing 1 (OFH1): Monday 30th October Item 3 (no letter reference as this was a late addition to the agenda): Effect on Elmesthorpe [Brief reference was once again made to previous point as raised at point 3j]</p> <p>The B581 (aka Station Road) through Elmesthorpe, is the village's access to services and amenities, as we have none within the village itself. The removal of Burbage Common Road will mean the B581 is Elmesthorpe's ONLY route to services and amenities.</p> <p>For example, the B581 is the only access for Elmesthorpe residents to their children's school, and our doctor's surgery in Stoney Stanton. Construction work as proposed at the road junctions in Stoney Stanton on B581 Station Road/New Road/Hinckley Road roundabout and those works on Hinckley Road/Stanton Lane will prevent access entirely to these essential services for residents. Construction will span an extended period of time, circa 10-12 years.</p> <p>The only alternative route to access the school and doctors surgery would be a 7.1 mile detour via A47 (where associated works are also proposed), B4668 (works also proposed), through Hinckley (which already experiences heavy traffic and delays), over the M69 J2 roundabout (works also proposed) and down Stanton Lane/Hinckley Road (works also proposed).</p> <p>In normal conditions (without proposed traffic works) this detour takes around 20-25 minutes each way. During construction phase this will dramatically increase in time, if indeed it isn't impassible due to closures, and during operational phase will also be longer due to significant increases in traffic. Residents do still have to get our children to school and manage to reach our own jobs in time and these delays will be impossible.</p> | <p>The design, phasing and construction of the highways mitigations works will be undertaken to minimise the disruption to the travelling public and residents.</p> <p>The individual highway improvement construction works will be short term and are planned to be fully completed within the first 2 years of the construction phase.</p> <p>We will minimise the disruption by</p> <ul style="list-style-type: none"> • Designing the highway mitigations to maintain existing features and minimise utility diversion works where possible which will reduce the time of construction in each location and reduce the requirement of total road closures and diversions • Phasing the works to ensure that we are not undertaking the highway improvement works all at once and not in adjacent locations. Works which are close to schools will be undertaken outside school travel times or during school holidays. We will utilise temporary traffic lights when working on the highway to minimise delays and will only utilise temporary road closures and diversions as a last resort for works such as final surfacing to the carriageway as these will be planned and notified in advance and approved by Leicestershire County Council and will typically be 1 day or nights duration. • Constructing the works using methods of construction which allow for works to be completed in a timely manner and to minimise disruption to residents and the travelling public. <p>We will maintain access at all times to properties affected by the works and the emergency services and will communicate the works extensively via letter drops and electronic means such as social media and email.</p> <p>We will provide a dedicated Traffic Control and Control Officer (TSCO) who will manage and coordinate all Traffic management on the public highway.</p> |

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| 6 | <p>The applicant responded to many points from our RRs and WRs. One in particular, references concerns over parking in the village during Construction Phase and Operational phase. Elmesthorpe Parish Council feels the Applicant is dismissive of our concerns by stating that ‘parking is available on site’ and any ‘trangressions should be reported to Site Management.’ The applicant has also stated that this will be ‘monitored’ by site management, but no information has been provided as to how. We believe more robust methods are required from the applicant to ensure this doesn’t happen in the first instance to protect the surrounding communities that are being affected most.</p> <p>We just wanted to query a point that has been raised numerous times during our representations, and we also believe it has been raised by other Parish Councils as well. Looking at the Deadline 2 response from the Applicant to Parish Groups’ Written Representations, our query about the inconsistency and over-estimation about the number of HGV miles removed from the roads as a result of the HNRFI proposal has not yet been answered. In the Applicant’s Community Newsletters, Community Explanation Documents and Exhibition Boards during Final Consultations and also on the project website it has been repeatedly claimed that 1.6 billion HGV KMs will be removed from the road network. The average person would look at that and think ‘wow, you really can’t argue with those green credentials,’ but this isn’t consistent with the 83 million miles that the Applicant is actually stating is being removed. Some clarification would be welcomed.</p> | <p>The Applicant has already acknowledged in responding to representations when raised and subsequently in ISH2 that the presentation of a saving of 1.6bn HGV kms annually seemingly from HNRFI, was an error in the Community Newsletter and on the website and was taken off.</p> <p>Parking will be monitored and residents will be able to report directly to the representative on site. Communications to all occupiers will be clear from first occupation that off-site parking will not be acceptable and monitoring will be in place.</p> <p>The Applicant has now identified the source of the information, which came from a report by the Rail Freight Group (RFG) and UK Major Ports Group (UKMPG) ‘Why the UK needs more intermodal rail freight’ published in January 2021, in which it stated:</p> <p><i>“It is much more environmentally friendly than road freight. Each train takes 76 HGVs (heavy good vehicles) off the road which equals 1.66 billion fewer HGV kilometres a year, reducing congestion and accidents.”</i></p> <p>The 1.66bn HGV kms saved relates to the UK as a whole. This was a genuine error in copywriting which had not been picked up. It has never formed part of the formal Application.</p> <p>The full RfG UKMPG report has been appended as Appendix A for information (document reference: 18.13.1).</p> <p>The full background to the assessment of up to 83 million lorry miles saved per annum (133.7 million kms) at 16 trains per weekday (4 on Saturday) has been provided at Deadline 3 (document reference: 18.6.7, REP3-052).</p> |
| 7 | <p>Elmesthorpe Parish Council Written Statements of Oral Cases Open Floor Hearing 1 (OFH1): Monday 30th October Item 4f: Other Rail Level Crossings</p> <p>The uncontrolled pedestrian crossing that is proposed to be sited at the base of the railway bridge by Bostock Close/B581 Elmesthorpe, as a result to alterations to the T89 crossing and the associated ProW, is dangerous. The visibility for traffic is extremely poor coming over the railway bridge (blind) and also from the approaching direction. Pedestrians have very limited visibility of approaching traffic, and it is a 40mph road. Should the Applicant simply move this around 5-6m further away from the base of the bridge, the visibility is remarkably improved and would ensure safety of traffic, pedestrians and all road users.</p> | <p>The works have been subject to an interim Road Safety Audit and a review of the comments/design has been submitted for Deadline 4 (document reference: 20.1.1 to 20.1.11).</p> |
| 8 | <p>Elmesthorpe Parish Council COMMENTS ON ADDITIONAL SUBMISSIONS RECEIVED ELMESTHORPE PARISH COUNCIL COMMENTS ON ADDITIONAL SUBMISSIONS RECEIVED ELMESTHORPE PARISH COUNCIL 10th November 2023</p> | <p>Noted, see responses below.</p> |

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| | <p>1. Introduction</p> <p>1.1. Elmesthorpe Parish Council has previously submitted Relevant Representations, a summary of Relevant Representations and Written Representations for consideration by the Examining Authority (ExA).</p> <p>1.2. Elmesthorpe Parish Council attended all hearings during the week of 30th October either in person, or virtually.</p> <p>1.3. Having reviewed our Representations against the current information available, our existing submitted concerns still remain in full.</p> <p>1.4. This document contains comments on information received post submission of our Written Representation: For brevity we have only included additional comments</p> | |
| 9 | <p>2. Location</p> <p>2.1 The applicant consistently refers to this location as ‘exceptional in its rail connectivity’ but we have yet to hear this quantified and explained. Especially considering the fairly numerous limitations of this stretch of rail.</p> | <p>The location sits on Network Rail’s Strategic Freight Line that uniquely connects directly to the West Coast Main Line, the Midland Main Line and the East Coast Mainline, with connections onwards to the North, Scotland and South East, and the South and South Wales (via Water Orton), enabling the location to be readily accessible to multiple locations on the rail network throughout Great Britain</p> <p>It is effectively sitting in the middle of NR’s Strategic Freight Network, with very clear runs to key ports. This will enable one train set to do two services a day to some key ports, making the service highly competitive to road, as well as being able to operate as a hub for emerging regional terminals.</p> <p>Compared to the Northampton Loop which serves Northampton Gateway and DIRFT; and the congestion around Birmingham which this scheme substantially avoids, there are comparatively few limitations on this section of rail.</p> |
| 10 | <p>3. Employment</p> <p>3.1. After receiving clarification on employment levels, Elmesthorpe Parish Council still remain deeply concerned with regards to commuter traffic. Particularly when considering the immature sustainable travel strategy and unrealistic expectations on how safely people can move by bicycle on the local roads.</p> | <p>The sustainable transport strategy has been progressed further with engagement from third party operators. Mode share figures are realistic and additional measures have been input to the active travel plans. An updated version was submitted at Deadline 3 (document reference: 6.2.8.1A, REP3-016).</p> |
| 11 | <p>4. Highways and Traffic Issues</p> <p>4.1. The Parish Council remains critically concerned about the impact on the local road infrastructure.</p> <p>4.2. Elmesthorpe Parish Council is troubled that no modelling has been undertaken regarding the impact of any potential closure of the A47 link road on Elmesthorpe and the surrounding road network. The applicant stated that they ‘couldn’t’ model the closure of the A47 link road. We believe that this is an essential incident to model, and well within the capabilities of the traffic modelling systems used to date.</p> <p>4.3. We welcome the modelling exercise requested by the ExA regarding the effect on the surrounding road network in the event of M69 closure.</p> <p>4.4. During construction phase (10-12 years) the impact upon residents to access essential services such as doctors, schools, chemists, post offices and supermarkets will be severely</p> | <p>The Applicant has been in discussions with National Highways and their emergency closure plan submitted at Deadline 3 (document reference 17.8, REP3-043) has been updated to reflect the new routes provided by the HNRFI site and is resubmitted at deadline 4 (document reference: 17.8A).</p> <p>Modelling is intended to provide typical conditions to inform infrastructure and management decision making. Emergency situations can vary significantly and are actively managed by dedicated staff at National Highways. Therefore dedicated modelling cannot be provided.</p> <p>As comments above to response 5</p> |

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| | <p>impacted. The quantum of highways works that will surround Elmesthorpe in every direction and at almost every connecting junction will isolate villagers and it is not considered reasonable.</p> <p>4.5. The mitigation proposed at New Road/Hinckley Road/Station Road B581 of introducing traffic lights to impose a delay in order to deter HGV traffic generated and/or reassigned as an effect of the proposed development, is deemed wholly unsatisfactory. To propose mitigation in the form of making a well performing junction into a poorly performing junction to produce delays, is an effect that will be permanently suffered by the villagers of Elmesthorpe (and Stoney Stanton) as they try to move about their daily lives.</p> | <p>Mitigation is proposed to ensure traffic moves more efficiently through the junction whilst enhancing pedestrian safety.</p> |
| 12 | <p>5. Site Access & Parking</p> <p>5.1. We still remain deeply concerned about the parking of construction and operational workforces around our very small village. No solution to prevent this from occurring has been secured by the Applicant.</p> | <p>All construction traffic parking will be on-site within the site compounds and accessed away from the B581. The construction environmental management plan (document reference: 17.1A,) will need to be maintained by the contractor, which will manage contractor parking and measures to prevent on-street parking.</p> |
| 13 | <p>6. Noise</p> <p>6.1. We still remain deeply concerned about the impact of prolonged construction and 24 hour operational noise, on the residents of the village and the effect upon their lives, educations, health and livelihoods.</p> | <p>Noise from both the construction and operational phases has been assessed at nearby receptors, which includes daytime and night-time periods over weekdays and weekends. The assessment shows that with mitigation in place, noise levels are predicted to fall below the Significant Observed Adverse Effect Level at all nearby receptors in the assessments undertaken. This includes receptors off Billington Road East, which are located closer than receptors within the village of Elmesthorpe. This can be found within the Residual Environmental Effects section of the Noise and Vibration Chapter (document Reference 6.1.10A).</p> |
| 14 | <p>7. Light Pollution</p> <p>7.1 The lighting strategy details received are concerning. Especially when bearing in mind the Applicant has not considered the impact of lighting on slip roads, the link road and the additional lighting required on the M69.</p> <p>7.2 The introduction of a Rail Freight Interchange and associated new highways lighting will be unbearably stark and disruptive.</p> | <p>7.1 The lighting strategy details are outline in nature. Recent discussions with BDC and HBBC resulted in revised wording to Requirement 30 (Lighting). In terms of ecology, the lighting strategy considers potential ecological receptors and includes control measures to ensure any potential lighting impacts are minimised, including on retained features of ecological value and off-site receptors.</p> <p>An updated position regarding has been submitted which considers the additional lighting associated with the M69, submitted as a Written Statement of Oral Case ISH3 [Appendix G - M69 Lighting Proposals and associated effects] (document reference: 18.7.7, REP3-062). This shows the proposed zone of influence of the lighting.</p> <p>7.2 Any new development should be specified an Environmental Zone (ranging from E0 'protected environment e.g. UNESCO starlight reserve, to E4 'High district brightness e.g. City Centre). For each Environmental Zone the ILP recommends maximum values of light parameters for the control of obtrusive light. The Site has been considered to fall within Environmental Zone E2 'Low district brightness' e.g. sparsely inhabited rural area. The Lighting Strategy (document reference: 6.2.3.2, APP-132 to134,) provides mitigation measures and criteria and ensures that the development must not exceed the maximum obtrusive light values for environmental Zone E2 in post-curfew conditions.</p> <p>To further alleviate concerns in respect to lighting, the Applicant provided a Technical Note for Lighting appended to the draft BDC SoCG submitted at Deadline 2 which contains further guidance, information, and quantitative assessment to demonstrate that the Proposed Development can be</p> |

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| | | provided with an external lighting installation that complies with the criteria as set out in the Lighting, while not exceeding the obtrusive light limitations for environmental zone E2 at residential properties. This quantitative assessment therefore demonstrates acceptable impact according to ILP Guidance Note 01/21. |
| 15 | 8. Air Quality 8.1. We are awaiting further clarification and assessments from the Applicant and reserve our comments until such time they are made available. | Noted - additional assessments/responses were provided as submission for Deadline 3, these include the Air Quality Construction Traffic Note (document reference: 18.7.1, REP3-056), Air Quality Effects at Acorns Café and Burbage Common Play Area (document reference: 18.7.2, REP3-057) and Air Quality at Narborough Crossing Note (document reference: 18.7.3, REP3-058). |
| 16 | 9. Visual Impact 9.1. The Parish Council maintains the view that there are different palette options available to the applicant that would render the appearance of the warehouses more sympathetically to the surroundings. 9.2. We still remain deeply concerned about the visual impact of this proposal. | <p>The material and colour palettes that have been put forward within the Design and Access Statement (document reference: 8.1A, REP2-059) and the Design Code (document reference: 13.1A), have been chosen based on their ability to create a park of high-quality design and appearance when viewed from an internal context, whilst acting as a subtle backdrop to the proposed, illustrative, landscaping scheme, thereby assisting in the integration of the development into the existing landscape.</p> <p>Alternative materials were considered, and the reasons for not using them expressed within the aforementioned documents on the grounds of not achieving the required levels of appropriateness for an SRFI development of this scale.</p> <p>Alternative colour palettes are also available within the material ranges that have been put forward, however it is submitted that the current design and colour palette represents a design approach and aesthetic that does not require certain environmental conditions to be in place, whether that be specific sky colouration or seasonally responsive landscape growth and coverage, in order to assimilate itself in the environment. By utilising the monotone hues proposed, it allows the natural elements of the environment to change throughout the year and make their own statement without drawing specific attention to the built form within them.</p> <p>The National Design Guide also states that good design comes from creating a development that has its own identity and sense of place and not mimicking other surrounding developments. The proposed design and material / colour palette application addresses all of these points in a positive way.</p> |

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| 17 | <p>10. Flooding & Drainage Issues</p> <p>10.1. The Parish Council still holds concerns regarding the flood mitigation. We believe the base modelling that flood mitigation is based upon is not reflective of the actual current conditions.</p> <p>10.2. The Parish Council also holds concerns regarding the Foul Water Network and any information as to how the HNRFI will feed into this existing old and delicate network would be gratefully received. Sewers are known to be blocked by tree roots in the village causing sewer floods into homes (Appendix 1).</p> | <p>10.1: The flood modelling has been independently reviewed by the Environment Agency and has been identified as fit for purpose.</p> <p>However, even without the support of the flood modelling, we are confident that the flood mitigation strategy is robust. As described previously, the flooding on the site is a product of rainwater that cannot drain away quickly enough, which leads to ponding of surface water. This source of flood risk can be resolved by intercepting the rainfall and directing to storage basins and tanks, prior to it being discharged from the site.</p> <p>The surface water discharge rate will be restricted so that the runoff leaving the proposed development area will be no greater than the current undeveloped conditions, and in larger storm events the runoff from the development will be less than existing. Therefore, there will be no detrimental impacts in the downstream catchment.</p> <p>10.2: Severn Trent Water (STW) have confirmed that a connection can be made into the existing foul sewer network in Burbage Common Road. This will be via a pumped connection from the HNRFI site which will allow flows to be regulated and stored within the network.</p> <p>STW are undertaking network modelling to understand areas within their network which may require upgrade works and have an obligation to provide sufficient public sewer capacity upgrades to allow for development within a reasonable timescale. This would include provision for flows from HNRFI and other sites.</p> <p>STW are responsible for maintenance of the adopted sewer network and any existing issues should be raised with them.</p> |
| 18 | <p>11. Wildlife & the Loss of Farmland</p> <p>11.1. No further comments at this time</p> | Noted |
| 19 | <p>12. PRow & Access to Burbage Common/Woods</p> <p>12.1. The proposals for T89 rerouted footpath give rise to specific safety concerns involving the B581. Please refer to Appendix 2: this highlights that there is a higher incidence of accidents at the proposed location for the new uncontrolled pedestrian crossing.</p> | The rerouted T89 will cross the B581 at a pedestrian crossing point which will be much safer than the current arrangement which involves negotiating a broken stile, crossing a railway line, emerging onto a narrow footpath over a crash barrier, and crossing the road without the assistance of a pedestrian crossing. |
| 20 | <p>13. Construction</p> <p>13.1. The Parish Council requested details of what was entailed within Works Plans 12, 18 and 19. We have been signposted to documents 2.2A-2.2H however these are just maps and provide no details of the actual work proposed. We require signposting to where to find information of what is entailed of these particular Works Plans please</p> | The details of the works to be undertaken within the works plans are listed within Schedule 1 of the Draft Development Consent Order document. (document reference: 3.1C) |
| 21 | <p>14. Green Credentials</p> <p>14.1. Elmesthorpe Parish Council are concerned that the Applicant's proposal to limit the production of renewable and sustainable energy is flawed and is purely proposed to avoid triggering the need for a separate NSIP application. Harnessing full capability of renewable energy generation technology is essential and to purposefully limit such a thing is rather defeating the object.</p> | The Applicant has already acknowledged in responding to representations when raised and subsequently in ISH2 that the presentation of a saving of 1.6bn HGV kms annually seemingly from HNRFI, was an error in the Community Newsletter and on the website and was taken off. |

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| | <p>14.2. We have queried continually where it is claimed that the HNRFI will “remove 1.6 billion HGV kilometres annually”. We raised this verbally during Final Consultation; our written Final Consultation response; in Relevant Representations and also Written Representations. This was consistently used by the Applicant on their ‘Community Newsletters’ issued widely to the public, this figure was supplied by the Applicant for articles in the Hinckley Times, used during Final Consultations in the Community Explanation Document and on the Public Exhibition Boards (copies of these can be provided if you would like these). It is/was also on the project website.</p> <p>14.3. The 83 million HGV miles detailed in the Applicant’s current application is not a new calculation. It was detailed deep in the PEIR material (PEIR Chapter 8 (table 7.7, page 8-68)) during Final Consultation so the Applicant has been aware of this gross over-estimation and dishonest ‘benefit’ since before Final Consultations took place and still opted to publicise this false claim.</p> <p>14.4. Despite being constantly queried, the applicant neglected to provide any meaningful responses until probed at ISH2; where the applicant advised it was incorrect and that it was removed after checking this after Final Consultations. We accept that this may still show for those users who don’t habitually clear their cached data on their personal computers.</p> <p>14.5. It is confusing to Elmesthorpe Parish Council how, if this was removed just after Final Consultations, this specific claim for the removal of 1.6 billion HGV kilometres was still published in an article on The Applicant’s website dated 26th April 2023. The Application was accepted for Examination on 13th April 2023. A copy of this can be found at Appendix 3.</p> <p>14.6. We await the explanatory memorandum demonstrating how the removal figure of 83 million HGV miles has been derived</p> | <p>The Applicant has now identified the source of the information, which came from the Rail Freight Group (RfG) and UK Major Ports Group (UKMPG) report ‘Why the UK needs more intermodal rail freight’ published in January 2021, in which it stated:</p> <p><i>“It is much more environmentally friendly than road freight. Each train takes 76 HGVs (heavy good vehicles) off the road which equals 1.66 billion fewer HGV kilometres a year, reducing congestion and accidents.”</i></p> <p>The 1.6bn HGV kms saved relates to the UK as a whole. This was a genuine error in copywriting which had not been picked up. It has never formed part of the formal Application.</p> <p>The full RFG UKMPG report has been appended for information (document reference: 18.13.1)</p> <p>The full background to the assessment of up to 83 million lorry miles saved per annum (133.7 million kms) at 16 trains per weekday (4 on Saturday) has been provided at Deadline 3 (document reference: 18.6.7, REP3-052).</p> |