

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 10 - Residents Businesses]

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	Applicants Response
1	No mitigation is planned along the rail track that sits behind Bostock close. Trains will be slowing before they reach Bostock to speeds of around 25 miles an hour in order to enter the rail terminal at a slow speed, at a length of 775 metres the time it will take each train to pass the area will increase and with that the IP notes that there is a risk of increased air pollution and noise. The IP notes that the trains will be operating day and night in addition to the passenger trains that will continue to use this track and this could have an impact on local quality of life	<p>It is understood that the additional freight trains may run regardless of whether the HRNFI comes forward as the line has the pathing and capacity necessary to run trains over and above the HRNFI proposals. In terms of noise, a train travelling at a slower speed will result in lower noise levels than a train travelling at a higher speed. Although trains will take longer to pass, the overall noise level experienced by residents is likely to be lower overall.</p> <p>With regards to air quality, Paragraph 9.158 - 9.165 in ES Chapter 9 – Air Quality (document reference: 6.1.9, APP-118) provides the screening assessment undertaken in relation to both stationary and moving locomotives as a result of the HRNFI, in accordance with Defra TG22 guidance. In accordance with Defra TG22 guidance, consideration was given to both the NO₂ annual mean and the sulphur dioxide (SO₂) 15-minute mean air quality objectives for England. It was determined that the HRNFI would not exceed any of the screening criteria therefore the impacts from diesel locomotives was deemed to be negligible and not significant, therefore no mitigation is deemed necessary.</p>
2	The IP notes a concern that any changes in the water course up stream may have a critical impact on the levels of water that Bostock close experiences. Should this occur, houses are at risk of flooding and with the increase of flooding not only locally but in the wider area in recent years.	As set out in the Flood Risk Assessment (document reference: 6.2.14.1, APP-209) and the Sustainable Drainage Statement (document reference: 6.2.14.2, APP-210), the Proposed Scheme will include new surface water drainage infrastructure which will intercept and store storm water falling on the development. The stored storm water will be released to the surrounding watercourse network at the equivalent greenfield (pre-development) annual average discharge rate. This will ensure that under normal rainfall conditions there is no increase in the rate of water leaving the site and therefore no impact on downstream flood risk. In larger storm events this will represent a reduction in the peak flow leaving the development, offering downstream betterment.
3	The IP notes a concern of increased HGVs	Restrictions on HGVs using specific routes are proposed. The majority of heavy vehicles will route to the motorway network which is designed for the strategic movement of goods as well as people. A HGV Route Management Plan and Strategy has been produced to ensure an operational plan is in place for managing the movement of HGVs to and from the site (document reference: 17.4B)
4	The IP notes concerns about the impacts of air pollution and the link to Countywide mortality rates.	<p>The latest version (2022) of the Defra Technical and Policy guidance has been used in the air quality assessment (document reference: 6.1.9, APP-118). Modelled concentrations have been compared against the current relevant air quality objectives for England which are set to be protective of the environment and human health.</p> <p>Air quality impacts associated with the construction and operational phase of the HRNFI has been considered at nearby receptor locations.</p> <p>No significant changes in pollutant concentrations were predicted at the modelled individual receptor locations across the whole study area, for both the construction year and operational year, as detailed in the air quality assessment (document reference: 6.1.9, APP-118). The HRNFI is not predicted to cause any significant impacts with regards to air quality.</p> <p>Noting that there would be no significant changes in pollutant concentrations across the whole study area, the changes would not be sufficient to quantify any adverse change in local population health outcome.</p>

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5	The IP asks whether an increase in traffic in Barwell results in congestion on the A47 / A447 or when the A5 is closed. The IP states that Barwell has been absent from traffic modelling.	Barwell has been included within the Strategic Modelling process. The models are set up for a standard peak hour including congestion. Mitigation is focused on those routes that experience significant changes as a result of the development traffic. Emergency protocols are managed by National Highways, these have been updated in line with the new development infrastructure.
7	The IP notes concerns regarding the loss of agricultural businesses and food production.	As noted in the Soils and Agricultural Land Quality Assessment (document reference: 6.2.11.3, APP-193), the land being developed comprises 40ha of previously developed land, 204ha of subgrade 3b land which is not what is 'termed 'best and most versatile' for agricultural production. The high clay content of the grade 3b land limits drainage, restricts access with machinery and cropping to autumn sowings of cereals and oil seeds. Only 2.9ha of the land is Grade 3a and better quality, some of which will not be developed but will be planted with native woodland, scrub and wildflower meadow planting.
8	The IP notes that the NW Leicestershire and East Midlands Modal Park and Toton are cited in the LLEPs Economic plan as suitable for rail freight hubs and are in much closer proximity to the automotive industry.	These are suitable for the single consignee business of Toyota and Toton is now being used for the distribution of completed cars from Toyota. They are in a location already served by East Midlands Gateway for Intermodal services. They would not compete with HNRFI.
9	The IP notes that consideration should be given to the effect on physical and mental health of an industrial landscape and associated noise, traffic and pollution on residents of the surrounding area must be given and balanced against a need for any development in this particular area	All tangible changes in environmental and socio-economic conditions with the potential to influence public health, including noise have been assessed and addressed through the assessment process set to objective thresholds and guidance that are protective of the environment and health and facilitate sustainable development. A Health and Equality Briefing Note has been provided to aid navigation of the DCO application and summarise how and where health has been addressed (document reference: 6.2.7.1C) .
10	The IP notes concerns about noise	As set out in Chapter 10 Noise and Vibration (document reference: 6.1.10A), noise associated with the proposed operational phase, which has included noise associated with HGV loading/unloading activities and SRFI operations, has been considered at nearby receptors. The results of the assessment indicate that with mitigation in place, noise levels from the development will be reduced and significant adverse noise effects are unlikely.
11	The IP notes concerns about air pollution	The latest version (2022) of the Defra Technical and Policy guidance has been used in the air quality assessment (document reference: 6.1.9, APP-118). Modelled concentrations have been compared against the current relevant air quality objectives for England. Air quality impacts associated with the construction and operational phase of the HNRFI has been considered at nearby receptor locations. No significant changes in pollutant concentrations were predicted at the modelled individual receptor locations across the whole study area, for both the construction year and operational year, as detailed in the air quality assessment (document reference: 6.1.9, APP-118). The HNRFI is not predicted to cause any significant impacts with regards to air quality.
12	The IP notes concerns about anti-social behaviour around lorry parks	The HGV Park is private and will be for those operators serving the rail port and the B8 units. Usage will be monitored by on-site management
13	The IP notes that the Skylark population is above average and not a 'fairly low number'.	A moderate amount of skylark (35-42 pairs) was recorded across the site during surveys. Numbers reflect the typically unsuitable or ever-changing habitat associated with grazing or intensive / rotational arable management. Similar opportunities are available in the wider area and on that basis, the site is unremarkable. The proposed landscape designs include new opportunities for breeding birds, including skylark.
14	The IP notes that farmland birds are declining and this must be halted. The IP also notes that Owls, Redkites and Ravens are not mentioned.	Comprehensive survey work has fed into an assessment of which protected or notable species the site supports or is likely to support. Appropriate mitigation has been proposed on that basis. Whilst the

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		<p>displacement of farmland species is inevitable when losing large areas of agricultural land, the impacts on the farmland bird populations are not considered to be significant, either alone or cumulatively, when considering population data and local records.</p> <p>Ravens and Red Kites are BoCC green list species, however their presence within the site has been recorded through the desk study exercise and the wintering bird surveys. Barn Owl presence was also recorded in 2018. (see Ecology Baseline document reference 6.2.12.1, APP-197). Whilst the site may be utilised by such species, it is not considered to be of any significant value to them.</p>
16	The IP notes that the claim that loss of intensively managed agricultural land is not considered to negatively impact pollinators' is in contradiction to the government publication by the Food and Environmental Research Agency which states that agricultural land with blossom rich hedgerows and trees, uncultivated areas of land, crops such as oil seed rape and field beans are all valuable resources for pollinators and in addition to this hedgerows and ditches provide valuable overwintering shelter for many creatures.	<p>The existing habitats present are limited in their diversity / floristic value. The loss of intensively managed agricultural land (i.e. pasture and arable) will not have a significant negative impact on invertebrates. As stated at Annex 7 of the Ecology Baseline (document reference 6.2.12.1, APP-197) a detailed invertebrate appraisal was undertaken by a specialist invertebrate ecologist in 2018. The significant woody resource on site was noted to be of site-level value for invertebrates. Further, the appraisal deemed it appropriate to undertake further, targeted surveys, which were done so in 2018 and 2021.</p> <p>A net gain in hedgerow and wet ditch habitat will be achieved post-development. New species-rich grassland, mixed scrub and woodland habitat will be an important, diverse and more naturalistic environment for pollinators.</p>
17	The IP notes that the loss of the five footpaths and bridleways in part or total (plus Burbage Common Road) will limit significantly the opportunities currently available for the public to enjoy walking, jogging, cycling and equestrian activities in the area.	<p>The effect of HNRFI on adjacent equestrian businesses and horse riders has been assessed in paragraphs 7.261-7.267 of the Environmental Statement Chapter 7: Land Use and Socio-Economic Effects (document reference: 6.1.7, APP-116) with minor adverse effects anticipated on both receptors.</p> <p>As shown on the Public Rights of Way Strategy, Figure 11.14 (document reference: 6.3.11.14, APP-298), new routes are proposed within the green corridors around the outside of the site.</p>
19	The IP further notes the loss of 4kms of footpath.	<p>The likely effects on the local network of Public Rights of Way (PRoW) is presented in the Public Rights of Way Appraisal (document reference: 6.2.11.2, APP-192). While a level of adverse effects on the local network of footpaths is noted, the report finds that the proposed mitigation package would be proportionate in relation to the proposed development.</p> <p>As shown on the Public Rights of Way Strategy, Figure 11.14 (document reference: 6.3.11.14, APP-298), while some existing routes would be stopped up as a result of the proposed development, there would be several new routes proposed around and through the site, which provide pedestrian and cycle connectivity as well as bridleways connecting to the local network.</p>
20	The IP notes that noise calculations do not include anything on the effects of wind direction. This was part of the project submission for the E M Gateway development.	Noise associated with the Proposed Development has been modelled using Cadna(A) noise modelling software. The adopted calculation method for industrial sources is ISO 9613-2 1996 Acoustics – Attenuation of sound during propagation outdoors – Part 2: General method of calculation. This methodology assumes downwind propagation, with the wind blowing from source to receiver. The use of this calculation procedure is in line with industry standards and presents a robust assessment case.
21	The IP questions how the site selected was selected.	
22	The IP questions whether the applicant did a full impact and risk assessment on the impact it would have on the people of Elmesthorpe, Stoney Stanton, Burbage Common and the surrounding area.	The impact of the development has been fully assessed through Environmental Assessment which is set out in the submitted Environmental Impact Assessment (document reference: 6.2.15.1, APP-211 to APP-214).
23	The IP notes that there will be excessive traffic through Sapcote heading for the new entry slip road on to the M69 and traffic from the new exit slip road will be high.	Background traffic is attracted through Sapcote due to the introduction of the M69 south facing slips. Further detail on the HGV numbers is included in REP3-051. A HGV Route Management Plan and Strategy has been developed REP3-039 which identifies the B4669 through Sapcote as a prohibited route for development HGV traffic.

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25	The IP questions that once the trains are unloaded at this site, how will the goods leave? The IP questions who the occupants are likely to be?	As outlined in the Trip Generation Addendum (APP-141) an assumption that rail to road freight will be split 70/30 in favour of external trips to the highway network. This has been factored into all modelling calculations and the development of the mitigation.
26	The IP notes that there may be 8 passenger trains/hr plus the freight trains delivering waste to Croft Quarry. The IP notes that the noise suffered by residents close to the line in Elmesthorpe, Croft, Narborough, Whetstone, Glen Parva, South Wigston and other places along the line would become unbearable. The line is only twin tracks with no passing loops.	There is capacity for the planned growth of passenger services as well as traffic to and from HNRFI. Croft can only handle 3-4 trains per day, which is entirely achievable. Rail use is critical to the future of sustainable transport. This line is Network Rail's Strategic Freight Route between Felixstowe, the Midlands and the North, which it is continuing to invest in.
27	The IP notes that the site is a greenfield site used for farming.	Alternative sites have been considered and there are no brownfield sites on the Felixstowe to Midlands and the North line that could accommodate an SRFI and fulfil the purpose of HNRFI in this location.
28	The IP note that there is a similar development being built at J15 of the M1, Drift at J18 of the M1 has been expanded on both sides of the A5, Magna park is also expanding. The IP notes that there are empty units and there is the East Midland Gateway so questions the need for the development in a Rural Community which will have an adverse effect on health and wellbeing and will destroy valuable agriculture land. The IP also notes that the Ratcliffe Power Station will be closing soon which is far more suitable	<p>It is recognised that Strategic Rail Freight Interchanges are difficult to locate and that they may need to be in rural locations when and where they have good access to both the Strategic Rail Freight Network and the Strategic Rail Network.</p> <p>The need case for large B8 units over 9,290 m² is outlined in the Logistics Demand & Supply Assessment (Document reference 16.2). This document has been produced alongside the Market Needs Assessment: Rail Freight Market Demand & Supply (Document Reference 16.1) which considered the need for rail freight terminals specifically. These documents evidence the need for the HNRFI. HNRFI is also evidenced as being needed as part for the Warehousing and Logistics in the South East Midlands' study consistent with Savills Logistics Demand & Supply Assessment (document Reference: 16.2). This is why the issue of need has not been raised as part of the Statements of Common Ground and is accepted by LCC, BDC and HBBC in particular.</p> <p>Ratcliffe Power Station is close to East Midlands Gateway, which is fully let. It may well be suitable but serves a different market to HNRFI.</p>
29	The IP reports insufficient information supplied by the applicant and inadequate consultations.	The Applicant has undertaken extensive pre-application consultation, including two informal consultations and a statutory consultation. Consultation has taken place in accordance with the provisions of a Statement of Community Consultation. The consultation process has extended over several years and has included information available on a HNRFI website. The Applicant does not accept that there has been a lack of information at the consultation stage of the project.
30	<p>The IP notes that the following Environmental policies are not considered by the developer:</p> <ul style="list-style-type: none"> • The Net Zero Leicestershire Strategy and Action Plan • Roadmap Research Evidence Base • Leicestershire Climate & Nature Pact 	<p>While the Net Zero Leicestershire Strategy and Action Plan may not be specifically quoted in Chapter 18, the overall assessment does take into account its effects on a pan-regional baseline and maintains consistency with the transport assessment. Where feasible, results were compared against the respective sectoral performance and targets. In relation to the localised impact of GHG emissions, the receptor of these emissions is the global, rather than the local, atmosphere according to IEMA (2020) As such, the geographical location of GHG emission sources is not a material consideration within the GHG assessment; the receptor for GHG emissions is therefore the global atmosphere; a summary of vehicular emissions using the traffic data in the PRTM for the baseline scenario (2019) (Table 18.11).</p> <p>HNRFI supports both the Strategy and Action Plan by "reducing vehicle mileage, enabling the switching of fuel type" and "reducing vehicle mileage through increased public transport, maximising efficiency of [the] logistics sector" ('Theme 1'), reducing fuel spending and harbouring renewable sources of energy 'Theme 4') and decarbonising construction and "raising awareness of decarbonisation and its co-benefits and ensure equitable and inclusive climate action" ('Theme 6')</p>

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while the Net Zero Leicestershire Strategy and Action Plan may not be significantly addressed in Chapter 18, the overall assessment does take into account its effects on a pan-regional baseline and maintains consistency with the transport assessment. 31	The IP notes discrepancies in Environmental Statement traffic impact figures- Environmental Impact Assessment used the lowest of the three potential employment figures to determine traffic levels therefore underestimating environmental effects on the community.	See note produced at Deadline 1; REP1-018 which discusses the detail of the employee numbers and the trip generation. The trip generation was produced on floor area as is industry standard, the employee numbers were purely indicative.
32	The IP notes that the Applicant is relying heavily on the 'scoping opinion' for the Environmental Impact Assessment which was agreed with the Planning Inspectorate over two years ago.	In line with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, the Environmental Statement has been prepared in accordance with the 2020 Scoping Opinion (document reference 6.2.6.2), the most recent Scoping Opinion received for the HNRFI. The Environmental Statement topic chapters (document reference: 6.1.7, APP-116 to 6.1.21) include content on how the Applicant took account of the Planning Inspectorate's comments and those from prescribed consultees. Since the Scoping Opinion was issued by the Inspectorate, the ES process evolved and continued to take account of consultation responses throughout the pre-application period, this is documented within the chapters of the ES and within the Consultation Report (document reference: 5.1, APP-091)
33	The IP notes concerns regarding the A47 link road and impacts on sporting facilities.	The applicant has assessed the potential socioeconomic effect of HNRFI on community land and assets within 500m from the Main Order Limits in paragraphs 7.259 and 7.260 of Chapter 7 of the ES (document reference: 6.1.7, APP-116).
34	<p>The IP note the following traffic concerns:</p> <ul style="list-style-type: none"> • Midlands Connect have classified the A5 corridor as a 'slow and unreliable route' • one third of vehicles using the A5 are HGV's • average speed at peak times gets down to 10mph, including at the junction 1 roundabout which connects the road to the M69 • Watling Street Bridge is hit every two weeks (on average) which results in a six-hour delay to clear it, causing severe local congestion as people use villages and Hinckley as rat run • transport assessment not yet concluded 	<p>Further discussion has been held with the Highway Authorities. The Applicant is committed to delivering further modelled evidence on the A5 based on the National Highways VISSIM model recently provided by NH and this will be available for Deadline 4. This accounts for HGV traffic, subsequent planning consent at Padge Hall Farm and its committed infrastructure changes, including lowering of the carriageway under the Watling St Bridge.</p> <p>The Transport Assessment has been concluded. The additional requests from the highway authorities re the changes in flows at mitigation junctions in 2023 and the addition of the recently consented Padge Hall Farm will be presented for information within a 2023 report submitted at Deadline 4 (document reference: 18.13.2).</p>
38	The IP notes concerns around environment, infrastructure and service provision during construction and operational phase not addressed.	<p>The Environmental Statement topic chapters (document reference: 6.1.7 to 6.1.21, APP-116 to APP-130) provides a full assessment of the proposals in both the construction and operational phases.</p> <p>Network Rail is satisfied that sufficient capacity has been identified for HNRFI services in the Working Timetable. This allows for known passenger service development aspirations identified by Midlands Connect, to better link Birmingham, Nuneaton, Hinckley and Leicester.</p>

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40	The IP notes a concern about Statements of Common Ground, specifically: <ul style="list-style-type: none"> with Rugby Borough Council. with Leicestershire County Council for transportation and highways. regarding the Sustainable Transport Strategy with various stakeholders. with Warwickshire County Council. that a number of areas still to be agreed with National Highways and the local highway authorities. 	The Applicant has submitted a Statement of Commonality at Deadline 3 (document reference: 19.12.A, REP3-082). Discussions are ongoing with all parties, the latest discussion are summarised in Statement of Commonality at Deadline 4 (document reference: 19.12B). The Applicant also submitted an updated Sustainable Transport Strategy at Deadline 3 (document reference: 6.2.8.1A, REP3-016) and is expecting to submit a further update at deadline 4 (document reference: 6.2.8.1B).
47	The IP notes that At present National Highways cannot provide, comment on nor accept the Stage 1 Road Safety Audits because strategic modelling outputs are outstanding.	Interim Audits have been carried out (document reference: 20.1). Strategic modelling outputs were submitted originally, these have been updated with revised counts in agreement with the Highway Authorities. The results are submitted at Deadline 4. A full RSA brief (document reference: 21.1) will be updated and issued to the LHAs/NHs with amended drawings that are being submitted at Deadline 4, following the Interim audit and comments from LCC.
48	The IP notes that National Highways remain concerned with the limited sustainable transport strategy for the development site.	A draft Sustainable Transport Strategy was submitted at Deadline 3 (document reference: 6.2.8.1A, REP3-016). The Sustainable Transport Strategy has been further updated and submitted at Deadline 4 (document reference: 6.2.8.1B). The updated strategy includes enhanced bus services, cycling and waling links.
49	The IP note that there was a lack of sufficient time for the consideration of additional information with the 5 th September deadline allowing for the submission of updated information and the subsequent deadline of 10 th October for submission of Written Representations and Local Impact Reports.	The Deadlines set are not in the control of the applicant they are set by the PINS examination timetable.
50	The IP questions what the delay would be from the traffic lights with signals at the Hinckley Road / Station Road / New road junction in Stoney Stanton. The IP asks how this is calculated and how this would be monitored.	The traffic signals at Hinckley Road/Station Road/New Road have been developed to allow more efficient movement of traffic through the junction based on projected future flows, the delay estimated is less than would be with the current junction arrangement. It is calculated through the use of industry standard modelling software- Junctions 10.
52	The IP note that the traffic on Hinckley Road will be further exacerbated by the addition of more traffic lights at the B4669 / Stanton Lane junction (listed as B2 in Table 8.28 of APP-117 ES Chapter 8); The IP note that this will cause continuous lines of vehicles coming into Stoney Stanton on Hinckley Road with no breaks in the traffic flow. The IP notes that the traffic modelling is inadequate and that the proposal is in the wrong place.	The modelling for the B4669/Stanton Lane has been based on projected future demand at the junction. The design has been developed to ensure a more efficient throughput of traffic based on the likely demands from all arms. The signals will ensure that queuing and delay is minimised. The modelling has been carried out on industry standard software and based on the outputs from LCC's strategic highway model.
53	The IP note that according to Tritax, this site will take 10 years to build. The IP note that this could raise significant construction impacts and a delay in any of the benefits claimed by Tritax might be realised.	The construction of the scheme is phased to minimise disruption, the first phase of work which will be approximately 2 years, will be to construct the Highway improvements such as the A47 link road to form an Eastern Bypass for Hinckley and Burbage and the construction of the Intermodal Rail terminal and the first buildings. The subsequent phases of the scheme will be to construct the buildings within the scheme. The CEMP document (document reference: 17.1A) and CTMP (document reference: 17.6C) cover how we will plan and manage the construction phases of the scheme.
54	The IP notes that there is an adjacent railway line is in a cutting. Thousands of tons of spoil will have to be removed involving many lorry journeys so that the sidings can be at roughly the same level as the railway line.	The earthworks materials to create the plateaus for the rail freight terminal and indeed the wider scheme will be sourced from within the site.
55	The IP notes that the delivery of construction materials to the site will cause disruption for other road users.	We have developed a Construction Traffic Management Plan (CTMP) (document reference: 17.6C) for the construction phase of the project which stipulates the permitted routes for construction vehicles, and this has been calculated to ensure that the deliveries of construction materials do not cause disruption for other road users.

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56	The IP note that electricity will be need to be brought in by either a new pole line or buried cable either of which would mean massive disruption for those near the chosen route.	The electricity to the primary substation within the site will be brought into the scheme by National Grid Electricity Distribution from their existing network within the area and it is not considered that this would result in “massive disruption”.
57	The IP note that Severn Trent would have to lay a new water main to the site and also sewers and possibly a sewage works to cater for the estimated 8,000 + workers. The IP note that this results in more disruption for those along the route.	Severn Trent have confirmed that a suitable connection point for Foul Water is within Burbage Common Road, within the Order Limits. Potable water is able to be served from a water main in the B4668 to the northeast of the Main Site. It is not considered that this would result in substantial disruption and works would be co-ordinated and planned to minimise this.
58	The IP note that emergency vehicles would be badly affected by the gridlock.	Strategic modelling has demonstrated the key impacts of the development. The applicant has developed access infrastructure and mitigation to proportionately address the impacts. Additional capacity will be provided with the additional of the J2 slip roads and the A47 link road which will improve accessibility and alternative route planning for emergency vehicles.
59	The IP notes that for every container delivered to this site, two HGV journeys will be necessary.	<p>This would be extremely inefficient. Containers drop offs and collections will be synchronised as far as possible to maximise utilisation and save on operating costs. There will be some which will arrive or depart empty. The average number of HGV's assumed to be required to move a single container is 1.35, not 2.</p> <p>In addition, of these, 30% of the movements are assessed as going to occupiers at HNRFI. (see document reference: 6.2.8.1, APP-141 Environmental Statement - Appendix 8.1 – Transport Assessment [Part 4 of 20] - Trip Generation Addendum Appendix B – Baker Rose Derivation Calculation and BWB Clarification Note (HNRFI-BWB-GEN-XX-RP-TP-0021-S2-P01, Rail Freight to HGV Movement HE Response).</p> <p>At East Midlands Gateway the Terminal Operator, Maritime Transport Ltd is already at 25% and expecting this to exceed 50%.</p>
61	The IP notes that traffic modelling is fundamentally flawed, purposely restricted and inadequate as is the geographic communication and consultation area provided by the developer.	The Traffic modelling has been carried out using Leicestershire’s strategic model. The inputs to which were fully agreed with members of the Transport Working Group. This covered an extensive area to understand the wider impacts of the scheme. Comments on consultation are covered in point 29 above.
62	The IP notes that the increased downtime of the barrier at Narborough Railway Station will impact on traffic in Littlethorpe, Narborough, Whetstone, Cosby and the wider south Leicestershire villages as drivers either queue for longer or seek alternative routes to avoid the railway crossing.	<p>HNRFI scheme does not significantly impact the downtime at Narborough.</p> <p>Network Rail undertook a detailed analysis of Narborough Station and the barrier downtime at a peak weekday time (7:00 – 10:00 and 16:00 – 19:00) as requested by the Transport Working Group of the local authorities. The ExA asked for a 24/7 analysis of the current position. This has been provided along with 4 and 10 trains each way serving HNRFI, as per the Application, which has been provided at Deadline 3. (document reference: 18.5.3, REP3-044).</p> <p>The highway modelling demonstrates that the effect of the increased traffic or additional trains on queuing and delay associated with HNRFI would be negligible throughout most of the day. The largest increase in queue clearance being between 0800 to 0900 hours and 1600- to 1700 hours. However, the resulting clearance time is still well within the average available barrier uptime during that period. Therefore, it is concluded that neither the traffic nor trains associated with HNRFI would materially exacerbate queuing at the Narborough Level Crossing.</p> <p>It is clear from both NR’s original study and the 24/7 analysis, that the impact is nominal. In the morning peak, the worst case goes from 70% open to 68% open; and in the afternoon peak, from 73% open to 70% open. There are indeed other routes drivers can use to avoid the level crossing, if they so choose.</p>

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		The Applicant has noted and advised the ExA that some Cross-Country passenger services are variable in their timing through Narborough, which can lead to longer downtimes if they pass the crossing one after the other. This may be a cause of frustration if it is the peak hours, but it is nothing to do with HNRFI. The intermodal services by comparison tend to run to time.
63	The IP notes that the M1 / M69 junction is already a nationally recognised pinch point by Highways England and therefore impacts on congested areas would occur.	The M69 J3/ M1 J21 has been reviewed and commentary provided within the Transport Assessment. There is an existing congestive issue at the junction which requires very large scale corrective action to address. The impacts of the development traffic however are proportionately low. Public Transport improvements and commitments to strong travel planning at the site will help to further reduce the impacts at Junction 21.
64	The IP notes that the Blaby District area has low unemployment levels with the developers indicating that the workforce for their proposal will be drawn from the Coventry area resulting in the Blaby District suffering all the pain with very little socio-economic gain.	The applicant has responded to this matter with the submitted response to RR-0731 in Deadline 1. This states that although unemployment levels are low in Blaby there are approximately 46,100 unemployed people in the Study Area, defined in paragraph 7.17 of Chapter 7 of the ES (document reference: 6.1.7, APP-116). The Study Area performs worse in youth unemployment in 16–24-year-olds at 13.5% compared to 12.9% at the England level, which the Proposed Development could help to address.