

Interested Party Reference Number: 20039546

Deadline 5 Submission:

REP4 – 131: Doc 18.13.2 Applicant's response to deadline 3 submissions (Appendix B Transport 2023 Update)

REP4-113: Doc 17.4B Revision: 10 HGV Route Management Plan & Strategy Report

REP4-053: Document reference: 6.2.8.1B ES Appendix 8.1 Transport Assessment [part 15 of 20] Sustainable Transport Strategy and Plan REV 6

REP4-055:ES Appendix 8.2 Site Wide Framework Travel Plan Document reference: 6.2.8.2B Revision: 06

**Application by Tritax Symmetry (Hinckley) Limited for an
Order Granting Development Consent for the Hinckley
National Rail Freight Interchange**

(ref. TR050007)

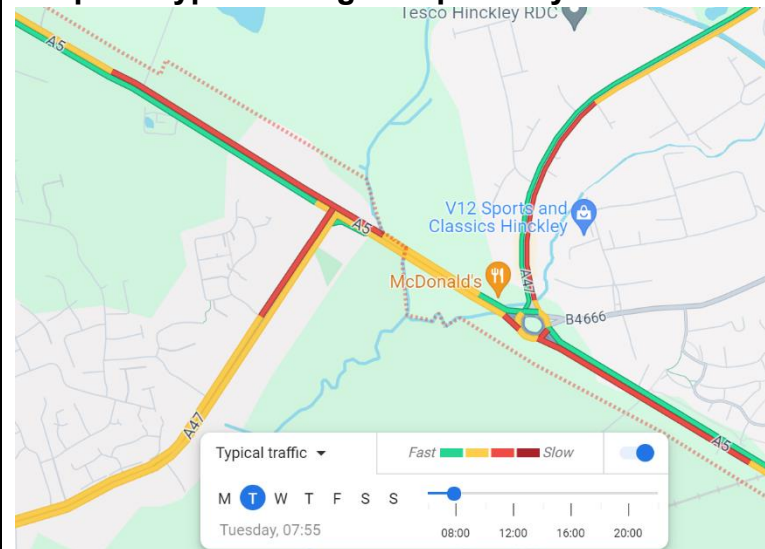
Document and Section Reference	Hinckley & Bosworth Borough Council Response
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<p>REP4 - 131 – Response to deadline 3 submission (Appendix B Transport 2023 Update)</p>	
<p>J21 of M1</p>	<p>This remains a major concern. The Council does not believe the analysis undertaken so far shows the true picture at this critical junction and the Council supports the concerns of Leicestershire County Council and National Highways on this matter. There has been a cursory analysis of the issue and detailed VISSIM modelling has been requested many times to understand the issues and implications – it is notable that VISSIM modelling has been undertaken by the applicant of the only other 2 junctions on the M69, but not the more critical J21.</p> <p>This analysis would lead to an understanding of (1) the effect and mitigation if the development traffic did not divert traffic from the junction (2) if the development has led to an increase in the ‘demand’ flow at J21 but not the ‘actual’ model flows? (3) What is the economic impact of the diversions forced on other traffic by the applicant’s traffic at this junction? HBBC notes that at the levels of demand over capacity shown in the TA, the junction is inherently unstable, and results will vary considerably around those shown in simple models such as Linsig. The Inspectors’ own site visit shows the current issues, and at the second transport hearing it was confirmed that there would not be a RIS scheme in the next National Highways Programme.</p> <p>The current results are not credible, in the sense that a major development such as HNRFI is proposed but at the very next junction north on the M69, the applicant’s analysis shows (1) <u>fewer</u> vehicles in the morning peak hour using the junction (2) very low increases in the pm peak hour (3) no change in volume/capacity at the junction (Table 8.6 and Table 8.8 of the TA)</p> <p>.</p> <p>At the same time, Table 8.7 shows that the development is generating 321 vehicles in the morning peak hour and 443 in the evening peak hour at this junction. In effect every single vehicle generated by the development requires existing traffic to reroute on local roads. The traffic ‘pushed off’ is not ‘background traffic’ as stated by the applicant, they are strategic road</p>

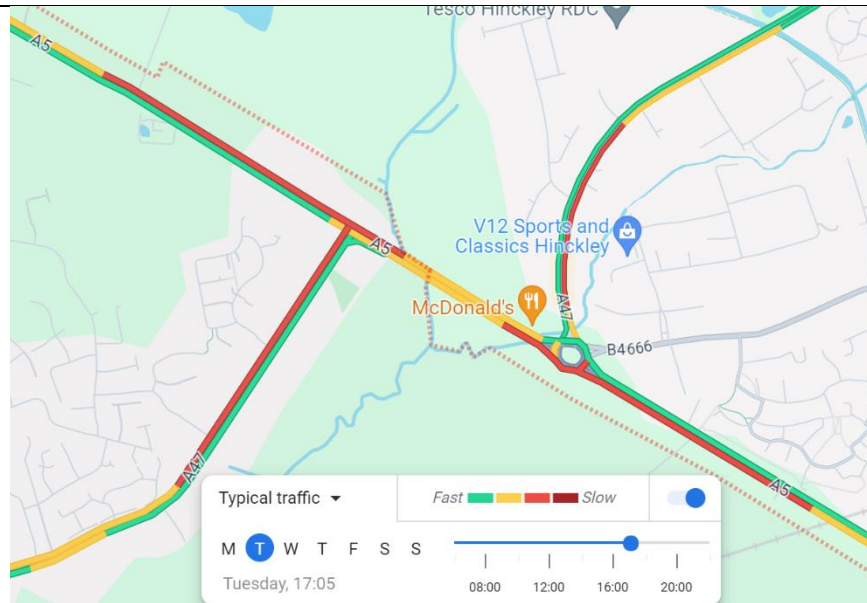
	<p>users who are forced to divert due to the applicant's scheme, incurring additional costs and delays to these travellers and degrading the local environment.</p> <p>The applicant has also presented additional analysis in Document reference: 18.13.2 Revision: 01, although this has not been reviewed and accepted by the highway authorities at the time of writing. These models have not been audited and reviewed and are not the appropriate tool to use for this complex junction, which is VISSIM. And there is no reporting in on interaction at the junction, blocking back of queue and whether traffic is actually all getting through at the junction. Some of the results appear at odds with the knowledge of current junction conditions and clearly much more work is required to understand the impacts here and what mitigation may be required.</p> <p>However they do show that if the development traffic is added to J21, that the capacity is worse at this junction in both peaks with the somewhat surprising exception of the M69W (the arm to and from the development) when it is better. Delays increase or stay the same on all arms expect the M69W, on the A5460 delays increase by a minute average delay per vehicle (nearly 2 minutes in the pm peak) , which is a significant impact.</p> <p>The analysis in Section 4 of the Sustainable Transport Strategy is a useful starting point but HBBC has noted elsewhere that the baseline and targets are not appropriate, and this will affect these estimates. Elsewhere HBBC expresses serious doubt over how the mode share targets can be achieved with the current proposals.</p> <p>HBBC recommends that this issue be properly investigated with appropriate modelling to understand the impact and mitigation.</p>
<p>A5/A47/B4666 roundabout junction (and related A5/A47 Longshoot signal junction) and M69 Junction 3 (junction with A5)</p>	<p>The operation of these junctions on the second key strategic route in the borough of the A5 (the M69 above is the other one) remains a significant concern for HBBC – problems here lead to vehicles re-routing through Hinckley. The applicant is proposing no mitigation, and the day-to-day existing conditions here include significant delays and queuing, even outside of the peak hours. It this is exacerbated there will pressure to divert from the strategic network to other local roads with consequent problems. The Google traffic plans below show existing conditions, with congestion also being experienced between the peak hours.</p>

The modelling and assessment of these junctions has not yet been accepted by the highway authorities and until this is the case, there is doubt over the conclusions. HBBC notes that at present all site HGVs from the A5 use the A47 to the link road to the site (rather than the A5/M69 route) in the morning peak and representations have been made to designate this route an Undesirable Road in the HGV strategy; this will impact all of the junction assessments along this stretch of the A5.

AM peak Typical Google Maps Delays – 2024 existing (Google maps Traffic data)



PM peak Typical Google Maps Delays – 2024 existing (Google maps Traffic data)



**REP4-113: Doc 17.4B Revision: 10
HGV Route Management Plan &
Strategy Report**

**Designation of the A47 (and
associated B4668 from new link road)
in Hinckley Borough in the strategy**

- 1) At present this stretch of road is neither a desirable or prohibited route, although the applicant's text in the strategy (para 2.20) refers to it as a route for local access and high-sided vehicles. In fact, as noted by HBBC in previous submissions, all of the applicant's consultation material showed this route as being prohibited.

- 2) As pointed out in previous HBBC submissions, the strategic modelling shows it as a very attractive route for HGVs to the site, and in the morning peak all HGVs from the northwest using the A5 use this route rather than the A5/M69 'Key Desirable Route.

While the A47 is an A road, the western part of it is 30 mph, it has a walk/cycle route along it, and it forms a barrier between the growing areas of the borough and the existing built-up area. One example is the development being constructed as Normandy Fields (15/00188/OUT, see extract of site plan below). This shows clear pedestrian /cycle linkages across the A47 between future and existing development and facilities such as primary and secondary schools, the town centre etc. While there will be controlled pedestrian crossings of the A47, it is clearly desirable to reduce the extent of HGV use of the A47 where possible; this will also help reduce any undesirable HGV parking problems, which are a key concern of HBBC residents.

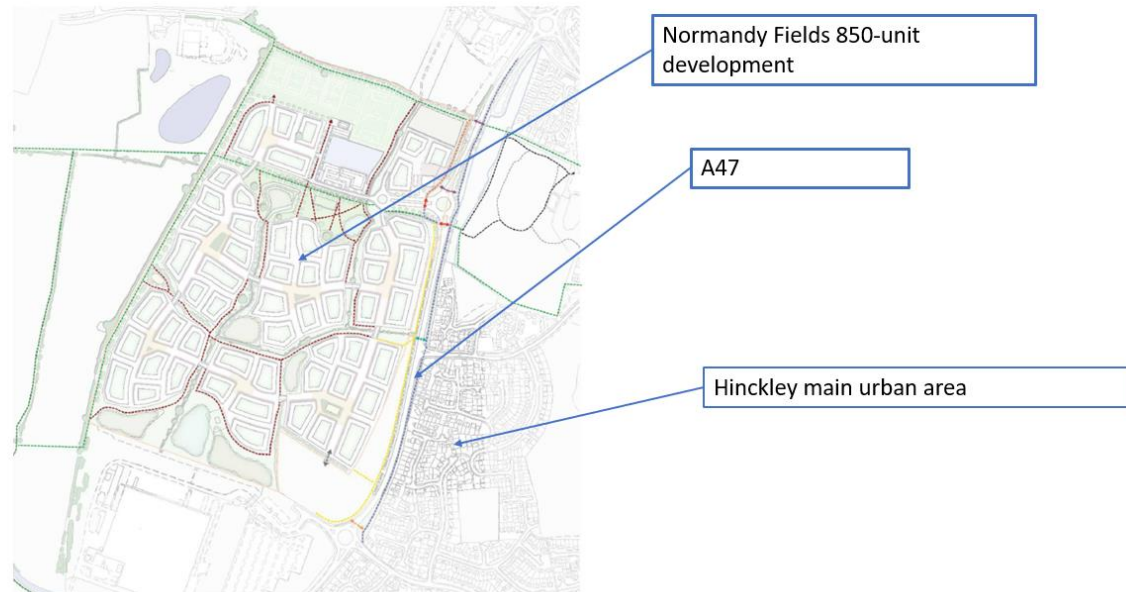
There will be much higher demand for pedestrians and cyclists crossing it over time, and experience shows that there will be pressure to downgrade this type of road, reduce speed limits and make it less traffic dominated; in other words, development has 'leap-frogged' a traffic-focused road and this needs to change in nature.

The A47 also has a narrow generally segregated use walk/cycle route along it, which is a strategic connection within Hinckley. High HGV use of the adjacent road detracts from the attractiveness of this facility, which already suffers from high-speed vehicles moving close to cyclists.

- 3) The A47 will still be used by existing HGVs and some attracted to the use of the new link road, but removing the use of the A47 for all HGVs associated with the development (with the exception of local access or high-sided vehicles until the A5 low-height bridge is mitigated) will help mitigate HGV impact on the HBBC area by HGVs. This is very feasible to enforce using the applicants HGV management strategy. It will require the vast majority of the HRNFI HGV:S to use the A5 and M69, which are the appropriate strategic roads, as set out by the applicant in Figure 3.

Consequently HBBC requests that the HGV Management Strategy be amended in para 3.14 and Figure 4 to show the A47 between the A5 and the B4668 (Leicester Road) and the B4668 between the link road and the A47 as being a 'prohibited road' with appropriate enforcement.

Extract from plans for Normandy Fields 850-unit development north of A47 - 15/00188/OUT



Other issues with the HGV Management Strategy
Undesirable or illegal HGV parking off-site

- 4) HBBC has in previous submissions requested that enforcement against undesirable parking associated with the development also be included in the Strategy. These undesirable problems can include parking in a way to restrict sightlines or road widths, use of adjacent areas as informal toilets, noise, litter, and other social problems, as well as security for drivers themselves. This is a key issue locally in

HBBC and affects residents' quality of life, which the applicant has stated they wish to maintain.

- 5) While the applicant is providing facilities on-site, they cannot ignore the potential for HGVs associated with it to park in ways that affect residents' quality of life in the surrounding area, for example if they wish to avoid any charges at on-site facilities, or if demand for these outstrips supply etc. At present there is no way of monitoring whether this will be an issue or not, although it is a key concern for residents, and it has been ignored despite HBBC previous comments.
- 6) **HBBC's request is therefore that the Strategy be amended to include a section on Undesirable or Illegal HGV parking in HBBC (and the Blaby District Council area).** The applicant's HGV management team should publicise an email address and social media link where residents can report undesirable or illegal HGV parking, by means of a photograph and information. The applicant will then check that date and time and registration number against their database of HGV movements and advise the resident of whether it is associated with the site or not. If associated with the site, the appropriate enforcement action (as with moving vehicles) should take place. The mechanism is already in the strategy, it just requires some adjustment, and similar techniques are used in public reporting of illegal or undesirable road traffic behaviour.

This will serve a few purposes (1) it will convince local residents that the applicant has their interests to heart (2) it should reduce any such occurrences associated with the applicant (3) it will highlight to the stakeholders HGV parking issue not associated with the applicant and they can deal with this separately. The method can be reviewed and adjusted as the HGV management strategy is implemented. We noted above that making the A47 a prohibited route should also help address this potential problem.

Monitoring and enforcement of prohibitive routes in the HBBC area

- 7) HBBC has noted that while there are a number of prohibited routes in the council's area (See Figure 4 of the HGV Strategy) there is however in Section 5 no intention

to monitor or have cameras enforce any of these, no information to Parish Councils, no attention to the HBBC area at all – the focus is entirely on the Eastern Villages . Unless this is rectified HBBC have no confidence at all that the strategy will be able to deal with this very important issue in their area. HBBC also notes that they would wish any HGV development flow triggers to be b very low in its area; there would appear to be no reason for HGVs associated with the development (who cannot prove a local access need) to use these roads at all. **HBBC therefore seeks amendment of the HGV strategy to show clearly how undesirable roads in its area will be enforced, and this includes the A47 west of the site and associated B4668 from new link road as described above.**

DCO requirements, compliance with the strategy and responsibilities

- 8) HBBC notes that currently the requirement in the draft DCO is the following:
18. The HGV route management plan and strategy must be complied with at all times following the first occupation of any warehouse floorspace on the authorised development.
HBBC notes that in Schedule 15 the HGV strategy definition will need to be updated to refer to any final approved version (as will the Travel Plan and Sustainable Transport Strategy)
- 9) HBBC are concerned that as written, and in conjunction with the HGV strategy, this requirement is too ‘loose’ and fails to specify clearly (1) what is being actually being delivered by the strategy and (2) how this will be monitored and enforced and (3) what the mechanism is for further action should this strategy fail to deliver its objectives. For example, in some other cases developers provide a bond to facilitate further mitigation work if the strategy does not work as required.
- 10) HBBC notes that in para 9 of the Draft Order requirements it also states that ‘(2) *The undertaker must use reasonable endeavours to maximise the use of Euro VI compliant HGV and public transport in respect of (a) Any HGV fleets operated by*

	<p><i>occupiers of the warehouse units which visit those warehouses.</i> HBBC support this requirement and indeed suggest that it could be strengthened by also including the encouragement of ultra-low emission vehicles. However there appears to be no mention of this issue in the HGV strategy and therefore no information regarding what is planned to achieve this and how it will be enforced and monitored. This is a crucial issue for local air pollution.</p> <p>Given the above, the following matters need attention if this strategy is to be relied on as appropriate mitigation for this very important issue:</p> <ul style="list-style-type: none"> • The strategy does not appear to contain clear objectives that are SMART¹ . There is partial mention of objectives for the HGV monitoring system only in para 5.27 but none for the rest of the strategy, for example Euro VI compliant vehicles, vehicles using prohibited routes in the HBBC area etc. • It is not clear what ‘compliance’ with the strategy means – this should be very clearly set out in a table for objectives and each measure, with indicators of compliance/success so this can be effectively monitored. • It is not clear where ultimate responsibility for the strategy lies(the applicant presumably), which measures the applicant will implement and which are dependent on occupiers and how it will be ensured that the latter get implemented. • The future monitoring and review process and implication if measures do not work.
<p>REP4-053: Document reference: 6.2.8.1B ES Appendix 8.1 Transport Assessment [part 15 of 20] Sustainable Transport Strategy and Plan REV 6</p>	
	<p>HBBC notes that currently the requirement in the draft DCO is the following:</p>

¹ Specific, Measurable, Achievable, Relevant, and Time-Bound

9.— (1) *The sustainable transport strategy must be complied with following the first occupation of any warehouse floorspace on the authorised development. **As noted in relation to the HGV strategy there are also obligations in this requirement to maximise the use of Euro VI compliant HGV and public transport; and no mention whatsoever of how this will be achieved and monitored in either the HGV Strategy or the STS, and this needs to be rectified.***

We note that the Sustainable Transport Strategy (STS) sets out in para 1.3 (underlining added) that *'It analyses the opportunities to maximise use of sustainable modes of transport to and from the site. Importantly the agreed public transport strategy must deliver options that gives staff a reliable, timely and economic alternative to driving to compliment the walking and cycling options.* Many of the points we make below seek to address shortcomings in the way the strategy achieves these aims.

Paragraph 3.2 sets out a Vision and 3.5 a set of objectives. None of these are SMART² and are very 'loose' and as it stands it is hard to see how 'compliance' with this can be achieved. As with the HGV strategy the following matters need attention if this strategy is to be relied on as appropriate mitigation for this very important issue:

- The objectives should be SMART.
- It is not clear what 'compliance' with the strategy means – this should be very clearly set out in a table for objectives and each measure, with indicators of compliance/success so this can be effectively monitored.
- It is not clear where ultimate responsibility for the strategy lies (the applicant presumably), which measures the applicant will implement and which are dependent on occupiers and how it will be ensured that the latter get implemented.
- The future monitoring and review process and implication if measures do not work.

HBBC has concerns regarding the mode share targets and objectives (which do not seem to be included in the objectives in para 3.5). The key issue is the selection of the baseline, which is based on existing Blaby 2011 census data. As set out in previous HBBC submissions this is

² Specific, Measurable, Achievable, Relevant, and Time-Bound

not appropriate given the sheer scale of HRNFI, its location close to the major urban areas of HBBC and the aspiration to have high quality sustainable transport links. This baseline is therefore far too low and needs to be adjusted to reflect a more realistic baseline.

In this respect the East Midlands Gateway (EMG) development, referenced by the applicant, would be a better foundation (although the data they show in Tale 4 for EMG appears outdated) The information below shows a similar issue- namely that the EMG baseline was on census (80% drive alone, 10 year target 68%) but this was clearly inappropriate, in the first five years of implementation the average car driver modes share was actually 47%, a little more than half the 'baseline' . As EMG's location is less suitable for short bus journeys and cycling than HRNFI, which has a huge catchment on its doorstep.

HBBC's view is that the baseline for HRNFI should not be (as in Table 7.5 of the STS) 75% car driver as 'Blaby existing' but no more than 60%, and the future target should be 47% as achieved at EMG. This is clearly achievable for a similar sort of facility in a similar location, and if enough investment is made into sustainable transport this can be achieved. HBBC also believe that given the availability of 70,000 residents in HBBC within easy cycling distance of the site and appropriate investment in cycling facilities that the cycling mode share target should be very much higher. This is a very important part of the STS and Travel Plan.

EMG mode share results first 6 years of operation (source – ITP³)

³ <https://www.itpworld.net/news-and-views/2022/creating-better-places-a-case-study-east-midlands-gateway> = confirmed as most recent publicly available data

Mode Share

Mode	Baseline Target	Actual Employee Travel Data					10-Year Target
		Year 1 (2019)	Year 2 (2020)	Year 3 (2021)	Year 4 (2022)	Year 5 (2023)	
Drive Alone	80%	58%	43%	43%	42%	51%	68%
Car Share	12%	31%	13%	26%	38%	25%	17%
Bus	5%	8%	15%	28%	14%	18%	10%
Walk/Cycle	3%	1%	2%	0%	3%	2%	5%
Other	n/a	3%	4%	3%	3%	4%	n/a

Bus services

One of the key reasons why bus mode share is high at EMG is the provision of several good frequency and geographically spread services.

EMG buses are summarised below, the table indicates that there are of the order of 10 buses per hour in the weekday daytime, 7 in the early morning and similar coverage on Saturdays and Sunday. It is understood that bus fares are currently £2 max per journey using the government scheme.

East Midlands Gateway - February 2024 bus services (Source – Burton Trent and Airlink 9 websites)

	Weekday daytime	Early morning	Evening (approx.)	Weekend	Approx Journey time
MY 15	2 bph	Ilkeston 3.55 am, 1 bph	To Midnight	Similar to weekday	16 mins to Ilkeston, 8 mins to Castle

					Donnington bus stations
Skylink Nottingham	2 bph	From Nottingham midnight on, 1 bph	To midnight	Similar to weekday	62 mins Nottingham, 14 mins Caste; Donnington bus station
Skylink Leicester-Derby	3 bph	From Loughborough, 12.29 for 1 bph, from Leicester 3.55 1 bph From Derby 12.25 1 bph	To midnight	Similar to weekday	51 mins midday time to Derby, 22 mins Loughborough, 51 mins Leicester
Skylink Express to Nottingham	2 buses per hour (bph)	from 4.05, 1 bph	To 9.55	Similar to weekday	35 mins midday journey time to Nottingham
Airway 9	1 bph	From Burton 3.05 1bph	To 2230	Similar to weekday on Saturday, a few services less Sunday	75 mins to Burton
Total (approx.)	10 bph	7 bph			

There is a transport hub at the key bus gateway and a safe comfortable building with real-time information. A shuttle operates every 10 minutes between 04:45 and 23:09 from the Gateway to the premises to coincide with operator shift patterns. The EMG benefits from close location to

the East Midlands Airport and related bus services, but it shows the frequency, timing and coverage needed to achieve good bus patronage to these kinds of developments. In contrast, the current proposals for HRNFI appear to include the following (Table 8 of the STS):

- X6 at 1 bus per 90 minutes, with '*7 hours of additional services*' (it is not clear what this means?) but it is unlikely this will deliver more than 1 bph. this is also '*subject to demand and travel planning*'. Does this mean the service could be reduced?
- A Nuneaton service – 1 bus per hour
- A Demand Responsive Service for the remainder of Hinckley, Earl Shilton, Barwell, Blaby etc. no indication of level of service but mention of 1 bph initially rising to 3bph by year 8. It is not clear how such a service could cater for an employee in Hinckley at the same time as one in Stoney Stanton and Earl Shilton all wanting to get to the same shift. There are many examples of such schemes failing to deliver fast and convenient journeys for passengers, they are more suited to 'recreational journeys' rather than commuting, which is very time dependant. There have been many such schemes introduced over the last decade and very few have been retained post the trial or subsidy. Dependence on this for a large part of the catchment is highly risky and definition of a level of service' for public transport would be more appropriate.
- Little detail of weekend operation, some draft indication of first and last buses in appendix
- Standard bus shelter/stop at interchange.
- Loose commitment to shuttle between bus stop and premises
- 'Discount scheme potential' – not defined, dependant on operator.
- There is no real definition of 'future phasing'.
- The Hinckley railway station is only linked up with the DRT service.
- Appendix 6 of the STS includes 'Future Bus timetables' – this is hard to read with the format shown but appears to show 1 bph in the early morning (and throughout the day) to HRNFI from Nuneaton, starting at 432, and the X6 1bph from Coventry to HRNFI starting at 5am and finishing round 11pm.

Figure 13 indicates that the proposed bus services only cover a very small proportion of the built-up areas of Hinckley and does not include Barwell and Earl Shilton, or indeed much of Blaby District's settlements. These are all supposed to be covered by the 1 bus per hour DRT (rising to 3 buses per hour in year 8).

It seems very clear that the HRNFI bus proposals continue to fall far short of that needed to provide a good bus alternative to the car for the site and are not well defined. HBBC notes that the applicant is depending on these as mitigation for highways issues on the local network, particularly at J21 of the M1.

In HBBC's view, a level of service should be specified for timetabled services and DRT with clear performance objectives that can deliver the bus mode share needed, with a firm commitment to increasing this if this is insufficient. HBBC regard it as important that:

- Bus frequencies and coverage be increased to at least 4 buses per hour (each way) from key origins for the main bus services.
- From the DRT or scheduled buses to the site, there should be full geographic coverage throughout the Hinckley and Earl Shilton/Barwell areas including the railway station, with a maximum of 400m or 5 minutes' walk to bus stops to the site.
- Services should cover appropriate shift times and office opening closing times for 7 days a week.
- This coverage should result in no longer than a 15-minute wait throughout this area and journey times to the site from these areas should not be longer than 15 minutes.
- Bus fare costs should be subsidised to have a maximum £2 fare per trip for HRNFI-related passengers for the first 5 years of operation, to be reviewed at that stage. This will include DRT services where trip cost can be very high given the typically very low patronage.
- There should be a firm commitment to a shuttle service between the site main bus stop and all the premises every 10 minutes during the times the buses are running to the stop.
- The facilities at the main bus stop should include real-time information with a high-quality waiting area.

- The bus patronage targets for mode share should be closely monitored and additional services added should these not be reached.
- It is essential that a very good service be there from the very first days of occupation as this is when travel attitudes and employee's choice of work at the site is formed.
- The commitment to the above should be for the duration of the development.

Cycling measures - Section 8 of the STS

There are several questionable statements regarding cycling in the latest version of the STS, including:

8.12 says 'Whilst the above proposal demonstrates that there is good cycle access to the site from the main identified catchment areas using existing routes connecting to the HNRFI infrastructure'. **This statement ignores that fact that there are no cycle connections to south Hinckley and the railway station or to villages in Blaby, or safe crossings of the A47.**

8.21 *'It is worth reiterating that the existing baseline position of establishing cycle and pedestrian connectivity from the site to existing cycle infrastructure is wholly appropriate and proportionate to achieving the increase in Modal Split Targets sought through Active Travel measures.* See points above, and we have noted above that the Modal Spoilt targets are not appropriate given the location of 70,000 people in HBBC within very easy cycling distances. The additional analysis by the applicant showing the potential for cycling from Hinckley, Barwell and Earl Shilton is welcome.

The applicant has analysed a number of further cycling improvements but has only proposed 3 of these:

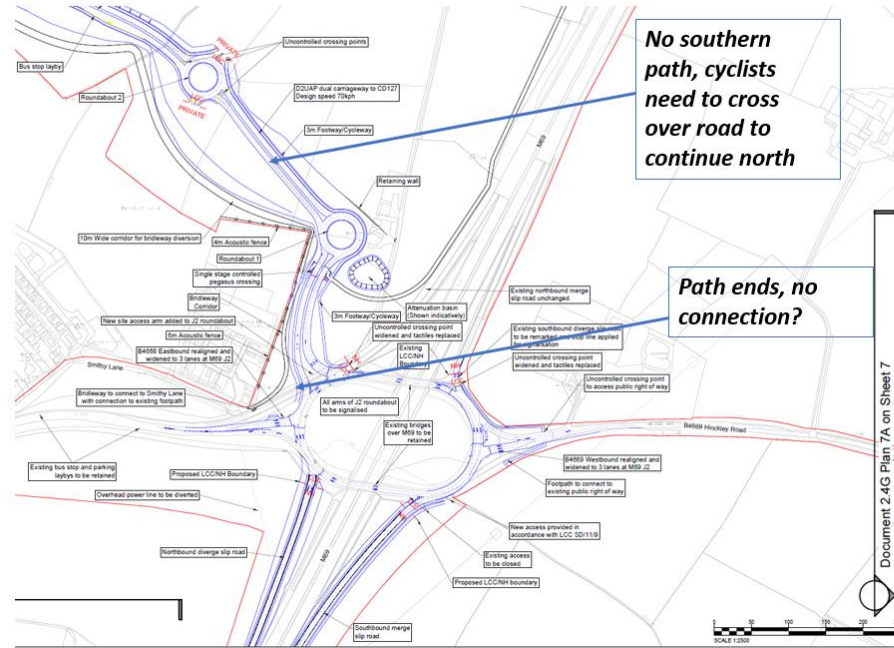
- Option 1 – Enhancement to Barwell, Toucan crossing on A47-
- Option 2 - Enhancement to Barwell, Gateway at The Common
- Option 8 – Enhancement to Hinckley and Burbage, New Cycle Lane to the B4669 between Smithy Lane and Wilkinson Avenue.

HBBC note that there is some confusion in the STS between 'options' and 'enhancements' for example option 1 in 8.20 seems to be enhancement 8 in Figure 17.

These improvements are welcome as part of a final package, but HBBC also believe the following issues should be addressed.

1. Section 8.29 of the STS states '*The suggested trigger for the works in connection with the cycle upgrades is post occupation of Phase 2 works which equates to 42% of the total floor area*'. This will clearly not provide the necessary infrastructure to ensure that employees from the start have full sustainable travel opportunities, and **the cycling facilities should be implemented prior to commencement of operations the site**, rather than when half of the employees have already chosen less sustainable modes.
2. The provision of shared use facilities on the new link road is welcome, but they appear to fall short of the direct and continuous requirements in LTN1/20, as in one case the facilities appear to end without a connection (sheet 4) and the users of this path have to cross the road in 2 locations to continue in a north/south direction (sheets 1 and 4) – see highway plans below. **Consideration should be given to a continuous cycle route in a north/south direction adjacent to the link road.**

Highway Plans Sheet 4 extract – 2.4D



No southern path, cyclists need to cross over road to continue north

Path ends, no connection?

Issues & Revisions			
Rev	Date	Issue / Description	By
001	04.03.24	Amended to reflect discussions with LVA	AM
002	14.11.23	Bus stops amended	DF
003	10.02.23	Original scheme	DF
004	05.11.23	Final issue	DF
005	18.12.23	Issue for Consultation	DF
Rev	Date	Issue / Description	By
006	09.01.24	Final issue	DF

Client
 TRITAX SYMMETRY
 A TRITAX SIG SIGA COMPANY

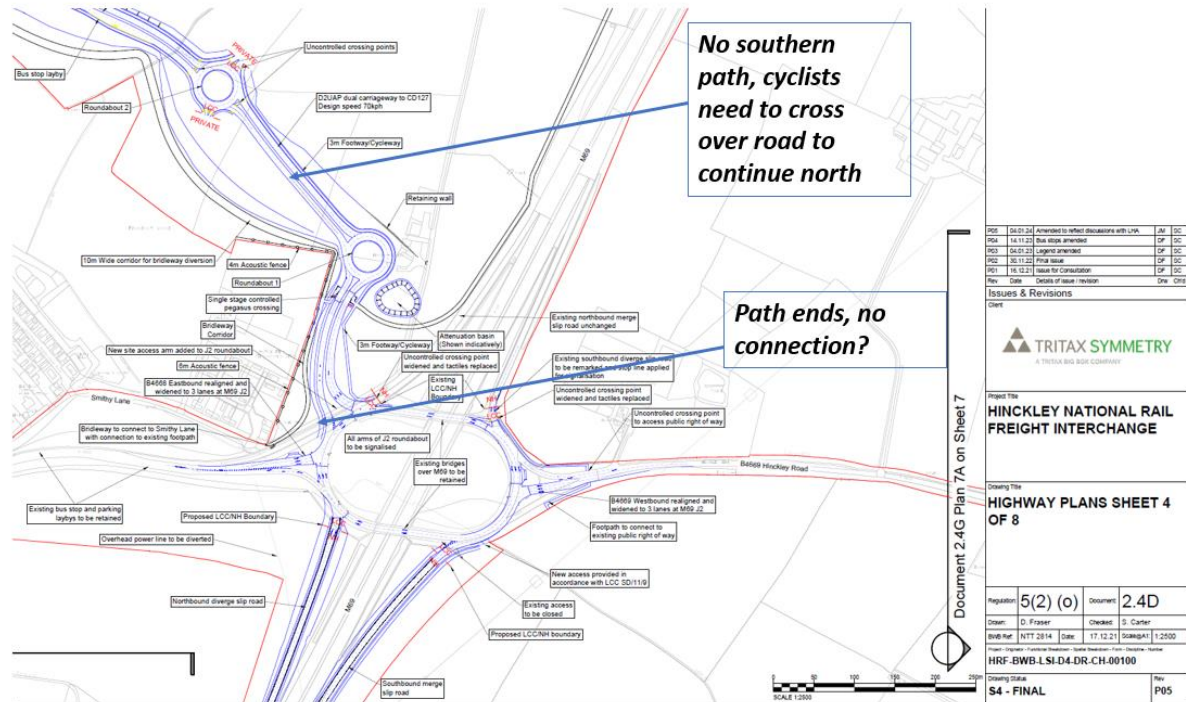
Project File
**HINCKLEY NATIONAL RAIL
 FREIGHT INTERCHANGE**

Drawing File
**HIGHWAY PLANS SHEET 4
 OF 8**

Revision	5(2) (o)	Occurrence	2.4D
Drawn	D. Fraser	Checked	S. Carter
Drawn Ref	NTT 2014	Date	17.12.23
Drawn Scale	1:2000		
Project File	HRF-BWB-L-LS-D4-DR-CH-00100		
Drawing State	S4 - FINAL	Rev	P05

Document 2.4G Plan 7A on Sheet 7

Highway Plans Sheet 4 extract – 2.4D



3. Option 8 - The new cycle Lane to the B4669 between Smithy Lane and Winchester Drive (8.25 of the STS text refers to Wilkinson Avenue contrary to the drawings) is a welcome improvement but ends here with no onward safe cycle route to Hinckley and no clear safe route to the railway station. Consequently, it is not clear how (as stated in the STS para 8.2.7 'The route also links up with the rail and bus station to provide multi-modal journey potential for employees. **This route should be extended to the station and Hinckley centre.**
4. Option 5 – Footway/Cycleway provision on B4668 from Burbage Common Road into Hinckley has been discounted as it not 'economically deliverable', although a sketch of a potential scheme has been provided in the appendix to the STS. The applicant

Revisions & Revisions			
No.	Date	Description of Issue / Revision	Drawn By
001	15.02.24	Approved to reflect discussions with LCC	AM
002	14.11.23	Bus stops amended	DF
003	04.07.23	Logos amended	DF
004	05.11.23	Final issue	DF
005	16.12.23	Issue for Consultation	DF
006	16.12.23	Issue for Consultation	DF

Client	TRITAX SYMMETRY A TRITAX SIG BOX COMPANY
Project Title	HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE
Drawing Title	HIGHWAY PLANS SHEET 4 OF 8
Revision	5(2) (o) Document 2.4D
Drawn By	D. Fraser
Checked By	S. Carter
Drawn Date	17.12.23
Scale	1:2500
Project Reference	HRF-BWB-LSI-D4-DR-CH-00100
Drawing Status	S4 - FINAL
File No.	P05

indicates that there are major issues with provision of a safe cycling route along here, and that the A47 is better. However, use of the A47 would take cyclists in the wrong direction to reach the parts of Hinckley accessible from the B4668. This route would link directly to an existing shared use path into the main part of urban Hinckley, would protect cyclists on a 50mph road and would be an appropriate route from the new link road facilities. **HBBC therefore request that this enhancement (B668 Leicester Road from new link road to Stoneygate Drive also be included as a commitment in the DCO**

5. The links to Earl Shilton are unlikely to be adequate; it is not yet clear from the applicant's information how safe and direct cycle routes to this fast -growing area will be achieved, and this should be set out clearly in the STS and amended where necessary.

Other STS matters

Car share and car club- section 9 of the STS

The additional analysis on this is welcome as is the recognition that 20-30% of HRNFO employees should be an appropriate target. This reinforces HBBC view that the current baseline targets are far too low, and that the aspiration of 5% car passengers after e5 years is low.

It is also not yet clear exactly what is being proposed for car share – is it a bespoke central facility for HRNFI or some sort of link to a more generic database? The latter is preferable. Will there be a membership charge for the car share, or could this be subsidised?

In relation to the car club in this section it is not clear what is being proposed if anything?

These important issues require further definition and much more appropriate targets.

Walking

Reliance is placed on the existing and diverted network of public rights of way and other paths to provide the necessary connectivity to the site from the wider area. However, part from improvements to footpaths in and around the Burbage Common & Woods as agreed with HBBC in the draft s106, no other improvements appear to be proposed and this is likely to lead to reliance on a network of footpaths which are substandard in their surfacing.

<p>REP4-055:ES Appendix 8.2 Site Wide Framework Travel Plan Document reference: 6.2.8.2B Revision: 06</p>	
	<p>HBBC wish to raise many similar issues in the Travel Plan as with the STS, with key concerns being:</p> <ol style="list-style-type: none"> (1) What exactly is being proposed and how can 'compliance;' with this be assessed as part of the DCO requirements? (2) Loose objectives, not SMART and very low mode share targets. (DfT guidance is that Travel Plans should set explicit outcomes rather than just identify processes to be followed such as encouraging active travel or supporting the use of low emission vehicles)⁴. (3) Who has ultimate responsibility for the Travel Plan – the applicant or tenants? If the latter how will implementation be guaranteed? Occupiers cannot be responsible for cycle infrastructure, buses and centralised car share. The applicant should take ultimate responsibility for achieving the targets, given that this is a key element proposed to avoid the need for highway mitigation. (4) What are the sanctions should targets not be achieved? We note that the applicant provides a bond for the implementation for highway works, but not for sustainable travel, although the travel plan outcomes are closely related to the highway mitigation (or lack of it). (5) Section 2.2 states that the FTP is based on principles of demand management; but there do not appear to be any measures in the FTP delivering this. As pointed out by the Examiner at the Second transport hearing, the best demand management would be via parking restraint, which could be implemented and managed in a way that creates the mode share outcomes that are required. This could be either through (1) parking only being provided in stages as the travel plan is implemented, for example only

⁴ <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements>

	<p>enough parking for a car driver mode share of 60% or (2) using a pricing mechanism, for example for single use occupants of vehicles. What is clear is that provision of the maximum standard or a high parking standard is very unlikely to lead to the mode share outcomes sought, and hence not require the highway mitigation at for example, J21 of the M1. The Travel Plan includes mention of a car park management system, but no details are given.</p> <p>(6) There are apparent discrepancies the Travel Plan STS, for example in relation to new cycle routes and an Ebike scheme, ; feasibility studies for various items, and these should be reconciled; this would be helped by an explicit list of commitments in both s requested.</p> <p>(7) According to the Draft S106 Agreement Document reference: 9.1A Revision: 01 January section 2.1, the travel plan is only for a period of 5 years, although targets are for at least 10 years?</p>
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