

Submission ID: 25963

We attach a technical note from RPS consulting which comments on the most recent transport and highways information submitted by the Applicant. This note is to be read in conjunction with our Written Representations at REP1-217.

TECHNICAL NOTE

Project Title: Hinckley NRF Interchange

Report Reference: 794-PLN-TRP-JNY10702-11

Date: 06 February 2024

Further Review of DCO Transport Assessment

Introduction

- 1.1 This Technical Note on highways and transportation matters, has been prepared by RPS on behalf of the Consortium of Landowners / Developers representing the proposed development of land to the West of Stoney Stanton.
- 1.2 The land to the west of Stoney Stanton forms part of the option testing for the Blaby Local Plan Regulation 18 Assessment and is included within the options which include strategic residential allocations for the period up to 2038. Hence this land could form part of the growth within Blaby for the period up to 2038.
- 1.3 This further review of the Hinckley National Rail Freight Interchange (HNRFI) follows the latest submission of additional documents for the DCO for the HNRFI. In preparing this review, this Technical Note has considered the issues previously raised as part of the consultation for the scheme, which were submitted as part of the representations provided by Shoosmiths on 08 April 2022, and 23 June 2023 on behalf of the Consortium. Those matters are still considered to be valid, and those technical notes should be read in conjunction with this review.
- 1.4 Accordingly set out below is a further review of the documents relating to highways and transportation matters, which form part of the Hinckley National Rail Freight Interchange DCO Application. This review includes the comments previously made in respect of the consultation which are shown in *italics* followed by an update based on the current DCO documentation.

General Matters

- 1.5 RPS maintain their view that as a general matter, the evidence base provided does not readily inform the individual of the effect of the development proposals. It is also noted that in terms of the evidence, the documents submitted still identify that they are not the final versions. Paragraph 2.26 of the Transport Assessment, (Document reference: 6.2.8.1 Part 1, Revision: 07, dated September 2023), identifies that:
- “The following documents are not complete at this stage and an addendum to the TA will be prepared in due course to cover the resultant modelling and mitigation package agreement in them.**
- **Final Transport Assessment**
 - **Traffic Modelling – WCC Rural Rugby Area Model Reports**
 - **Stage 1 Road Safety Audits and Audit Response.”**
- 1.6 It is understood from the evidence given that National Highways and Leicestershire County Council, both required PRTM modelling including the complete mitigation measures which has not been provided to date. The above statement in the current TA seems to suggest that this work will be undertaken and hence a further iteration of the TA will be provided.
- 1.7 Hence until a final complete assessment is made available for consultation, the comments within this further review must be considered as “interim” and we will wish to reserve our position on the final assessment of the scheme effects if these are submitted in due course.
- 1.8 In the context of the information available, document reference 6.2.8.1 Part 1 Table 7-2 now shows 55 junctions within the study area that have been considered in terms of the impact of the development traffic. This is a further increase in the junctions to be considered and now includes an additional junction to the north of Lutterworth on the A426.
- 1.9 However there remains a lack of clarity as to the year of assessment and the basis of the flows being assessed. Whilst it is understood that assessment scenarios are agreed with the Highway Authorities for 2026 and 2036, there is a lack of information provided especially in the context of the 2026 assessment year. Accordingly, the reader is left questioning what are the actual changes in traffic expected at each of the junctions within the study network as a consequence of the development and infrastructure requirements for the development.
- 1.10 As an example, Junction 3 is highlighted in Table 7.2 as having only a 4% highway impact with an increase in traffic of 95 vehicles, hence the amber highlighting of the junction. However, the total without development flow would appear to be far higher than the current baseline flow indicating this to be the total flow through the junction in 2036. In practice this percentage increase in development traffic is likely to be higher in the opening year of 2026 and would represent an increase in excess of 5% and hence another red highlighted junction within the table requiring the need for the junction impact to be addressed.

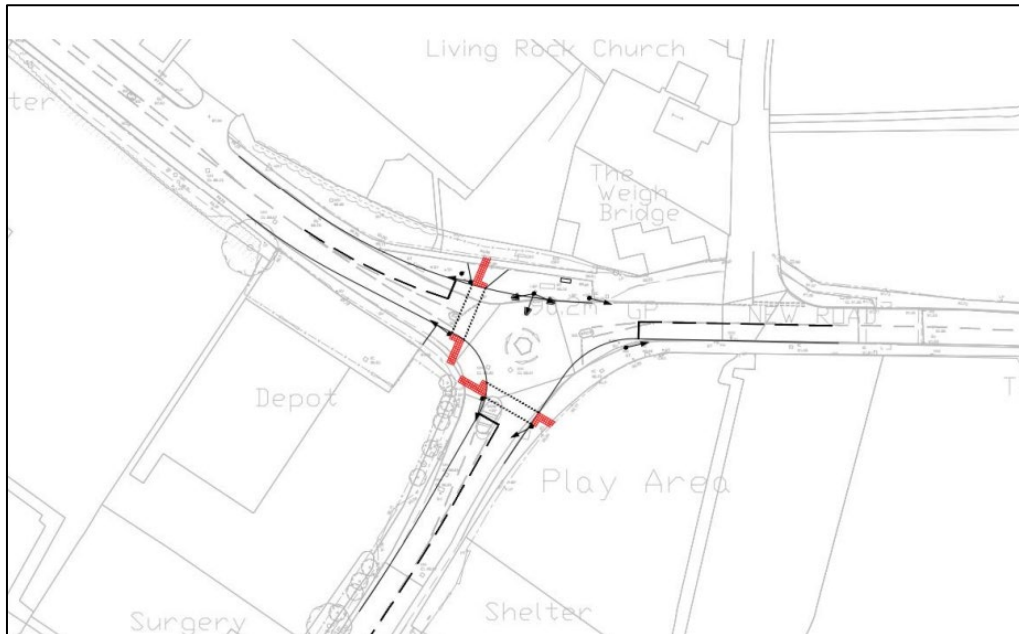
- 1.11 In the context of the Environmental Statement, there remains a lack of clarity of the changes in traffic flow on the various links within the network be able to consider the significance effect.
- 1.12 Overall RPS remain of the view that:
- There is insufficient evidence within the application to be able to determine the impact of the overall development on the study network in the opening and design years.
 - There is insufficient evidence to understand the growth factors that have been applied to the network in order to determine how growth within Blaby District has been taken into account and the extent to which traffic associated with the growth within Blaby and specifically at Stoney Stanton development forms part of the general background flows.
 - The impact of the development to the east of the motorway is not clearly defined to be able to ensure suitable mitigation is provided. Specifically, the level of traffic predicted to travel through Sapcote and Stoney Stanton varies considerably between the evidence provided in the transport assessment and that included in the transport section of the ES.
 - There is also insufficient evidence to consider the impact of the development outside of the network peak hours and at the operational peak of the development.
- 1.13 In the context of the above we concur with the views expressed by LCC in their October 2023 statement, PI reference TR050007, which states at Para 2.94 – 2.96:
- “Proposals for mitigation in the village of Sapcote do not appear to relate to the identified impact i.e., predicted doubling of vehicular traffic. This traffic will include vehicles of all types, including HGVs drawn to the SRN. Whilst it is proposed to control the routing of HGV traffic to/from the development, general HGV traffic will not be controlled and its impacts on the residents of Sapcote remain unknown.***
- The proposals are limited to a gateway feature and associated road markings, a zebra crossing and associated re-location of a bus stop, and some seating and planters. No evidence appears to have been presented to suggest that there is a speeding issue to the east of the village to justify the proposed gateway feature.***
- As above, in the absence of a more detailed drawing of a scale that can be checked, and a supporting RSA, it is not possible for LCC LHA to determine whether the proposed zebra crossing is deliverable. However, based on local knowledge this is proposed to be in a part of the village with restricted forward visibility from the east, heavy footfall, and in a location where available carriageway and footway widths are restricted.”***
- 1.14 However, we also consider that these issues also relate to Stoney Stanton and the impact of traffic as a consequence of the upgraded M69 Junction 2, which is required for the overall development of the HNRFI.
- 1.15 This review now considers some of the detailed elements contained within the consultation evidence. The matters previously raised in the context of Trip Generation, Background Traffic / Growth, Assessment Years / Scenarios Traffic Flow Data, Highway Impact Assessment and Mitigation remain valid as set out in the Technical Note dated 25 May 2023. This technical note now turns to consider matters associated with the HGV routing strategy.

HGV Routing Strategy

- 1.16 The HNRFI submission includes for an HGV Management Plan and Routing Strategy which seeks to identify the routes that the development HGV traffic will be directed toward. The original version submitted as part of the DCO was dated March 2023, but this was then updated to January 2024.
- 1.17 The strategy seeks to ensure HGV traffic to or from the development is prohibited from routes through Sapcote, Elmesthorpe and Stoney Stanton, hence routes B4669 and the B581 to the east of the M69, unless delivery is local.
- 1.18 However currently there are no restriction to HGV traffic on these routes, and the HNRFI proposals do not propose any general weight restrictions within the villages of Stoney Stanton or Sapcote. Accordingly, the restrictions that apply will be to HNRFI HGV traffic only.
- 1.19 In practice irrespective of the way HNRFI HGV traffic is monitored and controlled, there will be an increase in other HGV traffic using the B581 and B4669 through Stoney Stanton and Sapcote, as this will be an easier route to connect to the M69 and strategic network via the upgrading of Junction 2 of the M69. The PRTM modelling identifies this reassignment of traffic as shown in the Transport Assessment Report (doc ref 6.2.8.1, Figures 5-8 and 5-9).
- 1.20 Whilst it is proposed to monitor and control any HNRFI traffic passing through the villages by means of ANPR cameras along these routes to record and match any HNFRI HGV traffic passing through the villages, no restrictions are provided against other HGV traffic travelling through these settlements.
- 1.21 This is also true of other non HNRFI traffic as has been highlighted in the Technical Note dated 25 May 2023, in the context of Highway Impact Assessment
- 1.22 The HNRFI Routing Strategy includes a trigger threshold above which actions would be taken with the HNRFI drivers should this be breached. In this regard the threshold for Stoney Stanton is currently identified as 10 HGV vehicles per day. Whilst this may seem low, in practice this would still represent a material impact in larger type of HGV traffic (OVG2) that would currently pass through the settlement.
- 1.23 Turning to the route through Sapcote, this is identified to have a trigger level of 117 HGVs per day, albeit the original proposals allowed for 67 HGVs per day. Whilst this level of trigger may instigate measures against the HGV drivers, there remains the potential for a daily increase in excess of 100 HGVs per day of HNRFI HGV traffic which will be a material change to the levels of HGV traffic passing through the settlement.
- 1.24 The additional and updated information relating to the routing of HGV traffic and the restrictions that are proposed to apply, only reinforce the concerns we have over the impact of the development related traffic on the settlements of Stoney Stanton and Sapcote. The effect of the HNRFI scheme will cause not only HNRFI traffic to pass through these settlements but also reassigned existing traffic seeking to access the M69 and strategic road network, with no appropriate assessment of this traffic nor mitigation.

Road Safety Audit

- 1.25 The latest submission of documents to support the DCO application includes a Road Safety Audit of the proposed mitigation. This covers 10 locations where mitigation is proposed, including the measures within Sapcote and also the proposed traffic signal controlled junction within Stoney Stanton at the junction of Hinckley Road with New Road.
- 1.26 When reviewing the measures within Sapcote, the RSA report highlights that the documents provided to the RSA Audit team includes the RSA Brief and the proposed scheme of works for Sapcote, Drawing no. HRF-BWB-GEN-XX-DR-TR-111 Rev P3. What is not clear is whether any vehicle tracking was provided, existing accident data, existing and proposed traffic flows, pedestrian crossing movements, etc. Hence whilst an interim RSA 1 was undertaken it is not clear as to how comprehensive this was.
- 1.27 The measures proposed include for proposed traffic calming, a pedestrian crossing relocation and a bus stop relocation. All of these are fairly minor works to address the impact of the development traffic passing through Sapcote.
- 1.28 The recommendations of the audit team highlight the issues surrounding the proposals which include concerns over the forward visibility at the bus stop, pedestrian visibility at the new crossing, and the width of the footway at the proposed crossing location. All of these points reflect the constrained nature of the road passing through the centre of Sapcote which is not suited to increased traffic movements especially those associated with HGV traffic.
- 1.29 The Designer's Response to the RSA is to agree with the points raised, albeit to make minor amendments in an effort to address the RSA concerns regarding the bus stop and pedestrian crossing. However, the proposed traffic calming / gateway features have been removed from the scheme. Hence the resultant measures within Sapcote seek to relocate the pedestrian crossing and bus stop in an effort to better accommodate large HGV vehicles passing through the settlement. RPS consider that such measures do not address the impact of the development.
- 1.30 Turning to the measures proposed within Stoney Stanton, here the proposals are to signalise the existing junction of New Road and Hinckley Road and to include within this new pedestrian crossing facilities on all arms of the junction. Again, in relation to this junction it is unclear as to whether the RSA team were provided with existing accident data, existing and proposed traffic flows, pedestrian crossing movements, etc. The RSA report does highlight the inclusion of "swept paths" to show the HGV movements through the junction.
- 1.31 The recommendations of the audit team effectively require the relocation of two private accesses either side of the junction and a restriction to existing residential car parking. In the absence of these alterations the two crossing points either side of the junction on New Road cannot be provided.
- 1.32 The Designers Response to this is to remove the eastern crossing from the scheme and amend the junction to accommodate the existing crossing to the west of the scheme. This is shown in the extract below.



- 1.33 A summary of the updated junction assessment is included in the latest submission for the DCO (document reference 18.13.2, Applicant's Response to Deadline 3 submissions, Appendix B - Transport 2023 Update). However, this document does not include the appendices and hence a review of the updated junction modelling cannot be undertaken to verify the validity of the junction assessment.
- 1.34 In conclusion on this issue, it is considered that the removal of a pedestrian crossing from the junction which was to enhance pedestrian safety is a detrimental effect. RPS remain of the view that the measures proposed at this junction together with the lack of measures at the New Road / Long Street junction do not address the impact of the development within Stoney Stanton, and that the residual overall cumulative impact on Stoney Stanton will be severe in the context of Paragraph 115 of the NPPF (December 2023).

Junction 21 M1 / M69

- 1.35 RPS have previously commented on the assessment of the impact of the development on the Junction of the M1 and M69, Junction 21 of the M1.
- 1.36 Table 8.7 identifies the HNRFI traffic movements at the M1 / M69 junction to the north of the site which is the main junction serving Leicester. This shows there will be an additional 321 two-way movements of which 100 will be HGVs in the AM peak, and 443 two-way movements of which 114 will be HGVs in the PM peak. RPS consider that this level of additional traffic at an already congested junction should be considered as significant as it reflects an increase of between 5% and 7% in these peak hours.
- 1.37 However, the situation remains as before in that HNRFI have not undertaken any detailed modelling of this junction, which would need to be undertaken in a microsimulation model. It is understood that this remains the position of LCC and NH as identified in their summary comments at the hearing on the 24 January 2024.

- 1.38 Accordingly, in the context of the M1 / M69 junction RPS consider that no appropriate detailed analysis of this junction has been provided. Furthermore, RPS consider that the comments provided by BWB at paragraph 8.35 of the Transport Assessment which state: “the proposed development provides a betterment / low impact at the junction in both peak periods...” is not a true reflection of the likely impact of the development on the junction.

Summary

- 1.39 In summary therefore, the updated information provided as part of the DCO, including an updated version of the TA does not fully address the basis of assessment or fully consider the necessary mitigation. Furthermore, these more recent submissions remain incomplete and do not allow the reader to fully review the DCO application.
- 1.40 In relation to the Road Safety Audits undertaken, it is clear that the measure proposed for Sapcote are not acceptable in terms of road safety. Whilst some alterations are proposed by BWB these works offer limited benefit to Sapcote when set against the increase in traffic passing through this settlement as a consequence of the DCO application.
- 1.41 Likewise, the measures proposed for Stoney Stanton raise road safety audit concerns and require amendments from those originally proposed. The lack of information included within the most recent submissions does not allow full scrutiny of the reappraisal of the proposed measures at the junction of New Road and Hinckley Road
- 1.42 Overall, it is considered that that the measures proposed both within Sapcote and Stoney Stanton do not address the impact of the development within these settlements and that the residual overall cumulative impact will be severe in the context of paragraph 115 of the NPPF (December 2023).
- 1.43 In the context of the M1/ M69 junction, RPS remain of the view that HNRFI have not undertaken any detailed modelling of this junction, which would need to be undertaken in a microsimulation model. It is understood that this remains the position of LCC and NH as identified in their summary comments at the hearing on the 24 January 2024.
- 1.44 RPS consider that the effects of the overall development must consider and mitigate both the effects of the rerouting of traffic which results from the new infrastructure proposals and also the effects of the development traffic itself. Hence any mitigation strategy must address the full effects of traffic changes resulting from the development proposals on the road network.
- 1.45 All of the above are comments are based on the latest information provided, however it is recognised that the TA still identifies at para 2.26 that it is not complete and that a final TA will be provided in due course. Accordingly, only once such an assessment has been submitted can the full and final review be undertaken.

- 1.46 In conclusion RPS remain of the view that:
- there is insufficient evidence within the DCO TA to be able to determine / verify the impact of the overall development on the study network assessed. Furthermore, there is insufficient evidence to understand the growth factors that have been applied to the network in order to determine how growth within Blaby District has been taken into account.
 - The impact of the development to the east of the motorway is not clearly defined to be able to ensure suitable mitigation is provided. Specifically, the level of traffic predicted to travel through Sapcote and Stoney Stanton varies considerably between the evidence provided in the transport assessment and that included in the transport section of the ES.
- 1.47 Accordingly, it is considered that the information provided as part of the DCO relating to highways and transportation does not demonstrate suitable assessment and mitigation of the scheme proposals.