Tritax Symmetry (Hinckley) Limited

HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE

The Hinckley National Rail Freight Interchange Development Consent Order

Project reference TR050007

Applicants Responses to Deadline 4 Submissions [part 6 - Statutory Bodies]

Document reference: 18.17

Revision: 01

9 February 2024

Planning Act 2008

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

No National Highway Applicant's Response

National Highways ("we") has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This note has been produced by National Highways, with the support of its consultants AECOM, as we have reviewed the furnessing methodology, which was supplied by the applicants consultants, BWB Consulting, at deadline 3.

Based on this appraisal, we have a number of matters where further information and clarification are required. Our full review is provided in Annex 1 of this document, based on this the National Highways has identified the following matters need to be addressed, and therefore at this time we are unable to agree the furnessing methodology at present.

The Applicant has not responded to National Highway's comments as set out in the DCO document REP1-182. This is replicated in Section 1 Introduction below

Six comments were provided by NH in summary of the comments within REP1-182, these have been addressed below:

- 1. NH considers furnessing approach sound as outlined with the REP1-182. No further comment required from BWB.
- 2. NH agrees with methodology undertaken for site access junctions. No further comment required from BWB.
- 3. BWB have undertaken checks on the furnessed matrices and the two areas of concern highlighted are not applicable to the furnessed traffic matrices.
- 4. As stated in Point 3, sense checks have been

No	National Highway	Applicant's Response
		undertaken for the furnessed matrices. The furnessing methodology is double constrained therefore if there is an increase in flows forecast for a particular movement, this will be reflected in the furnessed flows.
		5. Internal Road Capacity Review-(REP2-073 18.4.2) provides detail on internal access junction assessments.
		6. The proposed development will come forward with the proposed infrastructure including the south facing slips at M69 J2 and A47 link road. Therefore an assessment scenario of 'with development without infrastructure' is not required.
		There are ongoing discussions with NH to close these points out.
2	No junction turn matrices forecasts were produced in the "Furnessing Spreadsheet" at the M1 junction 20 two-bridge roundabout nor at the A5 'Redgate' elongated roundabout.	M1 Junction 20 and Redgate roundabout impacts within the PRTM were reviewed as part of the Transport Assessment process at NH's request. This identified that the junction experienced a 22% and 11% reduction in traffic flow in the 2036 Future Year scenario (REP3-131 Transport Assessment Table 7-2) and were therefore not taken forward for further capacity assessment.
3	The "Furness spreadsheet" does not document the grade separated flows at M69 junction 1 and at M69 junction 2. This means that the turning	The furnessing spreadsheet only includes flows arriving and departing at identified junctions, therefore any

No	National Highway	Applicant's Response
	movement matrices cannot be used to assess the future operation efficiency of the M69 slip road merge areas.	grade separated flows (M69 mainline) have been excluded from the furnessing process to ensure these do not skew the results. However, M69 mainline flows have been furnessed separately and included within the respective VISSIM models. The furnessing for the mainline flows have now been shared with NH and the TWG on the 05 February.
4	The Furnessing process could underestimate the magnitude of the HGV turn movements between A5 North and A4303 East at the A5 'Cross In Hand' roundabout if new HGV trips are induced between the Applicant's Hinkley NRFI site and the existing Magna Park regional distribution center.	As agreed on 13th November 2023, new surveys were commissioned at all junctions for which a mitigation measure was identified. This included 'Cross in Hand' roundabout and 'Gibbet' roundabout. The traffic flow turning matrices were furnessed again based on the 2023 surveys. This along with the PRTM distributed development traffic flows would adequately forecast HGV trips induced between the sites mentioned and the Applicant would maintain that the furnessing would not underestimate the HGV turning proportions. The traffic modelling has been updated and was submitted as part of Deadline 4 Transport 2023 Update (document reference: 18.13.2, REP4-131).
5	Directional traffic growth biases in the target flows were noted at the A5 'Gibbet' roundabout. The operational performance of this roundabout should be assessed with alternative turning movement proportions applied to check that these biases are not material to the operational performance of the roundabout.	Updated turning count flows have been used to reassess the junction. The results are set out in Deadline 4 Transport 2023 Update (document reference: 18.13.2, REP4-131). Further detail has been shared on the 07 February 2024 with AECOM on the turning proportion adjustments at Gibbet Hill.

No	National Highway	Applicant's Response
	1. Introduction National Highways provided a written response – dated 3rd October 2023 – to information submitted to the Hinkley NRFI Development Consent Order (DCO) examination. This written response was allocated the DCO library reference REP1-182.	See response to summary above, where the outstanding points are addressed. The Applicant notes that the methodology is accepted for SRN Junctions:
	The Applicant has proposed a method of forecasting the traffic flow turning movements for various scenarios – with and without the development and with and without mitigation – at the key junctions using a "Furness" method.	 M69 J1 M69 J2 M69 J3/ M1 J21 A5 Dodwells Roundabout A5 Longshoot
	This method starts with a matrix of the observed turning movements at each junction and then modifies these matrices — using a process of successive matrix row and column factoring — such that the row totals and column totals match the forecast approach and exit flows extracted from a strategic traffic forecasting model. In this case the strategic traffic forecasting model was a version of the Pan-Regional Transport Model (PRTM) developed jointly for Leicestershire County Council and Lecester City Council and used forecasting years of 2026 and 2036.	In the remaining sections included here, there is agreement to the methodology other than the 6 points set out and addressed above.
	The "Furnessing Methodology" was reviewed by National Highways and comments were recorded as set out in Appendix B of REP1-182 (see PDF page 120 of 183 and the table on the subsequent pages 122 to 125). In this REP1-182 table, National Highways made some 'General Observation' (GO) comments and listed two items of 'Concern' (C). The concern comments are reproduced in Figure 1 below:	

		National Highway		Applicant's Response
Figure 1			5,5	
Issue			spolicant's tesponse/Action	
3.3	(C)	The objective of the Furness process is to provide forecast turning flows at each junction of interest without and with the proposed Hinckley NRFI highway improvements in place. For the forecasts with the trips generated by the Hinckley NRFI deepenment, these were only assigned to the highway networks with the proposed Hinckley NRFI highway improvements. Le. Assigned to highway network: Future (committed schemes) A. Without (WO) Dev Prips With Hinckley NRFI trips Future + NRFI improvements. A. Without (WO) Dev Hintstructure With Hinckley NRFI trips Future + NRFI improvements. These three forecast flows sets (A, C, D) may be used for operational junction modelling with Hinckley NRFI infrastructure improvements and may be used for operational junction modelling with Hinckley NRFI trips included in the forecasts. These three forecasts flow sets will not identify if a junction or link to be improved is unnecessary. This might be a concern if: a) Environmental impacts are unnecessarily incurred. b) Carbon budget expended on unnecessary construction. c) Traffic management during construction delays existing users. d) There are no traffic forecasts to inform the construction phasing programme.		
4.5	(C)	For the junctions along the development's Spine Road, it is noted that forecast traffic flow matrices will be derived from the reassigned traffic attracted to the Spine Road – as forecasts by PRTMv2.2 – and combined with a first principals' method to distribute the trips generated by the proposed development. This method is considered to be a reasonable approach. This paragraph does not explain how the double counting of trips generated by the proposed development (i.e. generated in the PRTMv2.2 forecasts, which loads the trips at a single development zone, and trips added by the 'first principals' method) was addressed.		

National Highway	Applicant's Response
Figure 2:	
Summary of National Highway's Comments:	
 The approach described is generally considered to be sound. The 'Furness' process is a common method used to adjust turning movement flows to match given target forecast flows entering and exiting a junction (i.e. doubly constrained adjustment). 	
2. A 'Furness' processed was applied to 'Prior' matrices that were derived from observed turning movements. However, this method of deriving Prior matrices is ineffective where the junctions would be substantially changed, specifically the two junctions at the north and the south accesses to the development site. The standard method of deriving 'Prior' matrices was adapted to instead derive 'Prior' matrices from the pan regional strategic traffic model's forecast outputs (PRTMv2.2) at these two junctions. This alteration to the agreed approach is reasonable.	
Whilst the general approach to applying the Furness Process is acceptable, two areas of concern were identified:	
Where an observed (2018/19) turning movement is zero, or close to zero, the Furness Process will not reflect a reassignment of traffic into the corridor where this is indicated as an effect of the scheme by the forecasting scenario outputs from the PRTM v2.2 traffic forecast model. There is a risk of underestimating the demand for a turning movement at an assessed junction.	
Where a large observed (2018/19) turning movement has had negative growth applied, due to reassignment effects in the PRTM v2.2 forecast outputs, then this could result in the suppression of a flow demand. This might be important to the junction's operational assessment if the suppressed flow demand is (say) a right turn.	
4. These two concerns may be addressed by undertaking a sense check using the PRTM reassignment impacts and turn movements; paying particular attention to the magnitude of flows that turn right at an assessed junction. Alternatively, the operational assessments of the junctions could include sensitivity testing of the derived turning proportions.	
5. For those junctions along the Development's spine road, the report contains no description of how design reference flows were derived from PRTMv2.2 forecast outputs (which model loads all development trips at a single zone) combined with a 'first principals' method of distributing trips generated by the development. It is noted that the design of the spine road is not a specific concern for the Strategic Road Network (SRN), such as the M69, A5, M1 corridors.	
6. There is no traffic forecasting set for the scenario 'With development generated trips' demand assigned to a 'Without HNFI infrastructure network'. This forecasting set would identify if all the link and junction improvements are necessary. This forecasting set would also assist in determining construction phase timing and sequencing of improvements.	
On 18th December 2023, an email from BWB Consulting to National	
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	 Summary of National Highway's Comments: The approach described is generally considered to be sound. The 'Furness' process is a common method used to adjust turning movement flows to match given target forecast flows entering and exiting a junction (i.e. doubly constrained adjustment). A Furness' processed was applied to 'Prior' matrices that were derived from observed turning movements. However, this method of deriving Prior matrices is ineffective where the junctions would be substantially changed, specifically the two junctions at the north and the south accesses to the development site. The standard method of deriving 'Prior' matrices was adapted to instead derive 'Prior' matrices from the pan regional strategic traffic model's forecast outputs (PRTMv2.2) at these two junctions. This alteration to the agreed approach is reasonable. Whilst the general approach to applying the Furness Process is acceptable, two areas of concern were identified:

No	National Highway	Applicant's Response
	2. Summary of "Furnessing Spreadsheet" Contents	See response to summary above.
	The supplied "Furnessing spreadsheet" contained 2026 and 2036 forecast	
	year turning movements, for the AM and PM peak hours (in units of	
	Vehicles/hour and PCU/hour), for light and heavy vehicle types.	
	The eleven junctions – in the bullet-point list below – were processed to	
	produce forecast year turning movements and the turn matrices were	
	tabulated in the "Furnessing spreadsheet".	
	· J1 – Ashby Road (A447) / A47.	
	· J37 – Hinckley Rd / New Rd / B581.	
	· J39 – B4669 / Stanton Lane.	
	· J3 – Coventry Rd (B4114) / B581 Broughton Rd.	
	· J13 – M69 Junction 1 / A5.	
	· J14 – A5 / B4666 / A47. (Dodwells Roundabout).	
	· J4 – A5 / A47 The Long Shoot.	
	· J27 – A5 / A4303 / B4027 / Coal Pit Ln. [J24].	
	· J15 – M1 Junction 21 / M69 Junction 3 / A5460. [J6].	
	· J20 – M69 Junction 2	
	· J26 – Gibbet Roundabout (A5 / A426 / Rugby Rd)	
	Note: the 'J' numbers in the bullet-point list above correspond to the 'J'	
	numbers used in the Transport Assessment [APP-155] as junctions	
	identified for further assessment in its Table 7-1. Refer to extract at Figure 3 below. The junctions in the above bullet point list are highlighted yellow.	
	below. The junctions in the above bullet point list are highlighted yellow.	

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	It is not	ed	that	some of the jur	ction numbers	used in the "Furness	
				=			
	spreads	he	et" a	are not consister	nt between she	ets nor with Table 7-1. Care is	
	-						
	needed when using the forecast turning movements tabulated in the						
	Furnes	55 5	prea	idsneet that the	e correct juncti	on is being examined.	
		_					
	Figure 3	3: T	able	7-1 Extracted F	rom Applicant'	s Transport Assessment	
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	Table 7-1: Init	ially Id	entified Ju	nctions within the AOI for further Asse	essment		
		Т					
	Junction		Survey	Junction	Location		
	Туре	ID	Jct Ref				
		J1	13	Ashby Rd / A47	Hinckley		
		J2	15	A47 / B581	Earl Shilton		
		J3	21	84114 Coventry Rd / B581 Broughton Rd	East of Stoney Stanton		
		14	26	A47 / A5 (Longshoot)	Between Hinckley and Nuneaton		
		J5	27	Rugby Rd / Brookside	Hinckley		
	Signal Controlled	J6	_	Coventry Rd / Croft Rd	Croft		
	Controlled	J7 J8	65	A563 / A5460 A47 / Wilkinson Lane	Leicester Earl Shilton		
		19	66	A47 / Wilkinson Lane A47 / B582 Desford Road	Between Hinckley and Leicester		
		J10	_	Braunstone crossroads	Leicester		
		J11		B581/Cosby Road, Broughton Astley	Broughton Astley		
		J12	_	Rugby Road/Hawley Road, Hinckley	Hinckley		
		J13	22	M69 Junction 1 / A5	South of Hinckley		
			25	A5 / B4666 / A47 (Dodswells)	SW of Hinckley		
	Signalised	J15		M1 Junction 21 / M69 Junction 3	Leicester		
	Roundabout	J16		M6 Junction 2	Coventry		
		J17		Narborough Rd Roundabout M6 Junction 3	Leicester Coventry		
		J19	_	84114/Foxhunter roundabout	SW of Leicester		
		J20		M69 Junction 2	Site access		
				A47 Leicester Rd / Clickers Way / Carrs			
		J21		Hill	Barwell		
		J22		A5 / Logix Rd	South of Hinckley		
		J23	24	A5 / Hammonds Way	South of Hinckley		
		J24	29	The Common Barwell / A47 / B4668 Leicester Rd	Barwell		
		J25	٠.	M1 Junction 20	Lutterworth		
		J26		A5 / A426 / Gibbet Ln	South of Lutterworth		
	Roundabout	J27	48	A5 / A4303 / B4027 / Coal Pit Ln	Magna Park		
		J28		Lubbesthorpe Way Roundabout	Leicester		
		J29 J30		A47 / A4254 Eastboro Way A5 / Higham Ln / Nuneaton Ln	Nuneaton West of Hinckley		
	ll l	J30	- 68	A3 / Higham Ln / Nuneaton Ln A47/Leicester Road roundabout	North of Earl Shilton		
		J32	_	A5/Royal Redgate	West of Hinckley		
		J33		A5/A444 Fenny Drayton	West of Hinckley		
		J34		A5/MIRA	West of Hinckley		
		J35		A4303 Frank Whittle	Lutterworth		
		J36		Shilton Road mini-roundabout, Barwell	South of Earl Shilton		
	Mini roundabout	J37		Hinckley Rd / New Rd / 8581	Stoney Stanton		
	roundabout	J38		New Rd / Long St / Broughton Rd B4669 / Stanton Ln	Stoney Stanton Sapcote		
		239	49	2-2257 Mariton Di	September		

No	National Highway	Applicant's Response
No	3. "Furnessing Spreadsheet" Contents – SRN Junctions National Highways has been appointed by the Secretary of State for Transport as the strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN), i.e. trunk roads. National Highway's role is to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. The SRN routes within the area of interest include: M69, M1 and A5 Figure 3: SRN Junctions In The Area Of Interest On: M69, M1, A5	Applicant's Response See response to summary above.
	The forecast tuning movements at nine of these junctions with connections	

No	National Highway	Applicant's Response
	to the SRN roads were examined in more detail. The locations of the nine junctions are labelled in Figure 3 above.	
	The following pages present extracts from the Applicant's "Furnessing spreadsheet" for the 2036 traffic forecasting year. Traffic flows and turning movements are presented in units of PCU/hour, where a PCU (passenger car unit) is equal to one car or half of a heavy goods vehicle. That is to say, in the subsequent capacity assessments, observed and modelled heavy goods vehicles (HGV) were assumed to occupy the capacity of two cars. Converting vehicles to PCU is a standard practice when modelling junction capacity.	
	 In the following extracts from the "Furnessing spreadsheet": WoD means 'Without Development', WoDWS means 'Without Development / With the Applicant's highway Schemes', and WD means 'With Development' (including highway scheme improvements). 	

No	National Highway	Applicant's Response
	M69 junction 1 / A5 (Stretton Baskerville)	
	TA Table 7-1 Ref: Survey Jct Ref: PRTM node:	
	J13 22 40168 AM Peak (PCU/Hour) Survey Flow Future year furnessed traffic matrices	
	Junction Arm 2023 Observed Rows WoD 2036 FINAL MAIN WODWS 2036 FINAL MAIN WD 2036 FINAL MAIN	
	A B C D E F D/AL	
	PM Peak [PCU/Hour] SURVEY FLOW FUTURE YEAR FURNESSED TRAFFIC MATRICES	
	Anction Aem 2023 Observed Rows WOD 2036 FINAL MATEX WODWS 2036 FINAL MATEX WO 2036 FINAL MATEX	
	At MCO impation 1, the incorporate between MCO Foot (arms D) and MCO Most	
	At M69 junction 1, the journeys between M69 East (arm B) and M69 West	
	(arm E) are grade separated and therefore these trips bypass the	
	roundabout and are not documented in the above turn matrices. This	
	means that the above forecast turning movement matrices cannot be used	
	to assess the future operation efficiency of the M69 slip road merge areas.	
	от о	
	In the AM peak hour, the total 2023 flows observed to arrive at the junction	
	were 4,841PCU/hour in the 2023 AM peak. Without Development (WoD)	
	trips, in 2036 the total AM peak flows arriving at the junction would be	
	5,684PCU/hour (+17%). Most of this AM traffic growth is attributed to the	
	SRN routes from A5 South (+20%) and from M69 West (+45%).	
	5 1 3 3 3 3 4 11 (· 25/6) 4 11 4 11 11 11 11 11 11 11 11 11 11 11	
	In the PM peak hour, the total 2023 flows observed to arrive at the junction	
	were 4,813PCU/hour in the 2023 PM peak. Without Development (WoD)	
	trips, in 2036 the total PM peak flows arriving at the junction would be	
	5,915PCU/hour (+23%). Most of this PM traffic growth is attributed to the	
	SRN routes from A5 South (+56%) and from M69 West (+24%). The effect of	
	Shirt routes from As South (15070) and from 1910s West (12470). The effect of	

No	National Highway	Applicant's Response
	the proposed infrastructure improvements (WoD	
	WS) would not materially change the levels of future year traffic flows but would change the directions of arrival – by reassignment – such that more flow arrives from the M69 East. This result appears logical given that the proposed highway infrastructure would provide a bypass to the east of Hinkley and redirect some existing journeys on the A47 via M69 junction 2.	
	The impact of the full development (WD) would be to increase 2036 forecast total inflows at M69 junction 1 by (5,946-5,684=) 262PCU/hour (+5%) in the AM peak and by (6,052-5,915=) 137PCU/hour (+2%) in the PM peak	
	The outputs from the Furness process at M69 junction 1 are reasonable.	
	M69 junction 2 / B4669:	
	TA Table 7-1 Ref: Survey Jct Ref: PRTM nodes: J20 52 30504, 30197, 37003, 30196 SURVEY FLOW SURVEY FLOW FUTURE YEAR FUNNESSED TRAFFIC MATRICES	
	Auriction Aem	
	PM Peak (PCU/Nour) SURVEY FLOW FUTURE YEAR FURNESSED TRAFFIC MATRICES Airc fon Arm 2003 Observed Rows WoO 2034 FINAL MATRX WOOVS 2034 FINAL MATRX WO 2034 FINAL MATRX WO 2034 FINAL MATRX	
	A B C D E SOLA	
	At M69 junction 2, the journeys between M69 Northeast (arm A) and M69	
	Southwest (arm C) are grade separated and therefore these trips bypass the	

No	National Highway	Applicant's Response
	roundabout and are not documented in the above turn matrices. This means that the above forecast turning movement matrices cannot be used to assess the future operation efficiency of the M69 slip road merge areas — which is likely to be a requirement in the WoDWS and WD cases given that the forecast flow to arm C is 1,365 & 1,644PCU/hour in the AM peak, and 636 & 1,222 PCU/hour in the PM peak. These forecasts traffic flow will use the proposed new southbound merge slip road.	
	In the AM peak hour, the total 2023 flows observed to arrive at the junction were 1,343PCU/hour in the 2023 AM peak. Without Development (WoD) trips, in 2036 the total AM peak flows arriving at the junction would be 1,373PCU/hour (+2%). This AM traffic growth is attributed westbound to the route from B4669 Hinkley Rd East (arm B) to B4669 Hinkley Rd West (arm D).	
	In the PM peak hour, the total 2023 flows observed to arrive at the junction were 1,206PCU/hour in the 2023 PM peak. Without Development (WoD) trips, in 2036 the total PM peak flows arriving at the junction would be 1,150PCU/hour (-5%). Most of this PM traffic reduction is attributed to the SRN routes from M69 Northeast (-18%).	
	The effect of the proposed infrastructure improvements (WoDWS) would change the levels of 2036 forecast traffic flows on the M69 junction 2 roundabout. The total inflows would increase from 1,373PCU/hour to 3,576PCU/hour in the AM peak hour. This is an increase of 2,203PCU/hour (+160%). In the PM peak hour, the total inflows would increase from 1,150PCU/hour to 3,263PCU/hour. This is an increase of 2,113PCU/hour (+184%). This result appears logical given that the proposed highway	

No	National Highway	Applicant's Response
	infrastructure would provide a bypass to the east of Hinkley and redirect some existing journeys on the A47 via M69 junction 2.	
	The impact of the full development (WD) would be to increase 2036 forecast total inflows at M69 junction 2 roundabout by (4,807-1,374=) 3,433PCU/hour (+250%) in the AM peak and by (4,521-1,150=) 3,371PCU/hour (+290%) in the PM peak.	
	The Furness process applied to the M69 junction 2 observed 2023 turning movement flows has had very little effect. Most of the turn movement changes at the M69 junction 2 roundabout have been derived from absolute changes in the PRTM strategic transport model outputs for the forecasting scenarios tested.	
	M1 junction 21 / M69 Junction 3 (at Fosse Park, Leicester): TA Table 7-1 Ref: J15 None 9463, 9495, 9447, 9439 AM Paak (PCU/Mour) SURVEY FLOW SURVEY FLOW RUTHEY YEAR FURNISSOS TRANFIC MARTICES WIND 2004 FRINAL MARTIX WIND 2004 FRINAL MAR	
	April PCU/New SURVEY FLOW PUTURE YEAR FURNESSED TRAFFIC MATRICES	
	In the AM peak hour, the modelled total inflows arriving at the junction were 8,905PCU/hour in the 2023 AM peak. Without Development (WoD) trips, in 2036 the total AM peak flows arriving at the junction would be 9,752PCU/hour (+10%). This AM traffic growth is attributed between three approach roads (M1 North, M69 West and A5460 East).	

No	National Highway	Applicant's Response
	In the PM peak hour, the modelled total inflows arriving at the junction were 9,106PCU/hour in the 2023 PM peak. Without Development (WoD) trips, in 2036 the total PM peak flows arriving at the junction would be 9,666PCU/hour (+6%). This PM traffic growth is attributed between two approach roads (M1 North and A5460 East).	
	The effect of the proposed infrastructure improvements (WoDWS) would not materially change the levels of future year traffic flows (No change in AM peak; +1.7% in PM peak). This result appears logical given that the proposed highway infrastructure would provide a bypass to the east of Hinkley and is unlikely to change the routing of the existing journeys at M1 junction 21.	
	The impact of the full development (WD) would be to change 2036 forecast total inflows at M69 junction 3/M1 junction 21 by (9,750-9,752=) - 2PCU/hour (+0%) in the AM peak and by (9,897-9,666=) 231PCU/hour (+2%) in the PM peak.	
	The outputs from the Furness process at M69 junction 3/M1 junction 21 are reasonable.	
	M1 junction 20 / A4303 (at Lutterworth) TA Table 7-1 Ref: Survey Jct Ref: J25 None	

No	National Highway	Applicant's Response
	No junction turn matrices forecasts were produced in the "Furnessing Spreadsheet" for the M1 junction 20 at Lutterworth.	
	Any additional trips generated for the full development (WD) forecast scenario at this M1 junction 20 roundabout would likely also pass through the A5 'Cross in Hand' junction. The magnitude of changes at the A5 junction should provide an indication of the changes forecast at M1 junction 20.	
	A5 / A444 'Redgate' elongated roundabout TA Table 7-1 Ref: Survey Jct Ref: J32 & J33 None	
	No junction turn matrices forecasts were produced in the "Furnessing Spreadsheet" for the A5 / A444 'Redgate' elongated roundabout.	
	Any additional trips generated for the full development (WD) forecast scenario at this A5 / A444 'Redgate' elongated roundabout would likely also pass through the A5 'Long Shoot' junction. The magnitude of changes at this easterly A5 junction should provide an indication of the changes forecast at this A5 / A444 'Redgate' junction.	

No	National Highway	Applicant's Response
	A5 / A47 'The Long Shoot' signal-controlled junction TA Table 7-1 Ref: Survey Jct Ref: PRTM node: J4 26 40491 AM Peak (PCU/Hose) SURVEY ROW FUTURE YEAR FUNNESSED TRAFFIC MATRICES Anction Arm 2023 Closerved Flows Wod 2026 Flows, LADIX Wod 2026 Flo	
	C 491 37 0 704 145 707 840 307 704 145 707 840 307 704 145 707 840 307 704 145 707 840 307 704 145 707 840 307 704 145 707 840 307 704 145 707 840 307 704 145 707 840 307 704 705 840 307 705	
	In the AM peak hour, the total 2023 flows observed to arrive at the junction were 2,897PCU/hour in the 2023 AM peak. Without Development (WoD) trips, in 2036 the total AM peak flows arriving at the junction would be 3,074PCU/hour (+6%). All of this AM traffic growth is attributed to the SRN route, A5 Watling Street East (arm A) and A5 Watling Street West (arm C). The two-way AM peak flows on A47 'The Long Shoot' would remain the same in 2036 as in 2023.	
	In the PM peak hour, the total 2023 flows observed to arrive at the junction were 2,891PCU/hour in the 2023 PM peak. Without Development (WoD) trips, in 2036 the total PM peak flows arriving at the junction would be 3,101PCU/hour (+7%). This PM traffic growth is attributed approximately equally to all three roads connected to the junction.	
	The effect of the proposed infrastructure improvements (WoDWS) would not materially change the levels of 2036 forecast year traffic flows at the A5 'Long Shoot' traffic signal controlled junction (0% in the AM peak hour and +1.6% in the PM peak hour).	

No	National Highway	Applicant's Response
	The impact of the full development (WD) forecast scenario does not change the level of the 2036 forecast peak hour flows at the A5 'Long Shoot' junction. This result implies that none of the trips generated by the proposed development would be to or from the local area around Nuneaton. This finding derives from the target flows generated by the PRTM strategic model's forecasting scenarios rather than from the Furness	
	## Department Part Part	
	PM Peak PCU/Hour SURVEY FLOW SUBVEY FLOW SUBVEY FLOW SUBVEY FLOW Full State Subvey Flow Subvey F	
	In the AM peak hour, the total 2023 flows observed to arrive at the junction were 3,459PCU/hour in the 2023 AM peak. Without Development (WoD) trips, in 2036 the total AM peak flows arriving at the junction would be 3,892PCU/hour (+13%). All of this AM traffic growth is attributed to the SRN route, A5 Watling Street Southeast (arm C) and A5 Watling Street Northwest (arm D). The two-way AM peak flows on the two minor roads (arm A and arm B) would remain the same in 2036 as in 2023.	
	In the PM peak hour, the total 2023 flows observed to arrive at the junction	

No	National Highway	Applicant's Response
	were 3,447PCU/hour in the 2023 PM peak. Without Development (WoD) trips, in 2036 the total PM peak flows arriving at the junction would be 3,828PCU/hour (+10%). This PM traffic growth is attributed to the SRN route, A5 Watling Street Southeast (arm C) and A5 Watling Street Northwest (arm D). The two-way PM peak flows on the two minor roads (arm A and arm B) would remain the same in 2036 as in 2023. The effect of the proposed infrastructure improvements (WoDWS) would not materially change the levels of 2036 forecast year traffic inflows at the	
	A5 'Dodwells' signal led roundabout (-4% in the AM peak hour and -2% in the PM peak hour). This is logical because the proposed highway infrastructure acts as an eastern bypass of Hinkley and would act to divert some longer-distance journeys away from A5 'Dodwells' junction and onto the M69.	
	The impact of the full development (WD) forecast scenario does not change the level of the 2036 forecast peak hour inflows at the A5 'Dodwells' junction. This finding derives from the target flows generated by the PRTM strategic model's forecasting scenarios rather than from the Furness process.	

No	National Highway	Applicant's Response
	## A5 / A4303 / B4027 'Cross In Hand' roundabout (at Magna Park) TA Table 7-1 Ref: Survey Jct Ref: PRTM node:	Applicant 3 Response
	In the AM peak hour, the total 2023 flows observed to arrive at the junction were 2,845PCU/hour in the 2023 AM peak. Without Development (WoD) trips, in 2036 the total AM peak flows arriving at the junction would be 3,909PCU/hour (+38%). This AM traffic growth is attributed predominantly to the A4303 East (arm B), which provides access to the nearby Magna Park regional distribution warehouses.	
	In the PM peak hour, the total 2023 flows observed to arrive at the junction were 2,763PCU/hour in the 2023 PM peak. Without Development (WoD) trips, in 2036 the total PM peak flows arriving at the junction would be 3,801PCU/hour (+38%). This PM traffic growth is attributed predominantly to the A4303 East (arm B), which provides access to the nearby Magna Park regional distribution warehouses.	
	The effect of the proposed infrastructure improvements (WoDWS) would not materially change the levels of 2036 forecast year traffic inflows at the A5 'Cross In Hand' roundabout (-0% in the AM peak hour and -1% in the PM	

No	National Highway	Applicant's Response
	peak hour). This is logical because the proposed highway infrastructure acts as an eastern bypass of Hinkley and would not change existing journeys passing through the A5 'Cross in Hand' roundabout.	
	The impact of the full development (WD) forecast scenario does not materially increase the level of the 2036 forecast peak hour inflows at the A5 'Cross In Hand' junction (+4% AM peak hour inflows; +3% PM peak hour inflows).	
	This finding derives from the target flows generated by the PRTM strategic model's forecasting scenarios rather than from the Furness process.	
	It is noted that the PRTM could be modelling new freight trips between the existing Magna Park regional distribution center and the Applicant's Hinkley NRFI site. If this was the case, then the Furness processing method would redistribute these large 2036 HGV turn movements between A5 North (arm A) and A4303 East (arm B) and in the WD scenario could underestimate the HGV flows between arm A and arm B.	

No	National Highway	Applicant's Response
	A5 / A426 / Gibbet Lane, 'Gibbet' roundabout TA Table 7-1 Ref: J26 47 100R YAA FUNDAMEN OF THE PRIM NODE: A B D D D D D D D D D D D D D D D D D D	
	In the PM peak hour, the total 2023 flows observed to arrive at the junction were 2,958PCU/hour in the 2023 PM peak. Without Development (WoD) trips, in 2036 the total PM peak flows arriving at the junction would be 3,541PCU/hour (+20%). This PM traffic growth is attributed predominantly to the traffic approaching from A5 Watling Street South arm D (+51%) and turning to A426 Rugby Road West arm E (+35%). This bias in directional traffic growth derives from the target flows obtained from the PRTM traffic forecasting scenarios.	

No	National Highway	Applicant's Response
	The effect of the proposed infrastructure improvements (WoDWS) would not materially change the levels of 2036 forecast year traffic inflows at the A5 'Gibbet' roundabout (-0% in the AM peak hour and -1% in the PM peak hour). This is logical because the proposed highway infrastructure acts as an eastern bypass of Hinkley and would not change existing journeys passing through the A5 'Gibbet' roundabout.	
	The impact of the full development (WD) forecast scenario does not materially increase the level of the 2036 forecast peak hour inflows at the A5 'Gibbet' roundabout (+2% AM peak hour inflows; +2% PM peak hour inflows).	
	Because of the bias observed in the directional flows, the operational performance of the A5 'Gibbet' roundabout should be tested with a proportion of the left turn flows, from arm D (A5 Watling Street South) to arm E (A426 Southwest), transferred to an alternative exit arm.	
4. Su	mmary Of Comments	
1	The Applicant has not responded to National Highway's comments as set out in the DCO document REP1-182.	See Comments at top of the section- the summary here replicates points made.
2	No junction turn matrices forecasts were produced in the "Furnessing Spreadsheet" at the M1 junction 20 two-bridge roundabout nor at the A5 'Redgate' elongated roundabout.	
3	The "Furness spreadsheet" does not document the grade separated flows at M69 junction 1 and at M69 junction 2. This means that the turning movement matrices cannot be used to assess the future operation efficiency	

National Highways

No National Highway Applicant'		Applicant's Response
	of the M69 slip road merge areas.	
4	The Furnessing process could underestimate the magnitude of the HGV turn movements between A5 North and A4303 East at the A5 'Cross In Hand' roundabout if new HGV trips are induced between the Applicant's Hinkley NRFI site and the existing Magna Park regional distribution center.	
5	Directional traffic growth biases in the target flows were noted at the A5 'Gibbet' roundabout. The operational performance of this roundabout should be assessed with alternative turning movement proportions applied to check that these biases are not material to the operational performance of the roundabout.	

No	ExQ Ref	Matter	Natural England Response	Applicant's Response
1	1.2.9.	Burbage Common and Woods SSSI – recreational disturbance In the RR from NE [RR-0974] it is indicated that the proposed Access Management Plan to mitigate the effects of additional recreational disturbance occasioned by the Proposed Development would include "Measures to restrict access to the more sensitive areas of the SSSI". a) Could the Applicant and NE set out the nature of these restrictions, including extent, timings (if part year), etc., as these do not appear to be mentioned in the Woodland Access Management Plan (Appendix 12.4 to the ES [APP-200]), to allow IPs to comment on them and the ExA and SoS to judge whether they are justified. If they are outside the proposed Order limits, how are they to be secured? b) Could the Applicant and NE set out respective positions should the ExA or SoS consider that these measures are not justified in the public interest.	Natural England have engaged with the applicant In relation to this question. Natural England have provided the Applicant with a series of measures we feel would be appropriate in mitigating the possible recreational pressure increase on the SSSI. To avoid repetition, we have asked that the applicant include these within their response to this set of questions. It should be noted that no physical restriction of access to the SSSI is considered necessary. Apologies, the wording of our RR's may have been misleading in this regard. In the absence of need for any physical restriction, Natural England have not provided our position should the ExA or SoS consider the mitigation measures not justified in the public interest. Please don't hesitate to get in contact should this continue to be required.	The Applicant and Natural England are now in agreement regarding potential recreational disturbance and have agreed that the RR from NE (RR-0974) was potentially misleading. It has also been agreed with Natural England that the implementation of the detailed WMP (Requirement 31) is considered sufficient to mitigate any potential recreational impacts on Burbage Common and Woods SSSI.

No	ExQ Ref	Matter	Natural England Response	Applicant's Response
2	1.5.12.	Article 49 - Disapplication, application and modification of legislative provisions a) Could the Applicant please check the referencing in the EM as this refers to Article 48. b) Do the EA, NE, NR, LCC as LLFA, BDC and HBBC agree with the provisions as cited? If not, could you please explain why or, if it considers alternative drafting is necessary, please provide it, making particular reference to the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015 (as amended).	Part 1 (e) of this article states that 'section 28E (duties in relation to sites of special scientific interest) of the Wildlife and Countryside Act 1981(e) do not apply I relation to the construction of any work or the carrying out of any operation required for the purpose of, or in connection with, the authorised development' Natural England advise that this appears to be referencing the fact that where planning permission has been granted, SSSI consent (under section 28E of the WaCA 1981) is not required for works specified within the planning consent, as NE will have been consulted and provided advice at the planning consent stage. This is correct, however, there may be a scenario where an 'operation required for the purpose of, or in connection with, the authorised development', has not been specified within the development consent order, but which may have an adverse effect on the nearby SSSI (Burbage Wood and Aston Firs). In this scenario, Natural England would anticipate either a notice for consent under Section 28E, or a consultation by the relevant planning authority for our advice in relation to the	The Applicant does not consider that the proposed amendment is required. A variation to the DCO would require formal amendment to the Order and the process that entails includes consultation. In the event that any amendments to the details in the Order is sought through the provisions within the Order which do allow amendment with the consent of the relevant planning authority, those amendments are required to be such that they do not give rise to materially new or materially different significant effects than those that have been assessed in the environmental statement. Even in such scenario, the Applicant expects that the relevant planning authority would consult with NE in such circumstances.

Natural England

No	ExQ Ref	Matter	Natural England Response	Applicant's Response
			SSSI for any variation to the development consent. This could be specified within this article, or perhaps more simply, Part 1 of the article could be amended to read: - 'The following provisions do not apply in relation to the construction of any work or the carrying out of any operation specified within this DCO, which is required for the purpose of, or in connection with, the authorised development'	