

Tritax Symmetry (Hinckley) Limited

HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE

The Hinckley National Rail Freight Interchange Development Consent Order

Project reference TR050007

Applicant's response to Deadline 5 Submissions [part 2 - HBBC]

Document reference: 18.19

Revision: 01

20 February 2024

Planning Act 2008

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

ExQ Ref	Matter	Hinckley & Bosworth Response	Applicant's Response
2.5.3	<p>Schedule 2, Requirement 19 - Green Space</p> <p>In response to concerns over the provision of green space, the Applicant at D4 has submitted a Landscape Ecological Management Plan (document 17.2A) and green space provision will be secured by Requirement 19. Can BDC and HBBC confirm they are happy with the approach set out and the Requirement?</p>	<p>The Council is content with the approach, but the wording of the requirement should be amended as follows:</p> <p>(b) provide a management framework for the conservation and enhancement of habitats and other features of ecological interest; This should be amended to make it expressly clear that this includes the BNG; and that it is for the minimum period covering 30 years.</p> <p>(c) provide a work schedule (including an annual work plan); This should be amended to make it expressly clear that the work plan includes BNG management and monitoring prescriptions in line with the conditions criteria for each individual habitat, including associated BNG specific reporting that reflects extreme weather events that impact the ability to attain the proposed final BNG score.</p> <p>It should be noted that there needs to be a clear distinction in the LEMP with regards to habitats created and/or enhanced for BNG and habitats created and/or enhanced for Green Space to avoid stacking.</p>	<p>The Applicant does not agree that the requirement needs further amending to refer to BNG. The delivery of BNG is covered through requirement 29.</p> <p>The Applicant will review requirements 19 and 29 before Deadline 7 and if it considers appropriate, it will incorporate some further drafting to deal with this new request from HBBC.</p> <p>Further, the Applicant does not agree that a distinction between greenspace and other habitat should be made within the LEMP in terms of BNG. The BNG considers all space, formal and informal, from the beginning. There is no guidance to suggest green space cannot count towards BNG, providing it's not being used for another specific land scheme.</p>
2.5.6	<p>Schedule 2, Part 2 – Fees</p> <p>The Applicant has finalised its drafting of these provisions. Could the Local Authorities indicate whether they are content with this. If not, could they please provide alternative drafting, explaining why they consider this should be preferred.</p>	<p>This is a matter which the Council is liaising with Blaby District Council over, recognising that the development of the buildings and freight terminal are within their administrative boundary. The Council understands that Blaby District Council is not content with the current drafting of the fees provisions and HBBC supports their position and proposal that the provisions should follow their suggested amended Northampton Gateway Rail Freight Interchange Order 2019 provision.</p> <p>The Council expects that it will be necessary to agree a post DCO decision PPA with the applicant (if it is approved) to ensure that the Council's costs of discharging requirements is met in full.</p>	<p>The Applicant advised at Deadline 5 that it was considering clarifying the drafting of the fees paragraph and that this will be reflected in its final dDCO to be submitted at Deadline 7. The Applicant maintains that the fees that would be applicable to reserved matters under a TCPA permission are to apply as in other SRFI Orders and this will be made clear in the final DCO.</p>

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It is important to state that this document is in direct response to the deadline 4 changes, amendments and comments received from the applicant. Unless superseded through this document the points within the Landscape Design Review previously carried out by LUC still stand and should be taken into consideration to give a complete picture of the scheme and landscape design in the eyes of national and local policy.

Executive Summary

LUC were appointed by Blaby District Council (BDC) and Hinckley and Bosworth Borough Council (HBBC) in July 2023 to undertake a review of the Landscape Design for the Hinckley National Rail Freight Interchange (HNRFI) Nationally Significant Infrastructure Project (NSIP). Fundamentally the purpose of the review is to establish if the applicant's scheme can be deemed as 'good design' in relation to the national and local planning policy it will be assessed against.

Following review of the further updated Design Code and clarifications relating to the design from the applicant, LUC has concluded that the findings of their original assessment still stand. In their view the proposals fail to deliver an acceptable scheme in landscape design terms when measured against national and local policy and in particular the criteria for good design within the National Design Guide. While there have been improvements to the Design Code in particular, this has primarily involved providing additional detail on the current proposal, rather than addressing the fundamental points on landscape character raised in the original Landscape Design Review. It is noted in a number of places through the Design Code, a reference to future detailed design approvals to resolve design issues has been added. While this may be acceptable for specific plot-by-plot details (building materials, SuDS features, etc.), this would further emphasise the need for a strong Design Code and Landscape Strategy to offer acceptable options and guide the future development applications. This level of detail is currently missing from the Design Code.

Document Ref	Summary of Representation	Applicants Statement	HBBC Response	Applicant's Response
Table 1.1: LUC comment on Applicant response to BDC joint response with HBBC on design matters of the HNRFI DCO Examination (ref. TR05007) issued at Deadline 4 (REP4-133)				
Page 2, section 1	General Design Approach	By necessity for a scheme of this nature, no one discipline has led the design approach per se. A number of different factors have been key at different stages including rail requirements, operational requirements and landscape and ecological factors. A practical approach has been taken that goes beyond the boundaries of the site, recognising that the best practicable environmental option at a district or national level is to maximise the development potential of this site and avoid the potential need for further greenfield site use beyond the well contained boundaries of the current DCO. Therefore, while the traditional aspects of a 'landscape' led approach on a smaller scale mixed use development' are not central to this design, a different set of landscape benefits have been considered and taken into account including creation of 22ha of publicly accessible green space and a well contained scheme which minimises its impact on the wider landscape for the scale of logistics	<p>The updated Design Code does provide additional information on typical landscape proposals within the 'pink' zone indicated on the parameter plan. While it is appreciated that the design needs to be considered in the context of the SRFI scale and practical requirements, a design code should set out the rules that future plot development proposals should adhere to and can be assessed against.</p> <p>The current Design Code does not provide the expected level of detail to do this.</p>	<p>Section 9, and specifically the Design Code (document reference: 13.1B, REP4-093) already sets out over 20 specific codes for the building plots themselves, both in terms of the buildings and their associated infrastructure as well as the landscaping within these plots.</p> <p>At present, the exact layout within the development 'pink' zone is unknown, and therefore defining more exacting codes is not possible, however as part of Requirement 4, that precise level of detail will be provided and can be assessed accordingly.</p>

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		<p>benefits it can deliver. Moreover, it should be noted that green and blue infrastructure account for 28% of the Main HNRFI and A47 Link Corridor area which, at over a quarter of the total area, demonstrates the extent to which landscape and ecology have been a central part of the design development process. Also of note, whilst the parameter plan shows a central development area without green space to avoid creating additional constraints, a significant part of the area will constitute green and blue infrastructure with attenuation basins, structural planting, amenity areas, tree lined streets and green corridors all forming a part of the 'pink' zone'. As many landscape and ecological features have been retained as is possible within the constraints of delivering an SNRFI, to defined parameters within a defined area whilst ensuring the necessary flexibility to ensure the development meets the needs of future occupiers. This is a clear approach which has remained constant throughout the application process. The design needs to be considered in the context of an SRFI and what is realistic for a development of that scale. There is not an option to deliver a smaller scale business park or mixed-use scheme which can readily incorporate most key landscape features and respond to local character in terms of scale.</p>		
<p>Pages 3 & 4, section 2</p>	<p>Loss of existing landscape features/ consideration of landscape character</p>	<p>The local authorities are focussing on the features that are to be removed within the main development site, but it must be noted that the many landscape and ecological features within the DCO boundary are to be retained. For example, of the 872 arboricultural features (individual trees, groups of trees, woodlands and</p>	<p>A clear landscape strategy would help to identify and quantify both landscape elements that require removal and the proposed additions. While the updated Design Code does provide some additional high-level information on typical landscape additions, this is not demonstrated in a structured manner that could be described as a true</p>	<p>As noted in the HBBC Response, existing and proposed vegetation is shown on the Illustrative Landscape Strategy Plan (document reference: 6.3.11.20A, REP4-080). Further detail is provided in the design code with regard to the principles of movement routes, boundaries and SuDs features as well as a clear planting strategy with species lists. In this instance the Design Code (document reference: 13.1B, REP4-093) is arranged by developmental features (i.e A47 Link Road, distributor roads, public access area) within</p>

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		<p>hedgerows) surveyed, 312 are to be lost or partially lost. However, this leaves the majority – 540 features retained within the DCO boundary. As a result of the central nature of the features to be lost, a misconception has developed that the applicant has not respected the existing vegetation and features on site. That is not the case. Whilst the nature of the scheme does require the loss of more features than other types of development, the proposals have retained as many of the existing features as possible. Further, the proposals respect existing vegetation patterns in so far as they replicate the existing vegetation within the local area. For example, wet woodland and grassland alongside stream courses to respect the existing character in lower lying areas within Elmesthorpe Floodplain Landscape Character Area; woodland copses, scrub and meadow grassland to reflect the vegetation in the Country Park; and copses, ponds and hedgerows which are characteristic of the broader countryside of the Aston Flamville Wooded Farmland LCA and Stoney Stanton Rolling Farmland LCA. A summary of proposals that accord with the Landscape Character Area Opportunities and Guidelines is contained below:</p> <p>Provision of 22ha of new accessible green space;</p> <ul style="list-style-type: none"> • New hedge planting which will be managed with traditional 'Midlands-style' hedge laying to improve structure and biodiversity; • Planting trees of appropriate size and species within open ground and hedgerows with opportunity to grow large spreading canopies 	<p>landscape strategy.</p> <p>This should include setting out how the green and blue infrastructure define the development plots along the key movement routes, as shown in principle on the illustrative landscape plan and accompanying section and plan (Fig 18) showing typical details to internal distributor roads.</p>	<p>which the multi-disciplinary elements including landscape are set out. It is an integrated design strategy which covers all of the usual elements within a landscape strategy but in a different format.</p>

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		<p>and be the veteran trees of the future;</p> <ul style="list-style-type: none"> • Planting wet woodlands in lower lying ground to extend this local habitat type; • Establishing a SuDs scheme to manage run-off and any pollutants from the development; • Establishing new areas of meadow grassland; and • Establishing new areas of woodland. 		
Page 4, section 3	Detailed Design Matters	<p>The local authority is looking for more detail and 'certainty' on a number of design matters. As noted above, this will be delivered at the requirements stage but in the meantime, the applicant is conscious that some of the detail that currently exists within the application is spread between documents and may not be fully appreciated by the councils. We have therefore prepared a more comprehensive Landscape Strategy Section within the DAS that pulls all of these strands together for ease of understanding and added some further detail to the Design Code Document that may assist the examining authority.</p>	<p>The effort has been acknowledged. However, the majority of additional information included in the revised Design Code are high level statements taken directly from the Design and Access Statement (DAS). The landscape strategy in the Design Code is primarily high-level statements of landscape intentions, rather than a design code to inform and guide future development plot proposals as to requirements and structure.</p>	<p>The information now portrayed within the Design Code (document reference: 13.1B, REP4-093) sets out a level of detail, that, given the absence of a defined layout at this stage, can be applied and used as an informative, in the determining of future applications made under Requirement 4.</p> <p>The landscape elements of the Design Code are more prescriptive than high level statements. The applicant refers the council to the detailed codes within each section of the document, in particular – Codes 02, 03, 04 and 05 which set out design specifics including for example species selection, verge widths, SuDs feature profiles and boundary treatments.</p>
Page 4,	Remarks on Executive Summary	<p>It is considered unfortunate, that Land Use Consultants Limited still feel that the updated Design Code, statements, and clarifications, put forward in the initial response, have not, in their view, yet been deemed acceptable in landscape design terms based upon their own review of the scheme. It is not the case, that the Applicant has not taken onboard the comments made in the initial review in the manner in which they have been purported to have been made, but</p>	<p>Acknowledgment welcomed.</p> <p>While some limited comments have been taken on board and the Design Code expanded to demonstrate typical landscape typologies, most of the responses are still weak. The overall illustrative landscape proposals remain as previously submitted, with limited additional detail.</p> <p>The specific status of the SRFI is of limited consequence to a landscape</p>	<p>The amended Design Code, submitted at Deadline 4 includes further detail. The landscape elements of the amended Design Code permeate throughout the document and include considerable extra detail across a number of areas. The applicant refers the council to the detailed codes within each section of the document, in particular – Codes 02, 03, 04 and 05 which set out design specifics including for example species selection, verge widths, SuDs feature profiles and boundary treatments.</p> <p>HBBC appears to have overlooked a critical element of landscape assessment in this statement – the susceptibility of the landscape to a particular type of development. The type of development/and or land use is very much a part of</p>

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		moreover the initial response set out to explain how, in the very specific case of an SRFI, the appraisal of the scheme against the ten characteristics of a 'well designed place' is a different process to that, of say, a residential scheme, which, as previously established, the National Design Guide is focused upon. The Applicant is committed to delivering a well-designed scheme, that seeks to respond in a positive manner to the existing landscape context, but it does need to be appreciated, that in the provision of an SRFI scheme, there are limitations, and this is recognised in NPS-NN, paragraph 4.30: <i>'It is acknowledged however that, given the nature of much national infrastructure development, particularly SRFIs, there may be a limit on the extent to which it can contribute to the enhancement of the quality of the area.'</i>	assessment. The landscape assessment uses established design guidance to assess the impacts on the existing landscape, irrespective of proposed land use.	the assessment process and has been included as such in the ES Narrative – for example at paragraph 1.130 of Appendix 11.1 (document reference: 6.2.11.1B, REP4-057).

Table 1.2: LUC design comment on Response on Points raised at Issue specific Hearing 03 – Environmental Matters - November 1, 2023 (REP4-133)

Loss of Veteran Tree Page 1	Points 1 & 2	LUC's commitment to their original standpoint on the Veteran Tree is acknowledged and the NPS-NN requirement fully understood, as is the need to demonstrate that its loss is unavoidable.	Noted	
	Points 3 & 4	Reviews of the previous iterations of the masterplan, place the Veteran Tree in the centre of a parking area or within the estate road, and to retain the tree would not just require a reworking of the plan in a top down two dimensional way, but also require retention and protection of its current natural habitat for a minimum of 15 times the diameter of the tree, including the levels and hydrological conditions to maintain the condition of the tree. This also, only pertains to the final state environment, with	No additional justification for removal provided. The Council stand by LUC's original assessment that the removal of the Veteran Tree on site has not been proven to be unavoidable.	A greater level of detail on this matter has been provided as part of the Deadline 4 responses, and in particular document reference 18.13, REP4-120 Part 1 – BDC Rev 01 and response number 1.

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		<p>further construction and design restrictions going beyond these bounds. It is appreciated that the technical points surrounding the scheme have been understood, but just as important is the understanding that this isn't a scheme where the final detailed design is known, and the masterplans were produced to 'illustratively' show what the development could look like and hence why is a parameter led application. As was stated in the hearing, the retention of the Veteran Tree and further changes in the number and location of plateaus within the development zones would not allow the Applicant to satisfactorily respond to all occupier enquiries in a way that would not affect the operation, functionality, or safety.</p>		
	<p>Point 5</p>	<p>Tree planting details will be provided as part of Requirement 22. The LEMP set out the tree species mixes and management for new planting. As noted in the LEMP and would be usual, woodland mixes will be planted as whips for the greatest chance of sound establishment. The masterplan while illustrative, is guided by the parameter plan which sets the area requirements for landscape proposals. The landscape and visual assessment is based on the mitigation as set out in the parameter plan and detailed in the illustrative landscape strategy. Whilst the exact locations may vary at the detailed stage depending on the configuration of the layout, the overall quantity and nature of planting is required to be broadly as described in the illustrative landscape strategy as that is the embedded mitigation that is relied upon for the assessment and</p>	<p>Additional information provided within the updated Design Code on tree species mixes to specific areas and typologies. However, while some detail on sizing for certain areas (Amenity areas suggest extra heavy standards and semi-mature) additional information on sizing generally would be required to set the ground rules for future development proposals and to close out comment. A succinct tree strategy diagram is required to demonstrate and quantify the different typologies.</p> <p>Noted that detail design deferred to future detail approvals.</p>	<p>The illustrative landscape strategy (document reference: 6.3.11.20A, REP4-080) sets out in plan form where proposed planting types will broadly be located and the amended Design Code, submitted at Deadline 4 sets out clear principles for tree planting in these locations including suggested species mixes, sizes at planting, minimum distances/setbacks for trees within road verges etc.</p>

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<p>Sense of Place Pages 1</p>	<p>Points 6 & 7</p>	<p>the ultimate success of the scheme.</p> <p>The current landscape character has not been disregarded, the Statements of Environmental Opportunity within NCA94 – Leicestershire Vales and the Landscape Guidelines associated with the relevant district Landscape Character Areas have been taken into account in the proposals and a number of aspects incorporated into the planting proposals in particular. However, as is recognised within the NPS-NN 'it may be that countryside locations are required for SRFIs'. (NPS-NN paragraph 2.56) and as previously referenced; <i>'It is acknowledged however that, given the nature of much national infrastructure development, particularly SRFIs, there may be a limit on the extent to which it can contribute to the enhancement of the quality of the area.'</i> (NPS-NN, paragraph 4.30) and it needs to be recognised that an SRFI will be quite distinct from the pattern of nearby villages in terms of scale and design. The proposals that have been put forward, follow a detailed study that was undertaken, to establish the architectural typology within the locality, especially those of comparative use, to ensure that the proposals put forward for HNRFI are of the highest standard and appropriateness. The proposed building design is the result of years of evolutionary development work with the Applicant, that has culminated in a form, design, and application of material, that can respond to the location, environment, constraints, and occupiers' operational requirements in a positive way, as well as providing an aesthetic that can establish and create its own sense of</p>	<p>While it is appreciated that <i>'given the nature of much national infrastructure development, particularly SRFIs, there may be a limit on the extent to which it can contribute to the enhancement of the quality of the area'</i>, this does not justify an identikit approach to development proposals and abandonment of existing landscape character.</p> <p>As commented previously, the scheme will rely heavily on signage and wayfinding, instead of utilising existing landscape features to create an evolving and mutable landscape. Where this is not possible, good design distinctions can be made between routes through locally distinct planting design and style.</p> <p>The Design Code provides the opportunity to set up and define characteristics of the landscape environment and typologies to inform each development plot and future proposals. While progress has been made in explaining some elements and landscape typologies, it is not considered a thorough design code.</p> <p>The Council disagrees with the statement regarding signage <i>'but as with all developments, familiarity for repeat visitors will render this unnecessary'</i>.</p>	<p>As noted previously, the landscape strategy takes many references from the surrounding landscape context, in particular the adjacent Burbage Common and Woods Country Park.</p> <p>A number of different approaches to legibility and wayfinding are set out in the amended Design Code, submitted at Deadline 4. For example, at paragraph 6.4, third bullet it is stated that crossing points on the A47 link road will be highlighted by feature planting and at paragraph 7.3, points 5 and 6 relate to the use of tree species selection as a means of assisting legibility.</p> <p>The amended Design Code, submitted at Deadline 4 includes further detail. The landscape elements of the Design Code permeate throughout the document and include considerable extra detail across a number of areas. The applicant refers the council to the detailed codes within each section of the document, in particular – Codes 02, 03, 04 and 05 which set out design specifics including for example species selection, verge widths, SuDs feature profiles and boundary treatments.</p>

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		<p>place without replicating other surrounding logistic / industrial developments. Whilst the buildings will follow the same aesthetic theme, this does not dictate a monotonous design, the buildings will change in scale, mass and orientation as well as having constant active frontages and key focal points provided by the office locations. In addition, each will be set in their own landscaped environment, and accessed via a seasonally changing avenue and streetscape. By creating a clear distinction between the main HNRFI site and the surrounding publicly accessible areas, it allows for the necessary larger form and scale of buildings to be accommodated in a considered manner, appropriate to their function and operation, alongside the more 'human-scale' components of the development such as the landscaped green corridors of the new bridleway and the extension to Burbage Common and Woods. This simplicity means that visitors to the site can make clear directional choices in terms of either entering the main HNRFI site to their place of work, or along defined routing and pathways laid out for walking, cycling or horse riding. Signage will be provided for information purposes, guidance and safe navigation, but as with all developments, familiarity for repeat visitors will render this unnecessary.</p> <p>Reasoning has already been provided, as to why the veteran tree and other landscape features cannot be retained in order to deliver an SRFI in this location. The illustrative landscape strategy sets out how the creation of new landscaped areas will tie the development into the existing area</p>		

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		with new woodland, scrub and grassland linking to surrounding habitats		
Wayfinding within the development and hierarchy Page 1	Point 8	To clarify, this statement was made in the context of the examples set out within the NDG, which as already stated, is at its core, a document for residential development. The response went on to state how the principal infrastructure proposed for the development does display the characteristics of street hierarchy, and the Design Code (Ref 13.1A) identifies the differences between the A47 Link Road proposals and the internal estate roads. Importantly, it also recognises that these must fundamentally provide appropriate and safe ways and means for access by all means to their destination. It is difficult to see how, when purposefully, the number of access points and nodes along the A47 Link Road are limited, how this can be seen as anything other than making wayfinding as easy as possible for users, and as mentioned above, familiarity for repeat users will render the signage provision unnecessary.	<p>Additional information provided within the Design Code, including additional specific codes relevant to this point for:</p> <ul style="list-style-type: none"> - A47 Link Road - Internal Distributor Roads - Public Realm and Public Rights of Way - Development Plots <p>This provides information on street hierarchy and characteristics, with specific detail on footpath widths, materiality, planting strategy and SuDS. Additional detailed plans and typical sections also assist to illustrate.</p> <p>This additional information provides sufficient detail to satisfy the Council's comment on street hierarchy.</p>	Noted
	Point 9	The detail requested will come forward pursuant to the Requirements, notably Requirement 4 'Detailed Design Approval'	Noted	
	Point 10	See point 8.	Noted	
Use of Materials and Architectural I Style Page 2	No point reference against this heading.	Reference has already been made, and recognised by LUC within their response, as to how the introduction of an SRFI within a countryside setting has its limitations, especially in terms of how it can respond to a local vernacular or context. The suggestions made, and the Applicant understands the thought and reasoning that went into them, were not dismissed out of	No further detail provided in the Design Code. The Council's previous comments that the proposed architectural detailing and style would be foreign within the landscape setting are still relevant. It is the Council's view that diversity between the buildings would help reduce the impact of this large-scale logistic park.	<p>The approach taken by the Applicant to the architectural detailing and style is consistent with the approach taken across many developments of significant scale, where a consistency in design creates a far lesser impact in the environment than one where a myriad of diverse applications draws the eye and highlights and singles the buildings out rather than allowing them to regress.</p> <p>The differentiation in the cladding type is in reference to</p>

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		<p>hand, and due consideration was given to them in the prepared response, and the reasoning why these weren't adopted in this instance explained in detail. The Applicant has confidence in the architectural style and how the palette of materials, and the application of them, that breaks down the mass of the building both horizontally and vertically, provides the best and most appropriate response in this setting, especially when utilised in conjunction with the illustrative landscaping proposals. It is true that AJA Architects have made use of other materials in their designs for other developments, as any Practice would for specific commissions, but not in their work on other SRFI's or large-scale logistics parks, and therefore the comment is misleading in this context. Where appropriate, within the landscape settings and smaller architectural elements, the use of local materials is not dismissed and this can be captured as part of Requirement 4 'Detailed Design Approval'. The use of graduated cladding was not ignored, but its application on large scale distribution units, because of its 'block on block' application draws the eye to the mass of the building in a horizontal way, and the use of colour, whether it be blue as suggested or another, because of the limitations of the colour palettes available always looks foreign in a landscape setting, something that is very evident at the development at Magna Park.</p> <p>Similarly, given the proximity of Magna Park to the site, if HNRFI is to have its own identity, this is something to avoid. The point made on the undulating roofline, was made against</p>	<p>This distinction on use of local materials is not referenced in the Design Code as guidance for consideration. While section 11.4 specific codes – office design refers to 'different cladding types used on office elevations to assist in creating an active and well-designed frontage which is readily distinguished from the rest of the building'; section 11.5 – materials states 'office elevations will use either flat or micro-rib profile panels.</p> <p>Noted that design deferred to Requirement 4 'Detailed Design Approval'. While the detail could follow in future applications, the principles and strategy should be set out within this application.</p>	<p>those used on the main body of the building which is also noted in section 11.5</p>

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		the suggestion that consideration could be given to a continuous parapeted eaves design, and in that context it is a more natural form than a straight line, and far from being monotonous, when applied to buildings of differing scale and form, provides change and interest, whereas buildings with a continuous parapet have a tendency to blur and be read as one mass		
Detail within the Design Code Page 2	Points 11, 12 & 13	The Design Code (Ref 13.1A) has been updated again with greater detail and information and will form part of the Deadline 4 submission documents. It is worth reiterating that the Design Code and Illustrative Masterplan (ref 2.8A) have been submitted having regard to the National Design Guide proportionate to the decision taking for this DCO, and that additional detail will come forward pursuant to Requirements 4 (Detailed Design Approval).	The Council acknowledges the effort put into the Design Code and the progress made. However, elements are largely taken directly from the DAS without introductory text and/or diagrammatic explanation. The Parameters Plan and the Landscape Strategy are still unchanged. Specific notes on Design Code in table below.	Design Code (document reference: 13.1B, REP4-093) provides additional detail considered by the applicant to be appropriate to the outline design stage. The Parameters Plan and Illustrative Landscape strategy describe the development proposals as set out in the DCO application – they form the basis upon which the detailed design will need to be approved.
Table 1.3: LUC design comment on the Applicant's response to LUC Comment on the Applicants amendments to the Design Code (REP4-133)				
Page 4, section 1.3	Point 16	Noted, no further comment.	N/A	
	Point 17	It is submitted, that explanation of how this has been applied has been detailed, not only within the document, but also by the other responses that have been made in the original response at Deadline 2, the ISH and this further response.	Noted	
Pages 5, section 1.5	Point 20	The local authorities are focussing on the features that are to be removed within the main development site but it must be noted that the many landscape and ecological features within the DCO boundary are to be retained. For example, of the 872 arboricultural features (individual trees, groups of trees, woodlands and hedgerows) surveyed, 312 are to be	No change to this section of document. As detailed in previous response, the proposal does not align with core policy due to the removal of existing green infrastructure including watercourse, hedgerows and veteran tree within the primary development zone set by the parameter plan. For this reason, the Council does not agree that the proposal respects existing vegetation	No further comment

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		<p>lost or partially lost. However, this leaves the majority – 540 features retained within the DCO boundary. As a result of the central nature of the features to be lost, a misconception has developed that the applicant has not respected the existing vegetation and features on site. That is not the case. Whilst the nature of the scheme does require the loss of more features than other types of development, the proposals have retained as many of the existing features as possible. Further, the proposals respect existing vegetation patterns in so far as they replicate the existing vegetation within the local area. For example, wet woodland and grassland alongside stream courses to respect the existing character in lower lying areas within Elmesthorpe Floodplain Landscape Character Area; woodland copses, scrub and meadow grassland to reflect the vegetation in the Country Park; and copses, ponds and hedgerows which are characteristic of the broader countryside of the Aston Flamville Wooded Farmland LCA and Stoney Stanton Rolling Farmland LCA.</p>	<p>patterns.</p>	
<p>Pages 5, section 1.6</p>	<p>Points 21, 22, 23, 27, 28, 29</p>	<p>Whilst the nature of the scheme is such that it has not been possible to retain all features of landscape and ecological interest, as the landscape strategy illustrates, many features are being retained and a considerable network of new habitats and landscape features will be created which will provide a richer natural environment in and around the site. There has been no simplification of design proposals, the proposals remain as they were at the application stage and as set out in the illustrative landscape strategy.</p>	<p>The Council's previous comment noted that the simplification of the previously detailed landscape strategy has been carried out to ensure the applicant can meet its own design principles through the proposal although to the detriment of the delivered scheme and the environment it's situated within.</p> <p>The Council would anticipate a design code to set out a series of detailed rules and principles for a development. The current code appears to amount to a series of high-level statements, very few of which have definitive language to guarantee anything or to guide the</p>	<p>The amended Design Code, submitted at Deadline 4 includes further detail. The landscape elements of the Design Code permeate throughout the document and include considerable extra detail across a number of areas. The applicant refers the council to the detailed codes within each section of the document, in particular – Codes 02, 03, 04 and 05 which set out design specifics including for example species selection, verge widths, SuDs feature profiles and boundary treatments.</p> <p>The DCO Requirements ensure that detailed design matters will be fully considered at the appropriate time.</p>

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			<p>future detailed development.</p> <p>While it is acknowledged that the revised Design Code document does start to set up rules for the different boundary and streetscape typologies within the active 'pink' zone, the detail is light, and language is not definitive beyond meeting standards.</p> <p>This fundamentally conflicts with the applicant's statement that 'the illustrative landscape strategy has been developed iteratively to maximise the potential for betterment at the site'.</p>	
<p>Page 12, section 3.1</p>	<p>Point 32</p>	<p>The point made previously, was that the parameters plan did not seem to show the same evolutionary process as the illustrative masterplan did, however this is not the case, and the Parameters Plan did indeed keep in step with the evolution of scheme.</p>	<p>No change to document wording – the point previously raised that despite comments outlined in the original LUC design report regarding character, scale, impact on nature and the locality (also raised independently by other parties during consultation), the scheme doesn't appear to have taken these comments into consideration.</p>	<p>No further comments</p>
<p>Page 14, section 4.1</p>	<p>Point 33 & 36</p>	<p>An SRFI requires a uniformity within which the Railport, serving infrastructure and development plots can be laid out within.</p> <p>Notwithstanding the larger scale that an SRFI dictates, and as was noted at the ISH, only smaller, non-rail served developments, could seek to achieve this.</p> <p>This point is not correct, and none of the previous iterations of the masterplan retained the veteran tree.</p>	<p>Noted</p> <p>Noted</p>	
	<p>Point 37.</p>	<p>As has been previously stated, multiple plateaus, when the detail of the development is not yet known, would not allow the Applicant to satisfactorily respond to all occupier enquiries in a way that would not</p>	<p>Noted, but this is not a concern of landscape assessment.</p>	<p>No further comments</p>

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		affect the operation, functionality, or safety.		
Page 20, section 5.2	Point 41	Applications to achieve a BREEAM Excellent rating, will be made, specific to the individual developments, as this is how the process is designed to be, with the rating being attributable to a specific building. The detail of any application will be subject to the characteristics of that development, but will, where appropriate, make reference to elements outside of the individual developments demise, e.g. the provision of bus facilities. The Design Code will be reviewed to provide greater clarity.	<p>Minor amendment to document to describe commitment to permeable paving within parking areas and footpaths. However, no firm commitment to proportion. No additional details provided on existing landscape and ecology matters. Previous comments remain.</p> <p>Further detail required on how the development will achieve Ecology and Land use credits to achieve BREEAM Excellent.</p>	No further comments
	Point 42	The landscape proposals as set out within the illustrative scheme are subject to the rigour of the biodiversity net gain process which has ensured that all opportunities to maximise biodiversity within the DCO boundary have been explored alongside the natural landscape design development process of seeking to introduce and enhance characteristic landscape features within the local landscape.	The Council would disagree that all opportunities to maximise biodiversity with the DCO boundary have been explored. As highlighted previously, existing landscape features within the development zone have been disregarded to maximise opportunities for development plots.	The fundamental point of the development is to deliver a fully functioning rail freight interchange, using land in the most efficient manner. The applicant has explained the rationale for the design approach, which is considered to be the best and most practicable option given the constraints of the site. As noted before, existing landscape features have not been disregarded but the positive aspects of retention, given lack of connectivity, outweigh the benefits of a more efficient development proposal. In this instance, offsite biodiversity enhancements are considered to be much more meaningful in terms of the landscape as a whole.
Page 25, section 6.3.1	Points 46 & 47	The local authorities are focussing on the features that are to be removed within the main development site, but it must be noted that the many landscape and ecological features within the DCO boundary are to be retained. For example, of the 872 arboricultural features (individual trees, groups of trees, woodlands and hedgerows) surveyed, 312 are to be lost or partially lost. However, this leaves the majority – 540 features retained within the DCO boundary. As a result of the central nature of the features to be lost, a misconception has developed that the applicant has	<p>No further commitment or detail provided in the updated Design Code on the retention of key ecology and habitat.</p> <p>As commented previously the Council would urge the applicant to explore ways in which to retain valuable site assets within the primary development zone. This aligning with policy and generally master planning best practice.</p>	No further comments

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		<p>not respected the existing vegetation and features on site. That is not the case. Whilst the nature of the scheme does require the loss of more features than other types of development, the proposals have retained as many of the existing features as possible. Further, the proposals respect existing vegetation patterns in so far as they replicate the existing vegetation within the local area. For example, wet woodland and grassland alongside stream courses to respect the existing character in lower lying areas within Elmesthorpe Floodplain Landscape Character Area; woodland copses, scrub and meadow grassland to reflect the vegetation in the Country Park; and copses, ponds and hedgerows which are characteristic of the broader countryside of the Aston Flamville Wooded Farmland LCA and Stoney Stanton Rolling Farmland LCA.</p>		
	Point 48	<p>As many landscape and ecological features have been retained as is possible within the constraints of delivering an SNRFI, to defined parameters within a defined area whilst ensuring the necessary flexibility to ensure the development meets the needs of future occupiers. This is a clear approach which has remained constant throughout the application process.</p>	<p>As the applicant states, the approach to flexibility of development over retention of existing landscape and ecological features has remained constant throughout and has not considered the Council's previous comments to align the scheme with policy and best guidance.</p> <p>As commented previously the Council would urge the applicant to explore ways in which to retain valuable site assets within the primary development zone. This aligning with policy and generally master planning best practice.</p>	No further comments
Page 25, section 6.3.2	Point 60	Noted, no further comment.	N/A	
	Point 61	Further details are provided in the updated DAS /Design Code	<p>Updated DAS & Design Codes acknowledged.</p> <p>Further detail provided across the Design</p>	Noted

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			Code including typical sections and plans, providing high level guidance on spatial requirements to landscape features and typologies. While the description is relatively generic and high level for a design document such as this, they do provide a level of reference to develop and assess future landscape proposals.	
	Point 62	The point is noted, but this needs to be reviewed in the context of an SRFI and what is realistic for a development of that scale. There is not an option to deliver a small-scale business park or mixed-use scheme which can readily incorporate most key landscape features and respond to local character in terms of scale.	While the point is noted, the scale of a development should not override matters of landscape character. The Council's position remains unchanged. The landscape character and sense of place would be further strengthened if the existing green infrastructure could be better retained and enhanced.	No further comments
	Point 63	The A47 link lies to the north of the Country Park and does not sever it. The option remains to increase the verge between the carriageway and the footway and provide increased segregation at the detailed design stage.	No further comment to add.	
	Point 64	To be checked with BWB.	Noted. Additional detailed text provided to confirm segregation, however graphic section shows conflicting information with combined cycle/footway.	It is not clear what conflicting information is being referred to here. The Design Code (document reference: 13.1B, REP4-093) allows for two options – combined footpath/cycleways of 3m and separated footpaths of 2m and cycleways of 3m on opposite sides of the internal roads to be agreed at the detailed design stage.
	No specific point reference, but taken from note 67	The local authority appears to misunderstand the application when making these comments. The applicant is bound by the parameters plan, the proposals as set out in the illustrated landscape strategy, the embedded mitigation, the biodiversity net gain requirements, and all of the requirements of the DCO. The changes to the wording of the design code submitted at Deadline 2 have been taken out of context and not in the	On review of the landscape strategy, the Council does not consider that this sets out a clear, concise strategy for landscape elements. A simple series of diagrams would help to illustrate how the various strands of landscape and ecology fit together with the functional requirements of the application. In the Council's view this should be	The applicant submitted an updated Design Code at Deadline 4 which contains considerable extra detail in relation to the Landscape Strategy. The applicant refers the council to the detailed codes within each section of the document, in particular – Codes 02, 03, 04 and 05 which set out design specifics including for example species selection, verge widths, SuDs feature profiles and boundary treatments.

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		<p>spirit of which they were intended. The approach to the application remains the same. For the avoidance of doubt a landscape strategy document has been prepared which draws together all of the key landscape information in one place to ensure all aspects of the landscape character approach, landscape features retention, landscape proposals and management approach is fully understood.</p>	<p>provided as part of the current documentation to set clearly the outline the framework for green and blue infrastructure.</p>	
	<p>No specific point reference, but taken from note 71.</p>	<p>The well-being areas are captured within the design code (section 12.11), and the precise detail would be part of the Requirement 4 (Detailed Design Approval). The statement is correct in that the public routing, for those that are not visitors or employees of the main HNRFI, is not along the internal estate roads, and this is clear from both the illustrative masterplan, parameters plan, and PROW plans, with the routing being set out around the main development area. However, use of the footpaths and cycleways within the main development area is not precluded by the public should they so wish to use them.</p>	<p>Reference is made throughout the revised Design Code, deferring most of the landscape design to detailed design approvals as per DCO Requirements. This confuses the purpose of a Design Code as the guidance and rules are designed to guide future detail of the development. While the detail could follow in future submissions, the principles and strategy should be set out within the current documentation.</p> <p>Descriptions of the different spaces are limited and would benefit from explanatory text/diagrams and location plans.</p>	<p>The applicant submitted an updated Design Code at Deadline 4 which contains considerable extra detail in relation to the Landscape Strategy. The applicant refers the council to the detailed codes within each section of the document, in particular – Codes 02, 03, 04 and 05 which set out design specifics including for example species selection, verge widths, SuDs feature profiles and boundary treatments.</p> <p>The DCO Requirements ensure that detailed design matters will be fully considered at the appropriate time.</p>
	<p>No specific point reference, but taken from note 73.</p>	<p>As above, the changes to the wording of the design code submitted at Deadline 2 have been taken out of context and not in the spirit of which they were intended. The approach to the application remains the same. For the avoidance of doubt a landscape strategy document has been prepared which draws together all of the key landscape information in one place to ensure all aspects of the landscape character approach, landscape features retention, landscape proposals and management approach is fully understood.</p>	<p>On review of the landscape strategy, the Council does not consider that this sets out a clear, concise strategy for landscape elements.</p> <p>A simple series of diagrams would help to illustrate how the various strands of landscape and ecology fit together with the functional requirements of the application. In the Council's view this should be provided as part of the current documentation to set clearly the outline the framework for green and blue infrastructure.</p>	<p>The applicant submitted an updated Design Code at Deadline 4 which contains considerable extra detail in relation to the Landscape Strategy. The applicant refers the council to the detailed codes within each section of the document, in particular – Codes 02, 03, 04 and 05 which set out design specifics including for example species selection, verge widths, SuDs feature profiles and boundary treatments.</p>

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	No specific point reference, but taken from note 75.	It will be the local authorities who discharge the requirements of the DCO and will therefore be in a position to ensure adequate and expected details appear within the detailed landscape scheme in broad accordance with the illustrative scheme which formed the basis of the assessment. Species mixes are detailed in the LEMP and DAS submitted with the application.	Reference is made throughout the revised Design Code, deferring the majority of landscape design to detailed design approvals as per DCO Requirements. This confuses the purpose of a Design Code as the guidance and rules are designed to guide future detail of the development. While the detail could follow in future submissions, the principles and strategy should be set out within the current documentation.	The applicant submitted an updated Design Code at Deadline 4 which contains considerable extra detail in relation to the Landscape Strategy. The applicant refers the council to the detailed codes within each section of the document, in particular – Codes 02, 03, 04 and 05 which set out design specifics including for example species selection, verge widths, SuDs feature profiles and boundary treatments. The DCO Requirements ensure that detailed design matters will be fully considered at the appropriate time.
Page 34, section 8.5	No specific point reference, but taken from note 77.	There is a clear PRoW Strategy that has been discussed and agreed with the councils and there is no apparent confusion beyond the wording of this design response document. Permissive footpath and cycle routes offer direct access through the development for those who desire it, noting this will require multiple road crossings. A new offroad bridleway is proposed around the perimeter of the site within a broad green corridor with one signalised road crossing.	No further comment to add.	
	No specific point reference, but taken from note 80.	Text changes have been taken out of context, noting the species mix lists are within the LEMP and DAS and incorporate a variety of species of local importance and landscape character is promoted through a range of different proposals including <ul style="list-style-type: none"> • Provision of new accessible green space; • New hedge planting which will be managed with traditional 'Midlands style' hedge laying to improve structure and biodiversity; • Planting trees of appropriate size and species within open ground and hedgerows with opportunity to grow large 	The additional detail, description and typical plans/sections within the Design Code do assist with understanding the proposals and setting some rules for future development applications. Reference is made throughout the revised Design Code, deferring the majority of landscape design to detailed design approvals as per DCO Requirements. While the detail could follow in future submissions, the principles and strategy should be set out within the current documentation.	The applicant submitted an updated Design Code at Deadline 4 which contains considerable extra detail in relation to the Landscape Strategy. The applicant refers the council to the detailed codes within each section of the document, in particular – Codes 02, 03, 04 and 05 which set out design specifics including for example species selection, verge widths, SuDs feature profiles and boundary treatments.

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		<p>spreading canopies and be the veteran trees of the future;</p> <ul style="list-style-type: none"> Planting wet woodlands in lower lying ground to extend this local habitat type; Establishing a SuDs scheme to manage run-off and any pollutants from the development; Establishing new areas of meadow grassland; and Establishing new areas of woodland. 		
	No specific point reference, but taken from note 83.	This comment has been addressed in the previous notes under the heading of Use of Material and Architectural Style.	Point noted. No amendment or additional information provided within to Design Code	
Page 45, section 11.6	No specific point reference, but taken from note 85.	It is not a case of strengthening the Tritax brand, but moreover, that the Applicant has developed a form that meets the needs, and can be adapted to suit the widest range of occupiers, a material application that works well in breaking up the visual mass and scale of the buildings, and through the use of a range of monotone hues, works far better as a backdrop to a considered landscaping scheme than an introduction of colours, that in reality to align to the natural environment.	<p>No amendment to Design Code.</p> <p>While utilising the Tritax brand colours is not an issue in itself, as per the Council's previous comment, the Council would advise such an intention at this scale is inappropriate with respect to impact on the surrounding area and is not in line with local or national policy. Based on the submitted sections and visualisations it certainly will not create a subtle appearance as described by the applicant.</p>	No further comments
Table 1.4: LUC comments on Applicant's response to LUC Comment on the Applicants response to Local Impact Report – LUC's Landscape Design Review (REP4-133)				
Page 1, point 3 Intro remarks - consultation	Point 89	The points are noted, however the response was to merely note that the detail contained within the review couldn't be appraised or assimilated prior to its issue.	Noted	
	Point 90	The note is not an acceptance of deficiencies, but an observation on timing and how the application couldn't address the detailed points	No comment to add	

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		prior to its issue.		
Page 2, point 6 Landscape Vision	Points 93,94 and 95	It is accepted that the changes incorporated into the Design Code at Deadline 2 introduced a number of inconsistencies and misunderstandings. All documents have now been subject to a full review and wordings updated to reflect the applicants clear position with regard to design which has not changed.	Design Code and DAS documents have been updated and the logic is clearer. The additional detail, description and typical plans/sections within the Design Code do assist with understanding the proposals and setting some basic rules for future development applications. However, as the applicant states, their position on design has not changed. This has not addressed the fundamental issues of scale and character raised in the previous landscape design reviews and the Council still considers the overall landscape design to be of poor quality.	No further comments
Page 2, point 7 Good Design	Point 100	By way of clarification, is the note stating they believe that the NPS or NDG should carry the greater weighting? By way of confirmation, the Applicant isn't applying a greater or lesser degree of importance on either document, and that it believes that the application addresses both in an appropriate way.	This note was not stating a greater weighting for either document, as they should be read in tandem.	
Page 3, point 12 Design Detail	Point 105	Agreed.	N/A	
	Point 106	Agreed, and it is submitted, that in the context of the application for an SRFI and the absence of a known detail, that it provides this.	Noted	
	Point 107	It is clear from the council's commentary that they do not fully understand or appreciate the landscape and green infrastructure proposals that form a part of the application. That may be a result of information being split across a number of documents – the Landscape ES Chapter including Appendices noting in particular the Baseline Assessment and Arboricultural Impact Assessment, Illustrative Landscape Strategy, Design and Access Statement, Design Code	The Landscape Strategy section added to the Design Code is acknowledged and does assist with review of the landscape and green infrastructure by specific area – albeit illustratively. The additional detail, description and typical plans/sections within the Design Code do assist with understanding the proposals and setting some rules for future development. However, a coherent overarching	The existing and proposed vegetation types are clearly set out in the Illustrative Landscape Strategy (document reference: 6.3.11.20A, REP4-080) which shows how the various elements of the landscape link together across the masterplan.

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		and LEMP. To address this, an updated Landscape Strategy Section has been included in the DAS which draws all of the relevant aspects together in one place.	landscape strategy should be provided to demonstrate how the various strands of landscape link together across the masterplan site.	
Page 3, point 16 Functionality	Points 111, 112 and 113	This isn't a case of semantics, but that the use of function or functionality is applied as a negative connotation in the review of the scheme, and that it shouldn't be seen as one of the key drivers for the basis of the development. It is agreed, that function should not be prioritised to the detriment of all other considerations, but it is a fundamental consideration in the planning of an SRFI.	Noted. No additional detail relative to landscape assessment provided.	
Page 4, point 20 Characteristics	Points 111, 112 and 113	This isn't a case of semantics, but that the use of function or functionality is applied as a negative connotation in the review of the scheme, and that it shouldn't be seen as one of the key drivers for the basis of the development. It is agreed, that function should not be prioritised to the detriment of all other considerations, but it is a fundamental consideration in the planning of an SRFI.	Noted. No additional detail relative to landscape assessment provided.	
	Points 117	The point misleads, as the Applicant doesn't state that it isn't successfully integrated, rather that because of its countryside location, it will be distinct from the neighbouring villages, by reason of it being an SRFI and capturing the characteristics of village design within it aren't appropriate.	Noted	
	Point 118	The scale of the development zone is proportional to delivering a successful SRFI in this location	Noted	
	Point 119	The point has already been made in that for smaller developments and non- rail related schemes, it is possible	Noted. No additional detail provided. The Council maintains its previously stated view that working with the existing grain	No further comments

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		to respond to the existing grain of the landscape, but not in the case of an SRFI, which requires the larger development plateaus for safe, functional, operational purposes.	of the landscape may have been more appropriate.	
	Point 120	Where appropriate, within the landscape settings and smaller architectural elements, the use of local materials is not dismissed and this can be captured as part of Requirement 4 'Detailed Design Approval'.	Noted. No additional detail provided in Design Code as guidance. While it would be appropriate for detail design to be determined at a future application, reference should be made within the Design Code to local material options and strategy to assist future development design and approvals.	At this stage, it is not known what smaller elements, if any, will be required as part of the detailed development, and therefore, the most appropriate local materials for these components can similarly not be defined. However, Requirement 4 provides the appropriate opportunity to do so.
Page 4, point 22 Parameter Plan Preparation	Point 123	See point 118 and 119 above	N/A	
	Point 124	The scheme has been developed by a full team of professionals, experienced in developing schemes of this type throughout the UK, and is not the result of a single imposed vision.	Noted	
	Point 125	By necessity for a scheme of this nature, no one discipline has led the design approach per se. A number of different factors have been key at different stages including rail requirements, operational requirements and landscape and ecological factors. A practical approach has been taken that goes beyond the boundaries of the site, recognising that the best practicable environmental option at a district or national level is to maximise the development potential of this site and avoid the potential need for further greenfield site use beyond the well contained boundaries of the current DCO. Therefore, while the traditional aspects of a 'landscape' led approach on a smaller scale mixed use development' are not central to this design, a different set of landscape benefits have been considered and	As previously stated the primary development zone within the parameter plan appears disproportionate to the site, which puts pressure on the resultant design and leads to inadequate opportunities for mitigation of the scheme. The scale of the development should not be a reason to discount a landscape led or hybrid approach. In fact, such is the regional importance and potential impact for such a sensitive site that this would have benefitted the masterplan and result in a proposal that is more sensitive to its environment and assist in meeting key aspects of environmental policy. While it is acknowledged there is a quantity of landscape benefits and publicly accessible greenspace to the	No further comments

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		<p>taken into account including creation of 22ha of publicly accessible green space and a well contained scheme which minimises its impact on the wider landscape for the scale of logistics benefits it can deliver. Moreover, it should be noted that green and blue infrastructure account for 28% of the Main HNRFI and A47 Link Corridor area which, at over a quarter of the total area, demonstrates the extent to which landscape and ecology have been a central part of the design development process. Also of note, whilst the parameter plan shows a central development area without green space to avoid creating additional constraints, a significant part of the area will constitute green and blue infrastructure with attenuation basins, structural planting, amenity areas, tree lined streets and green corridors all forming a part of the 'pink' zone'.</p>	<p>periphery, this does not address the fundamental issues of scale and loss of existing landscape to the central development zone.</p> <p>To assist in demonstrating the green and blue infrastructure, structural planting, amenity areas, tree lined streets and green corridors described in the applicant's response and sporadically through the Design Code, the Council would suggest producing a series of clear landscape strategy diagrams to demonstrate how these elements/strands fit together in the landscape masterplan</p>	
<p>Page 4, point 24 Landscape Design Review</p>	<p>Point 128</p>	<p>Not sure how the statement misleads when it just confirms that the Landscape Design Review comments have been responded to and in what way.</p>	<p>No comment to add</p>	
	<p>Point 129</p>	<p>To confirm, all of the points were addressed in the initial response, and changes made in line with the response.</p>	<p>As noted previously, this statement is misleading.</p> <p>The majority of points raised within the Landscape Design Review have not been addressed and the scheme appears to remain largely unchanged. While limited additional detail has been provided on specific issues (street hierarchy and tree planting, as examples), the fundamental issues raised on scale of development, existing landscape features and character have not been addressed.</p>	<p>No further comments</p>

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Page 5, 1.2 core documents Design Code	Point 132	Noted.	N/A	
	Point 133	The response went into detail to explain, how, the proposals, in the context of an SRFI, has addressed the 10 characteristics of a well-designed place	Noted	
Page 6, 2.2 Identity	Point 137	Agreed	N/A	
	Point 138	See responses above relating to species and landscape character.	N/A	
Page 7, 2.3 built form Wayfinding & Sense of Place	Point 141	It is correct that the development will create its own sense of place, as this is inherent in the creation of a new SRFI in this location. It is not the case however, that the current and neighbouring characters have been disregarded, merely that replication of such character within the main HNRFI site is not appropriate to a well-designed scheme of this type.	No additional justification or change to design proposals within Design Code. As noted previously, the applicant states the development proposes to create its own sense of place, but little detail is provided on how this will be achieved without disregarding the current and neighboring characters.	No further comment
	Point 142	Clarification is sought on why it is believed that this goes against guidance, so that an appropriate response can be provided.	As noted in the Landscape Design Review, draft NPS (4.24) states development should; <i>'make a positive contribution to local landscapes within and beyond the project boundary.'</i> From a landscape perspective, the Council cannot agree that this proposal meets this criteria due to negative impacts on the surrounding local landscapes, both physically and visually.	No further comment
	Point 143	By creating a clear distinction between the main HNRFI site and the surrounding publicly accessible areas, it allows for the necessary larger form and scale of buildings to be accommodated in a considered manner, appropriate to their function and operation, alongside the more 'human-scale' components of the development such as the landscaped green corridors of the new bridleway and the extension to Burbage Common and Woods. This simplicity means that visitors to the site can	Additional information provided within the Design Code, including additional specific codes relevant to this point for: <ul style="list-style-type: none"> - A47 Link Road - Internal Distributor Roads - Public Realm and Public Rights of Way - Development Plots This provides information on street hierarchy and characteristics, with specific detail on footpath widths, materiality, planting strategy and SuDS. Additional detail plans and typical sections also assist to illustrate. This	Noted

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		<p>make clear directional choices in terms of either entering the main HNRFI site to their place of work, or along defined routing and pathways laid out for walking, cycling or horse riding.</p> <p>Signage will be provided for information purposes, guidance and safe navigation, but as with all new developments, familiarity for repeat visitors will render this unnecessary.</p>	<p>additional information provides sufficient detail to satisfy our comment on street hierarchy.</p>	
	Point 144	<p>Many of the landscape features are being retained and new planting is designed to respond to local character. The nature of the development is such that a new 'sense of place' will be established which will draw on larger scale features such as woodlands, ponds and meadows.</p>	<p>Noted. No change to design proposals or justifications.</p> <p>The Council's previous comment remains valid – retention of some of the landscape features such as the veteran tree, existing hedgerows or brook are opportunities missed to give the development a strong sense of place that is connected to the current environment.</p>	No further comment
Page 8 section 2.3 Hierarchy	Point 147	<p>This point has been addressed in our previous note on response on Points 8 and 9.</p>	Noted	
	Points 148, 149, 150, 151	<p>These points have all been addressed in our previous response on Points 8 and 9.</p>	Noted	
Page 8 section 2.3 Relationship	Point 158	Noted.	N/A	
	Point 159	<p>The applicant does not consider the planting scheme to be inadequate. Yes, there are some significant visual impacts but that is to be expected for a scheme of this nature. Notably they are contained within 1km of the site and the effects are relatively well contained.</p>	<p>No change to design proposals or justifications.</p> <p>The Council maintains its comment that the areas set aside to buffer this development dictated by the parameter plan are severely inadequate leading to the significant visual impact to the surrounding receptors that has been found to be a matter agreed on by both parties.</p>	No further comment
Page 13, section 2.8 New Buildings	Point 187	<p>Where appropriate, within the landscape settings and smaller architectural elements, the use of local materials is not dismissed and this can be captured as part of</p>	<p>No further detail provided in the Design Code.</p> <p>This distinction is not referenced in the Design Code as guidance for consideration. While section 11.4 specific</p>	No further comment

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Document Ref	Summary of Representation	Applicants Statement	HBBC Response	Applicant's Response
		Requirement 4 'Detailed Design Approval'	codes – office design refers to 'different cladding types used on office elevations to assist in creating an active and well-designed frontage which is readily distinguished from the rest of the building'; section 11.5 – materials states 'office elevations will use either flat or micro-rib profile panels.	
	Points 188 & 189	It is not a case of imposing the Tritax brand, but moreover, that the Applicant has developed a form that meets the needs, and can be adapted to suit the widest range of occupiers, a material application that works well in breaking up the visual mass and scale of the buildings, and through the use of a range of monotone hues, works far better as a backdrop to a considered landscaping scheme than an introduction of colours, that in reality to align to the natural environment.	No change to design proposals or justifications. Previous comment remains valid - a more sensitive approach would be more aligned with national policy and lead to a better development more integrated into its local context.	No further comment
Page 14, section 2.9 Adaptability	Point 193	It is submitted, that in the context of the application for an SRFI and the absence of a known detail, that the level of detail provides sufficient information to inform and guide future submissions pursuant to Requirement 4 (Detailed Design Approval.)	Noted	
	Point 194	This point has been addressed in our previous note on response on Point 118.	Noted	
Page 15. Section 2.9 Materiality	Point 197	The SuDS and overall drainage strategy is a holistic site wide consideration, and it is only the detail of how it will be applied that will be undertaken on a plot by plot basis.	<p>Holistic method requires site-wide strategy which suggests an opposite approach than plot-by-plot basis described.</p> <p>A diagram to demonstrate the SuDS strategy, and referencing the Concept Drainage Strategy Plan would help to explain the proposals and SuDS interconnections with the wider landscape. This should be provided as part</p>	The reference to plot by plot, refers to how specific detail will be provided as part of the Requirement 4 submissions, when the detail of each layout can be worked up in conjunction with an appropriate SuDs solution. Given the detail is not yet known, capture within the Design Code as specific codes is not possible, however further information on the approach and strategy on SuDs has been provided within the Sustainable Drainage Statement (document reference: 6.2.14.2B, REP4-071) Appendix 14.2

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	Point 198	Reference to the provision of a SUDS compliant drainage scheme has been made within the Design Code within Section 5 – Sustainability.	Limited reference in Design Code to what SuDS elements would be employed and how they would function as a complete system. Refer to note above.	Given the detail is not yet known, capture within the Design Code as specific codes is not possible at this stage, however further information on the approach and strategy on SuDs has been provided within the Sustainable Drainage Statement (document reference: 6.2.14.2B, REP4-071) Appendix 14.2
Page 19, section 3.12 Materials	Point 201	Agreed	N/A	
	Point 202	<p>By creating a clear distinction between the main HNRFI site and the surrounding publicly accessible areas, it allows for the necessary larger form and scale of buildings to be accommodated in a considered manner, appropriate to their function and operation, alongside the more 'human-scale' components of the development such as the landscaped green corridors of the new bridleway and the extension to Burbage Common and Woods.</p> <p>Whilst the buildings will follow the same aesthetic theme, this does not dictate a monotonous design, the buildings will change in scale, mass and orientation as well as having constant active frontages and key focal points provided by the office locations. In addition, each will be set in their own landscaped environment, and accessed via a seasonally changing avenue and streetscape. This simplicity means that visitors to the site can make clear directional choices in terms of either entering the main HNRFI site to their place of work, or along defined routing and pathways laid out for walking, cycling or horse riding. Signage will be provided for information purposes, guidance and safe navigation, but as with all developments, familiarity for repeat visitors will render this unnecessary.</p>	<p>Relating specifically to building materials (as per the origin of this comment), while it is appreciated that <i>'given the nature of much national infrastructure development, particularly SRFIs, there may be a limit on the extent to which it can contribute to the enhancement of the quality of the area'</i>, this does not justify an identikit approach to development proposals and abandonment of existing landscape character.</p> <p>As commented previously, due to the consistent approach described within the development itself it will not be distinct at the 'human scale' and will likely appear monotonous. This does not align with good design or encourage natural wayfinding and will rely heavily on signage.</p>	No further comments

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<p>Pages 20, 21 & 22 Approach – Veteran Tree Removal</p>	<p>Points 207 & 208</p>	<p>To reiterate the previous response in respect of the loss of the veteran tree in this response: <i>'The HNRFI proposal, and the Parameters Plan that has been prepared, have defined the vertical parameters of the scheme based upon an engineering review and design that started with the rail element of the works and the connection to the existing Felixstowe to Nuneaton line. This has the least flexibility in terms of its vertical alignment and geometry, and therefore defined the levels for the Railport and the development sites where a direct rail connection can be attained. Once this parameter was set, the neighbouring areas then had to relate to these levels, and work with them in a complimentary manner in all three dimensions. The engineering design for the site, also took into account the need to tie into the existing levels around the perimeter of the site; have a scheme that worked on creating a cut/fill balance for the earthworks to avoid the need to remove material from site, whilst creating development plateaus that provide flexibility in the ultimate position of the boundaries of the individual development plots, and the location of the infrastructure that serves them. Also, and using the 'Rochdale Envelope' as a guide for the Parameters Plan given that all the details of the development are not yet confirmed, limits of deviation have also been set out within it, to allow for the movement of specific parameters to provide the required flexibility when responding to individual occupier enquiries. Within smaller scale developments, where smaller, non-rail connected, buildings are more</i></p>	<p>Noted – no change to proposals or justification from a landscape perspective. The Council stands by LUC's original assessment that the removal of the Veteran Tree on site has not been proven to be unavoidable. The NPS NN states: <i>Aged or veteran trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals, the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons for this.'</i></p>	<p>A greater level of detail on this matter has been provided as part of the Deadline 4 responses, and in particular document reference 18.13, REP4-120 Part 1 – BDC Rev 01 and response number 1.</p>

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		<p><i>appropriate, there is a greater ability to respond to the existing site levels. However, the requirements of an SRFI, with the provision of a rail terminal and larger building footprints, mean that significant level changes within the terminal itself or the buildings and their plots is not acceptable in order for them to operate effectively. Therefore, Veteran Tree (T486) cannot be retained in its current location, and its loss is unavoidable if TSH is to deliver an SRFI scheme based upon the Parameters Plan, with the engineering of the site levels and the flexibility required within the development plateaus that has informed it. The dead wood from the felling of veteran T486 will be placed in the natural areas to benefit wildlife.</i></p> <p><i>Replacement woodland and tree planting across the development including large trees. The proposed mitigation strategy would provide significant additional tree planting, including approximately 20,000 new trees within woodland areas and approximately 600 individual trees as street trees and in amenity areas, as depicted in the Illustrative Landscape Strategy (document reference 6.3.11.20). The trees, including some large trees, will provide structure for the development; create habitat connectivity to provide amenity and microclimatic benefits and ensure succession to the existing tree stock. The new planting has potential for longevity within the landscape and will enhance the species diversity of the site, whilst also contributing to the Green Infrastructure for the area.'</i></p> <p>In addition, responses provided within this document, go further in explaining</p>		

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		how its loss is unavoidable in the provision of an SRFI in this location.		
	Points 209, 210 & 211	See points 207 and 208 above.	Noted	
	Point 212	Repeat of point above – tree size will be determined at the discharge of requirements with variations in size depending on type and timing of planting and location.	Noted	
Page 22, section 3.2 Assessment of Good Design	Point 216	LUC's position on this point is noted, however the Applicant still submits that this assessment doesn't take the value of the function and operation of an SRFI fully into account	Noted. The value of function and operation of the SRFI are not a matter of consideration for landscape assessment. The landscape assessment purely considers planning policy guidance.	

REP4 - 121 – Response to deadline 3 submission (part 2 HBBC)		
Point 21 – Health	<p>This point has been agreed in the latest SoCG. However, in respect of 7.1. Improved Mental Health: consideration is only given to the provision of net additional long-term employment and the working environment for employees. It does not consider the impacts associated with noise, vibration and landscape and visual effects which are all known to affect mental health.</p>	<p>Noted, this point is now agreed by all parties.</p> <p>Regarding the residual clarification in respect of point 7.1 (item number 21 of the Deadline 3 Submission (document reference: 18.13, REP4-121). The reason the original response does not consider mental health “impacts”, is because the original question and subsequent answers were not requested or framed to do so.</p> <p>To clarify, the original question was a concern that the Leicestershire Joint Health and Wellbeing Strategy (HWBS) was not specifically referenced, and that local burdens of poor health and relative sensitivity were therefore not considered appropriately. As noted, it is now agreed that they were.</p> <p>Key Priority 7.1 of the HWBS was raised as an example of where the project was supportive of the HWBS, where income and employment are key determinants of health, where socio-economic deprivation is closely linked to higher burdens of poor physical, social and “mental health”. That is why the creation of significant income and employment opportunities is supportive of “Improved Mental Health”, and why it was stated in the original response that:</p> <p><i>“the proposed Development does not materially impact or hinder the delivery of the strategic objectives in the JHWS, quite the opposite. It supports the development and retention of local employment, increases regional logistics capabilities and builds economic resilience, key to addressing existing socio-economic inequality, and associated burdens of poor health”</i></p>
Point 23 - Health	<p>Further clarification is required as to how good quality open space will be achieved. The LEMP document describes habitat creation/enhancement and does not provide an understanding of how the open spaces will be accessed by the public and well maintained.</p>	<p>The updated LEMP (document reference: 17.2B) and Illustrative Landscape Strategy (document reference: 6.3.11.20A, REP4-080) submitted at Deadline 4 detail the public access paths to be provided within the public open space which will be managed as part of the overall maintenance and management strategy.</p>

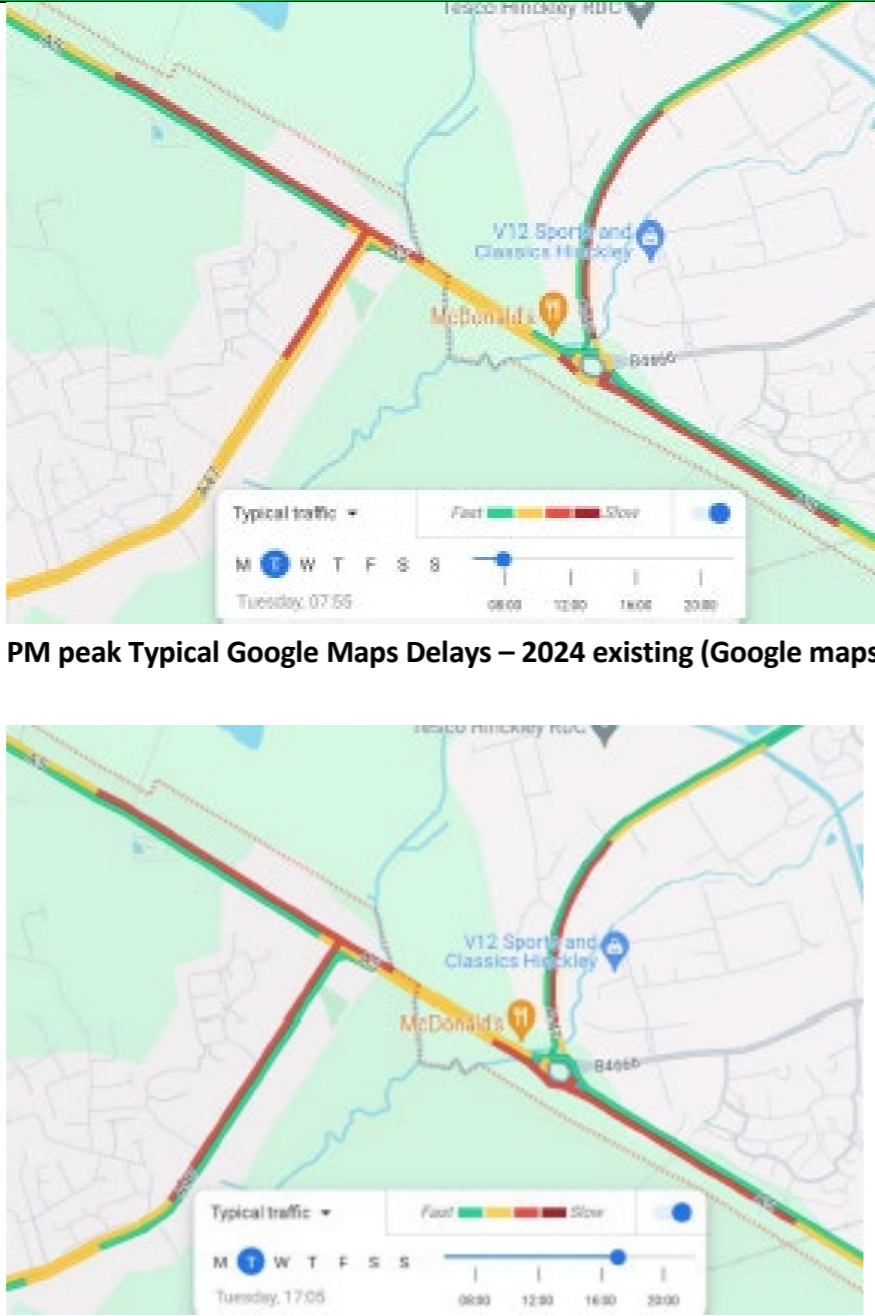
Document and Section Reference	HBBC Response	Applicant's Response
REP4 - 131 – Response to deadline 3 submission (Appendix B Transport 2023 Update)		
<p>J21 of M1</p>	<p>This remains a major concern. The Council does not believe the analysis undertaken so far shows the true picture at this critical junction 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>At ISH2, it was agreed that modelling would be produced for M1J21. LCC had previously requested a VISSIM model of the junction. It is accepted that a VISSIM model would be beneficial in enabling LCC/NH to identify a comprehensive improvement scheme and if such a model were already available. However, this is not the case and consequently, the LINSIG modelling for the Lutterworth Urban Extension was used. This was a scheme that was brought forward by LCC as the applicant and landowner and did not require the use of a micro-simulation model. A PARAMICS model had been built in 2016 for the J21 network by LCC, but this had not been validated and had been raised only once in April 2021 during discussions between the Applicant and the Transport Working Group.</p> <p>The LUE mitigation works themselves were primarily provided to avoid queues on the M1J21 northbound approach and have been secured via planning condition. The traffic for LUE is already included in the PRTM 2.2 WoD and WD models. Consequently, the baseline for HNRFI modelling should also include the associated mitigation works. But those mitigation works were excluded in the baseline due to the S106 for the LUE works not being signed.</p> <p>As agreed with the TWG, traffic surveys were undertaken at M1J21 on 29th November 2023 and the same agreed furnishing methodology was used to produce 2036 WoD and WD turning flows. (Peak hour flows have reduced by 11% and 13% during peak periods compared with the 2019 survey/base model.)</p> <p>At the request of LCC, a theoretical assessment has also been undertaken where no background traffic diverts. This does not follow the agreed methodology used for all other junctions within the Transport Assessment. Therefore, it is provided as a sensitivity test only.</p> <p>The modelling demonstrates the magnitude of impact is negligible in both scenarios and whilst the junction operation is worse without the committed LUE improvements, the development impact on queues and delay remains marginal.</p>

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		<p>Hence, the impact is not considered to be 'severe' and it is maintained that highway mitigation is not justified.</p> <p>Further work has been carried out using video data at M69 J21 submitted at Deadline 5 (document reference: 18.18, REP5-051). This has sought to detail the interactions of queuing with the M1 mainline flows and where they affect capacity on the circulatory carriageway. The evidence suggests that queuing due to well documented mainline flow capacities causes peak hour blocking of the M69 (eastbound) stopline.</p> <p>In accordance with National Government Policy, the development would seek to limit future traffic growth at the junction through the reduction of single occupancy car trips as secured through the STS (document reference: 6.2.8.1D) and via its contribution to transferring freight from road to rail, which aims to reduce long distance trips on sections of the SRN like M69 and M1. An effect that hasn't been accounted for within the assessment work. However, like the impact of the development itself, the beneficial impact of these measures is considered marginal too.</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) fewer 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>See above.</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 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>At the request of LCC, a theoretical assessment has been undertaken where no background traffic diverts. This does not follow the agreed methodology used for all other junctions within the Transport Assessment. Therefore, it is provided as a sensitivity test only. This is included within the Transport 2023 Update Note (document reference: 18.13.2, REP4-131) and J21 Modelling Note submitted at Deadline 5 (document reference: 18.18, REP5-051). The diverted trips are accounted for in the wider PRTM outputs and mitigation has been developed on this basis.</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</p>	<p>As per point 1 above; further analysis has been provided at M1 J21 (document reference: 18.18, REP5-051) which uses contemporary video footage to understand root causes of delay at J21. Fundamentally the mainline capacity on the M1</p>

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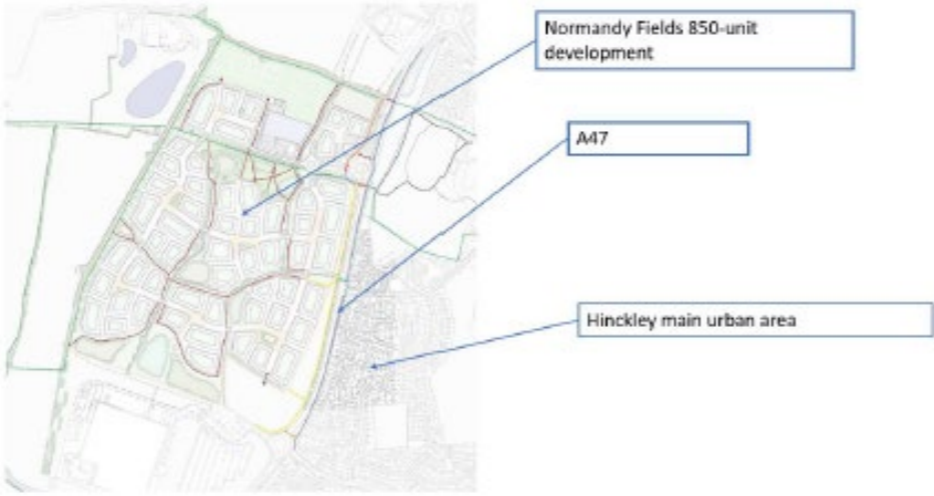
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	<p>back of queue and whether traffic is actually all getting through at the junction. Some of the results appear at odds with the knowledge of current junction conditions and clearly much more work is required to understand the impacts here and what mitigation may be required.</p>	<p>impacts the access slips which affects the overall functionality of the roundabout.</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 except 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>Further analysis on M1 J21 has been provided at Deadline 5 (document reference 18.18, REP5-051) addressing specific issues at the M69 interface. Based on the analysis included within this note, it is concluded that there is a small residual impact due to the HNRFI traffic at M1 J21, but the cumulative impact is not severe nor causes a highway safety issue.</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>In accordance with National Government Policy, the development would seek to limit future traffic growth at the junction through the reduction of single occupancy car trips as secured through the STS (document reference: 6.2.8.1D) and via its contribution to transferring freight from road to rail, which aims to reduce long distance trips on sections of the SRN like M69 and M1. An effect that hasn't been accounted for within the assessment work. However, like the impact of the development itself, the beneficial impact of these measures is considered marginal too.</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. If 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> <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.</p> <p>AM peak Typical Google Maps Delays – 2024 existing (Google maps Traffic data)</p>	<p>The Applicant has carried out further surveys and has run the additional VISSIM at the A5 Dodswell/Longshoot, this was submitted at Deadline 4 (document reference REP4-131). The evidence from the PRTM and the VISSIM conclude that the development impacts on these locations are not severe. It is not the Applicant's position to resolve underlying traffic issues but mitigate the impact of additional traffic generated by the development.</p> <p>Contrary to the point raised here, HGVs generated by the site broadly will use J2 M69 to access the SRN. There has been a sensitivity exercise carried out to quantify the high-sided HGVs which would use this route, should the Nutts Lane Bridge carriageway lowering not be implemented (document reference: 18.15.2, REP5-032).</p> <p>It should be noted that Google traffic only indicates typical speeds through a network and does not provide calibrated evidence of capacity and delay.</p>

Document and Section Reference	HBBC Response	Applicant's Response
	 <p>PM peak Typical Google Maps Delays – 2024 existing (Google maps Traffic data)</p>	
<p>REP4-113: Doc 17.4B Revision: 10 HGV Route Management Plan & Strategy Report</p>		
<p>Designation of the A47 (and associated B4668 from new link road) in Hinckley Borough in the strategy</p>	<p>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.</p>	<p>This position has been clarified to HBBC several times. The most recent HGV Routing Plan and Strategy (document reference: 17.4D) indicates the prohibited routes, this does not include the A47.</p>

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	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>The A47 is a key distributor road around Hinckley. It is identified within Leicestershire's Network Management Plan as a route suitable for HGVs.</p> <p>The link to the M69 presents a more attractive access to the SRN than the A47.</p> <p>There has been a sensitivity exercise carried out to quantify the high-sided HGVs which would use this route, should the Nutts Lane Bridge carriageway lowering not be implemented. (document reference: 18.15.2, REP5-032) This demonstrates low numbers of HGVs when compared with background traffic would use this route to access the A5.</p> <p>HGV parking is provided on site for those vehicles waiting to access loading bays within the development.</p> <p>Pedestrian and cycle provision have been factored into the mitigation plans on the A47, the fact remains that the A47 is a major distributor around the town of Hinckley and remains a key link within the county's HGV Network Management Plan.</p> <p>Enhancements to the A47 Ashby Road junction are proposed as part of the off-site mitigation to improve pedestrian and cycle safety</p>

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	<p>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 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.</p> <p>Extract from plans for Normandy Fields 850-unit development north of A47 - 15/00188/OUT</p>  <p>Other issues with the HGV Management Strategy Undesirable or illegal HGV parking off-site</p>	<p>See response above. The A47 is a key distributor road around Hinckley. It is identified within Leicestershire's Network Management Plan as a route suitable for HGVs. The HGV Route Management Plan clearly sets out desirable routes from the site- which focuses on access from the M69 and the wider SRN and this is to be communicated to all operators on the site by the Site Management team.</p>
	<p>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.</p>	<p>See paragraphs 4.6 to 4.17 within the HGV Route Strategy and Plan (document reference: 17.4D). Welfare facilities, parking and layover facilities will be available in the lorry park and within tenants demise.</p>
	<p>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.</p>	<p>See paragraphs 4.6 to 4.17 within the HGV Route Strategy and Plan (document reference: 17.4D)- The Applicant takes parking and infringement of parking regulations seriously and the HGV Route Strategy and Plan reflects this.</p>

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	<p>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.</p> <p>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.</p>	<p>Measure 12 within the commitments table (Table 1) of the HGV Route Management Plan and Strategy (document reference: 17.4D) highlights the availability of the Travel Plan Coordinator contact details to be available on relevant websites. If registration details are provided to the Travel plan coordinator, they can ask the data processor to check if the vehicle is recorded as entering a tenants demise and notify the tenant of the concerns raised.</p>
	<p>Monitoring and enforcement of prohibitive routes in the HBBC area</p> <p>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 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.</p> <p>DCO requirements, compliance with the strategy and responsibilities</p>	<p>Projected HGV numbers from the PRTM modelling within Hinckley are minimal. This is due to direct access to the SRN or A-Road network. However, further revisions have been made to the Routing Strategy at Deadline 6 to include ANPR monitoring on the B4669, B4668 west of the site accesses towards Hinckley and The Common for Barwell to enforce such routing.</p> <p>There are, however, development impacts forecast in the Eastern Village areas, which the ANPR technology seeks to minimise.</p>
	<p>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)</p>	<p>Schedule 15 in the final dDCO will reflect the final versions of all relevant documents.</p>
	<p>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.</p>	<p>The most recent HGV Route Management Plan and Strategy (document reference: 17.4D) includes a clear table of commitments (Table 1) which sets out what is to be secured by the Strategy and Plan in one place. This has key facts regarding the delivery, monitoring, enforcement and securing mechanism for the Sustainable Transport Strategy commitments. The plan itself outlines the mechanisms for further actions. No bond is necessary.</p>

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	<p>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 occupiers of the warehouse units which visit those warehouses. HBBC supports 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. 	<p>The most recent HGV Route Management Plan and Strategy (document reference: 17.4D) includes a clear table of commitments (Table 1) which sets out all the main points of the Strategy and Plan in one place. This has key facts regarding the delivery, monitoring, enforcement and how it is secured.</p>
	<ul style="list-style-type: none"> 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. 	<p>As confirmed at ISH6 and to HBBC directly, the Applicant has inserted a table to clearly identify the commitments which will enable effective monitoring. This was reflected in the updated version submitted at Deadline 5. Compliance with the strategy will be monitored annually by the Travel Plan Coordinator.</p>
	<ul style="list-style-type: none"> 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. 	<p>The Applicant is responsible for the strategy and it is to be monitored and implemented by the Travel Plan Coordinator for the overall site. This is included in commitments 2,3,4 and 6 within the summary table.</p>
	<ul style="list-style-type: none"> The future monitoring and review process and implication if measures do not work. 	<p>Compliance with the strategy will be monitored annually by the Travel Plan Coordinator. There are also annual monitoring meetings with the relevant authorities and the Applicant has agreed to fund the authorities' annual attendance through s106 obligations. These review meetings will provide the opportunity to discuss and review how the measures are working. A summary Table was included at the ExA's request in the version of the plan submitted at Deadline 5.</p>
<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> <p>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</p>	<p>The Applicant will take reasonable endeavours to ensure Euro VI compliant vehicles are used on the site. Public Bus services are required to comply through agreements with the public transport authorities. This obligation is secured by</p>

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	<p>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.</p>	<p>DCO requirement and</p> <p>(document reference: 17.4D)</p>
	<p>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:</p> <ul style="list-style-type: none"> The objectives should be SMART. 	<p>The Sustainable Transport Strategy (document reference: 6.2.8.1C, REP5-009) submitted at Deadline 5 includes a clear table of commitments (Table 1) which sets out all the main points of the Strategy and Plan in one place, the STS is resubmitted at Deadline 6 (document reference 6.2.8.1D). The commitments table sets out the provisions of the Sustainable Transport Strategy such that the commitments are SMART (specific, measurable, achievable, relevant and time bound). It is also clear in the table how the commitments are secured through the dDCO.</p>
	<ul style="list-style-type: none"> 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. 	<p>As confirmed at ISH6 and to HBBC directly, the Applicant has inserted a table to clearly identify the commitments which will enable effective monitoring. This was reflected in the updated version submitted at Deadline 5.</p> <p>Commitments are included within the Strategy summary (Table 1) of the Sustainable Transport Strategy submitted at Deadline 5 (document reference: 6.2.8.1C, REP5-009) these are time based and have specific triggers included. Delivering the specified commitments is compliance with the strategy. The STS is resubmitted at Deadline 6 with these commitments still in place (document reference 6.2.8.1D)</p>
	<ul style="list-style-type: none"> 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. 	<p>The Sustainable Transport Strategy (document reference: 6.2.8.1D) is secured by requirement 9. It is the Applicant's responsibility to ensure the complete implementation of the Sustainable Transport Strategy. As above, Objectives and Measures are included within the Strategy summary (Table 1) of the Deadline 5 Submission (document reference: 6.2.8.1C, REP5-009) and in the resubmitted version for Deadline 6 (document reference 6.2.8.1D) these are time based and</p>

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		have specific triggers included. The table also states how each commitment is secured- and which requirement within the DCO this is secured by.
	<ul style="list-style-type: none"> The future monitoring and review process and implication if measures do not work. 	A clear commitment to monitoring and reporting on an annual basis to the Travel Plan Steering Group has been included in The Deadline 5 update to the STS (document reference: 6.2.8.1D); Table 1 Commitments 2,3,4 and 6, 8 and 14 along with Paragraphs 7.23 and 9.7, this is also contained within the Deadline 6 version (document reference 6.2.8.1D).
	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 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.	Mode share targets use census data as a starting point. As was highlighted at the start of the examination process. These have been adapted based on observed information from EMG and other RFI sites. Table 5 within the STS submitted at Deadline 6 (document reference: 6.2.8.1D) clearly sets this out along with a narrative on the assumptions made. Aims and objectives provide the high-level strategy (Para 3.5), the mode share numbers are targets and are a function of the strategy rather than part of it.
	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.	As described within the STS submitted at Deadline 6 (paragraphs 5.13-5.17) (document reference: 6.2.8.1D) the EMG figures (from 2022, which is not considered to be outdated) have been used as a guide, but they are not the foundation for the baseline figures. Robust car driver numbers are retained for HNRFI and are based on employee catchments, trip distribution and the census data. The STS (document reference: 6.2.8.1D) further outlines the attractiveness for cyclists and pedestrians with evidence based catchments and population centres as a guide for the active travel enhancements.
	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.	As outlined above, evidence has been used from EMG and other sites including Coventry Gigafactory to provide a considered baseline and target for trips. This is realistic and targets will shift as details are recorded across the life of the development. EMG clearly differs in profile from the Hinckley site in that it is adjacent to an international airport with existing and well established frequent bus links.

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	<p>EMG mode share results first 6 years of operation (source – ITP3)</p> <hr/> <p>Mode Share</p> <table border="1" data-bbox="587 527 1374 835"> <thead> <tr> <th rowspan="2">Mode</th> <th rowspan="2">Baseline Target</th> <th colspan="5">Actual Employee Travel Data</th> <th rowspan="2">10-Year Target</th> </tr> <tr> <th>Year 1 (2019)</th> <th>Year 2 (2020)</th> <th>Year 3 (2021)</th> <th>Year 4 (2022)</th> <th>Year 5 (2023)</th> </tr> </thead> <tbody> <tr> <td>Drive Alone</td> <td>80%</td> <td>58%</td> <td>43%</td> <td>43%</td> <td>42%</td> <td>51%</td> <td>68%</td> </tr> <tr> <td>Car Share</td> <td>12%</td> <td>31%</td> <td>13%</td> <td>26%</td> <td>38%</td> <td>25%</td> <td>17%</td> </tr> <tr> <td>Bus</td> <td>5%</td> <td>8%</td> <td>15%</td> <td>28%</td> <td>14%</td> <td>18%</td> <td>10%</td> </tr> <tr> <td>Walk/Cycle</td> <td>3%</td> <td>1%</td> <td>2%</td> <td>0%</td> <td>3%</td> <td>2%</td> <td>5%</td> </tr> <tr> <td>Other</td> <td>n/a</td> <td>3%</td> <td>4%</td> <td>3%</td> <td>3%</td> <td>4%</td> <td>n/a</td> </tr> </tbody> </table> <hr/> <p>Bus services</p> <p>One of the key reasons why bus mode share is high at EMG is the provision of several good frequency and geographically spread services.</p> <p>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.</p>	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	<p>Bus targets are based on the baseline percentage splits and a realistic ten year target. This differs from EMG but is deliverable through additional public transport services and the DRT. EMG clearly benefits from being adjacent to an international airport and the existing well established bus linkage.</p> <p>Further detail is included within the updated STS (document reference: 6.2.8.1D) table 6 and 7</p>
Mode	Baseline Target			Actual Employee Travel Data						10-Year Target																																													
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Other	n/a	3%	4%	3%	3%	4%	n/a																																																
	<p>East Midlands Gateway – February 2024 bus services (Source – Burton Trent and Airlink 9 websites)</p>																																																						

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						Donnington bus station s	
	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				
	<p>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 patters. 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.</p>						
	<p>In contrast, the current proposals for HRNFI appear to include the following (Table 8 of the STS):</p> <p>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</p>						<p>Table 8 contains the Evening projected trip generation demonstrating forecast numbers.</p> <p>Bus targets are based on the baseline percentage splits and a realistic ten year target. This differs from EMG but is deliverable through additional public transport services and</p>

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	<p>hour in year 8).</p> <p>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.</p>	<p>the DRT.</p> <p>Further detail is included within the updated STS (document reference: 6.2.8.1D) and summarized within Table 1 of the document. There is clear commitment to review of provision of public transport on an annual basis and adjustments to suit demand. The Applicant is not dependent on the STS for mitigation of highway issues on the local network or J21. See summary of REP5-051.</p>
	<ul style="list-style-type: none"> • 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? 	<p>Further detail is included within the updated STS (document reference: 6.2.8.1D) submitted at Deadline 6, and summarized within Table 1 of the document. There is clear commitment to review of provision of public transport on an annual basis and to make adjustments to suit demand.</p> <p>The existing service operates at 1 bus every 90 minutes. The extended bus service will be funded by the Applicant to accommodate HNRFI.</p>
	<ul style="list-style-type: none"> • A Nuneaton service – 1 bus per hour 	
	<ul style="list-style-type: none"> • 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 r 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. 	<p>Further detail is included within the updated STS (document reference: 6.2.8.1D), and summarized within Table 1 of the document. There is clear commitment to review of provision of public transport on an annual basis and adjustments to suit demand.</p>
	<ul style="list-style-type: none"> • Little detail of weekend operation, some draft indication of first and last buses in appendix 	<p>The bus services will operate on Saturdays and Sundays to cover the shift changes this is included in the commitments table at table 1 in the STS (document reference: 6.2.8.1D).</p>
	<ul style="list-style-type: none"> • Standard bus shelter/stop at interchange. 	<p>A bus interchange is to be built on the north side of the A47 link Road providing a high quality stop for employees at the site. This will have real-time information on services. A Private shuttle will circulate through the site and will coincide with arrivals and departures from the interchange and is</p>

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		included within the STS (document reference: 6.2.8.1D).
	<ul style="list-style-type: none"> Loose commitment to shuttle between bus stop and premises 	A shuttle bus is secured through the commitments in the STS (document reference: 6.2.8.1D) and will connect the site to the public bus services running on the A47 link road.
	<ul style="list-style-type: none"> 'Discount scheme potential' – not defined, dependant on operator. 	These schemes are not known yet, they could be Government initiatives, County led schemes etc. It will be the responsibility of the Travel Plan co-ordinator to be aware of such initiatives and promote them to occupiers and their employees. However, there is a commitment to provide Free 6 month bus pass available to the first employees to work at each building as outlined in Table 1 of the revised STS (document reference: 6.2.8.1D).
	<ul style="list-style-type: none"> There is no real definition of 'future phasing'. 	For the purposes of delivery of the cycling enhancements, Table 1 of the STS defines the future trigger as being 'Prior to the occupation of 105,001 sqm'
	<ul style="list-style-type: none"> The Hinckley railway station is only linked up with the DRT service. 	This is not correct. The X6 and the DRT service will both connect with the Railway Station and will provide an adequate service.
	<ul style="list-style-type: none"> 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. 	The timetables are indicative at this stage but provide an illustration of the timings. These are public services and subject to changes which are outside the Applicant's control. However, commitments 1,2 and 3 within the STS Table 1 commit the Applicant to providing a level of service.
	<p>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:</p> <ul style="list-style-type: none"> Bus frequencies and coverage be increased to at least 4 buses per hour (each way) from key origins for the main bus services. 	DRT Service and public services will be increased in line with the on-site staff- as per the approach set out within the STS, as per the commitments table of the STS (document reference 6.2.8.1D), Table 1, this is to be reviewed on an annual basis. There is a memorandum of understanding with the DRT delivery, company, Arriva as the public bus operator and the Applicant. The site will populate over a long time, so it is critical for monitoring to identify suitable provision.
	<ul style="list-style-type: none"> 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. 	DRT coverage is included in the latest STS (document reference: 6.2.8.1D) this includes Earl Shilton, Barwell and Hinckley, it offers a flexible service and is not reliant on bus stop infrastructure. DRT typically pick passengers up from pre-identified safe locations close to their residence
	<ul style="list-style-type: none"> Services should cover appropriate shift times and office opening closing times for 7 days a week. 	DRT coverage is included in the latest STS (document reference: 6.2.8.1D), it offers a flexible service throughout

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		<p>the day. The X6 and 8 services also provide linkage to the site during shift changes. Commitments 2 and 3 within the STS cover the timetabling requirements for the seven day coverage</p>
	<ul style="list-style-type: none"> 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. 	<p>DRT coverage is included in the latest STS (document reference: 6.2.8.1D), it offers a service to supplement the X6 and 8 service which will cover the DRT areas as set out at figure 12 in the STS (document reference: 6.2.8.1D). It will cover shift changes and office hours.</p>
	<ul style="list-style-type: none"> 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. 	<p>Bus fares are covered within the STS Commitments table. A Free 6 month bus pass will be available to any employee to work at each building within 6 months following occupation of the relevant building.</p> <p>Employees at each unit will be able to apply for a 6-month free bus pass within 6 months following occupation of the relevant building for the public bus services (currently the X6 and No 8 bus services) through the travel plan coordinator who will promote the availability of bus passes to new employees.</p> <p>Consequently, the Site Wide Travel Plan Coordinator will promote the availability of these passes and any other local or national discount schemes intended to encourage travel by public transport.</p> <p>The free 6 month Bus Pass will be offered to Employees to work at each building for a period of 6 months following occupation of the relevant building</p> <p>Every first employee (i.e. not including replacement of existing roles) of each building constructed, for a period of 6 months. This is the standard provision requested by Leicestershire County Council and the wording of the requirement for bus passes has been provided by LCC.</p> <p>This is the first incidence of a fixed fare being requested.</p>
	<ul style="list-style-type: none"> 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. 	<p>There is commitment to provide a shuttle bus on the site connecting with the main bus interchange and the plots. This is set out in paragraph [10.9] of the STS (document reference 6.2.8.1D). The frequency will depend on the linking public services. Ten minutes limits the operation prior to understanding how this works on a practical level.</p>

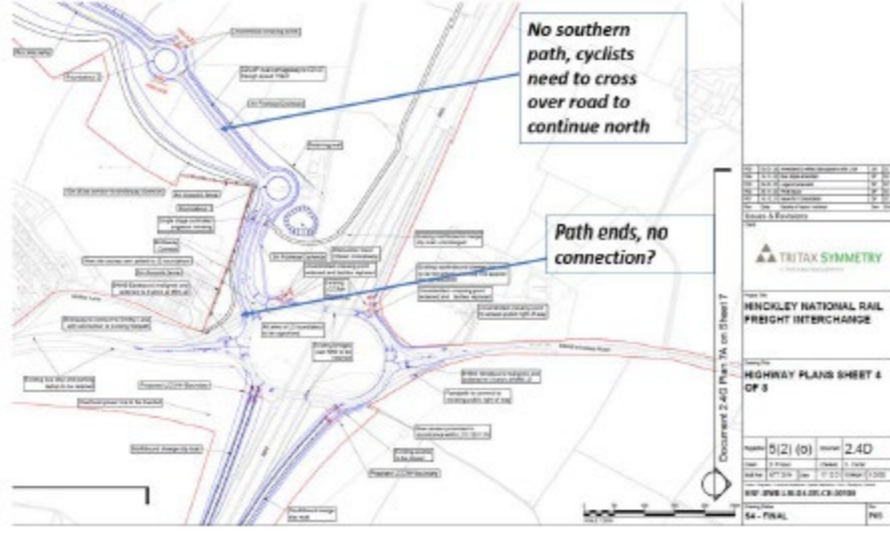
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	<ul style="list-style-type: none"> The facilities at the main bus stop should include real-time information with a high-quality waiting area. 	<p>The bus interchange will be a high quality facility with real-time timetabling. This is set out in paragraph [8.8] of the STS (document reference 6.2.8.1D).</p>
	<ul style="list-style-type: none"> The bus patronage targets for mode share should be closely monitored and additional services added should these not be reached. 	<p>There is clear commitment to review of provision of public transport on an annual basis and adjustments to suit demand. This is set out in table 1: STS Commitments.</p>
	<ul style="list-style-type: none"> 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. 	<p>See STS commitments Table 1 of the Sustainable Transport Strategy (document reference: 6.2.8.1D)</p>
	<ul style="list-style-type: none"> The commitment to the above should be for the duration of the development. 	<p>See STS commitments Table 1 of the Sustainable Transport Strategy (document reference: 6.2.8.1D)</p>
	<p>Cycling measures - Section 8 of the STS</p> <p>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.</p> <p>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.</p>	<p>The Applicant disagrees that the commitments or statements in the STS (document reference: 6.2.8.1D) in respect of cycling are "questionable". They are proportionate and reasonable and reflect the overall strategy which focuses on several modes of sustainable transport. The STS commits to cycling enhancements based on population catchments (included within the STS appendices) (document reference: 6.2.8.1D). These provide cycling enhancements to areas with the largest population centres and include Hinckley, Barwell and Earl Shilton.</p> <p>Active travel numbers in terms of mode split are realistic and are higher than those at EMG (which are <2%)- The site is positioned close to the SRN and rail links as is acknowledged to be appropriate and necessary for such sites within Circular 01/22 Paragraph 30 and the immediate cycling and walking opportunities are limited. The Applicant's overall sustainable transport strategy is aligned to this.</p>
	<p>The applicant has analysed a number of further cycling improvements but has only proposed 3 of these:</p> <ul style="list-style-type: none"> 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. 	<p>Nine options for additional cycling enhancements were identified for further analysis. Following analysis of these options three of these options were identified as deliverable and having the ability to offer benefit. The STS commits to the listed 1,2, and 8 cycling enhancements based on</p>

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	<p>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.</p>	<p>population catchments (included within the STS appendices) (document reference: 6.2.8.1D). HBBC are mistaken, Option 1 is correctly identified in the text- this references the B4668 Leicester Road and not the B4669 Sapcote Road (Option 8)</p>
	<p>These improvements are welcome as part of a final package, but HBBC also believe the following issues should be addressed.</p> <ol style="list-style-type: none"> 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. 	<p>This delivery trigger was adjusted to prior to occupation of phase 2 in the STS submitted at Deadline 5 (document reference: 6.2.8.1C, REP5-009).</p>
	<ol style="list-style-type: none"> 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. <div data-bbox="575 1167 1412 1724" data-label="Image"> <p>Highway Plans Sheet 4 extract – 2.4D</p> </div>	<p>This was addressed within the Applicant's Deadline 5 submission including a supplementary plan showing the routes to the development from the north and south (document reference: 18.15.3, REP5-033). With respect to the items highlighted on the extracts from Sheet 4, connection to the development is achieved from the northern side of the link road and a controlled crossing point is provided to provide road users with a safe crossing point to use the footway/cycleway on the northern side. The path connects to Smithy Lane which is quiet and allows cyclists to continue on carriageway if travelling in this direction.</p>

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Document and Section Reference	HBBC Response	Applicant's Response
	<p>Highway Plans Sheet 4 extract – 2.4D</p> 	
	<p>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.</p>	<p>The route links to Winchester Drive and Woodland Avenue which subsequently connect to a series of quiet routes and cycling facilities already in place and shown on the 'Choose how you Move' interactive cycling map for the area. Connection to the town centre and the Railway Station is achieved via Forrester's Road, Far Lash, Brookside, Bridge Road and Station Road</p> <p>h.jpg</p>
	<p>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 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</p>	<p>As expanded upon in the STS (document reference: 6.2.8.1D), the space to deliver a safe and adequate route adjacent to the B4668 is very limited due to level differences, retaining walls, private means of access and other constraints. Alternative access to Hinckley via the A47 is via high quality off carriageway routes and links, via Barwell Lane and Stoneygate Drive to several existing cycle facilities in the main urban part of Hinckley</p>
	<p>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.</p>	<p>There has been a review of provision for the Earl Shilton SUE. A comparison of journey times was carried out and existing provision on the A47 is no different to alternative routes from Earl Shilton. Therefore no enhancements are proposed.</p>
	<p>Other STS matters Car share and car club- section 9 of the STS</p>	

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	<p>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.</p> <p>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?</p> <p>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.</p>	<p>A commitment to the provision of a car sharing app / website has always been included within the STS (document reference: 6.2.8.1D). Targets are realistic and based on feedback from car sharing platform providers.</p> <p>The app/website will be bespoke for HNRFI, though it will have the option to be used more widely in the Hinckley area and will be free to use.</p> <p>The car club is within the future commitments and will be delivered through the review process.</p>
	<p>Walking</p> <p>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>	<p>The STS ensures there are appropriately surfaced routes connecting the site to surrounding settlements for commuters. It is considered that recreational routes on Public Rights of Way in the vicinity should remain as countryside amenity routes without any surfacing upgrades which would lead to unnecessary urbanisation of the countryside beyond the boundaries of the site.</p>
<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> <p>(1) What exactly is being proposed and how can 'compliance;' with this be assessed as part of the DCO requirements?</p>	<p>The requirement to submit detailed travel plans which must comply with the framework travel plan and their ongoing compliance is clear in the DCO. A Travel Plan Coordinator will be in position from Day one at the site.</p> <p>It is noted that HBBC did not have any comment on the requirement in response to ExQ2.</p>
	<p>(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)</p>	<p>The Applicant does not agree. The FTP has SMART objectives included and the STS has a clear table of commitments which have been added to the latest version of the report.</p>
	<p>(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.</p>	<p>The applicant is responsible for the delivery of commitments secured through DCO requirement 8 to comply with the Framework Travel Plan (document reference: 6.2.8.2C, REP5-012). Occupiers must comply with the unit-specific travel plans. The requirement is clear on this.</p> <p>The Site management Company, through the Travel Plan Coordinator will manage the travel plan with individual operators responsible for keeping their own specific plans up</p>

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Document and Section Reference	HBBC Response	Applicant's Response
		to date. Surveys will be site wide.
	(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).	A clear review plan is set out within the FTP to ensure targets are hit. Reports are required to be submitted to the steering group and plans for service enhancements. The review mechanism secures the requirement for additional services as necessary. A bond is not necessary or reasonable for the provision of sustainable transport commitments. Bonds for highway works are to enable the highway authority to undertake works on the highway network in rare and specific circumstances. The DCO requirement to comply with the STS (document reference: 6.2.8.1D) and Travel Plan are perfectly adequate and reasonable.
	(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 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>There needs to be a balance struck between parking provision on site and applying mode shift targets. Reducing car parking numbers can have an adverse impact on the surrounding communities as employees may be tempted to park off-site, this has been a concern raised by local communities pre-submission and during the examination. The Applicant has been able to respond to these concerns by demonstrating the commitment to delivering adequate parking for employees. The FTP and the STS (document reference: 6.2.8.1D) clearly set out a proactive and secured approach to managing travel demand to the site using a variety of measures including; active travel, public transport, DRT and incentives.</p> <p>All modelling for infrastructure capacity points is based on a worst-case car mode share and trip generation numbers agreed with the Highway Authorities. Car park management will be developed through the Travel Plan Coordinator. As stated in the FTP this will be detailed in unit specific travel plans.</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.	Further detail and amendments to address discrepancies was included within the updated STS document reference: 6.2.8.1C, REP5-009), and summarized within Table 1 of the document. The FTP also has an actions table for the Travel Plan Coordinator and key tasks to be delivered. E-bike and other measures are to be investigated as part of ongoing monitoring.
	(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?	This is a misunderstanding of the s106 provision. The obligation in that draft of the s106 Agreement was to appoint

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Document and Section Reference	HBBC Response	Applicant's Response
		<p>a Travel Plan Co-ordinator prior to first occupation for the period from first occupation until the fifth anniversary of the first occupation of the final unit. Which covers the 10 year horizon.</p> <p>However, at LCC's request, the Applicant has now agreed to a revised commitment so that the Travel Plan Co-Ordinator will be in post for the lifetime of the development. This will be reflected in the final Unilateral Undertaking to LCC.</p>

Landscape

Document Ref	HBBC Response	Applicant's Response
REP4 - 121 – Response to deadline 3 submission (part 2 HBBC)		
Point 4 – Landscape & Visual Impact	The suggestion that the extent of effects on views from Elmesthorpe and surrounding villages is now largely agreed between the parties within the SoCG is actually a matter not agreed between the parties in the SoCG.	Paragraph 1.3 of the HBBC SoCG sets out the significant long-term negative visual effects agreed between the parties which is the majority of significant visual effects. The only visual effects not agreed being those identified in Matters not Agreed which includes PVP3 and Night-time construction and operational effects.
Point 5 – Landscape & Visual Impact	The Council does not agree with the applicant's assertion that "planting does serve to screen and filter the majority of the development" the photomontages show that large portions of the proposed buildings will remain visible above vegetation in a number of viewpoints, e.g. PVP7, PVP9, PVP17 and PVP20	The Applicant agrees that the upper parts of the buildings will remain visible from these viewpoints but maintains the assertion that the majority of the development will be screened and/or filtered.
Point 6 – Landscape & Visual Impact	The applicant asserts that the ES does not suggest that "this is the case" [that the extent of the visual effects extends beyond the viewpoints selected], but no additional material is submitted to support his assertion and therefore the Council's position stands.	There will always be some visual effects beyond the representative viewpoints selected in an LVIA as acknowledged. The point being made by the Applicant in this instance is that these additional effects are very limited, supported by the fact that there have been no further requests for additional views from other locations where views may be available as would often be the case when there are multiple opportunities for consultation. The Applicant was informed of additional viewpoints as part of the first consultation event and included the recreation ground at Elmesthorpe within the representative views as a result.