Tritax Symmetry (Hinckley) Limited

HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE

The Hinckley National Rail Freight InterchangeDevelopment Consent Order

Project reference TR050007

Applicant's response to Deadline 5 Submissions [part 6 - Non-Statutory Bodies]

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20 February 2024

Planning Act 2008

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

Matter	Applicant's Response
CPRE Leicestershire	
2. Modelling	
2.1 In response to concerns we raised about modelling of local roads, particularly difference in HGV numbers on Stanton Lane, Tritax say it is based on: 'percentage increase in flows between peak hours and AADT flows for each road classification.' (18.13 Para 51) 2.2 However, the road classification is purely artificial in this case, HGVs are likely to travel all along that road. This suggests the strategic PRTM modelling is simply not fit for purpose of assessing local roads. 2.3 The problem is further exacerbated because it is then explained that: 'Both links have been assessed in the ES Chapter and as shown above the larger HGV impact is assessed in the area that would have the most impact (northern end of Stanton Lane) as a worst case.' However, that is the 'greater' impact only because the model says so. Both ends of the road should carry similar levels of traffic (particularly HGVs.) 2.4 In other words, the real worst-case scenario at the southern end is not being tested. But the problem gets worse. The junction modelling also relies on the PRTM outputs. As is explained in the Transport Assessment: 'Traffic flow outputs have been taken from the strategic traffic model PRTM 2.2 undertaken by AECOM on behalf of Leicestershire County Council's (LCC). The traffic flows have subsequently been through a furnessing process to approximate the turning flows against observed traffic data.' 6.2.8.1 Appendix 8.1 Transport Assessment (part 1 of 16) Para 7.29	The PRTM provides the strategic flows across the wider network to understand traffic movement at a wider scale- it covers all types of roads and assigns traffic based on speed/flow calculations. Capacity based models have also been used to determine the impacts on local roads as discussed at length in the Transport Assessment. The PRTM is the best predictive tool we have available for traffic assignment in the locality- its use was agreed early in the pre-submission process with the Transport Working Group. The PRTM is the start point, but furnessing takes observed flows to interpolate and assign traffic to use in the capacity based models.

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2.5 This means that the assessment of Junction 39 (at the Southern End of Stanton Road) is inherently optimistic in terms of the traffic modelled entering or exiting Stanton Lane. And this will be happening at other junctions where the PRTM modelling downgrades traffic because part of the road is lower down the hierarchy. 2.6 It is likely to be a more significant HGV problem in villages where the road designation changes but there are fewer HGV destinations. 2.7 Para 52 of Document 18.13 confirms the problem: 'See the above - response 51 The Model is appropriate and the calculation of AADT is normal practice and appropriate for a strategic model the size of the PRTM.'	The assignment of traffic is not based on road hierarchy, see points above.
2.8 This is a frank admission that the model is only really 'appropriate' for determining strategic issues. In this case it is being used to consider whether mitigation at a local junction, or in a village, is appropriate, and to test the NPPF requirement of safe and suitable access on those local roads and through those local communities for which it is not well-suited.	See above- 2.4
2.9 And it is also confirmed by Documents 18.13 that this is a wider problem that applies elsewhere (and particularly in Sapcote). Para 55 of the response says: 'Similarly to the above, the nature of the link changes as it leaves the residential area and therefore there is a road type change on leaving the village [Sapcote] hence the drop in traffic (opposite to the above on Stanton Lane as it enters the village, it increases) The environmental assessment is not affected by these reductions as no sensitive receptors are on these links leaving the villages.'	18.6.6, REP3-051 provides a further summary of HGV traffic through the Eastern Villages and the comparative impacts.
2.10 The modelling in Sapcote will again lead to results which are not 'appropriate' at that level. This will further impact on junction modelling for Junctions 40 and 41. 2.11 Whether or not there are sensitive receptors on these links does not resolve the increased congestion problem and rise in HGVs.	As above

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2.12 Unless large numbers of HGVs are stopping in Sapcote they must somehow leave the village, either on Sharnford Road or the B4669. It is not clear which because no detailed modelling is provided.	
2.13 What we have now been provided with is a set of Select Link Analysis maps. Like much of the published traffic-map evidence, these are almost impossible to interpret because we do not have the actual traffic figures. The maps also do not differentiate HGVs and light vehicles. 2.14 According to the Select Link Analysis Introduction (Document 21.1) these maps show that: 'a significant amount of the traffic' originates in Sapcote, which is both suitably vague and also not surprising. Furthermore, it tells us nothing more about the growth in HGVs. 2.15 The promoters have still to produce any kind of readable maps showing the model outputs on the roads through Sapcote so that those can be interrogated to see if they give 'appropriate' outputs for traffic on these local links and, in particular, the distribution of HGVs through the village.	SLA was included at the request of LCC. Full assessment of impacts in discussed in REP3-051 and subsequent modelling within the Transport 2023 Update (document reference: 18.13.2, REP4-131).
2.16 This is not only a problem with PRTM modelling in the Sapcote area, The Panregional Transport Highway Assignment Local Model Validation Report (May 2021) (Appendix 8.1 of the Transport Assessment [part 6 of 20] Document reference: 6.2.8.1) identifies an issue with local roads in Leicester. It says: In addition to this there are also a number of locations within Leicester City where counts are located on relatively minor, local roads. The model zone system within Leicester City is sufficiently detailed for the known applications of the model, but with this level of detail there may remain local zone loading issues between local residential roads. Without further zone disaggregation, which may be disproportionate for the proposed uses of the model, this localised loading of demand onto the network cannot be resolved. (E7, p148)	As above 18.6.6, REP3-051 provides analysis of HGVs through the villages. The HGV Route Management Plan and Strategy (document reference: 17.4D) has further information on the measures to prevent Development HGVs routing through the villages and the potential measures to mitigate against HGV traffic. This is based on a monitor and manage approach. The PRTM model has been fully validated prior to use on the Forecast Model runs in Accordance with DfT WebTAG M4 Guidance

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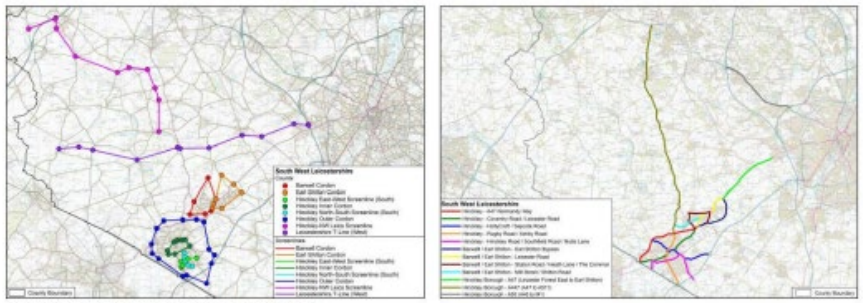
2.17 Figure E5 of the Validation Report specifically identifies the count points around Hinckley. Notably, these do not include count points beyond the M69 on the B4669 to Sapcote. We are relying on an assumed dissipation of traffic from that point onwards. Figure E5: South-West Leicestershire Screenlines and Journey Time Routes  Contains Ordnance Survey data © Crown copyright and database right 2021 2.18 The response to us in Para 56-59 of document 18.13 goes on to demonstrate that the issues we have raised about the model outputs in the villages, and particularly Sapcote, are simply not resolved. 2.19 While we understand that modelling is required to assess the impact of traffic changes, it seems to us that the current analysis of Sapcote and the other villages is fundamentally flawed because, while the model outputs may be 'appropriate' for a strategic model, they will not be reliable for the assessment of traffic through villages and, even if they were, the detailed results are not available in a usable form.	As mentioned above- the PRTM outputs have been furnessed using observed traffic data to assign traffic at the junction level, this has then been used within the capacity assessments and reported in the Transport Assessment and its appendices.
3. HGV Routing 3.1 The Deadline 4 submission include a new Route Management Strategy (RMS). The most notable thing about it is the changes in Table 2 to the categories for breaches.	A revised HGV Route Management Plan and Strategy was submitted at Deadline 5 (document reference: 17.4C, REP5-022), this has highlighted commitments from the Applicant in a summary table and has revised the breach levels to ensure these are appropriate to the links.

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3.2 The 7 January RMS has significantly raised Level 3 breach requirements for HGVs levels through Sapcote from 67 to 117 per day in Table 2. Wolvery has also gone up from 10-127. Surprisingly these changes are not track-changed and so can easily be missed. 3.3 The Level 1 and 2 breach levels are also raised, lowering the point at which internal action will be taken. 3.4 It is not clear that this change was ever discussed with the relevant local authorities. And it immediately calls into question the commitment by Tritax to managing HGVs in the interest of communities (such as Sapcote) since breaches will now be less likely to be recorded or actioned. 3.5 In response to concerns we had before these changes Para 69 of document 18.13 says 'the HGV scheme supposed to be self-enforcing'. Of course, one way to ensure that outcome is to increase the breach levels to allow HGVs to go through Sapcote without any action (something not mentioned in the response to us in Document 18.13). As you recall the Promoters were asked at the hearing to explain the numerical change but did not choose to do so. 3.6 Indeed, Para 70 of document 18.13 effectively absolves the developer of responsibility for re-routed lorries through Sapcote resulting from its actions. 3.7 Para 67 of 18.13 explains the process: 'Should other routes and areas be affected by the development HGVs then this can be discussed at the steering group meetings and any further action agreed. A Contributions will be set aside by the developer to fund additional measures and for community benefit from the proceeds of the fines received due to HGV routing transgressions. This is secured through the Hinckley NRFI HGV Route Management Plan and Strategy.'	Breaches and escalations of responsibility are also mapped out in the revised approach. The enforcement and monitoring is based on a similar existing route management plan at Redditch Gateway. This has been highly successful in limiting HGV routing on prohibited routes and has been endorsed by WCC and National Highways.

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3.8 Again there is no mention of the raising of the breach levels. Nor does the text refer to the monitoring changes where background traffic will be only monitored yearly rather than quarterly. 3.9 According to the most recent HGV Route Management Plan and Strategy Report (Document reference: 17.4B): 'In addition to the monitoring of HGVs to and from the development, the HGV background traffic levels on the B581 and the B4669 will be monitored through Sapcote as part of the HGV Route Management Plan & Strategy. Reporting the results to the HGV Strategy Working Group on a yearly basis.' The Applicant will provide a fund of £50,000 towards additional measures that the HGV Strategy Working Group considers necessary to further discourage HGVs routing via Sapcote. These measures could include signage, road markings, traffic calming, Traffic Regulation Orders etc. This fund would be topped up on an annual basis with any occupier fines collected for breaching the HGV Route Management Plan & Strategy (5.25)' 3.10 This is a change from the Written Statement of Oral Case ISH2 [Appendix F - Assessment of HGV Impacts] (Document reference: 18.6.6) which says: 'Therefore, the Applicant also proposes to monitor the background traffic growth through Sapcote as part of the HGV Route Management Plan & Strategy, reporting the results to the HGV Strategy Working Group on a quarterly basis.' (Para 2.12) 3.11 This approach is, in our view, completely unsatisfactory. The level at which development traffic breaches in Sapcote would be acted on has been raised. The monitoring of background traffic would also now only be annually. Even if all these hurdles were passed it is unclear what level of overall HGV traffic would be considered unacceptable or when or what would be done about it. 3.12 There is also no actual scheme currently identified which could resolve the issue of HGVs going through the village. The gateway feature has been	

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withdrawn and it is doubtful if it would have worked anyway. So, there is nothing effective to spend the money on. 3.13 Yet it is clear, even from the evidence provided by Tritax, that there will be very significant impacts on the B4669 form additional HGVs and potentially on other local rat-runs, as can be seen from Table 4 of the Assessment of HGV impacts. Table 4. HGV Flows (2036 Future Year with HGV Route Management Plan & Strategy)	
4. Routing During Incidents 4.1 We note that the Strategic Road Network Incident Plan (Document reference: 17.8.) shows a number of routes for HGVs, all of which go through Hinckley. We do not consider this likely in reality. 4.2 Moreover, the document is scant. It does not explain whether the routes identified are by Tritax or National Highways. It is unclear who they would apply to.	The Strategic Network Incident plan document was produced (REP4 115) by the Applicant, this is supplemented by REP3-138 produced by National Highways . REP4 115 provides advisory routes from the site, the NH document provides general SRN closure routes and protocol. Modelling is intended to show normal operating conditions in order to test and develop infrastructure where required. National Highways have performance indicators in place to clear lane compromising incidents within 60 minutes

	AM Peak Hour			PM Peak Hour			AAWT		
	WoD	WoDWI	WDWI	WoD	WoDWI	WDWI	WoD	WoDWI	WDWI
Stoney Stanton									
L1 (Elmesthorpe)	28	15	16	24	14	16	295	164	183
L2	25	22	23	23	15	17	285	217	235
L3	16	13	13	15	12	12	175	138	133
Sapcote									
L4	42	67	68	13	25	23	318	542	474
L5	28	51	52	8	21	18	206	419	349
L6	7	35	37	3	14	12	54	279	218
Wolvey									
L7	116	117	114	104	114	87	1248	1317	1057
Pailton									
L8	50	50	50	50	46	50	580	560	535
L9	40	40	41	48	44	47	474	453	473
Sharnford									
L10	77	67	74	57	47	51	758	630	694
L11	75	65	72	55	45	49	753	620	683
L12	2	2	2	2	2	2	0	0	0

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4.3 There is also no modelling of the overall network operation in that case. Given the paucity of information we are not convinced that this document answers the questions about diversions and how they will impact on the local road network, particularly the Eastern Villages.	alongside established diversionary routes which are outlined in the documents mentioned above.
5. Road Safety Audit 5.1 We welcome the submission of a Road Safety Audit (RSA) and response (Interim Stage 1 Road Safety Audit Response Report, Document 21.1) 5.2 We note, however, that the RSA cannot address the fundamental question of whether the route is safe and suitable, only the nature of the proposed mitigation. It cannot, for example, say whether lorries should be actively diverted from the local villages. 5.3 Moreover, as we said at the hearing, we are not aware of any one in Sapcote being approached to discuss the suitability of the measures proposed or to assess how people actually behave in the village. 5.4 Neither the RSA (nor previous comments by Tritax on vulnerable users) appear to have fulfilled the requirement of GG119 set out in Table C:3: Pedestrian, cyclist and equestrian desire lines: Include details of pedestrian, cyclist and equestrian movements in the vicinity of the scheme and, when applicable the relevant walking, cycling and horse-riding assessment and review reports GG 5.5 The reason is simple. There has been no attempt to establish these movements beyond some desk-top assumptions. 5.6 This remains an important (and outstanding) issue at a number of locations. We previously identified the potential impact of traffic growth on cycling on Aston Lane for example. Without adequate mitigation cycling, in particular, is likely to fall due to increased traffic.	It is the Applicant's view that the interim Stage 1 RSA carried out was fully in accordance with the requirements of GG119, with the Audit Team being provided with the relevant documentation required and conducting site visits to all affected areas. The Applicant has looked in detail at pedestrian movements within the village of Sapcote and utilised a toolkit which has been accepted by numerous highway authorities elsewhere, including Warwickshire County Council locally, to reduce traffic in villages through design led initiatives to reduce vehicle speeds and make routes less attractive to through traffic. The Applicant's response report to the RSA states that we predominantly agree with the findings of the RSA and have taken action to widen footways, move kerb lines and improve sight lines to ensure that visibility to the zebra crossing is compliant with the LCC Design Guide requirements. The updated design is shown on drawings appended to 2.29B, REP5-004.

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5.7 Having said that, we do agree with Para 3.3 of the RSA that the installation of a zebra crossing in Sapcote, where there is such limited visibility, risks pedestrians' behaviour being unsafe. That is not resolved by comments from Tritax. 5.8 We also agree with Para 3.4 that the narrow footway is an issue for the pedestrian crossing. 5.9 However, an even more obvious issue is the increase in pedestrian using that unsafe section of pavement to get to the centre of the village because of the relocation of the bus stop. 5.10 This would almost certainly increase the risk on a route which would carry additional HGVs due to the proposals, something not mentioned in the audit. 5.11 The relocation of the bus-stop is referred at by Tritax as a 'traffic calming' response, but this would be limited to the time when buses are stationary. It may be largely illusory 5.11 Para 3.4 also identifies that the Gateway feature has gone, although, as noted at the hearings, according to Para 2.11 of 18.6.6 this is one of the elements aimed at calming HGVs as we discuss in Para 3.12 above.	
6. Cyclists 6.1 We note the comments in the latest revision of ES Appendix 8.1 Transport Assessment [part 15 of 20] Sustainable Transport Strategy and Plan Document reference: 6.2.8.1B Revision: 065) In total, 39 cyclists were injured or killed over the latest five years period within the study area. Of the 39 cyclists, 25 were recorded as having slight injuries, 12 serious injuries and 2 fatal injuries. No clusters with three or more cyclist casualties have been identified and the two fatal collisions that involved cyclists both occurred on the B4114. Whilst they	An analysis of accidents on the surrounding network concluded that the absence of clusters or causal factors does not indicate a verifiable safety issues in the vicinity of the site. The STS does not dismiss these cases, there are facilities included within the commitments and the access infrastructure. All off-site mitigation includes for non-motorised users.

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occurred at different locations, they were within 1.0km of each other. However, they did occur two years apart and there were no common causal factors reported between the two collisions. The active travel safety record across the wider Area of Influence does not suggest that there are significant safety issues on roads surrounding and further afield from the Site. (Para 4.42-4.43) 6.2 We are simply not convinced this is the case. Two fatal collisions so close together suggest there may be issues with the speed and behaviour of drivers on the B4114. 6.3 Rather than dismiss these cases, a risk assessment of the junction and surrounding areas would help establish whether an increase in traffic, including HGVs, is acceptable.	
7. Noise 7.1 Para 84 of the response to our submission (Document 18.13) says: It should be noted that the data and criteria required for the Noise Assessment are inherently different from that required for the Transport Assessment The traffic levels have been taken from the Leicestershire PRTM model and represents the worst case. The HGV Route Management Plan and Strategy (document reference 17.3B) prohibits the movement of development HGV traffic through Sapcote via the B4669. 7.2 Para 88 of the response adds: The applicant does not agree with this statement. As detailed above in points 75 and 76, the 'with development' traffic scenario includes development generated road traffic, reassignment of traffic associated with the access infrastructure and the any further reassignment of background traffic, which has been included within the traffic data used within the noise assessment.	This issue has been addressed under the 'Traffic levels and cumulative developments' subheading for Agenda Item 6d of the Applicant's written statement of oral case at ISH6, submitted at Deadline 5 (document reference: 18.5, REP5-025).

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7.3 Unfortunately this remains inherently opaque. 7.4 If the PRTM modelling data has been used for the Noise Assessment but the additional noise is only from 'development-related' traffic then the nondevelopment, (that is to say, diverted traffic) would be in effect part of the base case model, increasing base-case noise while underplaying the noise increase. 7.5 We are not, therefore, convinced that our concerns in this regard have been answered.	