

Position Statement from National Highways at Deadline 6

– including Comments on ExA’s commentary on, or schedule of changes to, the dDCO and on additional submissions received by Deadline 5

Title:	National Highways Position Statement – Deadline 6
Reference:	TR050007
Applicant:	Tritax Symmetry
Proposal:	Application by Tritax Symmetry (Hinckley) Limited for an Order Granting Development Consent for the Hinckley National Rail Freight Interchange
Author:	National Highways (20040073)
Date:	20 February 2024

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

This submission forms National Highways’ Deadline 6 response which covers comments on the schedule of changes to the dDCO and the following transport matters submitted by Deadline 5 (9 February 2024).

Schedule of changes to the dDCO (Document Ref: 3.1C)

National Highways has reviewed the changes to the dDCO proposed by the Applicant as part of its Deadline 5 Submission. National Highways seeks to reserves its right to make further submissions in respect of the dDCO at the Deadline 7, but in the meantime makes the following comments.

dDCO Article/Schedule	Comments by National Highways
Schedule 2 – Requirements	No comments

Schedule 5 – Public Rights of Way	No comments
Schedule 15 – Certification of plans and documents	National Highways is in the process of reviewing the listed plans and confirming their approval or otherwise. We shall endeavour to provide an update at the next deadline, but this will be dependent on agreement of the highway works requirements.

National Highways notes that works to the Cross in Hand roundabout are not detailed within Requirement 5(1) of Schedule 2 Part 1. Discussions between the Applicant and the local authorities are ongoing in relation to these works to better understand whether the mitigation works are required. Other key locations on the SRN, in particular M69 J1, M69 J2 and M1 J21/M69 J3, are not listed either. Until such time that the highways assessment is complete, it is not possible to confirm whether these locations mentioned require works to be undertaken under the Order or not.

It is also notable that no works are proposed to the A5 trunk road near the Hinckley 'low bridge'. Whilst National Highways has not actively sought works at this location, a HGV management plan is in place to keep HGVs on the SRN; although a height constraint exists at this low bridge. The current HGV management plan does not detail how this height restriction will be managed. Although the low bridge is intended to be addressed through the Padge Hall Farm development the risk of the timing of the works not aligning with what is required under this dDCO exists.

Sustainable Transport Strategy (Document Ref: 6.2.8.1C) and Framework Travel Plan (Document Ref: 6.2.8.2C)

National Highways welcomes the amendment of the monitoring period to yearly, particularly in the early phases of the development when there is more propensity for change, and opportunities to influence change, in travel behaviours.

The Travel Plan sets out a number of initiatives, including some aspirational ones. Furthermore, there is reference to the Travel Plan Co-ordinator's responsibilities to include monitoring, but it is unclear how any unmet targets would be addressed. The

Travel Plan Co-ordinator's responsibilities also include for feasibility reviews of various initiatives, but it is unclear how any such initiatives, in particular the aspirational ones (for example bike hire schemes) would be triggered and brought into use, particularly if mode shift targets are not met.

It is noted that walking and cycling are considered collectively in 'Active Travel' and it is implied that this generally relates to cycling, with the Travel Plan suggesting low opportunities to capture walking trips. However, walking trips should not be discounted entirely and splitting these out discretely may enable monitoring more transparent to enable any remedial measures to be implemented.

It is also noted that membership to the Travel Plan Steering Group is not identified and therefore it is unclear what responsibilities and authority the Steering Group would have. Para 8.2 of the Framework Travel Plan (Doc Ref: 6.2.8.2C) makes reference to membership of the 'Working Group' but it is unclear if this is the same as the Steering Group.

HGV Management Strategy (Document Ref: 2.29B)

National Highways notes that the low bridge risk on the A5 has been identified within the HGV Management Strategy. It further identifies that the Padge Hall Farm application, now consented, includes a scheme to address this issue. Both of these statements in the HGV Management Strategy are factually correct.

Whilst discussions are progressing between National Highways and the promoters of the Padge Hall Farm site, the position set out in the HGV Management Plan has not set out a proactive interim mechanism for limiting the potential for bridge strikes which result in disruption to the operation of the SRN. The A5 is identified as an appropriate route (by virtue of it not being an inappropriate route) but has not identified that there is a separate constraint for high-sided vehicles which must be highlighted in the interim. The level of risk associated with the volume of high sided vehicles anticipated has also not been presented.

Geometric Design Strategy Record (Document Ref: 2.29B)

National Highways notes that an updated Geometric Design Strategy has been submitted. However, as per our previous position, the suitability of all proposals can only be confirmed following agreement of traffic modelling work which remains ongoing.

HNRFI Works Plans (Document Ref: 2.4H)

National Highways notes that updated Works Plans have been submitted. However, as per our previous position, the suitability of all proposals can only be confirmed following agreement of traffic modelling work which remains ongoing.

Applicants response to deadline 3 submissions (Appendix B - Transport 2023 Update) (Document Ref: 18.13.2)

National Highways notes that the Appendices to the Transport update of 2023 has been submitted. This includes all significant volume (in excess of 1,000 pages) of modelling outputs reports. Whilst not all these would relate to the SRN, National Highways will, nonetheless, require additional time to review these. It should also be noted that the final review of these can only be possible once traffic input flows (relating to the PRTM and furnishing matters) are resolved.

Additional information on highway impact, including highway works requirements

In addition to the above, National Highways has been in dialogue with the Applicant relating to furnishing and highways impact matters. Our position has been set out in our Deadline 5 response for submissions made prior to 9 February and we continue to work with the Applicant to resolve outstanding issues.