



The countryside charity
Leicestershire

Charity Number: 1164985

HINCKLEY RAIL FREIGHT TERMINAL

Comments for deadline 7

CPRE Leicestershire

Unique Reference: 20038675

(With Sapcote Parish Council (UR 20039514))

February 2024

1. Introduction

1.1 This note includes a number of comments following submissions to Deadline 6.

1.2 It has been prepared jointly by CPRE Leicestershire and Sapcote Parish Council to address a few selected issues where we consider additional comments to our existing statement may be helpful to the examining authority.

1.3 We have already made comments in relation to the issues below and do not seek to repeat those in detail but to address new material. We do, however, note that changes to the RMS (Revisions 12 and 13) should be understood together so our comments on that will need to be read in conjunction with our Deadline 6 response on those issues.

1.4 We would also ask the Inspectors to note that, in our view, none of these documents answer our key concerns.

2. Response to Deadline 6 submissions

*Applicant's response to Deadline 5 Submissions [part 6 - Non-Statutory Bodies]
Document reference: 18.19*

*HGV Route Management Plan and Strategy Report Prepared by: BWB Consulting
Ltd Document reference: 17.D Revision: 13, 20 Feb 2024*

2.1 Document 18.19 is entirely a response to our Deadline 5 submission. We do not consider that the comments resolve our concerns but would make the following specific comments.

Para 2.5 Response:

2.2 In response to our Para 2.5 they say: *The assignment of traffic is not based on road hierarchy, see points above.*

2.3 This does not seem consistent with the explanation they gave in Document 18.13 that discrepancies in HGV traffic flows on the links we identified resulted from: *percentage increase in flows between peak hours and AADT flows for each road classification.* (18.13 Para 51).

2.4 However, if their new explanation is correct and the previous explanation is not, it means that the discrepancies we identified, no longer make logical sense. This only underlines, as we have already said, that the model outputs for local non-strategic road links cannot be relied upon.

Para 2.16 response:

2.5 In response to our Para 2.16 they say:

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

2.6 This seems to refer to Table 3 of the RMS which in the latest iteration¹ is labelled 'Potential Future Mitigation Measures in Sapcote'. In other words, none of these mitigations are agreed.

2.7 Indeed, the first item in that table appears discounted by their response to the Road Safety Audit.

¹ HGV Route Management Plan and Strategy Report Prepared by: BWB Consulting Ltd Document reference: 17.D Revision: 13, 20 Feb 2024

2.8 None of the other measures appear to have been agreed with LCC or been discussed with (or even consulted on with) local residents. They would involve restrictions which might not be considered appropriate without an alternative route being provided for traffic through the village.

Para 3.1 response:

2.9 In response to para 3.1 they say:

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.

2.10 We addressed the changes to the breach levels in Revision 12 of the RMS (as submitted at Deadline 5) in our Deadline 6 response.

2.11 We note that they do not now say they have reduced the breach levels, only that they have '*ensured they are appropriate to the links*'. Their '*appropriate*' approach is to now use averages which, as we pointed out, in our Deadline 6 response, causes potentially further difficulties for anyone externally seeking to raise issues about HGVs in the villages.

2.12 Some further changes additional have been made to the Deadline 5 RMS in the latest RMS (Deadline 6, Revision 13). Table 4, which suggested how many HGVs might actually go through villages, has been deleted. The new Table 4² (the old Table 5) includes the breach levels based on an average of 10 one-way trips per day (As per para 5.54).

2.13 Further changes are made with new Paras 5.60-5.61 which explains the situation following the first steering group meeting of the developer and local authorities (but not, we note, parish councils):

The HGV Strategy Steering Group will meet annually, until 10 meeting occurrences have taken place, unless the group agrees to meet more than once annually.

Any breaches will be reported to the HGV Strategy Steering Group on a quarterly basis. The HGV Strategy Steering Group can agree to meet more frequently than once annually if reported breaches are considered unacceptable.

2.14 Not only are the breach levels now difficult to establish but the group will only actually meet annually. It will cease after 10 years, even though this may be before the whole development is built out.

2.15 We can see little likelihood that this approach will lead to effective and transparent controls on development HGVs in villages that will command local

² Note the table changes are not reflected in the index at the front of RMS revision 13

confidence, let alone deal with HGVs displaced by the development and the associated changes to the road network.

2.16 Note: We welcome the addition of the New RMS Figure 6: '*Proposed ANPR Camera Locations*' which identifies (as requested by the Panel) the locations of the cameras. It underlines our comments at Deadline 6 (para 2.5-2.6) that only camera 2 can measure HGVs going towards Sapcote and its location may allow for debate about their onward route.

Para 5.1 response:

2.17 In response to para 5.1 they say:

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.

2.18 We are not aware of any detailed assessment of '*pedestrian movements*', or surveys of pedestrians. The applicant provided a list of identified crossing points in ES Chapter 18 and used those in its assessment without, as far as we can tell, any further examination of usage.

2.19 The paragraph also confirms that the toolkit is a theoretical approach from other areas. Its outputs have not been subject to discussion with residents.

Para 6.1 response:

2.20 In response to para 6.1 they say, with regards to the identified cycling crashes on the B4114:

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.

2.21 We welcome this acknowledgement but are not aware of any facilities included in mitigation of this scheme which would impact on the locations of those crashes on the B4114. In particular no work is proposed at Junction 41 between the B4669 and B4114.