

Position Statement from National Highways at Deadline 7

Title:	National Highways Position Statement – Deadline 7
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:	27 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 7 response which provides a position statement and comments on information received by Deadline 6 (27 February 2024).

Updated position - overview

National Highways has continued to engage with the Applicant and the wider project team on legal and highways and transport matters. Whilst there has been some progress in discussions, many items remain to be resolved on highways and transport as was stated during ISH6. Table D5.1 in National Highways’ Deadline 5 submission [REP 5-078] remains the most up to date position; however where there has been changes to the position on specific matters, these are detailed below.

Gibbet Hill – furness methodology and contribution

As stated in our Deadline 5 response, revised flows provided by the Applicant are now acceptable. However, it should be noted that these are identified as ‘Sensitivity Test’ flows by the Applicant, a point on which we disagree. Instead these should be seen as the revised flows to correct errors in the application of the agreed furness methodology. We understand that the Applicant intends to submit this information as part of Deadline 7.

With the agreement of the flows at the Gibbet Hill junction we are now in a position to understand the likely impact of the proposed development on the operation of the junction. This has shown that the development is likely to result in increases in demand totalling approximately 70 vehicles in each of the peak periods. The majority of these increases are on the A5 southbound in the AM peak and the A5 northbound in the PM peak. These are the arms where, operationally, there is the greatest delay presently, therefore any increases on these movements will adversely affect the operation of the junction.

It remains National Highways’ view that the assessment should be undertaken in VISSIM rather than ARCADY owing to the nature of the junction operation and the limitations of the ARCADY software. Having, today, received the complete package of information required to assess the robustness of the Applicant’s ARCADY modelling, this review is currently ongoing.

Further, as clarified at ISH6 and subsequent representations, the advised methodology is for the Applicant to develop a mitigation scheme, which is to be agreed with the relevant highway authorities and for the equivalent cost to be secured through S106 agreement. Until an acceptable scheme to form the basis of the contribution is agreed, National Highways does not consider it to be possible to agree on a contribution value.

We note that the Applicant has expressed contrary views on the approach to modelling and derivation of the contribution value. We therefore invite the Applicant to put forward any alternative methodology for consideration, along with a justification for its appropriateness should they so wish.

Cross in Hand – furness methodology and mitigation

The Applicant has advised that Sensitivity Test flows at this junction have been agreed with Warwickshire County Council. However, National Highways considers that the agreed furness methodology continues to be incorrectly applied.

Our concern relates to the derivation of the matrix for the 2036 ‘With Development’ (WD), specifically that an incremental change is calculated between the ‘Without Development’ (WoD) 2036 Post-Furness matrix and the WD 2036 Post-Furness matrix. The furness process takes the link flows from the WoD and the WD future year assignments and then synthesises matrices to match the target link flows in each case. Therefore, the method is not directly calculating the positive and negative traffic impacts of the development proposals but is calculating the difference between two synthetic (Post-Furness) matrices. This method may distort the turning movement impacts of the development site as represented by the PRTM forecasting model. The result is that HGV turning movements between the A5(N) and the A4304(E) arm are likely to be underestimated. (It should be noted that this could potentially also result in an underestimation of traffic flows at the M1J20 further to the east of the Cross in Hand junction, where the assessment requirement is contested by the Applicant.)

Furthermore, the proposal for mitigation works at Cross in Hand is now unclear. It has been suggested by the Applicant in recent discussions that works on the Warwickshire network may not be required. However the most up to date Works Plan Sheet 8 [APP-015] details work on the Warwickshire network on the Coal Pit Lane and B4027 arms of the junction. As a roundabout, requirement for mitigation must be looked at comprehensively, rather than considering individual arms in isolation.

National Highways position remains that the furness methodology must be correctly applied to develop an agreed set of traffic flows (not ‘sensitivity test’ flows), against which any mitigation requirements can be agreed.

M69J2 – furness methodology

National Highways has received further information from the Applicant in respect of the furness methodology; however we consider that the methodology remains incorrectly applied.

We note that the impact of the Development (site + schemes) has been calculated by the Applicant from the PRTM forecast outputs as WD 2036 – WoD 2036. On several of the turn movements the impact of the Development has been to reduce the turn flows, i.e. negative traffic growth. For example, on the M69 mainline (between arms A and C) and between the Hinckley Rd E and W roads (between arms B and D).

The Applicant has then applied these development impacts (both positive and negative) to the 2023 Observed flows (i.e. “growth between PRTM 2019 and 2036 has been directly added onto the 2023 survey flows”). However, trips that the PRTM has removed from its 2036 WoD forecast year matrix for the 2036 with development (WD) case, cannot be subtracted from the 2023 Observed turn flows matrix if those trips were not observed to be using the roundabout in 2023. (i.e. trips that do not exist should not be subtracted).

An appropriately robust basis for assessment would be to use the 2023 Observed turn movements where the PRTM is forecasting negative growth from 2019 to 2036. Care also needs to be applied on those turn movements where the PRTM is forecasting negative growth as a result of the Development.

VISSIM modelling (M69J1 and M69J2)

We note that a number of changes have been made to the approved base model, which include:

- J1: Changes in Priority rules - Several changes in priority rules, some of them are related to Keep Clear behaviours that have been removed
- J1: Changes to Speed distributions - The slowest speed on the speed distribution has been removed or modified. New Speed distributions have been added

- J1: Changes to AM demand - Small changes in some OD pairs
- J2: Changes to the desired acceleration function
- J2: Additional vehicle classes added to the models using the new acceleration function

Any changes to the approved base model must be documented, along with a justification, to ensure that VISSIM models remain robust and accurate, and for review alongside the forecast models.

Statement of Common Ground

National Highways has received an updated revision of the Statement of Common Ground (SoCG) at noon on the 27 February 2024 (Deadline 7). The Applicant has been previously advised of severely restricted availability in the lead up to Deadline 7 for the review of any documents given National Highways' attendance at Planning Inquiry. It is unfortunate that we have only today received the revised SoCG. As such, we are unable to provide comments on the SoCG as part of this Deadline 7 submission and will now provide these through our Deadline 8 response instead.

Draft Development Consent Order

Whilst we have had discussions with the Applicant on the dDCO, our requirements for our Protective Provisions and access rights remain contested. We note that one of the requirements for submission at Deadline 7 will be a revised dDCO and we will provide comments on this as appropriate upon receipt along with a final version of the National Highways Protective Provisions which we seek to be included on the face of the DCO.