

Tritax Symmetry (Hinckley) Limited

## **HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE**

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### **The Hinckley National Rail Freight Interchange Development Consent Order**

Project reference TR050007

### **Applicant's response to Deadline 6 Submissions [part 6- Statutory Bodies]**

Document reference: 18.20

Revision: 01

**27 February 2024**

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Planning Act 2008

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

No	National Highway	Applicant's Response								
<p>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.</p> <p>This submission forms National Highways' Deadline 6 response which covers comments on the schedule of changes to the DCO and the following transport matters submitted by Deadline 5 (9 February 2024).</p>										
<p><b>Schedule of changes to the dDCO (Document Ref: 3.1C)</b></p>										
1	<p>National Highways has reviewed the changes to the DCO 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 DCO at the Deadline 7, but in the meantime makes the following comments.</p> <table border="1" data-bbox="276 499 1353 871"> <thead> <tr> <th data-bbox="276 499 804 541">DCO Article/Schedule</th> <th data-bbox="804 499 1353 541">Comments by National Highways</th> </tr> </thead> <tbody> <tr> <td data-bbox="276 541 804 583">Schedule 2 – Requirements</td> <td data-bbox="804 541 1353 583">No comments</td> </tr> <tr> <td data-bbox="276 583 804 625">Schedule 5 – Public Rights of Way</td> <td data-bbox="804 583 1353 625">No comments</td> </tr> <tr> <td data-bbox="276 625 804 871">Schedule 15 – Certification of plans and documents</td> <td data-bbox="804 625 1353 871">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.</td> </tr> </tbody> </table>	DCO 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.	<p>Noted, however, Deadline 7 is the final deadline for the Applicant's dDCO to be submitted so the Applicant doesn't envisage being in a position to make any further changes to the DCO unless an error in the dDCO submitted at Deadline 7 is identified by NH which the Applicant agrees and the ExA is able to accept an updated version before the close of the Examination.</p>
DCO 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.									
2	<p>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.</p>	<p>This is not correct.</p> <p>The Cross in Hand roundabout works (Work No. 16) and the M69 J2 works (Work Nos. 8 and 9) have always been listed in requirement 5(1). The Applicant has included a new paragraph (3) in requirement 5 to address the ongoing discussions and to enable the parties to agree that alternatives may be provided, subject to such alternatives being appropriate mitigation for the HNRFI impact(s). This is explained in the Explanatory Memorandum submitted at Deadline 7 (document reference 3.2C).</p> <p>As explained in the Applicant's other Deadline 7 submissions, WCC has suggested that the Cross-in-Hand mitigation may not be required. However, this has not been agreed with LCC and NH at this stage and the works are therefore still included within the Applicant's proposed mitigation works.</p> <p>Works are not identified at M69 J1 nor M69 J3/M1 J21 as set out in our latest submissions (document reference: 22.2).</p>								
3	<p>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 DCO exists.</p>	<p>A separate note has been submitted with the quantification of high-sided vehicles (document reference: 18.18, REP5-032) diverting based on the 20% guidance provided by NH. The HGV Route Management Plan and Strategy (document reference: 17.4E) includes within Commitment 9 that for occupational agreements to include fully agreed routes for all HGVs and monitoring and Commitment 11 to have a management company in place to manage communications and review of routes.</p>								

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		<p>The Applicant's HGV Route Management Plan and Strategy (document reference: 17.4E) has always included in the list of advisory routes to the northwest,</p> <ul style="list-style-type: none"> <li>• A47 south, A5 west (alternative route to avoid low bridge).</li> </ul> <p>Under the section named Low Bridge Risk, as identified in point 8, the first paragraph states the following:</p> <p>As described above, there is a low bridge on the A5 approximately 2 miles to the west of M69 J1. Occupiers of the development using vehicles above 4.6m in height will be advised to avoid the bridge and use an alternative route (which would be a choice of the A47 or the M69, M6 and M42) by the TPC (Travel Plan Coordinator) .</p> <p>This is being amended as part of DL7 submission to read the following.</p> <p>Occupiers of the development using vehicles above 4.6m in height will be advised to avoid the bridge and use an alternative route (which would be a choice of the A47 or the M69, M6 and M42). The mechanism is covered by occupiers required to adhere to the HNRFI HGV Route Management Plan &amp; Strategy (document reference: 17.4E) as part of their occupational agreements (Commitment 9 in Table 1) and reminders will be sent out periodically reminding all of the prohibited routes, the advisory routes including the alternative route for high sided vehicles wishing to go northwest via the A5 avoiding the low bridge until such time the works have been completed at the bridge.</p>
<b>Sustainable Transport Strategy (Document Ref: 6.2.8.1C) and Framework Travel Plan (Document Ref: 6.2.8.2C)</b>		
4	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.	Noted
5	The Travel Plan sets out a number of initiatives, including some aspirational ones. Furthermore, there is reference to the Travel Plan Coordinator's responsibilities to include monitoring, but it is unclear how any unmet targets would be addressed. The Travel Plan Coordinator'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.	The mode shift targets and commitments (2,3,4,7 and 15) to monitoring are set out within the Framework Travel Plan document. At this stage of the process, the recording of surveys and engagement with the Steering Group will identify potential changes that would need to happen to align with mode share targets. It is too early in the process to define any figures, without clear surveys of users- which will happen within the first year of occupation.
6	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.	Active travel to the site is encouraged through infrastructure and enhancements. As outlined within the Sustainable Transport Strategy, walking opportunities are limited due to distances involved from key residential areas. Therefore the focus has been on cycling. It is acknowledged within Para 30 of 01/22 that SRFI type facilities are generally located in areas with good SRN and rail linkage, which can mean walking opportunities are reduced.
7	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.	). The Steering group are responsible for reviewing the Travel Plan Monitoring and Reporting , and agreeing if any changes required. The Working Group is a group whereby occupiers can feedback any comments, concerns or suggestions to the Site Wide Travel Coordinator and this is fed into monitoring updates in the reports submitted to the steering group. c. The Steering Group will include representatives of the local highway authority, the developer, site wide Travel Plan Coordinator and

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		the Working Group will be formed of the individual occupier Travel Plan Co-ordinators and or representatives, the Site Travel Plan Coordinator and Site Management company.
<b>HGV Management Strategy (Document Ref: 2.29B)</b>		
8	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.	Noted
9	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 be presented.	As above: point 2 A separate note has been submitted with the quantification of high-sided vehicles (REP5-032) based on the 20% guidance provided by NH. The HGV Route Plan and Strategy includes within Commitment 9 for occupancy agreements sets out that all occupiers will required to agree and implement the HNRFI HGV Route Management Plan and Strategy as part of such agreement.
<b>Geometric Design Strategy Record (Document Ref: 2.29B)</b>		
10	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.	The Applicant notes that the GDSR document referenced here (document reference: 2.29B, REP5-004) relates primarily to works on the Local Road Network and not the main work proposed on the Strategic Road Network. The works on the SRN relate to the provision of two new south facing slip roads which comprise access infrastructure to the development. The Applicant has undertaken detailed discussions with NH regarding the geometric design of the slip roads, departures from standards, signage strategy, drainage strategy, provision of highway structures and lighting strategy and have received positive responses to all communication, with the design principles and departures from standards all provisionally agreed. The Applicant is confident that the agreement of the traffic modelling work will not affect the design of the slip roads themselves due to the two-lane sliproads used in the design which have significant residual capacity (the merge and diverge flows used in the design are slightly above the threshold for provision of two lane slip roads in CD 122). The Applicant has submitted the GDSR report for the new slips roads on the SRN and the associated comment log at Deadline 7 (document reference 2.29.1)
<b>HNRFI Works Plans (Document Ref: 2.4H)</b>		
11	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.	Noted- extensive remodelling has taken place on the basis of requirements from the Highway Authorities to include 2023 observed traffic.
<b>Applicants' response to deadline 3 submissions (Appendix B - Transport 2023 Update) (Document Ref: 18.13.2)</b>		
12	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 furnessing matters) are resolved.	The submission documentation contained furnished traffic data based on the more robust 2018 flow information. At the request of the Highway Authorities, the Applicant had to re-survey and re-model all the mitigation and SRN junctions based on 2023 flows. This meant a very large volume of work being done in December and Early January. All of which broadly reach the same conclusions.
<b>Additional information on highway impact, including highway works requirements</b>		
13	In addition to the above, National Highways has been in dialogue with the Applicant relating to furnessing and highways impact matters. Our position has been set out in our Deadline 5 response for submissions made prior to 9 February and	The Applicant has submitted the requested models and traffic flow assignment to NH. A formal technical note is submitted with Deadline 7 (document reference:

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	we continue to work with the Applicant to resolve outstanding issues.	22.2).