

HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE

*Blaby District Council (IP ref.
20040018) Deadline 8
submission: Summary and
Signposting Document (ref.
TR05007).*

Deadline 8 – March 08, 2024

Table of contents

1. Executive Summary	3
2. Introduction.....	4
3. Consequences of inadequate consultation and engagement	4
4. Traffic and Transport	5
5. The Applicant’s Approach to Designing the Proposed Development	6
6. Design and Landscape and Visual Effects.....	7
7. Ecology and Biodiversity	9
8. Noise and Vibration.....	10
9. Lighting	11
10. Health	12
11. Narborough Level Crossing	12
12. Socio-Economics	13
13. Climate Change	13
14. Conclusion	14

Appendices

Appendix 1 Blaby District Council Section 42 Consultation Response (April 2022)

1. Executive Summary

- 1.1. This is the closing submission of Blaby District Council (“BDC”) on the application by Tritax Symmetry (Hinckley) Limited (“the Applicant”) for development consent for the Hinckley National Rail Freight Interchange (“the Proposed Development”) on land predominantly located south-west of the village of Elmesthorpe (“the Application Site”).
- 1.2. BDC’s position on the merits of the Proposed Development remains unchanged since the submission of its Written Representation [[REP1-050](#)]. BDC vehemently opposes the Proposed Development on the basis of the far-reaching adverse environmental and social impacts it would cause in the local area. BDC have throughout the examination process engaged with the Applicant on the core concerns held by BDC; the matters of agreement and disagreement are recorded in the Statement of Common Ground (“SoCG”) between BDC and the Applicant. Furthermore, BDC provided submissions throughout the examination of the Proposed Development and made appearances at the Issue Specific Hearings (“ISHs”).
- 1.3. BDC submits that the Secretary of State does not have sufficient information to make a reasonable assessment of the Proposed Development’s worst-case scenario highway impacts, especially in the case of granting consent.
- 1.4. This closing submission outlines BDC’s key outstanding concerns which BDC submit in the overall planning balance weighs heavily in favour of refusal. BDC still has significant concerns with respect to highway impacts and the likely harm to the Strategic Road Network (“SRN”) at Junction 21 of the M1 motorway / Junction 3 M69 motorway (“the M1/M69 Junction”) and corresponding impacts on the Local Road Network (“LRN”). BDC consider that the Applicant has not sufficiently investigated highway impacts and as a result the true severity of highway impacts have been understated, which also means that the mitigation necessary is unknown.
- 1.5. Furthermore, the design of the Proposed Development has not responded to the environmental constraints of the Application Site and the surrounding area; the design of the Proposed Development has been overly focussed on the operation of the Proposed Development. The focus on operations rather than working within the environmental constraints has resulted in a proposal that would create significant adverse landscape and ecological impacts and unnecessary noise and lighting impacts. BDC do not consider that the Proposed Development meets the criteria for ‘Good Design’ as required by paragraphs 4.28 – 4.35 of the National Policy Statement for National Networks (“NPSNN”) and results in an overdevelopment of the Application Site.
- 1.6. Finally, BDC submit that the purported socio-economic and climate change benefits of the Proposed Development do not outweigh its adverse impacts and therefore the application for development consent should be refused.

2. Introduction

- 2.1. BDC does not seek to reiterate the submissions that have been made throughout the examination nor reconsider the matters that are currently agreed/disagreed between BDC and the Applicant. Rather, the closing submissions reaffirm BDC's fundamental opposition to the Proposed Development.
- 2.2. This document summarises BDC's position at the closing of the examination and provides links to the relevant documents that set out the stated points in greater detail. At the time of finalising this document (Friday 8 March 2024, 13:00) the Examination Library had not been updated; therefore, references have not been included for Deadline 7 documents which link to the Library.
- 2.3. This document will begin by explaining how the Proposed Development's identified impacts have been present since the statutory consultation and the consequences of this inadequate consultation. The document will then set out the significant traffic and transport related impacts. After this, the document explains how landscape, ecological, noise and lighting impacts have originated from the Proposed Development's poor design. BDC's position on health and Narborough Level Crossing related impacts are then set out before the claimed socio-economic and climate change related benefits are critiqued. Finally, a conclusion on the overall planning balance is provided.

3. Consequences of inadequate consultation and engagement

- 3.1. BDC's Section 42 Consultation Response (attached at **Appendix 1**) concluded with "Given the quantum of additional information required, and the potential changes needed to the proposals, the Council expects that further public and statutory consultation is undertaken prior to submitting the application to the Planning Inspectorate". BDC's Adequacy of Consultation Response [[AoC-001](#)] and Written Representation [[REP1-050](#)] went on to state that the Applicant's pre-application consultation and engagement was inadequate. BDC still maintains that position whilst acknowledging that the Proposed Development's application was 'accepted' for consideration by the Planning Inspectorate. As outlined in BDC's Written Representation [[REP1-050](#)], the Applicant provided incomplete information which prevented the issues that have been raised by BDC through the examination process from being resolved.
- 3.2. Many of BDC's residents, who have consistently raised the same issues since Spring 2022 and earlier, find it frustrating to need to repeat, at the close of the examination, their concerns which were grounded in inadequate consultation so long ago. Many of the issues raised with the adequacy of the consultation were centred around a failure to properly assess the highway impacts of the Proposed Development. Given that the Applicant has never resolved these issues, it would have greatly helped the transparency of the Development Consent Order ("DCO") process to have seen a published report that explained the Examining Authority's decision on this matter when that decision was made.

4. Traffic and Transport

- 4.1. BDC as the local authority and Leicestershire County Council (“LCC”) and National Highways as Highways Authorities made several representations throughout the Proposed Development’s examination raising significant concerns in respect of the highway impacts of the Proposed Development and the inadequate assessment of traffic impacts carried out by the Applicant.
- 4.2. As outlined in BDC’s Local Impact Report [[REP1-055](#)], BDC has held significant concerns on the significant increase in traffic through the M1/M69 Junction. BDC is concerned that the Applicant has failed to appropriately assess and mitigate the Proposed Development’s impacts on both the SRN and the LRN. Both BDC and LCC have been concerned by the lack of appropriate detailed modelling of the M1/M69 Junction. As a result, there is significant uncertainty as to the impacts of the Proposed Development on the road networks and in terms of environmental impacts associated with the additional traffic.
- 4.3. The Applicant did provide a Modelling Note on the impact of the Proposed Development on the M1/M69 Junction [[REP5-052](#)], however the Applicant’s additional submissions have done little to resolve the concerns of either BDC, National Highways or LCC. As noted in LCC’s Deadline 6 Submission [[REP6-033](#)] the Applicant concluded that the Proposed Development would not have a material impact on the operation of the M1/M69 Junction and no further mitigation is required, despite the modelling showing a detrimental impact on the LRN. In addition, LCC noted that the Applicant has relied upon the Sustainable Transport Strategy to reduce the Proposed Development’s future traffic flow through the M1/M69 Junction by 10-13%. BDC set out its initial concerns to the Proposed Development’s sustainable transport plans in its Local Impact Report [[REP1-055](#)] and Written Representation [[REP1-050](#)] and repeated these more recently during ISH6 (see BDC’s summary of its oral case for ISH6 [[REP5-054](#)]) and again in its Deadline 6 submissions [[REP6-029](#)]. The uncertainty around the efficacy of the Proposed Development’s sustainable transport measures raises the risk that the Proposed Development will harm the SRN and LRN.
- 4.4. Crucially, the M1/M69 Junction has not been assessed using the ‘VISSIM’ model as requested by LCC. The VISSIM modelling was requested because the ‘Linsig’ model used would not replicate complex movements at this junction as discussed by the Highways Authorities at ISH6. The Applicant’s own consultant, during ISH6, agreed that the VISSIM model would be the most appropriate in that circumstance.
- 4.5. Overall, the Applicant has failed to appropriately model the true impacts of the Proposed Development on a portion of the SRN which already operates overcapacity. The Proposed Development would have significant adverse transport impacts which have not been fully assessed and therefore, adequate

mitigation has not been developed. The Applicant has refused to engage with LCC as Highway Authority in a constructive manner by undertaking appropriate modelling to determine the true impacts of the Proposed Development and in turn develop the requisite mitigation. The result is that the requisite mitigation is unknown. As was outlined in BDC's Local Impact Report [REP1-055], Written Representation [REP1-050] and Written Summary of Oral Submissions made at ISH2 [REP3-100] BDC does not consider that the Sustainable Transport Strategy is adequate in addressing any of the above concerns.

- 4.6. This outstanding, significant concern has been compounded by the fact that outside of providing market evidence to suggest there is a market for the uptake of rail to move freight in and out of the Proposed Development, there is nothing in the DCO that secures the use of rail by future occupiers. Therefore, there is no certainty that the Proposed Development would not induce additional traffic on the SRN rather than contribute to modal shift of freight from road to rail.
- 4.7. In regards to the impacts that additional HGV use would have on the LRN, BDC is unconvinced that the HGV Route Management Plan and Strategy will be an effective means of ensuring that local residents will not be impacted by HGV movements. BDC's detailed comments on the efficacy of the Applicant's revised draft HGV Route Management Plan and Strategy, submitted at deadline 7, will be submitted separately at Deadline 8.
- 4.8. The Applicant has failed to appropriately assess highway impacts. BDC considers that the Secretary of State does not have sufficient information to make a reasoned and informed decision, and should adopt a precautionary approach when balancing the significant adverse impacts on the highway networks. The failure to adequately assess the Proposed Development's highway impacts means there is great uncertainty regarding the severity of these impacts and BDC have significant concerns that the true nature of such impacts are far greater than those stated by the Applicant. BDC does not consider that the Applicant has taken reasonable steps to mitigate the significant known adverse transport impacts, and that any greater, currently unassessed, impacts have also not been mitigated. BDC consider great weight should be afforded to the significant adverse highway impacts that are known and that such harms are a clear indication that the application should be refused.

5. The Applicant's Approach to Designing the Proposed Development

- 5.1. BDC maintains the position it initially outlined regarding the merits of the Proposed Development's design in Chapter 9 of BDC's Written Representation [REP1-050]. The Proposed Development's design, when objectively assessed against the relevant design codes and guidance, is poor and this is detailed further in section 6 below. The design represents an over development of the Application Site and an introduction of an urbanised, alien landscape. BDC

consider this will have significant impacts on the setting of the Application Site and sensitive receptors such as Burbage Common, Burbage Woods & Aston Firs Site of Special Scientific Interest.

- 5.2. The Proposed Development has been designed with little cognisance for the environmental constraints and overall setting of the Application Site with total disregard for urban grain and vernacular. The Parameters Plan [[REP4-016](#)] outlines a primary development zone too large for its context with inadequate buffering.
- 5.3. The Proposed Development seeks to clear a majority of existing natural assets on the Application Site. This lacks sensitivity and prevents integration of the Proposed Development into the surrounding environment. The Proposed Development will result in a loss of both visual and physical amenity, with its scale and massing making it visible from a large number of receptors. Furthermore, BDC submit that the green infrastructure is inadequate, with proposed green areas that are disproportionate to the scale of the Proposed Development with little ecological value.
- 5.4. The Applicant's poor design and overdevelopment of the Application Site results in significant adverse landscape and ecological impacts and unnecessary noise and lighting impacts that weigh heavily in favour of refusing the Proposed Development.

6. Design and Landscape and Visual Effects

- 6.1. BDC considers that the design of the Proposed Development cannot objectively be considered Good Design and would create significant adverse landscape and visual effects. The Secretary of State is required under the NPSNN at paragraph 5.157, to consider whether the Proposed Development has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to avoid adverse effects on landscape or to minimise harm to the landscape, including reasonable mitigation. BDC submits that the Proposed Development fails to satisfy these requirements. BDC provided detailed submissions on the design of the Proposed Development and the landscape and visual impacts that would be experienced in the following documents:
 - a) Appendix 5 of BDC's Written Representation [[REP1-053](#)];
 - b) BDC's Comments on additional submissions received at Deadline 2 [[REP3-094](#)]; and
 - c) BDC's Comments on the Applicant's Revised dDCO [[REP5-054](#)].
- 6.2. Notwithstanding the position outlined in the above documents regarding the inadequacy of the Proposed Development's design and the shortcomings in the Design Code. BDC highlight specific shortcomings in the Proposed Development's Design:

- a) As outlined in Appendix 5 of BDC's Written Representation [[REP1-053](#)], the design is generic and is detrimental to the surrounding landscape character and sense of place. The Architecture does not integrate into the surrounding area.
 - b) The scale and siting of the primary development zone does not provide sufficient opportunities for mitigation.
 - c) As noted at BDC's Comments on additional submissions received at Deadline 2 [[REP3-094](#)] the separation distance between the built development and Burbage Common and Woods Country Park is not generous, rather it creates a pinch point which crosses into Burbage Common Local Wildlife Site.
 - d) The diverted bridleway corridor along the western boundary would be perceived as narrow in comparison to these open views currently available from much of the existing Public Rights of Way through the Application Site. This would have a negative impact upon the visual amenity which cannot be mitigated for by improving the surfacing of road and rail crossings.
 - e) The Applicant has not been able to demonstrate that the loss of the Veteran Tree is unavoidable.
 - f) The design of the surrounding streetscape and site circulation results in a loss of amenity for the surrounding area.
- 6.3. BDC submits that there will be long term negative effects. Whilst it is agreed in the SoCG that there would be a large number of significant adverse residual landscape and visual effects (at Year 15 and beyond), BDC considers that the severity of residual landscape and visual effects has been understated by the Applicant. The receptors that BDC considers would experience significant adverse landscape and visual effects in addition to those reported are outlined in the SoCG.
- 6.4. As noted at BDC's comments on the Applicant's Deadline 3 submissions [[REP4-166](#)] there would be adverse residual effects (Year 15 and beyond) on the Burbage Common Rolling Farmland Landscape Character Area, the views experienced by Country Park Users (Public View Point ("PVP") 44) and Public Right of Way users in the vicinity of Burbage Common (PVP 3). Furthermore, BDC still consider that there will be significant visual residual night time impacts as outlined in BDC's Written Summary of Oral Submissions made at Issue ISH3 [[REP3-097](#)]. The specific receptors are outlined in the SoCG.
- 6.5. BDC submit that the large number of significant adverse landscape and visual effects are representative of the inadequate mitigation proposals and poor overall design. BDC does not consider that the measures outlined in the Landscape and Visual Effects Assessment (contained within Chapter 11 of the Environmental Statement [[REP4-041](#)]) or the Illustrative Landscape Strategy [[REP4-080](#)] are sufficient. BDC's position is unchanged in that it considers the primary development zone within the Parameters Plan [[REP4-016](#)] to be disproportionate to the Application Site, putting pressure on the resultant design and leads to inadequate opportunities for mitigation of the Proposed

Development as outlined in BDC's Comments on Deadline 4 Submissions [[REP5-054](#)].

- 6.6. As noted in BDC's Comments on the Deadline 4 Submissions [[REP5-054](#)], BDC does not agree that the proposed mitigation planting would screen the majority of the Proposed Development. The day-time [[APP-300](#)] and night-time [[REP4-076](#)] photomontages show that large portions of the proposed buildings will remain visible above vegetation in a number of viewpoints at Year 15 and beyond.
- 6.7. Furthermore as outlined above, BDC does not consider that the embedded mitigation by way of design is sufficient. BDC does not agree with the Applicant that the scale of the development makes it inappropriate for a landscape led or hybrid approach. As noted in BDC's Deadline 5 Submissions [[REP5-054](#)] BDC does acknowledge that there is a limit on the extent to which it is possible to contribute to the enhancement of the quality of the area, however BDC does not consider this is sufficient reason for not attempting to enhance the current rural character or aesthetic and considers the Applicant could and should have done more in this regard.
- 6.8. BDC has maintained its position that the design of the Proposed Development, its siting and inadequate mitigation measures will lead to unacceptable and far reaching landscape and visual effects that will erode the rural character and aesthetic of the area. BDC submits that the residual effects that are purported are emblematic of the inadequate mitigation proposal and an illustration of the Proposed Development's inability to meet the criteria for 'Good Design' as required by the NPSNN at paragraphs 4.28 – 4.35.
- 6.9. BDC submits that the significant adverse landscape and visual effects of the Proposed Development significantly weighs against the Proposed Development being granted development consent in the planning balance.

7. Ecology and Biodiversity

- 7.1. BDC outlined at Chapter 12 of its Local Impact Report [[REP1-055](#)] the significant negative effects that the Proposed Development would have on local biodiversity and ecology including loss of woodland, mature trees, a veteran tree, hedgerows and fragmentation of habitats. BDC also commented on the concerns regarding biodiversity impacts in its Written Representation [[REP1-050](#)] and made additional comments at ISH3 as outlined in BDC's Written Summary of Oral Submissions made at ISH3 [[REP3-097](#)].
- 7.2. It has been agreed through the SoCGs between the Applicant and BDC and HBBC that the biodiversity impacts of the Proposed Development would be significant adverse and thus further assessment would be required at the detailed design stage, including the consideration of offsite Biodiversity Net Gain (BNG).

- 7.3. BDC consider that the severity of adverse impacts on ecological receptors is a further symptom of the poor design of the Proposed Development. As outlined in BDC's Written Representation [[REP1-050](#)], Local Impact Report [[REP1-055](#)] and SoCG with the Applicant, BDC considers that the scheme has resulted in the unnecessary loss and fragmentation of habitats and has four key points in this regard. Firstly, important ecological receptors will be unnecessarily impacted because of the scale and size of the primary development zone – overdeveloping the main application site between the M69 and railway line. The scale of the primary development zone has hindered the ability to provide effective mitigation which has resulted in a reliance on offsite measures. Secondly, there has been a lack of consideration to the retention of existing hedgerows/features of note within the Application Site to minimise the need to displace fauna. Thirdly, BDC has continually expressed concerns on the loss of the Veteran Tree on site and does not consider that the Applicant has provided ample justification for its loss. Finally, the habitat severance caused by the A47 Link Road is poorly mitigated against with insufficient underpasses.
- 7.4. In relation to the proposed mitigation measures, and as set out in our SoCG with the Applicant, BDC has outstanding concerns on the ability of the Proposed Development to deliver 10% BNG and overall, consider that there has been an over reliance on the mitigation measures of other developments to provide the requisite mitigation. BDC does not consider that the proposed mitigation measures are sufficient to compensate for the significant adverse effects on ecological receptors. Whilst it is acknowledged that the Applicant has committed to delivering 10% BNG via Requirement 29, there remains a lack of clarity on the use of Habitat Banks to deliver the remaining BNG offsite.
- 7.5. Overall, BDC submit that the biodiversity and ecological impacts of the Proposed Development will be significantly adverse. The proposed mitigation relies on offsite measures with a lack of clarity or certainty as to whether these can be adequately delivered. BDC consider that the impacts will be insufficiently mitigated and therefore weigh against the granting of development consent.

8. Noise and Vibration

- 8.1. BDC have invested a significant amount of time discussing the noise and vibration issues that were laid out in its Written Representation [[REP1-050](#)], Local Impact Report [[REP1-055](#)] and ISH3 summary [[REP3-097](#)]. The Applicant provided additional information including sensitivity testing and additional drawings of mitigation measures in response to BDC's concerns. In addition to this, Requirement 26 Control of operational noise of the Applicant's draft Development Consent Order (document reference 3.1D) secures the provision of further assessment at the detailed design stage of the Proposed Development's construction.
- 8.2. Notwithstanding the progress made in that regard, out of necessity from the Proposed Development's overall poor design and overdevelopment of the Application Site, the Applicant is required to rely upon visually intrusive

acoustic barriers. The barriers are up to 6m in height, between 5 and 20m away from residential properties at Aston Firs Caravan Site, Woodfield Stables and dwellings located on Burbage Common Road. In respect of the barriers to be erected adjacent to Aston Firs Caravan Site and Woodfield Stables, BDC does not consider that the acoustic barriers can be implemented without significant removal of existing vegetation and encroachment into root protection areas. While stating that minimal disruption is intended, the Applicant's proposals clearly both necessitate and seek consent for the near total removal of the existing hedgerow and trees bounding the eastern side of these gypsy and traveller sites. This is evidenced by the Acoustic Barrier Locations [[APP-279](#)], Acoustic Barrier Sections [[REP4-026](#)] and Arboricultural Impact Assessment (see sheet 38) [[APP-194](#)] and secured by Requirement 4 Detailed design approval. In general, BDC consider that the Proposed Development's noise impacts are exacerbated by poor design and overdevelopment of the Application Site.

- 8.3. Overall, BDC consider that the Applicant's assessment approach and conclusions in respect of noise and vibration are in line with current guidance. However, given the subjective nature of noise impacts and the Proposed Development's scale and proximity to residential dwellings (including caravans at nearby gypsy and traveller sites), BDC consider there will a detrimental effect on nearby residents in this regard. BDC also considers that some of these impacts have unnecessarily arisen as a result of the Proposed Development's poor design and overdevelopment of the Application Site.

9. Lighting

- 9.1. BDC have invested a significant amount of time discussing the lighting issues that were laid out in its Written Representation [[REP1-050](#)] and Local Impact Report [[REP1-055](#)]. In response to BDC's concerns, the Applicant provided additional information including a Technical Note for Obtrusive Light that is now appended to the revised lighting strategy submitted at Deadline 7 (document reference 6.2.3.2A). In addition to this, Requirement 30 Lighting, of the Applicant's draft Development Consent Order (document reference 3.1D), secures the provision of further assessment at the detailed design stage of the Proposed Development's construction. As a result of this additional work there are no longer any matters of disagreement between BDC and the Applicant in respect of the Proposed Development's lighting.
- 9.2. Given the above, BDC is satisfied that, following established guidance and in technical planning terms, the lighting is acceptable. Notwithstanding this, it is important to note that the scale and 24-hour operation of the Proposed Development will be incredibly impactful on residents living nearby who will experience a significant change to their lives and who are understandably concerned by the prospect of losing their dark, night-time skies. BDC also considers that some of these impacts have unnecessarily arisen as a result of the Proposed Development's poor design and overdevelopment of the Application Site.

10. Health

- 10.1. In addition to the impacts set out above, the Proposed Development will result in several other impacts, namely in respect of health, detailed in this section, and also other impacts as a result of the increased barrier down time at Narborough Level Crossing which are detailed in section 11 below.
- 10.2. BDC's SoCG reiterates that BDC has consistently requested that due to the scale of the Proposed Development, health impacts should have been addressed through a health impact assessment. It is not considered that the Health and Equalities Briefing Note [\[REP3-012\]](#) fully assesses for potential impacts.
- 10.3. Similarly, BDC is mindful of the Proposed Development's proximity to Burbage Common and Woods and the disruption to Public Rights of Way at the Application Site. Many of the submitted Relevant Representations, Chapter 18 of BDC's Written Representation [\[REP1-050\]](#) and Chapter 20 of BDC's Local Impact Report [\[REP1-055\]](#) highlighted the public mental health benefits these amenity areas provide. Despite this, as set out in BDC's SoCG, the Applicant has not conducted an assessment of the potential mental health impacts of the Proposed Development. BDC can only therefore conclude that the consideration of the impact on mental health has not been adequately addressed. This weighs against approving the Proposed Development in the planning balance.

11. Narborough Level Crossing

- 11.1. In respect of the increased barrier down time at Narborough Level Crossing, BDC notes LCC's Deadline 6 submissions [\[REP6-033\]](#) and the Applicant's response to both of those submissions (document reference 18.20) and the ExA's written questions 2.11.8 and 2.11.9 [\[REP5-036\]](#). BDC remains concerned in respect of the environmental and social impacts in Narborough and Littlethorpe, including additional traffic and the wait times for those who are unable to use the stepped footbridge. It still appears likely that the quality of life of Narborough and Littlethorpe's residents will be negatively impacted by the Proposed Development.
- 11.2. The concerns raised in BDC's Written Representation [\[REP1-050\]](#) at paragraphs 6.33 and 6.34 remain and weigh against approving the Proposed Development.

12. Socio-Economics

- 12.1. The merits of the Proposed Development is predicated upon the delivery of socio-economic benefits via job creation. However, BDC considers that there will be little in the way of economic benefits for Blaby District. BDC has outlined its apprehension as to the purported socio-economic benefits in its Local Impact Report [[REP1-055](#)], Written Representation [[REP1-050](#)] as well as at ISH4 as outlined in BDC's Written Summary of Oral Submissions [[REP3-098](#)].
- 12.2. BDC's Local Impact Report [[REP1-055](#)] at paragraphs 10.16 – 10.17 details that the Proposed Development is anticipated to generate below median wages comparative to Blaby and Leicestershire. Given the comparatively low sector pay for the future operational wages at the Proposed Development it is likely that fewer employees will reside in Blaby District and Leicestershire. As outlined in the Local Impact Report, this will reduce the purported benefits and potentially increase the negative transport and traffic impacts which BDC consider are already significant.
- 12.3. Whilst it is unlikely that the Proposed Development would cause a shortfall in the local housing market, there is a very limited rental market in Blaby District and in Hinckley and Bosworth Borough, which indicates greater in-commuting from urban areas such as Leicester, Rugby and Coventry. BDC does not consider this has been adequately reflected in the Applicant's mitigation proposals.
- 12.4. It should be acknowledged however, that the Applicant and host authorities have worked amicably to produce a Work and Skills Plan which will be secured via the Section 106 Agreement. The Work and Skills Plan sets targets to maximise the local benefits of employment generation from the Proposed Development. However, BDC does not consider such an agreement obviates the reality that the employment opportunities that will be generated will have wage profiles below the national and regional average. It is on this basis that BDC considers that the Proposed Development will not deliver the purported socio-economic benefits that the Applicant has stated it will. Therefore, BDC do not consider that the socio-economic benefits outweigh the very significant, long term adverse effects that the Proposed Development would cause.

13. Climate Change

- 13.1. As set out in in BDC's Deadline 7 submissions (comments on Deadline 6 submissions) and further updated in BDC's signed SoCG with the Applicant, disagreement exists with the Applicant in respect of amendments to Requirement 10 Rail which would evidence the claimed modal shift of freight from road to rail through the operation of the rail freight terminal. BDC consider that this Requirement is necessary for the reasons previously submitted and that without such a Requirement, the climate change benefits purported by the Proposed Development are undermined.

- 13.2. Therefore, BDC do not consider that the climate change benefits outweigh the very significant, long term adverse effects that the Proposed Development would cause.

14. Conclusion

- 14.1. BDC maintains its vehement opposition to the Proposed Development which has been characterised by an overdevelopment of the Application Site and the introduction of an urban landscape that is alien to the surrounding environment. The Proposed Development would result in significant adverse highways impacts which the Applicant has under investigated and insufficiently mitigated. The poor design of the Proposed Development would result in significant landscape and ecological impacts and unnecessary noise and lighting impacts. BDC submit that these impacts weigh significantly against the Proposed Development in the planning balance, such impacts will not be outweighed by the supposed socio-economic and climate change benefits of the Proposed Development. The anticipated job creation will result in jobs below the median wage profile and the Applicant is unwilling to guarantee or evidence the ongoing operation of the railfreight terminal and it is on this basis that BDC submit that such purported benefits do little to outweigh the significant impacts that will occur.
- 14.2. BDC submit that the application for the Proposed Development should be refused.