

Tritax Symmetry (Hinckley) Limited

HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE

The Hinckley National Rail Freight Interchange Development Consent Order

Project reference TR050007

Applicant's response to Deadline 7 Submissions [part 6- Non-Statutory Bodies]

Document reference: 18.21

Revision: 01

8 March 2024

Planning Act 2008

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

HINCKLEY RAIL FREIGHT TERMINAL Comments for deadline 7 CPRE Leicestershire Unique Reference: 20038675 (With Sapcote Parish Council (UR 20039514)) February 2024

No	CPRE Response	Applicant's Response
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:	Noted
2.2	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).	The PRTM assigns traffic based on speed/flow curves. The assignment takes account of road classification but is not based purely on the road hierarchy.
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.	As per previous responses. The Applicant has maintained a consistent and logical approach to the outputs from the PRTM. This model has been used throughout the county to understand forecast flows across for a variety of developments on the strategic and non-strategic network. It remains the best predictive tool available for forecasting traffic demand in the future years.
	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	Noted and correct.

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2.6	This seems to refer to Table 3 of the RMS which in the latest iteration ¹ is labelled 'Potential Future Mitigation Measures in Sapcote'. In other words, none of these mitigations are agreed.	Proposed mitigation has been accounted for in the works plans and is discussed in the Transport Assessment (REP3-157). The requirements for further measures have been added to the latest HGV Route Management Plan and Strategy submitted at Deadline 7 (document reference: 17.4E, REP7-055), which is the point referred to here.
2.7	Indeed, the first item in that table appears discounted by their response to the Road Safety Audit.	The safety audit has been carried out by third parties to identify appropriate measures- those deemed unsafe have to be reconsidered.
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.	LCC have been party to discussions on design and have commented on the interventions and Road Safety Audits.
	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.	Noted
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.	Noted- the Applicant has provided feedback to all Deadline responses.
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.	The thresholds need to be breached on an averaged daily flow across the reporting period to be escalated to the next stage or in the event of cumulative breaches of 4 or more per occupier, then Stage 2 fining is triggered. The details of the HGV Route Management Strategy breach will be provided via the HNRFI HGV Review report to the HGV Strategy Steering Group. Full contact details for reporting has been committed to within the revised HGV Route Management Plan and Strategy submitted at Deadline 7 (document reference: 17.4E, REP7-055)).
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 4 ² (the old Table 5) includes the breach levels based on an average of 10 one-way trips per day (As per para 5.54).	Correct, the RMS has been further updated for Deadline 7 (document reference: 17.4E, REP7-055) to account for comments from stakeholders.
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): <i>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.</i>	Correct

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

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

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	<i>The HGV Strategy Steering Group can agree to meet more frequently than once annually if reported breaches are considered unacceptable.</i>	
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.	Breach levels are now consistent across all sites and, as stated in 2.13 above, the option to meet more frequently should breaches be considered unacceptable has been added.
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 confidence, let alone deal with HGVs displaced by the development and the associated changes to the road network.	Noted. The HGV Route Management Plan and Strategy submitted at Deadline 7 (document reference: 17.4E, REP7-055) is intended to set out full commitments to monitoring HGVs connected with the development. It will also be used to check background HGV levels. It is the Applicant's view that the commitments are in place to provide a proper framework of reporting and monitoring to reduce impacts on the neighbouring villages.
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.	The camera locations pick up key movements through Stoney Stanton on the B581 and Sapcote on the B4669. The ANPR cameras will need to be situated in public highway and the details of their implementation (precise location, power supply, signage etc) will be subject to approval by Leicestershire and Warwickshire County Councils and consultation with relevant Parish Councils through details to be submitted to the LPA for Requirement 18.
	Para 5.1 response:	
2.17	In response to para 5.1 they say: <i>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.</i>	Noted
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.	Improved pedestrian facilities are proposed within Sapcote and have been assessed through the Road Safety Audits.
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.	The toolkit approach identifies appropriate interventions for rural villages, it is not theoretical, but a highly practical guide. The proposals were in place at public consultation and have been refined based on feedback from residents and LCC.
	Para 6.1 response:	
2.20	In response to para 6.1 they say, with regards to the identified cycling crashes on the B4114: <i>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.</i>	Noted.
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	The Sustainable Transport Strategy (document reference: 6.2.8.1E, REP7-028) provides a full rationale behind the cycling interventions put forward. These have concentrated on providing enhancements to

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	on the B4114. In particular no work is proposed at Junction 41 between the B4669 and B4114.	routes with the largest population catchments and that lie with 5km of the site. The B4114 is not identified as a cycle route to the site as it is more sparsely populated with little cycle infrastructure in place currently.