

HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE – LAND WEST OF STONEY STANTON

COMMENTS ON APPLICANT'S RESPONSE TO SECRETARY OF STATE'S LETTER DATED 10 SEPTEMBER 2024.

1. Introduction

1.1. We refer to our following previous submissions:

- (a) our written representations at REP1-217;
- (b) our written statement of Oral Case at CAH2 at REP3-144;
- (c) our response to Deadline 3 submissions at REP4-200;
- (d) our updated technical note from RPS in response to Deadline 4 submissions at REP5-095;
- (e) our written response to Deadline 7 submissions at REP8-056.

1.2. Our above listed submissions referred to the impact of the HNRFI development infrastructure and the effect of the redistribution of traffic on Stoney Stanton and Sapcote, in addition to the impact of the development traffic on the M69 and specifically on the M69/M1 Junction.

1.3. We have reviewed the latest information submitted by Tritax Symmetry (Hinckley) Limited (the "Applicant") in response to the Secretary of State's Letter dated 10 September 2024.

1.4. Despite significant additional information being provided by the Applicant, our clients' still have the following concerns regarding the impact of the HNRFI on the surrounding highways network.

2. Sapcote

2.1. Whilst the HNRFI will enforce HGV restrictions on traffic travelling to and from the rail freight terminal, this won't stop other HGV traffic travelling through Sapcote seeking access to the M69 following the introduction of the new south facing slip roads.

2.2. Traffic from the south of Leicester including Blaby, Narborough, and Broughton Astley will likely find the new route to the M69 via Sapcote more attractive than routing north through the M69 / M1 junction. It is this traffic which will impact on Sapcote and not just the development traffic.

2.3. The HNRFI Transport Assessment at APP-156 highlights the increase in traffic using the B4669 in Table 7-2 of the document. This demonstrates on their own evidence that traffic in the AM peak hour will increase by 84% in the AM peak and 65% in the PM peak east of the M69 junction. It is this material increase in flow through Sapcote which will impact on the village.

2.4. The following proposed highways mitigation works in Sapcote are minor: improvements to the pedestrian area outside the Co-Op store, delivery of a zebra crossing, additional footway widening and the re-location of the bus stop from outside the Co-Op eastwards along the B4669. These measures will not materially benefit the safety of pedestrians within the village and will not materially ease the movement of traffic through the village.

2.5. Therefore, it can only be concluded that the proposals including any mitigation result in a detrimental impact on the village of Sapcote.

3. M69/M1 Junction

- 3.1. The modelling report for this junction included in the most recent submissions by Tritax, report 'Appendix 1 – M1 Junction 21 Modelling Note' (the "Modelling Note"), includes details of the level of development traffic through the junction. In the assessment year of 2036, this reflects 4.9% of the existing traffic in the AM peak and 6.8% in the PM peak (see Table 6 of the Modelling Note), hence a material increase in traffic.
- 3.2. The conclusion to the Applicant's assessment is set out in paragraphs 2.7 and 2.8 of the Applicant's response letter from Eversheds Sutherland dated 10 December 2024 (the "Response Letter"). This states:-

"2.7 The Applicant is not proposing to undertake any works to mitigate its impact on the junction. This is because current capacity constraints at junction 21 are longstanding and driven by the restricted width of the M1 underbridges on the circulatory carriageway. Improvements to address these constraints would be of a significant magnitude and require considerable Government investment. Whilst there is a clear aspiration from both Leicestershire County Council and National Highways to improve the junction, there is currently no scheme identified. It is acknowledged by all parties that the junction is over capacity as a result. In simple terms, the impact of the proposed development would be to put a minor amount of additional vehicles through the junction in the PM peak. This would add to existing queues.

2.8 To place this increase in context, even taking the worst case scenario, the total percentage impact at junction 21 attributable to the Development would only be 4.9%. This includes all projected development traffic on top of the without development scenario - i.e. it assumes that there will not be any diversion of existing traffic as predicted...."

- 3.3. Accordingly, despite it being accepted that the junction is already over capacity and that the HNRFI will materially increase traffic, no mitigation is proposed. The Applicant justifies this on the basis that the costs of any mitigation works would be significant, require government investment and that, in any event, no mitigation scheme is currently identified.
- 3.4. However, this contrasts with the levels of financial contributions now being offered at other junctions where the impact of the development is far less.
- 3.5. This includes the Desford Crossroads junction where the Applicant identify their level of impact as 17 vehicles in the AM peak and -7 in the PM peak (see footnote 13 of the Response Letter). At this level of impact, the development is contributing £1,060,272.19 toward junction improvement works.
- 3.6. Furthermore, at Gibbet Hill junction, the Applicant identify their level of impact as 2% in the AM peak (70 additional vehicles) and 1.9% in the PM peak, (68 additional vehicles) (see Appendix 14 Gibbet – Cross in Hand Modelling Note. Ref DCO HNRFI-BWB-GEN-xx-RP-TR-0046). For this level of impact, the agreed level of contribution appears to be £1,668,240.02.
- 3.7. Hence, at locations on the wider network where modest levels of impact are defined, sums in excess of £2.7 million have been contributed to improvements, yet at the key junction of the

M69 and M1 where circa 25% of the development traffic will pass through, no mitigation is proposed or seemingly required.

- 3.8. We therefore highlight the inconsistencies in the approach to the assessment of impact of the HNRFI scheme (particularly in respect of M1 Junction 21) and the mitigation that stems from this.

4. Certainty

- 4.1. In any event, we wish to highlight the importance of the Secretary of State making a decision on the HNRFI DCO application as soon as possible. Continued uncertainty around whether the HNRFI is going to come forward or not negatively impacts the planning and preparation for emerging development proposals in the areas.
- 4.2. In particular it is creating uncertainty for those seeking to prepare the new Blaby Local Plan and stalling the bringing forward of ambitious growth proposals that would otherwise assist in meeting the Government's agenda for delivering 1.5m new homes in the lifetime of this parliament. Therefore, we would urge the Secretary of State to make a decision either way without any further delay.