

**Sharon Scott**

**Tritax application re Hinckley National Rail Freight Interchange (HNRFI)**

**Interested Party Reference No. 20037843**

**1. Sapcote Village Centre**

Overall, the enhanced design for the historical centre of the village has not changed significantly from that originally presented to the ExA. The main addition seems to be the idea of HGVs driving down the centre of the carriageway in the section of road between the Co-op and New Walk and flashing lights to encourage them to do so. The enhanced scheme has not been put to public consultation.

In my opinion, the key issues are:

- a. While Tritax say that opening the extra slips at M69 Jct 2 will result in a 25.6% daily increase in HGV activity through the village (Sapcote Technical Note: Executive Summary), they do not seem to have assessed the increase in car traffic through the village arising from the same event, or explained how the cumulative effect of both increased car traffic and extra HGV traffic will impact on their enhanced scheme.
- b. The proposal to deal with the section of road between the Co-op and New Walk by reducing the width of the carriageway so that HGVs realise there is insufficient room for them to pass and wait for the oncoming HGV sounds dangerous in the extreme. It relies on the HGV drivers actually doing this and not trying to pass anyway – in which case they would still mount the kerbs. Also, as LCC point out (Sapcote Technical Note 6.59), it is unclear how, if one HGV does not stop to let an oncoming HGV through, they could then safely reverse to remedy the situation. The scheme coincides with a major blind spot at the eastern end of the Co-op, so cars driving round the bend from the direction of Hinckley will suddenly be faced with HGVs driving towards them down the middle of the road. It is also unclear whether the reduced width of carriageway will continue to be sufficient to allow two cars to pass as we move towards wider electric cars. If this is not the case, then the length of ensuing tailbacks would be wholly unacceptable.
- c. Tritax do not seem to have addressed the increased risk to cyclists of the extra HGV traffic and additional cars arising from the opening of the extra slips at M69 Jct 2 in any part of their enhanced scheme, but in particular on the length of carriageway where they intend to reduce the width of it.
- d. The central traffic island outside the Co-op that Tritax say they can remove to create more space for HGVs is actually just two keep left signs with a narrow pedestrian refuge in the middle so its removal will only improve width on a very small part of the carriageway.
- e. The opening up of the hatched area outside the Co-op to pedestrian use and the prohibition of cars from using it does not take into account that the Co-op's public car-park offers parking for only 5 cars, one of which is for disabled use only. Many villagers stop off by car outside the Co-op to visit the shop or to use the cashpoint or parcel drop point on their way to and from work, and elderly villagers often drive to the Co-op to do their shopping, so there is never adequate parking. Cars are often parked all the way down Church Street and often illegally parked in the area outside the Co-op. (which is why BWB say in Sapcote Technical Note 3.12 that they recorded 150 illegally parked vehicles a day in the hatched area). The point Tritax fail to address is where these cars would park instead, given that there is no space in the centre of the village to provide a larger car park for the Co-op and parking on Church Street is

very limited since many residences there do not have off-street parking. I cannot, therefore, see how any of Tritax's measures will prevent parking in the area in front of the Co-op, regardless of the legality of it, so consequentially, pedestrians will still be likely to use the narrow pavement on the opposite side of the road, and this aspect of Tritax's scheme will not provide any mitigation whatsoever; in fact, it will make the area more dangerous than it is already.

- f. Tritax do not seem to have addressed the increased risk posed to pedestrians by the 'S' bend outside Blacksmith's cottage and the poor visibility associated with it that arises from the increased HGV and car activity resulting from opening the additional slips at Jct 2 M69.
- g. Tritax fail to explain where the vehicles that often park on the northern kerb outside Sapcote Club and adjacent properties would park instead, given that there is no other parking in the vicinity. I believe the problem stems from inadequate parking facilities for the terrace houses next to the kerb way. Some of the parked cars may also belong to customers and staff of the hair salon on the corner of Stanton Road, since this does not have a car park either. Also, this proposal was not put to the public consultation for HNRFI, so the affected people would have been unable to comment on it.
- h. It is difficult to see how the new informal crossing to the west of Stanton Road (Sapcote Technical Note Appendix C) would be used given that pedestrians crossing the B4669 to head towards the Co-op would then be faced with the very narrow walkway past the old horse mounting block outside Blacksmith's Cottage. It would be dangerous in the extreme to encourage pedestrians to use this walkway.
- i. Tritax's entire scheme fails to take account of the fact that there is no public parking (or space for any) in the centre of the village. A lot of villagers, particularly the elderly (many of whom rely on being able to get to the Co-op by car to do their shopping), and others who do so for convenience as part of their evening or morning commute or during bad weather and dark evenings, use their cars to visit the amenities in the centre of the village such as the Co-op, the cashpoint, the parcel drop point and the hairdressers. I cannot see how this can be stopped and where the vehicles displaced by Tritax's more onerous no-waiting restrictions will park instead. I am surprised that neither road safety audit picked up on this point. In addition, Tritax do not seem to have considered the effect of these measures on local businesses, or indeed consulted them.
- j. Tritax fail to mention that there is a children's nursery just before Sapcote Club, where parents often park on the road to pick up and drop off their children. This would be particularly dangerous given the 25.6% daily increase in HGV activity that Tritax predict. Additional car traffic generated by the opening of the additional slips at Jct 2 M69 would also impact.
- k. I note that BWB say that they observed no more than 10 to 20 schoolchildren using each of the two daily school bus services (Sapcote Technical Note 3.12), but they do not provide any firm evidence to support these findings (dates; times; any special circumstances etc.). I find this number a little on the low side given that Sapcote does not have any provision for education above the age of 11. Also, infant and primary school children from one side of the village cross Leicester Road opposite the Co-op to reach the infant and primary school on Bassett's Lane via Church Street. This is evidenced by the fact that until her recent death, there was a crossing lady on Leicester Road beside the Co-op, and I believe a replacement is currently being recruited. The zebra crossing proposed by Tritax would obviously offer some mitigation, but given the cumulative effect of more traffic, dangerous blind spot, HGVs travelling in the centre of the carriageway between there and New Walk, parked cars etc., it is difficult to see that this will be a safe environment for children to cross the road.

- I. BWB say that there is currently no public bus service in Sapcote. I believe that there is actually an on-demand Fox Connect bus service, which picks up in the same area as the regular public bus used to.
- m. The accident statistics that BWB quote relate to the last five years and so are based on the status quo. This is not a relevant basis for a future where the additional slips at M69 Jct 2 are opened and traffic arising from this event is routed through the village.

The issue of pedestrian safety in the centre of Sapcote is one that I feel very strongly about due to my personal history, which I verbally explained to the Public Examination, and which I repeat again here for ease of reference:

The M69 was not opened until 1977, and until this date, the main route between Leicester and Coventry was the former A46 (now B4114). Consequently, there were a lot more lorries passing through the centre of Sapcote then. As a small child in the late 1960s, I was walking with my mother, who was pushing my younger brother in a pushchair along the narrow footpath opposite where the Co-op stands today, when I was injured by a lorry mounting the kerb. The layout of the village centre has changed little since that time, and Tritax's proposals will do nothing to alleviate the situation; in fact, they are likely to make it far more dangerous.

The total forecast increase in HGV traffic of 25.6% daily through the village centre predicted by Tritax (Sapcote Technical Note: Executive Summary) – no figures are given for cars – is wholly unacceptable given the risks and issues outlined above and the low level of mitigation proposed by Tritax.

In addition, re-routing of HGVs from HNRFI along the B4669 through Sapcote village centre to Magna Park and South Leicester (2 key markets identified by GB Maritime) is bound to occur at peak times due to congestion at Jct 21 M1/Jct 3 M69, despite Tritax's assertion to the contrary. The £1,000 fine proposed would not be much of a deterrent in view of the time that would be saved on a delivery by avoiding Jct 21 M1/Jct 3 M69.

I find it inconceivable that Tritax can alter the ExA's assessment of *unacceptable* impact on Sapcote Village Centre to *neutral* without having put forward any substantial improvement to their original plan. (Letter to Secretary of State P29).

I believe that the ExA's conclusion that the proposed development would lead to an unacceptable highway safety risk in the village of Sapcote, which could not be mitigated within the terms of the application, remains correct.

## **2. Jct 21 M1/ Jct 3 M69**

Tritax do not propose any mitigation whatsoever for this junction and state that there are no future plans to improve it, that any improvement would be of a scale that would require Government intervention and that the junction is already overcapacity.

Tritax estimate that the total percentage impact at Jct 21 M1/ Jct 3 M69 attributable to HNRFI would be 4.9% (Letter to Secretary of State 2.8). This needs putting into context with the already unacceptable magnitude of the congestion at Jct 21 M1/ Jct 3 M69. Queues all the way back to Jct 2 M69 are not unknown. Queues often stretch back north on the M1 well into North Leicestershire.

I am not sure which hours of the morning and evening Tritax consider to be peak hours, but in the evening, queues start to build up at 4PM and continue until late evening. In the morning, queues continue until at least mid-morning.

Tritax have 9,000 HGV movements per day (FAQ section [www.tritaxbigbox.co.uk](http://www.tritaxbigbox.co.uk)) to accommodate, and given the markets that Tritax are proposing to engage with, I would expect a significant number of these to be routed through Jct 21 M1/ Jct 3 M69 if they are to avoid using prohibited routes such as through Sapcote.

There are also 8,000 workers to be accounted for. Leicester City Council stated during information submitted to the ExA that they expect a significant number of these workers to come from Leicester City. These will therefore also have to pass through Jct 21 M1/ Jct 3 M69. Even if the bus services suggested by Tritax in their comments on the Sustainable Transport Service (Letter to Secretary of State 3.9) are implemented, I would expect the workers' commute to still significantly impact congestion at Jct 21 M1/ Jct 3 M69, especially since Tritax state that Network Rail have made clear its position on a passenger station at Elmesthorpe would not be supported (Letter to Secretary of State 3.26).

Given the magnitude of the current congestion at Jct 21 M1/ Jct 3 M69, even 4.9% impact arising from the development is completely unacceptable. In addition, motorists who currently use A47 for their commute may switch to M69 due to increased traffic on A47, which will further increase congestion at this junction.

Tritax state (Letter to the Secretary of State 2.10) that they do not expect any increase in the annual collision rate of 6.2 per year at Jct 21 M1/ Jct 3 M69 to result from the development. This does not sound particularly credible given the expected 4.9% increase in traffic at this junction.

I have commuted from Sapcote to North Leicester via M69/ M1 / A46 for many years and can testify to the massive disruption and loss of productivity that delays at this junction cause to local residents and businesses. Even a relatively minor incident such as a van braking down on the roundabout can quickly accelerate queues on both the M69 and the M1.

I would have expected Tritax to take the well-known and long-standing capacity issues at Jct 21 M1 / Jct 3 M69 into account when selecting a proposed site for HNRFI, and for this reason would not have expected them to select a site off the M69.

I find it inconceivable that Tritax can alter the ExA's assessment of *very substantial* impact on M1 Jct 21 / M69 Jct 3 junction to *neutral* without having put forward a single improvement to the junction. (Letter to Secretary of State P29)

Tritax state that they have been working on this project for 10 years, and, while not disputing this, I would point out that the two critical highway issues of Sapcote village centre and Jct 3 M69/ Jct 21 M1 were pointed out to them by many local residents at the very first public consultation in 2018, but Tritax have consistently refused to address them.

### **3. General**

Tritax state that HNRFI is *the only site possible for a rail freight terminal in this area*. (Letter to Secretary of State 1.6). If the Secretary of State refuses consent for HNRFI, however, it is extremely likely that other developers will come forward with new sites in the area which have better road connectivity. Tritax found that some suitable alternative sites in the vicinity were not available as they were located in the green belt (Examiners' Report 3.2.43). However, with the current shift in

Government policy, it is possible that some of these alternative sites would now meet the classification of grey belt, and so could be considered.

I put forward to the ExA a proposal to rail-link Magna Park (the largest dedicated logistics park in Europe, which is located in South Leicestershire), which was prepared for me by a rail engineer. (Examiners' Report 3.2.81). The ExA view was that *the cost of rail and other infrastructure connection would make this unattractive to the market due to financial viability*. However, this obviously would become a viable option if Government funding were to be provided for at least part of the rail and other infrastructure connection. Magna Park is much better sited than HNRFI from the perspective of road connection, given that M1, M6 and A5 are all nearby and easily accessible.