



# TR050007 Hinckley National Rail Freight Interchange

## Stoney Stanton Action Group

Comments on additional information supplied by TSH (10<sup>th</sup> Dec 2024) in response to the SoS's letter (10<sup>th</sup> Sep 2024)

5/2/2025

The Stoney Stanton Action Group (SSAG) is formed of a group of residents of Stoney Stanton. These are our comments on additional information supplied by the Applicant in response to the Secretary of State's letter dated 10th September 2024.

For ease of cross referencing, the Secretary of State (SoS) letter paragraph numbers are referred to as SoS n; the Applicant, Tritax Symmetry Hinckley (TSH), response sections are referred to as TSH n.n etc.

**A general statement from SSAG:** The HNRFI proposal was flawed when it was put forward for Examination. During the Examination, and now post-Examination, too many significant changes have been made. Even at this late stage the Applicant's proposal is still not acceptable. The whole process comprised poor consultation, insufficient and inadequate information brought to the Examination and multiple late attempted fixes to problems identified. This has led us to the conclusion that the Applicant is not even attempting to create a first-class "Nationally Significant" development. It seems that the Applicant is proposing a sub-standard development which will be to the detriment of the seven surrounding rural villages and towns (about 95,000 people), and to the wider area. This should not be allowed.

We note that in TSH 5.44, the Applicant has proposed their version of a "Planning Balance" table which is biased in their favour. We have offered our opinion against a few of these at the end of some of the following sections.

### 1. Reply to TSH 1: Introduction

The SSAG and residents of Stoney Stanton and surrounding villages are overwhelmingly against the HNRFI proposed development going ahead, as has been stated many times during the consultation and examination. We have submitted responses at every available opportunity during the examination process clearly stating the devastating impact that the HNRFI would have on this rural area. It is therefore extremely perturbing to find the effect on the quality of our lives dismissed by this statement in para 1:7 of the Applicants response: **'The residual local impacts of HNRFI are very clearly outweighed by its extensive and nationally significant benefits'**. Our opinion is that this is not true and that comments made by the Applicant in TSH 1 are disingenuous for the following reasons:

TSH 1.4.1: The A47 link road will not be a by-pass for Hinckley and Burbage. It will not directly join the A47, but to the Leicester Road, Hinckley (B4668) opposite a local football club and a rugby club, this road then connects to the A47. With the number of roundabouts proposed, this is merely an access road for the HNRFI site.

TSH 1.4.2: Making the M69 J2 into an all-movements junction is not a benefit as it causes a lot of the traffic problems discussed intensively during the examination.

TSH 1.4.3: Burbage Common and Woods are already approximately 200 acres of much loved nature areas surrounded by farmland. Putting an NRFI adjacent to them will remove the benefit of peace and tranquillity that local residents already enjoy and have a right to. Replacing some of the farmland with 50 acres of public open space offers no additional benefit.

TSH 1.4.5: More than 8,000 jobs obviously seems like a benefit, but these are not jobs needed in the locality where employment rates are already higher than average. This will cause excessive amounts of road traffic, which the local infrastructure cannot support, and nothing has been proposed to ameliorate this.

TSH 1.5: Despite the fact that the applicant has spent “10 years bringing the scheme forward”, the Applicant provided inadequate transport plans and incomplete information to review at the Examination. An example would be that the locations of schools and potential safety hazards in Stoney Stanton and Sapcote had not even been identified.

TSH 1.6: There had not been a “robust alternative site analysis” when consultation commenced. In fact, for a Nationally Significant Infrastructure Project, only Leicestershire had been considered and this was the result of the publication of a Leicestershire Strategic Growth 2050 paper. The strategy described in that paper depended on the completion of the A46 Expressway, to connect the M1 to the M69 south of Leicester. This proposal was dropped by Midlands Connect well before the examination commenced, thereby negating the road transport connectivity benefits of the site.

## 2. Traffic and Transport

### 2.1 Sustainable Travel Strategy

SoS 36 and 37: Consideration of whether a railway station could be opened at Elmesthorpe. Response from TSH in TSH 3.1.3 and 3.15 to 3.35. The point made by the ExA is that the Applicant **did not** investigate the provision of a rail passenger station at or near the site when it should have done. TSH responses TSH 3.15 to 3.17 are dismissive of this issue. If this is to be a first-class development, then one would expect the Applicant to investigate more thoroughly travel options for their 8,000 employees, and ways to make the whole development more acceptable to the local population. The reference to three nearby Sustainable Urban Developments (SUE) applications which could create 4,000 houses makes no sense because these cannot in any way be compared to an 8,000 employee industrial site, where the possibility is to have a passenger station exactly where it is needed.

Appendix 7, produced by Network Rail (NR) after the Examination was completed and after the SoS letter, attempts to defend the fact that NR were not available to answer questions at significant Examination meetings, much to the ExA’s obvious frustration. It is a document that should have been available as a submission at the start of the Examination. Reviewing and commenting on such a document in the time allowed is difficult. The purpose of the document is to show that a rail passenger terminal would not be practical. However, Appendix 7 subsection 7.3.14 does point out that commuting by rail to/from an SRFI is only likely to be viable where the SRFI connects into lines with a frequent passenger service. This factor could have been taken into account when assessing other possible locations e.g. possible sites near to Nuneaton (Warwickshire), 7 miles to the West of the proposed site, which could be served by West Coast Main Line, Birmingham to Peterborough and also the Coventry to Nuneaton branch line. This does not seem to have been seriously considered because it was not in Leicestershire. Perhaps the problem is that the proposed HNRFI is in the wrong place!

Planning Balance: ExA: Little Against, TSH: Limited for! SSAG opinion: Situation unchanged therefore Little Against.

## 2.2 HGV Route and Management Plan

SSAG are concerned that although the revised HGV Route and Management Plan aims to disincentivize HGVs associated with HNRFI from passing through the local villages, it does not do anything to discourage HGVs that are not related to HNRFI, and which may well decide to travel through Sapcote or Stoney Stanton in order to use the newly opened slip roads on the M69. This would inevitably add to the safety problems in Sapcote and Stoney Stanton.

## 2.3 M69 J2 (Junction 20)

In SoS 44 to 48, the ExA recommended that the SoS gives a substantial weight against the development with respect to this junction for a variety of reasons. The SoS invited the applicant to address safety concerns raised in respect of this junction. TSH have responded in TSH Section 4.

TSH 4.8 and 4.9 appear to show that this issue is still not fully resolved. In any case, for perspective, we will re-iterate our observation taken from our Written Representation:

“APP-141 Doc 6.2.8.1 ES Chapter 8 Appendix 8.1 Part 4 (Trip Generation) contains some startling statistics, but one obvious point is the sheer volume of traffic that will enter and exit the M69 J2 roundabout (B4669 junction). Assuming most trips go via this roundabout – as the proposal documentation says, then there will 555,984 **additional** HGV journeys added per year, and during a normal day, *from section 2.14 Table 7*, up to of 1,767 additional vehicles (494 HGV, 1,273 light) added at the peak hour. This equates to one vehicle every 2 seconds, and included in this would be one HGV every 7.3 seconds. This equates to an absolutely major disruption to the motorists that regularly use this junction.”

Planning Balance: ExA: Very Substantial Against, TSH: Neutral, SSAG opinion: still Very Substantial Against

## 2.4 M1 J21/M69 J3 (Junction 15)

In SoS 51 and 52, it is noted that the ExA does not think the M69 J3 /M1 J21 roundabout and junction has been modelled adequately, based on evidence from the Highways Authority and LCC Highways, giving “very substantial” weight against the development. In TSH 2.1 to 2.11, the Applicant states that HNRFI will only add a small percentage (figures of 1.8% and 4.9% are quoted) to vehicle numbers passing through the junction in the p.m. peak. The 4.9% figure is stated in TSH 2.8 as “a total percentage impact at Junction 21 attributable to the Development”. This is misleading, because a 4.9% increase at an already over-capacity junction would have a very significant impact. Regular users will know that there are always large queues (>1 mile) Southbound on the M1 heading toward J21, frequently large queues heading Westbound on the M69 (also frequently >1 mile) and significant queues heading out of Leicester and onto the roundabout at the junction at peak periods. In our opinion, even a small increase in traffic on the roundabout and M69 Westbound will cause a disproportionately large increase in queue lengths, queueing time and queue dissipation times. The Applicant’s Appendix 1 contains some information that is difficult for a lay person to readily understand, however some figures appear to be presented in a way which is unduly favourable to the Applicant. For instance, in Appendix 1 paragraph 3.20 Table 4; the a.m. Lane 1 figures show values of 19.0 (Observed) and 14.3 (Modelled), with no explanation of what the numbers mean, however the observed figure here is 32.8% higher than the modelled number. Appendix 1 Paragraph 3.21 then goes on to state that Table 4 indicates that modelled queues are reflective of the observed

queues. This doesn't seem to be the case. The smallest difference between modelled and observed values in the table is 14%. This suggests that the model is not accurate.

M1 J21 / M69 J3 is clearly already over-capacity. Allowing any major development to go ahead which could increase traffic at this junction without any effort to ameliorate the problem should not be allowed, regardless of the reasons for overload in the first place.

LCC Highways do not appear to have agreed with the content of Appendix 1.

Planning Balance: The ExA: Very Substantial Against TSH: Neutral, SSAG opinion: Very Substantial Against

## **2.5 Sapcote Village**

The increased highway safety risk in Sapcote is raised in SoS 63 to 66. The applicant tries to dismiss the Examining Authority (ExA) conclusion in TSH 2.13, however from attending examination meetings it was abundantly clear that the ExA had gone to great lengths to understand the TSH proposals. From reading "Appendix 2 – Response Report Sapcote Enhanced Scheme (LCC)", it appears that the Overseeing Organisation (Leicestershire County Council) did not agree that "vehicle activated signage" would address the problem raised in the Road Safety Audit (RSA). The notion of reducing the width of the road to ensure that only one HGV could get through that stretch at a time would inevitably cause more safety problems. This proposal is not a minor change.

From a cursory read through "Appendix 2 - Sapcote Technical Note", another document that is overly dismissive of valid concerns. Table 2.1 in Section 2.12 of that document shows vehicle numbers for the B4669 to the West of the Co-op (Link 41) and to the East of the Co-op (Link 43). The HGV Annual Average Daily Traffic figures are inconsistent, for instance 2026 (scenario ii) Westbound is shown as 170 for Link 41 and 93 for Link 43. The difference is explained in section 2.13 by stating this shows that there is a significant proportion of local HGV traffic. From local knowledge it is easy to deduce that this is not likely, as all possible other destinations (e.g. Church Street and Stanton Road) are difficult to access by HGV. Additionally Westbound traffic for the Western Link (Link 41) increases by 10 in 2026 "with development", whereas the Westbound Traffic for Eastern Link (Link 43) increases by 1 in 2026 "with development". Either the HNRFI is creating additional local HGV traffic or the table is wrong. See photos in this document Section 4.

TSH had the opportunity to propose a better solution. During their early stages of consultation TSH had proposed two possible village bypass options, one to the West of Sapcote and one between Sapcote and Stoney Stanton, neither of which were liked by residents. These were dropped from the proposal because local opinion was against either solution. Dropping the bypass option entirely was illogical because a) the outcome was to have no solution at all, and b) local opinion was also against the whole HNRFI proposal. At that stage TSH should have tried to find a more satisfactory solution and then they would have avoided these "sticking plaster" attempts to get the DCO made. The new proposals are very unsatisfactory, will degrade rather than improve living standards for people in the vicinity, will create their own safety problems and should not be allowed.

There has been discussion about a possible major SUE between Sapcote and the proposed HNRFI site. Although that in itself is not relevant to this application, it has been noted at a Community Consultation Event, that it would be impossible to bring such a development forward without including a suitable village bypass. It seems that the same logic should apply to the whole HNRFI which would generate very much more HGV traffic.

Planning Balance: ExA: Unacceptable, TSH: Neutral, SSAG opinion: Very Unacceptable

## 2.6 Stoney Stanton

In SoS 67 and 68 it is noted that “the ExA considers that the Applicant has not taken all reasonable steps to mitigate the impacts of the Eastern junction operating, in its view, significantly over capacity”. We have assumed that this applies to both J37 and J38. We could not find the TSH response to this, however we do note that in the “Planning Balance” table, in section TSH 5.44, the Applicant has declared that this should have Neutral Weight rather than Limited Weight Against for no apparent reason. J37 is in the village centre adjacent to a primary school (Manorfield), three churches (Living Rock, St Michael’s and a Methodists’ Church) and a busy doctors’ surgery (Old School Surgery) (J37 in ES Appendix 8.1). The Applicant’s solution is to add traffic lights but residents know from experience that traffic lights at these junctions, especially during the school day start and end periods, cause havoc. J38 is a short distance away (~200m) where Long Street crosses the B581 adjacent to shops (Co-op). This junction is already operating over capacity but the Applicant has stated that nothing can be done about it. There have already been several HGV collisions with the building on the corner at this junction! These junctions, combined with similar problems in Sapcote, mean that there is no feasible HGV route away from M69 J2 to the South.

It is noteworthy that in the past; to improve road safety, a chicane was introduced in Stoney Stanton between J37 and J38. This created so many traffic problems (very lengthy queues in both directions) that it was eventually replaced by speed bumps to allow traffic to flow simultaneously in both directions and still reduce speeds. Recent temporary traffic lights at J38 have caused similar problems. It is our view that adding traffic lights at J37 will only make traffic problems worse. There has been no opportunity for consultation because this proposal was put in at a late change.

For reference, see SSAG Written Submission subsections (TR050007-001388) 5.1.38 to 5.1.42

It is incomprehensible that this has not been addressed by the Applicant. See photos in this document Section 3.

Planning balance: ExA: Limited Against, TSH: Neutral, SSAG opinion: Substantial Against

## 2.7 Aston Firs

In SoS 106 and 107 the Secretary of State makes very important comments about the need to maintain travellers’ sites. This particular site is well established and is an important part of the diverse nature of our community. Any developments which are to the detriment of the site should be avoided.

The Applicant responds to the Secretary of State’s concerns about the nature of the high acoustic barrier in TSH 2.37 to TSH 2.50. The statement in TSH 2.40: “The Applicant was surprised to read the ExA’s conclusions on this matter since it was an issue that received only limited attention during the examination itself. This matter had been subject to only a single written question during the Examination.” is deceptive. Most Interested Parties would not typically access this site, therefore would not be likely to raise questions based on their area of knowledge. The ExA did, quite rightly, arrange a site visit during the Examination, therefore it is our opinion that the ExA was able to come to an informed opinion and appropriately question the potentially harmful effects of the barriers (and indeed the whole problem of a major industrial site being constructed immediately adjacent to the traveller site).

In TSH 2.50 the Applicant refers to correspondence with the Service Manager in the Multi-Agency Travellers Unit and the Aston Firs Site Manager at Leicestershire County Council “who have endorsed the positive effect of the Applicant’s evolved design in addressing the issues raised.” Our



interpretation of this correspondence is that they have agreed that the new proposal is better than the original proposal, not that the overall problem has gone away.

Planning Balance: ExA: Very Substantial Against, TSH: Limited Against, SSAG opinion: Much smaller improvement than TSH claim, Substantial Against

**Section 3 – Photographs, of J38 (B581 / Long Street junction). Stoney Stanton**



Vehicle negotiating the road from Broughton Road to Sapcote Road (Long Street) using both sides of both roads



Broughton Road to Long Street



Broughton Road to Long Street



New Road onto Long Street, note the damage to the corner of the adjacent home following multiple large vehicle strikes.



Traffic waiting to allow oncoming lorry, Broughton Road from Co-op roundabout

**Section 4: Photos of traffic through Sapcote**



Lorries turning into Link 43 (Leicester Road – B4669). The building on the right at the corner will always present a problem.



Showing proximity of the building on the right



School bus travelling from Link 43 to Link 41. The building on the right will always cause a problem.



Difficulty of negotiating the corner in front of the Co-op



Even light vehicles swing across the centre line