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Date: 8th April 2022
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Dear Sinead

Proposals for a strategic rail freight interchange-including warehousing-on the land south of Elmesthorpe, between the Leicester to Hinckley railway and the M69 motorway (known as the Hinckley National Rail Freight Interchange, (HNRFI)) and associated highway works.

Notice pursuant to Section 42 of the Planning Act 2008 and Regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

Thank you for your letter dated 8th February 2022 consulting Leicestershire County Council (LCC) in its statutory role as Local Highway Authority (LHA) on the above proposals.

As you will be aware, LCC in its role as LHA entered into pre-application discussions for a Rail Freight Interchange in this location with DB Symmetry and their appointed transport consultant Hydrock in 2018. Following a lack of contact from the Applicant team for a significant period of time, the LHA were approached by Tritax Symmetry (TS) in late 2020 to engage in alternative proposals. The LHA has actively engaged with TS and their appointed transport consultants BWB since that time and has been an active member of the Transport Working Group (TWG).

The LHA has reviewed the PEIR, and in particular Appendix 8.1 Interim Transport Assessment, and has the following Observations to make:

<u>Appendix 8.1 Interim Transport Assessment (ITA) (January 2022 public consultation)</u>		
Section	ITA statement	LHA observations
Access infrastructure	The ITA at section 4 identifies the proposed access infrastructure	The ITA states that M69 J2 circulatory is proposed to be signalised. The LHA understands that the signalisation of this junction was not included in the model run on which the outputs of this ITA are based. In addition, the LHA have requested sensitivity tests of the A47 link dualled in its entirety. On this basis the LHA has not reviewed the proposed access designs in any detail.
Public Rights of Way (PROW)	The ITA at section 4 cross references a PROW Strategy (Also PEIR Appendix 11.2)	The LHA would welcome engagement with the Applicant's appointed consultants EDP on the PROW proposals including vertical and horizontal alignment, routeing, surfacing, and ongoing maintenance, ideally through the TWG as previously requested. At this stage limited engagement has taken place, and therefore there is currently no agreement on treatment of

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		<p>existing/future PROW. It is also worth noting that the submitted plans as presented do not appear to marry across the various documents resulting in some confusion.</p> <p>It would also be helpful for the LHA to have sight of Network Rail requirements where PROW's cross the rail line.</p>
Sustainable Transport Strategy	The ITA at section 4 states that a "Sustainable Transport Strategy" is being developed for the proposed development with the TWG.	The LHA welcomes the development of a Sustainable Transport Strategy given the substantial predicted trip generation to this site. The ITA states that the Sustainable Transport Strategy is being developed and does not appear to form part of the formal consultation documentation. It is noted that to date engagement and progress on this element has been limited. The LHA will continue to work with BWB (and the wider TWG) in this regard, noting that safe and appropriate access to the development for all users by sustainable modes should be prioritised.
PRTM v2.2 model	The ITA identifies the use of Leicestershire County Council's Pan Regional Transport Model (PRTM) to assess the impact of the proposed development on the local and strategic highway networks	<p>The use of PRTM v2.2 to assess the impact of the development on the local and strategic highway networks is agreed by the LHA.</p> <p>The LHA have agreed trip generation and distribution inputs.</p> <p>However, the ITA is based on other key input assumptions that have not been agreed by the TWG/have been subsequently superseded.</p> <p>For the avoidance of doubt, the following inputs have been identified as requiring updating:</p> <ul style="list-style-type: none"> • Planning assumptions and trajectories • Network assumptions • Network coding (e.g. routes through the eastern villages not meeting DfT WebTag criteria, signal timing changes at Narborough level crossing) • Model brief (including signal timings at Narborough level crossing subsequently revised by Network Rail) • Access assumptions (M69 J2 previously modelled as priority junction i.e., not signalised) <p>Based on the above, the findings in the ITA are not accepted by the LHA. For the avoidance of doubt, the LHA does not accept the impacts of development as defined in the ITA, nor therefore does it accept the proposed mitigation measures identified in the ITA.</p>

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		The LHA continues to work with BWB (and the wider TWG) to agree input assumptions ahead of new model runs and will follow the agreed formal “sign off procedure” developed by BWB.
Baseline traffic surveys	The ITA states that a range of traffic surveys have been collected between 2017 and 2019	The appropriateness of these traffic surveys for use in local junction models will be considered by the LHA at the appropriate time in the assessment process. Normally, traffic surveys should be no older than 3 years and carried out in a neutral period. However, relaxations have been applied during the Covid-19 pandemic. On the basis that the impacts of the development are not agreed (see comments above and below), it remains unclear if all junctions requiring further assessment have been surveyed.
Assessment years	The ITA proposes assessment years of opening year 2026 and future year 2036.	The LHA agrees with these assessment years. However, it is noted that additional interim assessment years may need to be agreed with the TWG to allow for phased testing to be carried out.
Assessment scenarios	The ITA identifies the following scenarios for both assessment years: <ul style="list-style-type: none"> • Without development • Without development with proposed access infrastructure • With development with proposed access infrastructure 	The LHA agrees with these principal scenarios. However, it is noted that additional interim assessment scenarios may need to be agreed with the TWG to allow for phased testing to be carried out.
Area of Influence (AOI)	The ITA identifies a series of parameters to identify the AOI at paragraph 6.28.	The LHA (and wider TWG) will agree the AOI at the appropriate time i.e., once revised forecast modelling (based on agreed assumptions) has been undertaken.
Furnessing methodology	The ITA states that the furnessing methodology used in the assessment is “largely accepted” by LCC	The LHA await responses to queries raised on the proposed methodology and will continue to work with BWB (and the wider TWG) to agree an appropriate approach. Agreement to furnessing methodology must be reached prior to flows being inputted into local junction models on the basis that PRTM does not validate at turning count level.
Highway Impact	The ITA at section 7 identifies the predicted impact of the	As above, on the basis that the input assumptions to this modelling exercise were not agreed/have subsequently been superseded, the highway

	development on the local and strategic highway networks	impacts as set out are not accepted/agreed by LCC as LHA. The LHA will of course review the identified highway impacts in detail at the appropriate time.
Highway mitigation	The ITA at section 8 identifies schemes of mitigation on the local and strategic highway networks	As above, on the basis that the input assumptions to this modelling exercise were not agreed/have subsequently been superseded, and the highway impacts as set out are not accepted/agreed, the LHA has not reviewed the proposed mitigation measures in any detail at this stage. However, there is currently insufficient robust evidence to eliminate the need for a Sapcote bypass at this stage. The LHA will of course review any proposed mitigation in detail at the appropriate stage in the assessment process.
HGV Route Management Plan & Strategy	Included in the ITA at Appendix 12	The LHA has raised concerns with this Strategy not least of which include its deliverability, legality and enforceability. The LHA will continue to engage with BWB (and the wider TWG) on this Strategy, noting that it is awaiting a response to comments dated April 2021.
Framework Site Wide Travel Plan	Included at PIER Appendix 8.2	It is stated in the ITA that the Framework Site Wide Travel Plan sits alongside the Sustainable Transport Strategy. The relationship between the two documents remains unclear. The ITA states that the Sustainable Transport Strategy is being developed and does not appear to form part of the formal consultation documentation. It is noted that to date engagement on this element has been limited. The LHA will continue to work with BWB (and the wider TWG) in this regard, noting that safe and appropriate access to the development for all users by sustainable modes should be prioritised.

Any Transport Assessment submitted would be expected to reference and explain all agreed inputs and outputs to the assessment process in full, as opposed to simply appending technical documents to a summary report. This will allow all readers to fully understand the technical assessment that has taken place.

Hinckley Strategic Rail Freight Interchange Rail Report December 2021

Whilst the LHA has no direct rail responsibilities, through its [Rail Strategy](#) (developed jointly with Leicester City Council) it does have priorities that seek to promote modal shift from road to rail (including freight), but also priorities to significantly enhance Leicester and Leicestershire's rail passenger connectivity to cities elsewhere across the UK, including in the West Midlands (which would use the same rail corridor as the HNRFI). In that context, the LHA has the following Observations to make on the above report:

- Further work is required to ensure that the analysis of rail impacts takes proper account of the Midlands Engine Rail proposals being promoted through Midlands Connect, which include

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proposal to enhance passenger rail connectivity between Leicester and Birmingham and to reinstate direct services to Coventry

- It is understood that the signalling system between Hinckley and Croft (the section on which the HNRFI would be located) is a relatively low capacity one. A more thorough assessment is required to identify to what extent additional signalling capacity would be required to accommodate the HNRFI proposals
- The development of the HNRFI proposals should be considered alongside the Midlands Engine Rail proposals to ensure that they can be jointly accommodated, including a detailed review of timetabling
- The geographical scope of any analysis should include the Leicester City area, which is a known capacity rail capacity constraint for accommodating both increased passenger and freight services.

The Hinckley National Rail Freight Interchange Order (Draft DCO)

Neither the LHA, nor LCC Legal Services were invited to input into the development of the Draft DCO. Whilst in general terms the Draft DCO contains the general headline provisions required, the detail is subject to further comment and the LHA would welcome engagement from Eversheds. Amendments will be required to align the document with the standard requirements of LCC to ensure no risk to LCC and the wider public, financial or otherwise, from the development proposals.

It should be noted that based on the comments on the PEIR submission above, none of the site-specific details in the Schedules can be agreed at this stage.

We trust that you find the above information helpful in the further development of any proposals for this site, and we look forward to continued and further engagement with you and your team in this regard.

Yours sincerely,

Rebecca Henson
Team Manager – Highway Development Management

On behalf of the Director of Environment and Transport

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