

## APPENDIX

### **Leicestershire County Council relevant representations as the Local Highway Authority and host authority to the Hinckley National Rail Freight Interchange proposal**

Leicestershire County Council (LCC) has considered the application submitted by Tritax Symmetry (Hinckley) Limited (the Applicant) for an Order Granting Development Consent for the Hinckley National Rail Freight Interchange (HNRFI) and considers the following should be deemed among the main issues and impacts. Matters are categorised by technical areas and are only in summary form. These will be developed in LCC's Local Impact Report and Written Representations in due course.

#### Highways and Transport

There is no agreement to the following elements of the proposed development:

- Trip generation - including discrepancies in employee numbers and addition of a lorry park
- Access infrastructure including its design, capacity and deliverability
- Strategic model outputs including furnishing methodology and lack of phased testing
- Impact of the development and role of the access infrastructure in the interpretation of modelling results
- Mitigation strategy and package, including local and strategic junction assessments, design, and lack of testing of mitigation strategy in strategic model
- Impacts on rail including Narborough crossing and future passenger provision
- HGV Management Plan and Route Strategy including method of enforcement
- Public Right of Way Strategy including rail crossings
- Construction Traffic Management Plan and construction traffic routing impacts
- Framework Site Wide Travel Plan
- Sustainable Transport Strategy
- Walking Cycling and Horse-Riding Assessment

In addition, it is concerning to note at paragraph 2.26 of the submitted Transport Assessment it states that an addendum Transport Assessment will be prepared at a later date, which will include a final Transport Assessment, further traffic modelling information, and Road Safety Audits. Moreover, no timetable is provided for this submission.

1. As a consequence of the above there is also no agreement to:

- Red line order limits
- Draft Development Consent Order
- s106 Heads of Terms

#### Strategic Planning Policy

- The impact on the demand for housing is underestimated and the employees beyond the construction phase would be drawn from a wider area than considered by the Applicant.
- Greater weight must be given to the policies and proposals in the relevant development plan documents.
- The impact of the proposed development on the operation of Croft Quarry, its committed extension to mineral workings and consequential impact on rail capacity.

#### Public Health

- Vulnerable groups not adequately considered such as in relation to active travel, severance, road safety and air quality.
- Proposed development potentially exacerbating existing health inequalities including for Gypsy and Travellers community and children and young people in Earl Shilton and Barwell.
- Impacts of Noise, Lighting and Air Quality during construction and development not fully considered in relation to human health.
- Stress mitigation not covered for Construction or Operational phases (diversions, interruptions to utilities, dust, noise).
- Concern some of the datasets used in relation to public health are incorrect.
- Insufficient consideration is given to the siting and space of indicative wellbeing zones and potential health risks.

### Net Zero and Sustainability

- The Net Zero Leicestershire Strategy and Action Plan and associated Roadmap Research evidence base, and Leicestershire Climate and Nature Pact have not been considered.
- Scoping of GHG emissions excludes key emissions sources from waste, land use, land use change and forestry and energy.
- 20% of Total number of Parking Spaces being for Electric Vehicles is insufficient and mitigation does not facilitate transition to ultra low emission vehicles or decarbonised road freight.
- Insufficient consideration to minimisation of fossil fuel usage from gas CHP infrastructure.
- GHG emissions post mitigation equate to an increase in the Leicestershire carbon baseline of 5%

### Socio-Economics

- Potential impacts in relation greater demand for shared accommodation in existing settlements.
- Concerns around the benefits of construction for local population and suppliers will not be appropriately secured.
- Concerns regarding the availability of local workforce to match required skills and how an effective training strategy will be secured.
- Concerns regarding impact on health service provision.

### Ecology

- Lack of lighting plan showing maximum luminaires limit for lighting used in proximity to sensitive ecological receptors in accordance with ILP Guidance Note 08.
- The proposals show an intent to deliver BNG but it is currently unclear as to how both on and off site BNG will be provided, secured and delivered.

### Flood Risk and Drainage

- It is considered that Flood Risk and Drainage will be a key issue for consideration of the proposed development. However the Examining Authority should note that statutory responsibility falls with the Environment Agency (EA) for this type of development. Albeit the Lead Local Flood Authority (LLFA) are directly liaising with the EA and with the Applicant in particular in relation to the surface water proposals.

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