
HINCKLEY RAIL FREIGHT TERMINAL

Response to Tritax Consultation

Sapcote and Sharnford Parish Councils

April 2022

1. Introduction

Sapcote and Sharnford Parish Councils are writing in response to the consultation on the proposed Hinckley Rail Freight Interchange by Tritax.

We are strongly opposed to the proposal. We do not believe the need for the site has been justified. We are particularly concerned about the potential increase in traffic, including the largest HGVs, during both the construction and operation phases.

This includes both the traffic generated by the site itself and redirected and generated traffic resulting from the site access proposals including the introduction of southern slip roads on the M69 Junction 2.

Despite the stress placed on the rail-terminal, it appears that, even with optimistic rail use, the majority of traffic generated on the site would be road-based HGVs using the B8 facilities.

We note that the County Council has not agreed with the Traffic Evidence and has said that the consultation is premature. Given their role on the transport working party this would suggest the evidence is not ready for scrutiny and the consultation should have been postponed.

Further concerns relate to the potential for air quality to be compromised and on-going noise and vibration issues. We are also opposed to the proposals because of the impact they would have on the landscape and local ecology.

Lastly, we do not believe the case has been proven to show that the proposals are consistent with a reduction in CO2 emissions in line with the Government's commitment to reach net-zero.

The Consultation Period of six weeks has not allowed detailed scrutiny of all the material related to the proposals and we reserve the right to seek further professional advice to inform our future submissions should the proposals proceed to public examination, including specifically in relation to noise and air-quality.

This report sets out our response in detail and sets out seven key conclusions.

We have also appended answers to the specific on-line consultation questions. However, we are concerned that the Questionnaire provided by the applicants encourages respondents to reply to specific questions which are inherently leading.

In particular the first two questions imply that the proposal's main aim is to support a transfer from road to rail transport, when in reality the majority of the site may well be road-based. We do not believe positive answers to these questions should be interpreted as support for the HNRFI proposals.

2. Need

The need for the site is justified by Tritax based on the National Policy Statement (NPS) supporting the need for intermodal rail-freight terminals and on a perceived shortfall in Rail-Served sites in Leicestershire and in the East Midlands.

While the NPS supports the growth of a network of SRFIs, it is worth noting the justification for this in Para 2.47 of the NPS.

A network of SRFIs is a key element in aiding the transfer of freight from road to rail, supporting sustainable distribution and rail freight growth and meeting the changing needs of the logistics industry, especially the ports and retail sector. SRFIs also play an important role in reducing trip mileage of freight movements on the national and local road networks.

The PEIR refers in Para 5.21 to the '*changing needs of the logistics industry*' but not to the important aim of '*reducing trip mileage of freight movements.*' As is discussed further, the success in achieving this second goal at the site is unclear, particularly because the vast majority of trips relate to the B8 element of the proposal as opposed to the rail terminal, and because of the assumptions about how much long-haul traffic by rail would result from transfer from road.

This brings into question the effectiveness of these proposals in meeting said goal of the NPS.

Turning to the perceived shortfall, there are, in fact, a significant number of existing and proposed logistics sites within the East Midlands, including Magna Park, DIRFT, Prologis Park and the East Midlands Railfreight Depot. Further sites exist at Birch Coppice, Hams Hall and the West Midlands Rail Freight terminal recently granted permission in South Staffordshire. Northants Gateway is also close by.

Without a proper examination of the overall capacity across the West and East Midlands, it is likely that some of these will be in competition with one another. There is a clear risk that there will be over-capacity and some sites will not be built out. If they are, there are likely to be cumulative impacts.

The need is then further supported with reference to the conclusions of the Leicestershire Logistics Study (2021).

We are concerned that this is an industry-led study which appears to be solely predicated on projections of future demand. Demand was calculated for both rail and road freight and there is clearly a risk of double counting. If rail freight genuinely removes lorries from the road, as is being supposed, that should lead to a reduction in the need for purely road-based distribution, but it is unclear whether this is what is predicted to happen.

Even if that is not the case, the study identified a total shortfall in rail-served provision from 2020 across Leicestershire, of 307 hectares, slightly less than the total size of the Hinckley site. However, the updated need figure (given in North West Leicestershire Plan is for 228ha has or 718,875 sqm. This is considerably less than the 850,000 sqm proposed at the Hinckley site. The remaining 131,125 sqm (15% of the site) is not required to meet the need assessed by the study.

Moreover, the HRNFI is not being assumed to contribute to any of the road-based need in the county. North West Leicestershire, for example, in their draft plan assume there is a need to supply all the road-based provision.

It is also unclear in the study how much of a site should be connected to a rail-terminal for it to qualify as rail-served. In this case, the majority of the site is not and even those facilities which have direct rail connections are not obliged to use them.

This is quite clear from the transport evidence. Table 15 shows a daily two-way HGV generation from the terminal of 1944 HGVs and 112 light vehicles. There are, however, 7,637 HGV movements from the B8 facilities and 16,326 light vehicles.

In other words, the proposals would generate significant additional traffic, much of which could simply be road-based logistics provision. At least some of the site is additional to the assessed need in the study and there is other provision in the county which would meet the same need.

The proposal would inevitably create jobs, some 8,600 - 10,600 are projected. However, the PEIR chapter on Socio-Economic Impacts is clear that at least some of these will come from relocation from existing premises to the park (7,222). The PEIR shows that the surrounding area is below the national average for unemployment and youth unemployment (Tables 7.6 and 7.7). This suggests that the new job projections are modest.

The PEIR is also somewhat vague about where the workers will come from. It says that currently 91% of such workers come from less than thirty miles in the Study Area (Para 7,8), but that will include sites better located in terms of larger population areas.

It is suggested that the provision of additional housing will help accommodate workers on the site, relying on the figures in the HEDNA (2016) which fed into the Strategic Growth Plan. The distribution of this housing is not currently agreed and a

review of the SGP is being considered. Moreover, the analysis in the HEDNA is now somewhat out of date and the housing assumptions are out of kilter with the most up to date ONS evidence. We do not consider this to be a firm basis for assuming housing will be developed close to the site, and that housing would anyway, itself, have large additional impacts on the countryside and so should be considered a negative environmental impact resulting from the proposals.

3. Transport

Sapcote and Sharnford Parish Councils are also specifically concerned both about the increase of traffic from the development of the site and the traffic generated by the changes to the road network, particularly the introduction of a new road to the M69 from Hinckley and the introduction of south facing slips at Junction 2 of the M69.

The M1/M69 junction has been a problem since the decision was made to terminate the M69 at M1 Junction 21 (J21). The addition of Junction 21A (J21A) in 1995 to serve the A46 Leicester Western Bypass led to a significant increase in traffic between J21 and J21A. This prompted the widening of that section of the M1 to four lanes prior to the bypass opening. The effect of this was to increase congestion at J21.

Since then, various proposals to deal with the congestion on the M1 have been looked at and rejected. Works to add traffic signals and more circulation lanes to the J21 roundabout have not eliminated congestion.

Junction 2 of the M69 was specifically designed with only north facing slip roads because in the 1970s it was realised that south facing slip roads would increase traffic travelling towards what is now the B4114 (it was the A46 prior the M69 opening). The likelihood of substantial traffic diverting through a myriad of minor roads is much greater now than it was then because of the development that has taken place and the problems associated with the M1 and M69.

The Interim Transportation Assessment by BWM seeks to quantify the impact. However, we have a number of concerns about the analysis:

Firstly, the level of usage of the rail terminal is based on that of existing terminals. Given, the number of competing terminals coming forwards, the level of usage may be lower, increasing the level of road-based usage above the 30-70 split envisaged in the assessment. Moreover, the amount of rail traffic may be limited by capacity constraints on the railway system itself.

The HNRFI is located alongside the Felixstowe to Nuneaton railway line between Hinckley and Leicester. Although this route has been modified to allow large containers it is not electrified.

The HNRFI Interim Rail Study does not consider capacity constraints on the route to Felixstowe, which includes traversing critical junctions, for example north and south of Leicester, Peterborough and Ely.

We understand that the Felixstowe branch line is part single track, as is a section between Ely and Soham. There have been some previous upgrades but we are unaware of further approved plans to upgrade parts of the Felixstowe to Nuneaton railway line or to enable electric trains to use it throughout.

The HNRFI Interim Rail Study area only looks at the section between Water Orton and Wigston. It notes that Wigston North Junction (Para 4.4.1) is already close to capacity and that some trains entering and leaving the SRFI would create a conflicting movement when crossing the southbound track.

The study notes an aspiration for a through Leicester-Coventry passenger service. However, this is still at an early stage and various constraints on the route including station capacity and station calls remain unresolved and no funding has been approved.

The rail study is clear that constraints remain during certain periods of the day (Para 4.7.4 and 4.7.5) which may hinder 24-hour operation and lead to bunching of trains, which may not be realistic and in Para 4.7.6 that:

'beyond the study area there are other infrastructure constraints that may require upgrades to achieve the full potential of the site.'

While some unused freight paths may exist in the national timetable there is no guarantee that these could be used to serve the SRFI. In other words, the aspiration to reach 16 train paths per day each way to HNRFI cannot be guaranteed.

Secondly, we are concerned that the routing of the development traffic assumes the M69 will be the main road used by HGVs. However, the impact on other roads will be much more serious at times when the M69 is not available and this needs to be considered.

Thirdly, the modelling of non-development traffic seems to assume a fixed growth in traffic which is then distributed on existing roads. However, the reality is that changes to the road network, especially when they add significant opportunities to travel, generate additional traffic and lengthen the journeys made by car. In this case the introduction of southbound slips could substantially change both the volume of the traffic and its origin and destination. For example, increasing commuting from Hinckley and surrounding villages into Coventry.

Moreover, the addition of those slip roads will influence future development patterns, as can already be seen by proposals for 5,000 houses in the Blaby Plan on the other side of the motorway to the NRFI proposals. This would particularly bring into question the model outputs in terms of traffic in the 'with-development with

infrastructure'. If, as we suspect, traffic levels are likely overall to be substantially higher if this infrastructure is put in place, the capacity of the M69 and other routes is likely to be placed under more pressure, leading to more displacement onto the local network.

This would be likely to amplify the increase in traffic on those local roads which the model shows as having increased traffic, while not impacting so much on those roads where traffic levels are reduced.

Taking all these elements into account there is a major concern about the realism of the projection for traffic going along the B4669 towards Sapcote to the B4114 Coventry Road or using the various cut-through routes to Sharnford and other villages. This would include both traffic accessing local facilities as well as HGVs with destinations on the A5 or in Leicester. It is clear from even a cursory glance at the local roads that this would be a far shorter cut-through than using the A47 to get to the A5 and M69.



Sapcote Traffic

In particular the narrow chicane road through Sapcote at the partially blind junction between Hinckley Road and Church Street/Stanton Road cannot cope with HGV traffic using it as part of a 'rat-run' from the M69 to the A5. It is already a busy route, being the main road through the village.

The nearby junctions with Sharnford and Grace Roads are often congested simply from 'everyday traffic' (cars and vans). Regular HGV movements would make these and the adjacent pedestrian crossing dangerous for Sapcote villagers.

Sharnford is a village which has suffered over many years with an increase in HGV traffic and was recommended for a bypass in the Leicestershire Local Transport Plan of 2007. This did not take place due to financial constraints.

Since then, traffic volume through the village on the B4114 have risen from just under 3 million vehicles per year to over 3.5 million¹.

Despite Tritax's assertions that mitigation methods will reduce traffic volumes, experience shows that traffic volume will increase exponentially. When the M69 is closed or long queues develop at either end, M1 and M6 traffic finds the quickest route to their destination. Vehicles leaving the HRNFI and heading south would, therefore, head for the A5, either through Sapcote and then Sharnford or, through Aston Flamville and then Sharnford.

Both roads into Sharnford have pinch points where HGVs cannot pass each other without mounting the pavement. There have also been several crashes on the stretch of the B4114 beyond Sharnford in the last 5 years.



B4114 Leicester Road, Sharnford

Traffic joining the A5 at Smockington Hollow would be subjected to an accident black spot. There have been at least 12 accidents in the last five years with a

¹ Information supplied by Leicestershire County Council Highways dept from average speed camera data.

number of fatalities.² Alberto Costa MP, Dr. Luke Evans MP and Mark Pawsey MP attended a Westminster Hall debate about A5 accidents/fatalities on 23/03/2022.

Table 8.5 of the PEIR sets out the specific growth in traffic on roads projected in the model for 2036 with and without development.

Notwithstanding the comments above it is clear that the ‘with development’ scenario dramatically increases traffic (AADT) on many local roads and particularly the routes through Sapcote and Sharnford, with major increases in traffic of between 80 and 130%, and commensurate and sometimes even greater increases in HGVs. East of Sapcote on the B4669, HGVs rise from 59 to 440, nearly 650%. This, of itself, must bring into question the compliance with the NPS requirement to reduce HGV mileage on local roads.

However, many of the impacts are downgraded when compared to a standard set of ‘receptor sensitivity’ (Para 8.2) taken from the 1993 IEMA Guidance on

Regarding Environmental Impacts of Traffic. Figure 8.1 of the PEIR shows the Guidance applied to the area impacted by traffic growth. The result can be clearly seen. Urban areas with a high level of facilities score highly under these criteria and rural settlements appear to have low ‘receptor sensitivity’. Rural links are also shown as low in sensitivity. This standardized approach can lead to some elements of road risk being downgraded or ignored, such as road width, which as shown above, an issue in Sharnford.

It is hard to agree that the sensitivity ratings demonstrate a fair representation of the potential for highly detrimental impacts to villages such as Sapcote and Sharnford and the use of the IEMA guidance alone in these circumstances is hard to justify.

The NPPF requirement that roads should be ‘safe and suitable’ for development is still relevant in as much as it applies in relation to NPS development (Para 1.18 of the NPS) and that is something which should in our view be fully examined with a risk assessment approach on these routes, as has been undertaken on other much more modest proposals elsewhere affecting rural roads.

The level of increase of traffic on these rural routes, especially the increase in HGVs represents, in our view, an unacceptable impact, even if it is not exacerbated by further generated traffic resulting from the changes in accessibility resulting from the new road infrastructure.

These problems would only be exacerbated if further development were permitted on the arc around the south and east of Leicester as envisaged in the current Strategic Growth Plan for the County.

² Information taken from local press, Fire Services and Highways England.

It is also noticeable that neither the transport chapter, nor the chapter dealing with accidents and disasters models the routes that would be taken by HGVs and other development traffic in the event of incidents on the M69 which lead to delays or closure.

The proposals include a number of off-site mitigations, in particular at the Junction on the B4669 and B4114, aimed at alleviating the additional traffic anticipated on those roads (In the case of that junction 106% over capacity according to the assessment). This is less mitigation than was originally proposed. The previous transport topic paper includes two alternative bypasses of Sapcote and Stoney Stanton. These would, leaving aside their environmental impact, have encouraged more development traffic to use the route to the B4114 Coventry Road. However, the current mitigation would almost certainly increase the attractiveness of that route, encouraging traffic (including HGVs) to route along the B4669 with all the issues described above.

The Interim Transport Assessment also includes an assessment of the accessibility of the site to other modes. A map shows bus routes which it considers to be close to the site. In reality the only regular services, the 158 and 48L are services which go to centre of Hinckley. The X6 and X55 are longer distance services with limited stops, however, they are highly infrequent.

There are some cycling facilities on the A47, including a dedicated cycle lane, but limited provision to the site. In terms of pedestrians the site would be poorly situated for access. The entrance to the site from Hinckley would be via the newly constructed link-road. This would be unlikely to provide an attractive environment for pedestrians. In other words, the site cannot be said to be well-linked for access by sustainable modes.

The Assessment consider the impacts on the Public Right of Way Network and identifies improvements that it suggests can result from development. This is underpinned by a PROW assessment which paint a glossy picture of potential improvements.

However, the impact on the PROW network of the development appears to us to be severe. The network between Hinckley and the motorway, as well as the opportunity to walk on the quiet Burbage Road are curtailed drastically and Pedestrians wishing to access the PROW network on those routes are forced to walk along a newly-constructed link road and through the Industrial Park itself. While some diverted walkways may be provided, they have none of the attractions of the current routes which are through open countryside.

Equally, residents of Stoney Stanton, Sapcote and Sharnford would find the PROW links to Burbage Common restricted both in quantity and quality by the development.

Those who currently use the PROW network may have physically improved paths through the development but the reason for using those PROWS would be almost

entirely removed. it is hardly likely people from Hinckley or the surrounding villages will wish to avail themselves of a walk through a Logistics Complex or under its shadow. Similarly, those wishing to walk to and from Burbage Common will do so in the lea of the new buildings.

What is clear is that this development would be highly car dependent and that very significant amounts of new traffic (including large (OGV2) articulated HGVs) would route through local villages, even if the Interim Traffic Assessment is correct. We consider the impacts to be unacceptable.

4. Air Quality, Noise, Vibration

We have not considered in detail the air quality, noise and vibration evidence but would want to do so if the scheme progresses. We note that the PEIR predicts major adverse impacts without mitigation from noise during construction but says these will be temporary. However, this may be for extended time periods and the success of mitigation is not something we are convinced about.

Moreover, all the assessments, and particularly the air quality assessment are currently limited in relation to construction traffic, in line with the traffic assessment.

5. Landscape, Ecology and Heritage

a. Visibility

The proposals involve high-bay warehousing with buildings as high as 33m, with 24-hour lighting. At the scoping stage Blaby Council asked for photomontages of the development to be provided. However, we cannot find comprehensive photomontages of the development from the locations identified in the landscape report.

This limits the ability to visualize the impact of the development on the surrounding landscape, including the view from Burbage Common and from the remaining PROWs and local housing, even though these are identified in the report as places of high risk.

The photomontages at the Public Exhibitions are from some distance away and are only given for year 15 when it is assumed that some tree cover will have grown up. However, what is also clear is that the tree cover will not fully mitigate the presence of the development as the height of the buildings mean they will be above the tree line. A further problem is that the view of the development from both the surrounding roads and rail services, as well as for people enjoying the countryside and recreational amenities in the area, will not be static so that the presence of the buildings coming into and out of view will increase the impact.

The impact at night is particularly difficult to assess from the photos provided by the applicant but the change in light pollution could be significant. The Landscape

Assessment includes some references to lighting, but emphasis is placed on the temporary nature of some impacts (Para 111.16). There is no separate assessment of lighting as suggested by a number of respondents to the Scoping Study and, furthermore, a lighting strategy is not currently provided making it difficult for exterior bodies, particularly local residents, to assess its adequacy.

This is something stressed in the NPS (Para 5.146):

The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include any noise and light pollution effects, including on local amenity, tranquility and nature conservation

Yet, in fact, there is very little that is clearly identified and where receptors have a high impact they are often downgraded as being of low significance, including areas of the Country Park. And we particularly note the comment of Burbage Parish Council.

The Applicant states ‘no Registered Parks and Gardens lie within the 5km search area’. This clearly shows no consideration of Burbage Common has been made. This is an important asset to the local community and should have specific safeguarding references built into the ES. Note: Burbage Common is HBBC’s largest countryside site and is located on the edge of Hinckley. Great for walkers, and dog lovers alike, a mix of semi-natural woodland and unspoilt grassland is 200 acres in size. In addition, the Common is well used for horses, along the trails and open landscape. There are also several paddocks and corrals along Burbage Common Road, and other livestock. The Common is immediately adjacent to the proposed site.

While we accept this is not a Registered Park or Garden it is clearly important for local residents. And by relying solely on Local Character Area Assessments there is a risk that results are not sufficiently weighted to take account of amenity value.

b. Loss of Biodiversity

A further issue which causes us significant concern is the potential impact on the wider environment and on the biodiversity that relies on those assets. The PEIR chapter on ecology acknowledges that Local Nature Sites will be lost as a result of the development as well as the proximity of the Burbage Woods and Aston Firs SSSI and the wider woodland setting of the SSSI. There are also accepted to be significant numbers of trees and hedgerows that would be lost to development as well as impacts on protected species, such as bats and badgers.

To mitigate these impacts the PEIR chapter proposes two kinds of mitigation, ‘inherent mitigation’ within the site and further mitigation where the inherent mitigation is considered inadequate. The latter is often identified as being part of future strategies which have not yet been identified. This makes it harder to assess the adequacy of those additional measures.

What is clear is that the development will not only have direct impacts on specific sites but that it will substantially change the wider biodiversity landscape. The presence of noise and lighting as well as the barriers created by the development on the site itself as well as new road infrastructure may well impact on biodiversity.

It is also worth noting the compartmentalisation of impacts. Clearly in the case of Burbage Woods, for example, there are impacts on landscape, amenity and biodiversity, yet the assessment does not appear to take this into account or allow for the combined impact being greater than each compartmentalised assessment.

6. Amenity

Taking account of the impacts on the countryside and the industrialisation and potential urbanisation that would result from this proposal, we are particularly concerned about the amenity impact of the proposals including the cumulative impact on residents close to the proposals as well as the impact on those wishing to utilise and enjoy the countryside, especially the Burbage Common Country Park and the Hinckley/Barwell/Earl Shilton/Burbage Green Wedge whose importance is identified in Policy 6 of the Hinckley and Bosworth Local Plan.

The importance of that area of countryside is underlined by the Open Spaces and Recreational Study of October 2016 which identified the park as one of the two most popular open spaces in the district (along with Bosworth Country Park) (Para 4.3)

More specifically Para 8.10 identifies its local importance saying that:

The majority of residents, particularly in the south and east of Burbage are outside the catchment of a natural or semi natural open space. Burbage Common (over 10ha) meets some of this deficiency.

Para 7.7 and 12.10 identify it as a key opportunity area for amenity enhancement:

A significant challenge facing Barwell/Earl Shilton is the lack of natural and semi-natural open space, an opportunity that could be pursued to address this is a Green Wedge Management Plan for the Hinckley/Barwell/Earl Shilton/Burbage Green Wedge which abuts the western edge of Earl Shilton. This could look into improving accessibility to the green wedge as a recreational resource which is one of the four functions of green wedge. Improving linkages to Burbage Common and Woods would also improve accessibility. The inclusion of natural open space within formal parks should be considered.

We would argue that this resource has wider benefits and, as set out above, when considering PROWs, impacts on the villages of Stoney Stanton, Sapcote and Sharnford.

Despite that the chapter in the PEIR dealing with socio-economic impacts does not refer to that important study or consider the overall impact on the amenity of that green wedge or the surrounding countryside (currently linked through the PROW network). Para 7.128 briefly refers to the plan designation but does not appear to give it much weight.

This seems to be a significant omission.

7. Carbon Dioxide

The PEIR does not include an overall assessment of the additional CO₂ emissions resulting from the development and we consider the current assessment is limited and does not answer that fundamental question.

The first and obvious problem is that it excludes significant areas of greenhouse gas emissions, including energy use on site and embedded carbon from the site construction as set out in Table 18.3. This not only includes the manufacture of high energy consuming elements (such as cement) but also all the construction traffic.

The second problem is that the assessment compares the impact of the operational traffic within the study area with the total network traffic in 2036. Not surprisingly the operational traffic forms a small part of the overall traffic on the network within the study area. Much of the traffic in the overall study area exists whether or not this development takes place.

There will also be traffic which is both rerouted and generated by the changes to the network implemented to allow development, as considered above. All those impacts need to be considered as part of the carbon balance of the site.

Table 18.18 gives a 'do something' difference of 9% in emissions from traffic following development, but Para 18.147 goes on to say that only 7% of the total increase is from development traffic. This is problematic, especially since the model seems to assume increases of traffic result from changes to traffic routing rather than generated traffic. In other words, all the additional emissions result from the decision to build the terminal and related works. The conclusion that there is a less than 1% increase in emissions seems to be comparing apples and pears.

Not only that but, in reality, the emissions are likely to be increased further because there would almost certainly be additional generated traffic as the new slips allow different and longer journeys to be made, as well as determining where further new development might occur.

There is a further issue with the assumptions about rail emissions. Some 221 ktCo₂ are directly projected (assuming the rail terminal is used to capacity, called a 'worst-case' scenario). This is then compared with the equivalent road freight and a reduction 32ktCo₂ is calculated. This then becomes a 'best-case' scenario in terms of emissions because it assumes all the trains are used and that all the freight on

those trains is replacing freight which would have been on the roads. Neither of these assumptions seem likely in reality and certainly are not being guaranteed.

8. Cumulative Impacts and Future Development

As we have already set out, we consider the impact of the proposals will be wider than simply the terminal. The PEIR includes an assessment of cumulative impacts which it bases on the definition on the NPS. Those are listed in Appendix 20.1. However, that assessment has not been undertaken so no concrete evidence is currently presented on the impact of those in-combination effects.

Also, importantly that excludes in-combination effects from other junction changes. We are concerned that this may lead to transport effects in combination which are not considered.

A further issue arises because the proposals are effectively providing enabling infrastructure for developments, not committed but included in local plan proposals, most notably large-scale housing on either side of the HRNFI which is likely to depend on the improvements to Junction 2 of the M69 and which could, in effect, constitute a new settlement around the HRNFI. We question whether this would be a sustainable community, what facilities would be provided and what impact this would have on carbon emissions.

The enabling of further development on the other side of M69 to the HRNFI would certainly have significant additional impacts on the setting and amenity of the villages of Sapcote and Sharnford, as well as increasing traffic through those settlements.

9. Conclusions

In conclusion Sapcote and Sharnford Parish Councils considers the proposals should not be supported because:

1. The need is not properly established.
2. It has not been demonstrated that the rail network would or could be utilised to the extent assumed.
3. The direct and indirect traffic impact will be serious.
4. The major change of introducing slip-roads to the M69 Junction 2 will have wider detrimental impacts.
5. There is little prospect of achieving good sustainable transport access to the site.
6. The impact on the landscape, biodiversity and amenity of the area has not been, and cannot be, adequately addressed.
7. The climate change impacts have not been reasonably assessed and the overall impact on climate emissions is likely to be more serious than is being suggested.

Appendix:

Hinckley National Rail Freight Interchange: Questions

2. Do you agree with the principle of transferring freight from road to rail?

Yes, but this is a leading question.

The scope for transferring freight from road to rail is limited because of its origin and destination. The proportion of freight that would be transferred from road to rail would not be very significant compared with total of road freight that would be generated by the proposed development. Most rail freight is moved by diesel locomotives and there are no plans to electrify freight routes.

3. Do you agree that the transfer of freight from road to rail has an important part to play in a low-carbon economy and in helping to address climate change?

No. This is also a leading question.

The amount of carbon saved by switching freight from road to rail would be low and is likely to be outweighed by additional carbon produced by constructing and running the overall terminal including the B8 component. Nearly all assumptions err on the optimistic side, for example by assuming that freight trains will utilise their maximum capacity.

The development's commitment to tackling climate change is not demonstrated in the supporting documentation. In particular it does not address the issues related to traffic generation from changes to the road network beyond the development traffic and compares emissions from site traffic with overall traffic levels.

4. Do you think that this is a good location for a Strategic Rail Freight Interchange?

HNRFI is centrally located between the West Coast Main Line and the East Coast Main Line, on Network Rail's Strategic Freight line connecting Felixstowe and London Gateway to the Midlands and the North.

NO.

There is no need for a further rail freight terminal in Leicestershire. There are already five others within 36km of the proposed location. The road and rail networks are already at or close to being congested. More developments are already committed and there are little plans to tackle or mitigate the impact of the additional traffic.

5. Do you support the proposals for up to 850,000m² of logistics floorspace, railway sidings and a rail terminal on the Felixstowe to Nuneaton railway line to the south west of Elmesthorpe?

No.

For all the above reasons and because of the more direct impacts on Sapcote and Sharnford residents of additional traffic, loss of local biodiversity and amenity and landscape deterioration. Our extensive objections are set out in the main objection document.

6. Do you support our proposed mitigation that is set out in the Preliminary Environmental Information Report (PEIR)?

No.

Given the type and scale of the development it is hard to see how it could be adequately mitigated. However, if the proposal does go ahead there will be a need to mitigate its impact. We are not convinced that the current mitigation is adequate and would consider this further if the scheme progresses.

7. Do you have any comments on the proposed highway improvements?

We are proposing several upgrades to the M69 including new north and south bound slip roads and the creation of a link road between J2 M69 and the B4468 Leicester Road (known as the new A47 Link).

We do not consider that the proposed improvements alleviate our concerns. They are all geared towards facilitating more traffic.

The introduction of south-facing slip roads would lead to increased traffic on unsuitable roads, including routes through Sapcote and Sharnford. It is also likely to facilitate more development and far more traffic in the future, - further to that from the development.

8. Do you support the idea of a lorry park with welfare facilities and HGV fuelling facilities in this location?

No.

There is no currently need for such a facility in that location. Should development be agreed, despite our objection, some facility may be required and should be a matter for discussion with local residents.

9. Do you support the proposed landscaping incorporated into HNRFI?

Not Sure.

While it is impossible to hide such large buildings, other structures or lighting, landscaping would be required to mitigate the impact if permission were granted. The Parish Councils have identified significant impacts of development and we may wish to make further detailed comments on the effectiveness of the mitigation if the scheme progresses.

10. Do you have any other comments about the proposals?

It has not been demonstrated that the development will contribute to the mitigation of climate change. It is therefore not acceptable.