



STONEY STANTON PARISH COUNCIL

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The Planning Inspectorate
Central Operations
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Dear Sirs

Feedback for the EIA Scoping Opinion Documentation regarding Tritax Symmetry and the Hinckley National Rail Freight Interchange (HNRFI).

We were asked as consultee to respond to the submitted scoping opinion for the above project and our responses are detailed below. As always we are more than happy to provide context around any of the raised points.

Stoney Stanton is a rural village some 1.4 miles (as the crow flies) to the East of the proposed development of Hinckley National Rail Freight Interchange. The Parish Council of the village have actively engaged with the promoter of the scheme and have submitted responses to all of the various consultations that have taken place. We have evaluated the document at length and have the comments detailed below that we feel should be taken into consideration and amendments made to the document in question.

General Comments:

- There are numerous (83 to be precise) references to “study area” – this has a different meaning in each section, so that although “study area” is frequently referred to, it is difficult to understand what “study area” means in any instance. A tabular method of indexing these would be beneficial.
- There are numerous statements referring to the “local vicinity” or “local area” but these fail to state a measured figure, and in each instance the “local vicinity” or “local area” differs. What one person understands as local is different to another, therefore a measurable distance or area should be stated so the impact can be assessed.

- Adding page numbers to the document would have made the report easier to follow and reference, whilst not relevant to the EIA scope it would be an improvement that would be easy to implement.

Comments per section:

1. Summary, The Applicant S6: The statement that “The portfolio is extremely well located” cannot be considered to be true if the National Policy Statement for National Networks is read, e.g. the NPS section 2.50 states that a network of large SRFIs “across the regions” is needed (not all in the midlands) and that new rail freight interchanges “especially in areas poorly served by such facilities at present” are likely to attract substantial business. Putting this close to DIRFT – which is 26km away – and other nearby rail freight terminals does not comply with the NN NPS. Therefore it is poorly located if the NPS is referenced.
2. Summary, The site: S7 – ought to mention that Burbage Wood is an SSSI, and also the blocks of deciduous woods cited are “ancient woodlands”. The link road to the B4669 needs to clearly state if this will be a public road or merely for access and egress to the site as there are huge implications if this is not a public road to the motorway junction.
3. Summary, The site S8 ii): The statement “up to 185.43 hectares of level land is proposed for the construction of a rail port...” Is vague. There should be a stated minimum for this as, presumably, this is what qualifies this to be an NSIP.
4. Summary, S8 v), vi), vii) and viii) All start with “potentially..” (relating to road improvements or new roads) – in the case of v) . The ES and application for a DCO should be totally clear about these, not vague, as the environmental impact will be affected significantly by these.
5. Section S10 mentions the supply chains, but fails to mention any of the proposed users of the site, as all of the major manufacturing centres in the area are already well served. These supply chains should be clearly stated and mention of why the existing rail freight infrastructure is inefficient for their needs.
6. Summary, Need S12: The Midlands, is, by definition, a large area in the middle of the country, so stating that 45% of British Rail freight goes through the midlands is stating the obvious, and not only that but “going through” the midlands is the means by which it reaches other regions and does not use road transport. How much of this freight goes along the line between Leicester and Nuneaton? There are other nearby locations, such as Nuneaton or Leicester, which are served by more rail lines and also motorways, and therefore would be able to easily cater for much more rail freight than this site.

Section 1

7. 1.8 and 1.9: 1.8 quotes paragraph 2.44 of the National Policy Statement which ends with the statement “reducing trip mileage of freight on both the national and local roads”. Section 1.9 of this document asserts that an essential component of an SRFI is “high quality strategic road connections to the region or regions that the interchange will serve. This is not stated in the NPS. This is actually contrary to the NPS which states that SRFIs should “minimise some elements of the secondary distribution leg by road” (NPS para 2.44) and “be near to the conurbations that consume the goods” (NPS para 2.45).
8. 1.10 i) Refers to the F2N (Felixstowe (the port) to Nuneaton (location of inland rail junction) line, this site is approximately 170 miles from Felixstowe and 5 miles from Nuneaton. Surely the preferable thing to do is to put this SRFI at Nuneaton, which has much better connections

into national networks than the proposed location. Nuneaton is served by the West Coast Main Line, the F2N and the Nuneaton to Coventry branch line, plus is very close to the M6 one junction away from the M69 Junction and also nearer to Birmingham. Nuneaton is also better placed for links to Southampton and Liverpool

9. 1.10 v, vi, vii and viii) – All start with the word “Potential” – it is not possible to do an Environmental Impact assessment if major road building and improvements are considered to be “potential”.
10. Para 1.11 – the area might be referred to as the “Golden Triangle” – which in itself has had unfortunate consequence (this automatically makes it a preferred site for land speculators), but not all land within the Golden Triangle is suitable for large amounts of freight traffic, and this area is definitely not suitable because of inadequate local traffic infrastructure and nearby villages. It is contrary to the NN NPS to build a large number of freight terminals in the so called “golden triangle”.
11. 1.12: Burbage Wood is an SSSI, and other woods cited in the paragraph are “ancient woodlands” – this should be made clear
12. 1.13: In order to assess the impact, the populations of these towns and villages should be included here.
13. 1.25 “the scoping responses from consultation bodies have been considered in the updated Scoping Report and will be addressed in the ES” – it does not appear that the late response from Harborough District, TR0500007-000024 has been taken into account, particularly with respect to the inclusion of West Midlands.
14. Figure 1.3 needs to take into account the historic and current traffic issues through Sharnford and this should be stated. The same figure shown the roads through Stoney Stanton as requiring traffic management but fails to mention how this assessment has been made and the definition of “traffic management” that is used. There has been no direct communication with the proposer with the local Parish Council on these proposals.

Section 2

15. Sections 2.3, 2.4 and 2.8 refer to Leicestershire studies (NOT statutory planning documents) – however this proposed development is only 4km from Warwickshire (A5 is the boundary). Is this of local significance to Leicestershire only or of national significance, as proposed? The report states in 2.8: “The genesis of this project has been in response to the level of need identified in the LLSSDS”. Equivalent studies carried out in the West Midlands should be considered before choosing a site.
16. Section 2.4 refers to “functional obsolescence” of warehousing stock for a number of reasons, but doesn’t consider that these site will become brown field sites prime for redevelopment.
17. Section 2.7 states the shortfall if 115ha of rail freight land by 2036 with the already accepted DCO’s for rail freight terminals. This proposal is 335ha so indicated that by 2036 there will be an over capacity and is being developed significantly larger than it needs to be, the rationale for this is not mentioned in the document or the impact of the size increase from the identified shortfall.
18. Section 2.12 references the LCC Growth Plan, but not that this plan is actually a policy as it has not being through the consultation and referendum process to enable it to be adopted.

19. 2.18 bullet 3 refers to the Midlands Connect Strategy: Powering the Midlands Engine March 2017 – but this has recently changed, therefore this scoping request is referring to out of date information.
20. 2.18 bullet 3: The Leicester and Leicestershire Strategic Growth Plan 2018 is a non-statutory document and should not be referenced. It also relies heavily on the Midlands Connect Strategy which has changed, therefore even more so, this document is referring to out of date information.
21. Section 2.25 mentions the road network but not the A46 where the M69 eventually leads that already has significant issues with traffic.
22. 2.27 and 2.28: Why are these described as “Potential” – if agreed then they should be considered to be essential before any other work can commence as they have a large environmental effect.
23. Section 2.36 mentions the services, but not how the availability of these will be assessed. The land is a local flood plain with no natural run off or foul water systems, Elmesthorpe the nearest village to Stoney Stanton pumps a combined system through our village and has potentially impacted the village where flooding has occurred.

Section 3 Alternatives

24. 3.5 This report does not fully describe reasonable alternatives, as commented in the late response by Harborough district to the previous Request for a Scoping opinion (TR050007-000024). This report only considers Leicestershire - whereas Nuneaton (a few kilometres away in Warwickshire) may be a more suitable alternative. The location is on the boundary between East Midlands and West Midlands regions but only Leicestershire (East Midlands) options are included.
25. Section 3.7 doesn't mention the LCC Strategic Development Area (SDA) that was adopted early 2020 to build 4500 homes and industrial unit directly to the East of the site.
26. Section 3.12 lays out the assessment criteria that were used in the search for this site. At least 3 of these objectives have not been met:
 - a. Availability of train paths that avoid conflicts with passenger services, with capacity for at least four freight trains per day
 - b. Access at all times of day and week without creating disturbance to neighbouring and nearby land users
 - c. Avoidance of housing – linked in with comment 25 these two schemes are clearly not considered together
27. Section 3.14 mentions the 2 per hour passenger trains, but doesn't reference the proposals for the need for this to increase for better links with other local policy and plans. It also doesn't mention the road crossings at Narborough that would be detrimentally affected by this proposal or how this has been taken into account. The addition of the South bound slip roads fails to document why these were not installed when the motorway was constructed, which was due to the negative impact these would have on the local roads and communities.
28. Section 3.16 mentions the land to the East, but fails to mention the LCC SDA proposals that would mean housing would be significantly closer than the initial plan.

29. Section 3.25 recognises the phased delivery of the infrastructure, however it should be stated what key road links will be in place before any development commences to ensure there is no impact on the surrounding area during any of the works or operation.

Section 4 Consultations

30. Consultations Undertaken to date 4.6 and 4.7: These do not include Warwickshire (4km away), Nuneaton (10km away), Harborough District (which includes Lutterworth, 16km away and Magna Park (13km away)) or Rugby (24km away) (which includes DIRFT – 26km away). All of these have large warehouse and/or rail freight terminals and should be included in consultations. Of particular note is that Harborough District have formally asked to be included in consultations (ref TR050007-000024- HRFI)
- a. “Harborough District Council (Strategic Planning Team) wishes to remain a consultee (under EIA Reg 11) or be added to PINS list of consultees for the duration of the application process.”

Section 5 Environmental Impact assessment

31. Section 5.10 Whilst it is recognised that each receptor will be assessed separately, there are many factors that will affect multiple receptors. It is important that each chapter should not be considered on its own merit and a combined evaluation of each should be undertaken and listed.
32. Section 5.16 “Following the assessment of effects, the ES will identify measures to mitigate and significant adverse effects of the development where feasible and necessary”. If a significant adverse effect is found it must be mitigated. The term feasible should be removed from this statement as the development must not proceed where there are identified “significant adverse effects”.
33. Section 5.20 states: “The development proposed is not associated with an understanding of linked health implications and is not considered a serious risk to public health”. Section 5.21 states that therefore a separate chapter on human health will not be included in the ES. Post-construction levels of air pollution, noise (24 hour per day working) and light pollution are all expected to increase in the area therefore a chapter on Human Health should be included.
34. Section 5.23 “The freight movements that the development would cater for already have a carbon footprint and the proposal would not be increasing the extent of this footprint”. As one aim of a SRFI is to reduce the carbon footprint, and taking into account the country’s aim to be carbon neutral by 2040 or 2050, then this development, which will have repercussions far beyond these dates, should significantly reduce the carbon footprint – including during the construction phase.
35. The National Networks NPS Section 4.16 and 4.17 state that:
- a) 4.16 When considering significant cumulative effects, any environmental statement should provide information on how the effects of the applicant’s proposal would combine and interact with the effects of other development (including projects for which consent has been granted, as well as those already in existence). The Examining Authority may also have other evidence before it, for example from a Transport Business Case, appraisals of sustainability of relevant NPSs or development plans, on such effects and potential interactions. Any such information may assist the Secretary of State in reaching decisions on proposals and on mitigation measures that may be required.

b) 4.17 The Examining Authority should consider how significant cumulative effects and the interrelationship between effects might as a whole affect the environment, even though they may be acceptable when considered on an individual basis with mitigation measures in place.

This is clearly not being done, as for instance, light pollution from Magna Park is already visible in this location.

Section 6 Land use and socio-economic effects

36. Section 6.5 states the use of the 2011 census as the statement for the proposed method. In the time since the 2011 census there has been significant housing development in all of the surrounding areas that will not be taken into consideration if this document is used on its own. As a minimum a more up to date method should also be used such as council records for home numbers and people to ensure the method is as accurate as possible. During the consultation period the 2021 census will also be completed and during the development phase if this new information is made available it should be used.
37. 6.7 has a bullet point for local plans. This needs to state the local plans that are to be used, there is the Fosse Villages Local Plan, Blaby Local Plan, etc
38. 6.10 States multiple bullet points, the final point states “if the impacts of traffic cannot be mitigated” the impact of traffic must be mitigated and to merely assess the impact rather than take action should not be considered acceptable.
39. 6.11 Construction employment: This section is very vague. For instance not many of the construction workers will be from the immediate area and will therefore need to be either shipped in or live locally in temporary accommodation during the construction period. This is not quantified and should be.
40. 6.12 Operational Employment. This report states that there could be up to 8,400 workers on-site. This number swamps the total populations of nearby villages. Where will these workers travel in from to the site and how? This is not explained and should be. The area already has very low employment and the other large industrial complex’s struggle to fulfil job roles and workers are regularly bussed in from Nottinghamshire and beyond. None of the housing developments will be in the financial reach of the low skilled job opportunities that are mainly generated, and this is counter to Blaby Local Policy where new sites must create roles for highly skilled, well paid jobs. This should be clearly stated in this section.
41. 6.13 “Replacing agricultural operations with 8,400 workers is likely to have significant benefits to the productivity of the region”. This could easily be replaced with “Replacing agricultural operations with 8,400 workers is likely to have a devastating effect on the area as these low skilled jobs will not be carried out by members of the local population”.
42. Section 6.19 refers to commuting distance. The distance should be clearly stated.
43. Section 6.23 refers to “expert judgement” it is also important and should be stated that the judgement should also be independent.
44. General for Section 6: The late response to the previous EIA scoping Request submitted by Harborough District (TR050007-000024-HRFI) (April 2018) has a lot to say in this area, none of which has been included – mainly to learn lessons from other recent, and in close proximity – developments.
45. Quoted from the above report: the methodology for determining the study area for this topic should be fully described and have regard to the Leicester & Leicestershire Functional

Economic Market Area / Housing Market Area (ref. HEDNA, 2017) and Census based commuting data. Drawing on case examples (e.g. DIRFT, Magna Park) could supplement the use of transport and census data.

Section 7 Transport and Traffic

General comment is that the section understands that there will be an impact on the local roads that are to be assessed and there will be public transport, etc looked at. Given that this is a rail freight terminal and significant modifications would be required to the rail system a separate line item should refer to the provision of an additional train station for the use of commuters. Earlier in the report it states the distance from both Hinckley and Narborough train stations, both of which are not an option with a 4km+ walk from the closest.

46. Section 7.2 fails to mention the local Parish Councils who should be asked for input as to opinions on the current and possible changes that a development will have on the villages, the District and County have not the granular information that is needed to fully determine the impacts.
47. Section 7.4 refers to the use of traffic models for the understanding and modelling of the effects of traffic. These are inaccurate and through the use of automated traffic counters SSPC have shown that traffic levels are already at times in excess of the 2036 predictions.
48. Section 7.34 references the models to be used for the assessment, the method of validating these in a statistically valid significant method should also be stated.
49. Sections 7.36 et al refers to the potential bypasses and road improvements. It needs to be stated that these roads and junctions should not be considered on their own but as part of a system. It should also state how the assessment will be made to take these modifications from “proposed” to “required / decided” and the final solution should be stated in the EA without any proposals, only definite plans.
50. Item 7.34 of table 7.5 needs to include the village of Sharnford as a minimum as the current levels of traffic cause many issues. The focus also needs to look at the already high number of serious and fatal accidents within 2km of Stoney Stanton (sadly 2 fatalities in the last 2 years)
51. Section 7.35 of table 7.5 It’s recognised the benefit of the 18 and 24 hour flow models, but disregarding peak traffic volumes should not be allowed, the impact of peak traffic is a huge impact to the local road networks.
52. Section 7.71: The list does not include the nearby Magna Park, Coventry Gateway or other large warehouse developments along the A5, e.g. “Hinckley Park” at M69 J1, that have added significant traffic to both the A5 and M69 since opening. These, and other nearby large warehouse facilities, should be included. The list also fails to mention the other local rail freight terminal of Tamworth (16.8 miles from proposed development site). There is also no mention of the BDC and LCC SDA area that is under proposal for the building of 4500 homes and additional warehouse units to the immediate East of the development. The planning reference of 17/010104/HYB relates to an already opened and functional large warehouse operated by DPD.
53. Section 7.82 The method for ascertaining if the bypasses, and road alterations should be clearly stated and how the TWG discussions will be determined. As previously detailed the local parish councils of Sapcote and Stoney Stanton should also be included in this group due to the local knowledge and issues that district and county councils do not have

54. Section 7.52 states the rules that should be used for the assessment. However there is no mention of how the baseline, accurate and evidenced data of the current vehicle numbers and type are to be understood.
55. Table 7.3 refers to providing public transport and alternative means to the car for travel. Given the 24/7 operation of the site there is no provision mentioned for a similar amount of public transport.
56. Table 7.5: It is noted that the PINS comment about section 7.35 of the previous submission (Percentage change in traffic flows) asks the applicant to seek agreement with the relevant statutory consultants on the approach and to provide a justification. The response is to get the updated assessment checked with the TWG – which I think is Transport Working Group. As they are deciding on the methodology, then in some respect they will be “marking their own homework”. It should be agreed by the parent group of statutory consultees as requested by PINS.

Section 8 Air Quality

57. In general, current European Directives, and DEFRA (e.g. The Clean Air Strategy 2019), aim to reduce air pollution, and in particular DEFRA states that a policy of “not exceeding agreed limits” is not sufficient. Therefore merely stating that limits will not be exceeded is not enough, especially for the operational period. The aim should be to reduce air pollution or at the very least keep pollution at or below existing levels.
58. Overall statement is that the approach of this section appears to look at the method of ensuring the air quality doesn’t breach the government and legal limits, as opposed to ensuring that there is no decline in air quality from ANY of the proposed activity. In the press in recent months there have been multiple articles on the effects of air pollution on people and in particular children. The area of this proposal will impact significantly on the rural villages surrounding the area, and where the predominant wind direction will take pollution from the proposed development to the villages. This appears not to be considered and should be.
59. Section 8.7 references the NPS, with a bullet point of “Existing air quality”, there is however no substantive method stated for how this will be measures pre, during and post the proposed development.
60. Section 8.11 references the LTP3 of the core strategy but fails to mention how this will be assessed when compiling the EA.
61. Sections 8.16 and 8.17 state guidance that is available but states only that this will be “considered” and not followed, it should clearly state if it will be followed or not, considering the guidance is not acceptable.
62. Section 8.36 and Section 8.38. Both of these neglect to mention that the Burbage Woods and Burbage common areas are favourite leisure destinations for residents within Blaby District, Hinckley and Bosworth District, and further afield. Walks around the woods and common can easily exceed 2 hours duration, and this combined with stops at the popular café in the common, picnics, children playing in the play area, all means that some people, including young children, could easily remain in the area for 4 or 5 hours. This should be included in the ES
63. Section 8.47 details the distance from the site boundary that the receptors will be assessed at 500m which we feel is insufficient. Given the prevailing wind direction is directly from the site

to Stoney Stanton the areas needs to be extended to at least 2km where emissions from vehicles and dust can easily travel and therefore impact.

64. Section 8.75 details the lack of data and “verification factor” that will be used. This should not be allowed and specific measurement should be undertaken in the surrounding areas to determine the true values as the models used can be inaccurate.
65. Section 8.76 States “The detailed assessment of plant emissions are proposed to be scoped out of the assessment as they are not considered to be likely to give rise to significant environmental effects”. There is no justification given for this, therefore this should be “scoped in”
66. The construction phase of the report fails to document that the vehicles that are used in the construction phase will emit significant levels of NOx and particulate matter from predominantly diesel engines, and given that the regulations for such vehicles for emissions to air is significantly behind those of the passenger car or HGV the impact of these should be included in the assessment.
67. Section: various state the existence of diffusion tubes. These tubes provide only an indicative result and only of a time averaged period where it is not possible to determine peak and weighted time averages for the exposure limits. There is nothing stated of how the particulate mass or number has been ascertained. The section needs to clearly state how the pollution levels will be ascertained by what method and for how long. It also needs to state how each site will be assessed to determine why measurements are to be taken there. All of this is important to the EA scoping and should be included.

Section 9 – Noise and Vibration

68. Operational Phase – Rail Freight Interchange – although many British Standards are quoted, this section does not make any specific mention of the fact that 24 hour, 7 day per week operation is expected, whereas at the moment no such operations take place. The ES should specifically consider noise generated at night time which is likely to have an impact over a larger area than daytime noise.
69. Section 9.16 – states “...dominant source of noise is likely to be from road traffic on the M69 to the south and east and existing rail movements on the railway line to the northwest”. This should be refined as assessment at the DIRFT facility locally it is clear that the shunting of trains and loading and unloading of containers can easily be heard above the sound of the M1 and A5. This statement should be reassessed.
70. Section 9.23 states that a baseline noise assessment will be conducted but not how this will be done and what assessment criteria will be used for the locations.
71. Section 9.33 references short term but fails to clarify this with a meaning full statement. This needs to state the use and definition of short term in respect to this comment. It also states “...controlled through a suitably worded CEMP”, this should read the ‘execution of a suitable CEMP’ as it implies in its current form that a document is all that is required to mitigate any issues.
72. Section 9.36 refers to the scoped out vibration analysis of the road and how this will be detrimental and could be assessed as an adverse effect. Given that there are new proposed roads to be built the makeup of the ground should be sampled and the determination of makeup used to ensure this section is scoped in. Furthermore the re-surfacing of existing

roads, whilst welcome will only assess the road in an as new condition and not the likely condition for the life span of the road, there for an as new assessment of the road should be replaced with a typical condition of road. Finally where an existing road is re-surfaced but the type and volume of traffic changes as a result of any part of this assessment change the vibrations from the road then this should be factored in. Given how close to peoples' homes, and villages that this will be this section should be scoped in with the required works completed.

Section 10 – Landscape and visual effects

73. Section 10.4 states “It does not consider potential effects as a consequence of development within the Order Limit boundary encompassing junction 21 of the M1 motorway”. The development within the Order Limit boundary will be the main issue with regards to Landscape and Visual effect. Earlier in the document it stated that warehouses will be some 33m in height, and the rail terminal will cover a significant area. If this is not taken into account then the section is pointless as this will be a major Landscape and visual effect.
74. Section 10.12 refers to local planning policy, it only refers to Blaby District, and as the development is on the border of Hinckley and Bosworth Council and indeed some of the proposed development runs through it, this should also be considered.
75. Section 10.23 states “... the main site does not fall within any national or local landscape designation” is a true statement, however it fails to mention that there would be a hard border with a designated ancient woodland, Burbage Common Country park and other areas that designated as such. The appearance of this proposed development should take this into consideration given the extensive use of Burbage Common and Woodland as an ‘escape’ for many people in the area and indeed the only green space for recreational purposes in the vicinity.
76. Section 10.32 states “...in very good to excellent weather conditions” to use this to form a representative view of the area, visits need to be undertaken in all weather conditions and in all seasons to form a representative view.
77. Section 1.52 states “In the wider landscape there will be opportunities for partial views of the proposed development from roads” Given the proposal to build 36m high warehouses on a landscape that is predominantly flat, the warehouses will become the significant view from many areas and dwarf any natural or manmade features. The section needs to include that the proposed site will detract from the natural beauty of the Burbage Common and associated ancient woodland.
78. Section 10.52 needs to specify that Burbage Common Road is a single track road, unsuitable for HGV's with passing places, the description in this section leads to a vision of a main road that is used extensively.
79. Section 10.54 needs to reassess the other affected areas as a further increase of 6m to the height of these warehouses will mean there are other sensitive visual receptors. To complete the assessment using a different criteria should not be considered as appropriate.
80. Section 10.59 states “Where likely significant adverse effects cannot be avoided through design, additional mitigation measures will be considered” This statement needs to read “...additional mitigation measures will be implemented”.

81. Section 10.61 only considers to impact to the immediate area, and not that to the wider areas (within 2.5km) that will also have significant detrimental detracting from the proposed development and should be considered.
82. Section 10.104 "opportunities exist to improve and enhance the structure of the landscape across the area" this statement is an opinion and is contradictory to that in 10.102 where it is noted that "development of the site in the manner proposed would alter the character of the landscape". However the proposed development is summed up in a positive manner the true impact to the local area (5km) needs to be fully understood and agreed with all affected parties.

Section 11 – Ecology and Biodiversity

83. Section 11.1 needs to include Hinckley and Bosworth District Council and Warwickshire County Council as the site borders each and the impact of the development will cover all areas.
84. Section 11.4 states the term "important" as per the Hedgerow Regulations but fails to state how "important" will be assessed.
85. Section 11.10 states the local policy that has been assessed but doesn't include the Fosse Villages Local Plan where some of the development falls
86. Table 11.2 has a section that refers to 'Badger' that appears redacted. In the interests of the document there should be no redacted sections.
87. Section 11.28 recognises the impact of the lighting pollution and other impacts on the site, but not on the ancient woodland or sites on the immediate border to the site that will be dwarfed by the development.
88. Figure 11.2 shows areas that either have existing wildlife sites or potential to become wildlife sites. There are sections of land that are shown where the landholder has not been contacted or involved in these proposals. There is no indication within the report that details what the scope and legal standing of these proposed local wildlife sites would be.

Section 12 - Cultural Heritage

89. No comments to specific points.

Section 13 – Surface Water and Flood Risk

90. Section 13.19 stated the use of LCC PFRA, this document should only be considered alongside other documents and not the sole source of truth. In the local areas (5km) there was significant flooding (including extensive tracts of the proposed development) on 1st October 2019 that was not included or seen as at risk in this document. It also fails to take into account the large scale development that has taken place in the surrounding areas (5km) as these were not a consideration when the report was published. A more up to date method for determining the flood risk should also be consulted and used.
91. Section 13.43 recognises the catchment area of the River Soar but should mention the significant flood issues that occur within the Soar catchment both up and downstream of the Thurlaston brook entry into River Soar.
92. Section 13.54 recognises the lack of public sewer but doesn't state what methods will be used to assess the requirements and assessment of the existing systems in local areas (5km). Other properties in neighbouring Elmesthorpe pump waste via a combined sewer that comes

through Stoney Stanton that in the recent past may have contributed to the contamination of flood water with foul.

93. Section 13.55 recognises the stress on the local water system as “moderate” but doesn’t state how an assessment will be conducted to ensure this is not increased.
94. Section 13.67 states that the increase from climate change will be taken into consideration but does not state by what margin, ie 30% increase over 100 years
95. Section 13.73 needs to also take into account the amount of flood water that currently sits on the agricultural land and road during heavy rainfall. Any development will lead to impermeable surfaces where flood water could accumulate and store and therefore add far quicker to the water tributary system causing potential issues along its course.
96. Section 13.81 refers to the attenuation of surface water on site and to take into consideration the effect of climate change, but not how this will take place or the increase that will be implemented as increase in water due to climate change i.e 30% over 100 years.
97. Section 13.87 states “There is no reported flood history” this should be reassessed with both BDC and LCC post the flooding 1st October 2019 that flooded extensive tracts of this land and is well photographed by local people.

Section 14 – Hydrology

98. Section 14.9 should also take into consideration Hinckley and Bosworth District Council and Warwickshire County Council both of which have land that is directly connected to the site, or that the hydrology of the land could effect.

Section 15 – Geology, soils and contaminated land

99. No specific comment on specific sections however the document very much focuses on the construction and existing contamination that may / may not be present. There is nothing of substance regarding the control and assessment of attenuation or other means from the facility when operational. There is also no mention of asbestos waste or similar and given the use as agricultural land, there could be significant ground contamination that should be in the scope.

Section 16 – Materials and Waste

100. Section 16.2 “Liquid waste such as wastewater from dewatering operations is covered in section 13” There is no reference to ‘dewatering’ within section 13, it is mentioned only twice in the report in sections 12 & 16
101. Section 16.4 recognises the “significant environmental impacts” of the use of material in the construction of the potential development but says these will be scoped out as there is no “fixed design to assess against”. This we feel is unacceptable as independent to the final design been derived there is a significant estimate that can be formed from the preliminary designs. Elsewhere in the report where full information is not known then estimates have been used and deemed suitable. In this instance due to the massive environmental impact it should not be removed from the scope.

102. Section 16.25 recognises the waste that will be generate by the operation of the area but fails to consider how this will be dealt with. This should be considered and detailed in the document.
103. Section 16.33 The section details the first year of operation, however it is not clear if this is the first year of the staged operation, or the first year when the facility is fully developed and occupied. The two are significantly different and both should be used for the assessment.
104. Section 16.45 This section states that the assessment of contaminated land is addressed in section 15. This section doesn't though cover the assessment of soils prior to them leaving site it covers the assessment of the site prior to works which will only be representative and needs to also cover in this section how waste will be screened prior to re-use, relocation or disposal.

Section 17 – Energy and Climate Change

105. Section 17.34 states “Energy / Sustainability Strategy” will include details of how the buildings will minimise their GHG emissions. There should be greater detail in this scoping report of how this will be achieved ie solar panels, ground source water, etc.
106. Section 17.46 states the areas to be scoped out of the report. The wide range of areas to be scoped out should be reviewed and looked at in detail as to scope all of these sections from the EIA will be a significant omission. Just because it is difficult shouldn't be a reason for exclusion from the document.
107. Section 17.48 states “Tritax Symmetry have adopted a Net Zero Carbon in Construction pledge which will be considered throughout the development”. This statement should read “...which will be implemented throughout the developmet”. It may be a pledge, but this must be enacted and the section should include specific details of how the proposer intends to complete this ‘Net Zero Carbon in Construction’.

Section 18 – Cumulative and transboundary effects

108. Section 18.6 states “... in conjunction with other projects that are expected to be completed before construction of the project”. This section should state before the facility becomes fully operational as to only look to the start of construction will not identify the true impact. In the instance of this site, it is important that the emerging Blaby Local Plan should be taken into consideration as this will run until 2036 when it is identified this proposal will be fully operational. This current local plan does not include this site, the LCC SDA area adjacent to the site or other significant developments that are likely to be included in the plan. As this proposal and the emergence of the Local Plan happen together each must be regularly updated to ensure there are no conflicts or the impacts of each are fully understood and modelled.
109. Section 18.8 states “EIA topics with the potential for cumulative and transboundary effects are the socio economic and transport and traffic”. This is too constrictive and as a minimum should also include air quality / pollution.

110. Section 18.11 lists the sources for other developments that will be considered, the list should also include the LCC for its decided strategic plans that are undergoing scoping opinion and potentially deliver at the same time as this proposal if they go ahead.

111. Section 18.13 states a planning reference “17/01043/HYB” which we presume is Hinckley and Bosworth District Council, it should be stated that at this time this is a built and operational facility that is already impacting the local area significantly used as a DPD central hub 5

112. Section 18.8 states a “zone of influence” this needs to be specific to the size of the area that will be covered.

General Comments

113. The EIA fails to document in how the impact of the increased in emissions from all of the vehicles utilising the site. There is 7% of the site traffic associated with the rail freight terminal, there is 93% of the site served by road alone. The impact of all of this additional traffic has not been fully understood especially on air quality, noise and operation.

114. The Council have conducted studies on other rail freight terminals and the impact of noise, especially from rail, reversing beacons, shunting and other movement operations. In recent works we have visited the existing terminals at night and observed the above factors at 1.8km away, and these are significant and far above the noise generated from the road and rail links that are currently in place. This will directly impact Stoney Stanton and the report fails to take this into account in a meaningful way.

115. The existing situation of the proposed development land is that of a “green lung” bordering the motorway where the air quality is improved. The development will remove this area through building and make the air quality worse, the fact that at the moment, the land leads to improved air quality needs to be factored in.

As always, we are keen to discuss our perspective of the scheme and the perceived impact that is will have on the village of Stoney Stanton and the surrounding areas.

Yours sincerely

Stoney Stanton Parish Council