

STONEY STANTON PARISH COUNCIL

Minutes of the extraordinary Council meeting of Stoney Stanton Parish Council which was held at the village hall on Tuesday 3rd October 2023 at 7.30pm.

Parish Councillors:

Mr L Cousin (Chair)
Mrs S Astill
Mr P Martin
Mr S Bateman
Mr M Eaves
Mr J Masters
Mrs R Bateman

Clerk: Miss R Ward

Consultants in attendance: Jonathon Weekes (Aitchison Rafferty Planning Consultants) and Tim Rose (M-EC Transport Consultants)

Public in attendance: None

23-149 Apologies

RESOLVED: Members accepted apologies from Cllr Sarah Eaves and Cllr Jade Lundean

23-150 Declarations of Interest

Cllr L Cousin: Action group

23-151 Public Participation

No public in attendance.

23-152 To consider and agree the HNRFI written representation ahead of the 10th October deadline

Members discussed the issues raised with Jonathon Weekes and Tim Rose following their draft reports.

Additional information will be added along with site photos.

RESOLVED: Members agreed to give delegated powers to Chair and Vice Chair to finalise the final document.

The final report is below:

SUMMARY

1. Stoney Stanton Parish Council (SSPC) covers the nearby village of Stoney Stanton, the largest settlement within the Fosse Village Neighbourhood Plan (FVNP) area. Located less than 1.5 km from the main Development Consent Order (DCO) for the Hinckley National Rail Freight Infrastructure (HNRFI) proposal, SSPC have strong concerns in respect of this proposal, due to the extent of impact upon the village and the errors and omissions within the information presented in support of the Application by Tritax Symmetry.

Overarching Concerns

2. A key outstanding inaccuracy is the differences generated by the highway movements compared to the socio-economic employment generation. The work patterns suggest that the office staff will operate a standard 9 – 5 day, meaning that the 20% of office staff align with the moments for the AM peak, as the shift patterns avoid this timeframe. Factoring up the 1,199 AM peak journeys by 5 to reflect 100% of staff, equates to 5,995. This is significantly different to the 8,400 – 10,400 staff noted in the socio-economic chapter. Although recognised to be derived differently, it is clear that the highway model significantly under represents the number of staff and thus employment movements. This could be by as much as 74%. Highways, and as a result the Air Quality and Noise Assessments that utilise the transport information within the reports, illustrates serious inadequacies in the reports conclusions and thus the mitigation required. This undermines the credibility of the whole scheme and the ability for anyone to accurately provide comment on the proposals.
3. The whole highways approach appears to be fundamentally flawed. A nationally significant infrastructure project should be seeking to direct traffic primarily towards the trunk roads. Recognising that there are significant issues with key nodes on the important surrounding highway network but not proposing any improvements (e.g. M69/M1 interchange) simply forces all associated employee traffic to ‘rat run’ through the villages and other lower order roads. This as an approach cannot be considered logical, even if upgrades to junctions on these roads are proposed. The essential point underpinning the Applicant’s proposal is its proximity and accessibility to the trunk road network, which it is then not seeking to ensure unimpeded traffic flows so that it can be used. This appears to contradict a key requirement for national logistic facilities, as set out in the Department for Transport’s National Policy Statement for National Networks (NNNPS).

Site Selection and Evolution

4. There is a disparity in the approach taken towards the evidence base underpinning the need for the rail-linked logistics park. It is recognised that there is a *national* need for additional logistic facilities, but all justification placed forward for the locational requirement is predicated on the fact it aligns with one of five possible growth areas for logistics in Leicestershire; this is a *localised* search area, that does not even extend beyond the county.
5. The search area is very tightly drawn in respect of alternative sites considered, whilst not actually respecting the suggested direction of growth even within Leicestershire. The site options process appears tokenism at best, with clear and obvious reasons to discount the alternative sites; no meaningful assessment has therefore been undertaken to justify a *national* facility in this location; it is contrary to the paragraphs 4.26 and 4.27.
6. It appears much more logical to position a new facility further west, past Nuneaton, as the rail lines from the south and west connect. This would enable a single facility to service both lines and thus offer greater resilience for the future.

Compliance with Rail-Linked Definition/National Infrastructure Objectives

7. The proposed layout appears to fail to maximise the ability for providing rail linked units; less than 50% of the units have a direct connection, a position which appears could be rectified by better on-site design. This appears a missed opportunity, and potentially leaves the scheme open to essentially operate as a standard logistics park for many the units, just situated in an inappropriate countryside location.
8. The rail port design is considered to have been created in order to minimise the land required for this element. Given the short-comings noted within this response on landscaping/visual impact, footpath

marginalisation and flood risk issues, it seems clear that the site is in fact not large enough to accommodate all the necessary infrastructure at a suitable scale. Compromises have therefore been made, which in itself has diluted the benefits of the scheme and increased the resultant harm. It is considered by SSPC that the scheme due to its design, as far as the details are provided at this stage, do not accord with the contents of paragraphs 4.28 – 4.35 of the NNNPS.

9. Serious concerns are also considered to exist in respect of the compliance with sustainable development objectives of the NNNPS. The lack of sufficient existing or proposed public transport links leaves the site reliant on private transport. The site is not designed to be carbon zero, with on-site energy seemingly curtailed to avoid the need for a second DCO, and the reliance on a gas-powered CHP. This does not meet the high standard expected for national infrastructure projects in terms of sustainability, a position that will clearly become worse when operational, due to the emergence of electric HGVs. There will be insufficient energy generation to meet the needs of charging vehicles and thus a reliance will be placed on the fossil fuels used to power the grid in order to charge electric vehicles. This is clearly undermining the aims and objectives for green vehicles and a cleaner energy future.

Locational Impact

10. The site is very rural in character, with relatively small-scale settlements scattered across the landscape. The scale of the development is clearly out of keeping with the character of the FVNP area within which it is partially located; the largest village Stoney Stanton could be entirely accommodated within the main built section of the proposal. Moreover, the buildings have no human element, providing substantial structures in terms of their dimensions, again contrary to the scale set out in the villages. In particular with buildings up to 28 metres and set on land between 10 and 20 metres higher than the villages to the east, the buildings will appear dominant in the landscape, permanently eroding the overall character that makes up the Fosse Village area.

Socio-Economic Effects

11. The proposal will generate a substantial number of employment opportunities; however, there is a lack of joined up thinking in terms of where the jobs are being created against those in need. New employees are shown to be travelling from the urban areas where house prices are lower (central Rugby and Leicester for example), adding to the travel costs to employees and traffic levels to the more expensive surrounding villages. The draw to the location also aligns with areas of higher unemployment, which is in contrast to the very low unemployment in the District/Borough within which the Application site is located.
12. There are also a significant number of other large logistic parks competing for staff. It is known that Magna Park, Leicestershire (9.5 km south-east of the Application site), struggles to secure sufficient staff; busses of contract workers from Birmingham commute every day to fill these voids. Adding substantial additional logistic employee demands to an area where there is already a number of other new/enlarged sites coming forward and known staff shortages within the section appears illogical. It will simply be compounding a known problem.
13. The socio-economic assessment insufficiently assesses the impact on human health. Physical and mental health are important considerations and the generation of jobs cannot simply be considered to usurp this impact. The Health and Equality Briefing Note provided by the Applicant includes no clear reference to human health, well-being or equality being considered. This shortfall manifests itself in numerous ways:

- Impact upon local residents due to deterioration in environmental conditions to their living environment (air quality; noise; traffic levels/congestion);
 - Impact upon perceived safety to residents in the area for any non-car borne movements: additional traffic restricting ability to access facilities on foot, particularly for young and older residents;
 - Reduction in benefits from using public routes in vicinity of Application site as visual setting changed – particularly important for footpaths on the site which have a lack of safety due to their design and potential for antisocial behaviour as a result;
 - Impact upon safety for traveling on trunk roads due to high volume of HGVs;
 - Impact upon tranquillity of amenity areas. Burbage Common and the Aston Firs SSSI are nearby leisure and recreational activity destinations which it is noted will be unacceptably impacted by noise from construction phase works;
 - Impact upon fauna and the changed perception of the rural setting of the landscape; wildlife may well be replaced with HGV noise, massively changing the feelings of the use of spaces;
 - Impact upon residential amenity where high acoustic fencing needs to be constructed immediately adjacent to dwellings.
14. There is also an inconsistent and over-estimation made in respect of the number of HGV miles being removed from the public highway. Tritax Symmetry (the applicant) have stated 1.6 billion HGV kilometres would be removed (cira 994 million miles); yet the highway consultant BWB have indicate that 83 million miles will be saved. The difference is significant. However, if the number of HGV miles is calculated using the information provided by Felixstowe Port, then is figure is reduced to 21.05 million miles. These figures are massively misleading but are integrated into the benefits delivered; the HGV miles saved should be considered much lower, and whilst still a benefit needs to be weighted accordingly, and in particular balanced off against the additional congestion harm created to the local area.

Highways

16. SSPC have severe concerns in respect of the highway information presented in support of this Application. Even at this late stage, it would appear that the highway model and mitigation is still not agreed with any of the statutory highway bodies (County Highways or National Highways). If the model and mitigation is not yet agreed, then clearly the public is at a serious disadvantage to provide comment, as the precise impact and necessary mitigation is not yet clear.
17. From a highways perspective, specifically from the point of the impact upon Stoney Stanton, the following issues are noted with the existing information presented:
- Methodologies for the calculation of employee counts requires a critical review in terms of the captured peak hours and employee shift patterns.
 - Necessity of the furnessing methodology requires additional information; explanation as to what the methodology seeks to achieve as well as reasoning for the diversion from typical assessment methodologies (future scenarios, plus committed development flows, added to development trips giving future scenarios).
 - All methodology and trip generation should be fully approved by the statutory consultees that have raised issues. Concerns raised by member of the TWG that are not exhaustive to those mentioned within this review should be considered in further detail.
 - A full analysis and modelling of the M1 Junction 21 is necessary to get an understanding of the present capacity and future year scenarios. Distribution from this junction into the local

villages if more traffic is added to the strategic road network will need logical consideration.

- Consideration to amend HGV trips to correctly reflect what is presented within Appendix 3 should be actioned.
- Formatting errors require amendment in regards to linked reference and data values within tables to ensure the structural integrity of the data being presented.
- Comments surrounding redistribution of traffic along Hinckley Road / B4669 in regards to the eastern villages should not be written relative to one another as a positive towards Sapcote and Stoney Stanton. Relative to the villages own prior carriageways, traffic redistribution is explicitly negative to residents and this should be excluded as a concluding point.
- Clarity on the 'benefit' of traffic not being fully diverted to Sapcote at the Stanton Lane / B4669 priority-controlled T-junction in relation to Stoney Stanton; comment that this traffics only other routing option is through Stoney Stanton.
- Comment and potential modelling regarding the balancing of traffic in the vicinity of Stoney Stanton is required to fully estimate the impact on the eastern villages. It should be considered that the only routes directly east are through the eastern villages and thus balancing of the traffic would not be sufficient contextually as the choices are either to travel through Sapcote or Stoney Stanton. The statement posing the balancing as a resolution to the significant redistribution should be contextually analysed in regards to the location of routes to the east; the balance of traffic here is unachievable so it should not be posed as a solution.
- The reference to the Eastern villages now being more accessible should be portrayed as a detriment to the Eastern villages. This conclusionary statement should be reviewed contextually against the routing out of Stoney Stanton to nearby locations to understand that the new 'access infrastructure' scheme will not benefit the resident's accessibility and will rather be a detriment, via more through-routing traffic being funnelled towards the village.
- Pedestrian, cycle and bus route trip data should be reviewed contextually to the accessibility of the development and these trips should be distributed accordingly through

other modes of travel. This change would alter car trips so further modelling would have to be considered.

- Stating of the software used to produce the capacity assessment models requires amendments to correctly reflect the processes used throughout modelling.
- Further comment regarding the criteria process chosen is required on junctions that did not meet initial capacity criteria but now require further mitigation schemes is required; the criteria process should be reviewed in these instances.
- Formatting errors in regards to references and comments outlining incorrect carriageway names requires review to uphold the structural integrity of the reporting.
- Speed survey data should be provided to back up speed restriction changes to quantify the benefits of such mitigation.
- Reference to the mitigation measures to be provided within Stoney Stanton be listed; the location of features should be specifically outlined within Stoney Stanton as physical restrictions in the village may not allow for features to be enhanced or added.
- The conclusion that traffic calming would deter traffic from the most direct routing through the eastern villages when Stoney Stanton and Sapcote are the main, and only, two routes eastwards needs to be analysed with context to the local area and further expanded upon.
- Further mitigation on the junction should be proposed or an outline of contributions to the local area made to support pedestrian and cycle movements affected by the increasing flow of traffic through the area.
- Explanation of why the Junction 38 LinSig model was conducted should be outlined as physical constraints within the village make signalling the junction not a feasible option.
- Mitigation for Junction 38 needs to be put in place otherwise the junction is not considered solved and no such conclusion that all overcapacity junctions have been addressed can be made.

Noise, Vibration and Air Quality

18. The baseline information provided is considered to be incorrect, given the issues already noted in respect of the highway information upon which these assessments are based. Notwithstanding this, there are concerns over the omission of night-time monitoring at a number of noise sensitive receptor locations (NSR) [5, 9, 18 and 19] and thus it is unclear how appropriate mitigation can be suggested without this baseline information. No noise assessment at all appears to have been undertaken for NRS 28 on Leicester Road, Hinckley, yet acoustic fencing is considered to adequately protect these residents. There is no factual basis for this conclusion though.
19. The quantum of acoustic fencing required and its position underlines the unacceptable proximity of the site to noise sensitive locations, essentially on all sides. The inclusion of acoustic fencing at 4 and 6 metres to enclose Aston Firs caravan park to the south on two sides presents an unacceptable relationship for these properties. The requirement for 1.55 km of fencing to the north and west, with much expected to be on bunds, is considered to represent an inappropriate situation; this is augmented by a lack of appropriate landscaping. The inclusion of acoustic fencing onto an elevated bridge then augments the inappropriate level of noise needing to be mitigated.
20. The impact of the noise extends to important nature areas which are frequently used for leisure purposes by the local residents. Extra traffic rat running through the villages, causing congestion and thus idling vehicles will add to the noise and air quality issues in the settlements; this has not been adequately considered at present.
21. Stoney Stanton already experiences lower levels of 'clean air', due to its proximity to Hinckley and the M69, given the prevailing wind direction and local topography. Increasing traffic flows within the

immediate area, as well as on the Strategic Highway Network and from activity on the Application site itself, will simply augment the existing issues.

Landscape and Visual Impact

22. The scale of development means that there is only limited scope for landscaping to mitigate the substantial visual harm. It is recognised by the Applicant that there will still be a large number of residual significant effects remaining at Year 15 (i.e. once vegetation has matured). This includes a number of public viewpoints, rights of way, a heritage asset and private locations.
23. The current assessment has failed to consider the existing bridleway across the site, V29/7, which will have its visual context completely removed. Moreover, this will be redirected along the edge of the site adjacent to the M69 such that the countryside sensation will be replaced by an enclosed, noisy and poor quality route. The footpaths on site are marginalised within the scheme, creating unacceptable and unsafe rights of way.
24. A number of judgements within the Landscape Report are also questioned, as they are not robustly justified. The night-time lighting assessment is also limited, and clearly fails to appropriately consider the impact upon this current dark sky from a number of viewpoints, including numbers 9, 12, 20, 24, 25 and 32. These issues underline the fact that the significant harm at Year 15 may still be an under-representation of the level of damage this site may cause to the surrounding area.

Ecology and Biodiversity

25. The site will undoubtedly impact upon ecology and nearby ecological designations. There is however a lack of clear information to determine the extent to which ecology will be harmed, due to short comings in the highways, noise and air quality reports. Moreover, a full baseline position has not even been created for the whole DCO, but merely relies on generalised comments for the peripheral land. Full surveys of all land should be required.
26. The proposed scheme eradicates all existing habitats on the main development site. This removes the network of hedgerows and thus linear corridors available to fauna, whilst existing ponds are removed, harming movements of great crested newts. The proposed scheme offers only a single notable linear route, along the eastern side of the site adjacent to the M69. The risk of interaction between fauna and the M69 will be increased as a result of its positioning, whilst it is also located on the wrong side of the site in comparison to all the existing ecological designations.
27. For national infrastructure projects, it is considered by SSPC that there should be sufficient land available on site to offset the losses incurred. This does not appear possible in this instance, reflecting again the overdevelopment of the land. Given the proximity of the site to a number of designated ecological areas, the reduction in biodiversity value should be seen as a severe negative. The importance of ecology from Central Government is rising and thus to allow a scheme such as HNRFI to be allowed where it clearly flies in the face of this policy steer would be inappropriate.

Surface Water and Flood Risk

28. Serious concerns are raised in respect of the flood risk posed from this scheme. The provision of the rail halt on bunds within Flood Zone 3 appears to reduce the storage capacity of the functional flood zone. This contradicts the national requirements on ensuring so increased flood risk elsewhere. On this reason alone, the scheme should not be considered acceptable and contrary to the NNNPS.

29. The drainage strategy is also questioned, with significant quantities of water stored within crates underground. A high groundwater table means that this does not appear to be a realistic option on the lower land, where many of the crates are proposed. Moreover, where the ponds are proposed, their capacity is questioned given the quantum of surface water flooding recognised to occur on site and the impact upon the flood plain capacity and the fact that the bund may well hold water behind it. The drainage strategy is not considered robust, which could pose a risk to human life, particularly if the redirected stream on site is not appropriately designed and over-tops its banks onto the M69.

1. INTRODUCTION

- 1.1 This Written Representation (WR) is made on behalf of Stoney Stanton Parish Council (SSPC). For clarification, Stoney Stanton Parish lies to the immediate east of the proposed Hinckley National Rail Freight Interchange site (HNRFI), to the east of the M69. This places the Development Consent Order (DCO) less than 1.5 kilometres from the proposed HNRFI and thus there is the potential for the development to have a significant impact upon this nearby settlement.
- 1.2 The view of Stoney Stanton Parish Council is that there are significant deficiencies in the evidence base presented as part of this Application. The expected effects of the development are frequently underplayed, the benefits over-emphasised and there is a lack of suitable mitigation to appropriately offset/overcome the identified harm. On this basis it is considered that the Application should be recommended for refusal.
- 1.3 This WR sets out the case for SSPC under the following topic headings, reflecting the chapters of the Environmental Statement (ES):
- Site Selection and Evolution
 - Locational Impact
 - Socio-Economic Effects
 - Highways
 - Noise, Vibration & Air Quality
 - Landscape and Visual Impact
 - Ecology and Biodiversity
 - Surface Water and Flood Risk
- 1.4 As an initial wider point about the accuracy of the information and the approach undertaken, it was helpful that clarity was provided by the Applicant through the Preliminary Hearing on 12 September 2023 in respect of the difference between the employment generation figures and the approach undertaken for the Transport Assessment. It would have been useful if the information was accurately presented in the first place to avoid this 'mis-understanding' by everyone.
- 1.5 However, it still raises the question as to whether the information provided follows the "Rochdale Envelope" approach of presenting the worse-case scenario as different baseline information essentially is used for the various reports. Put simply, a highway model that under-estimates the level of vehicle movements does not represent a worst-case scenario; where the expected vehicle movements clearly do not align with the expected level of employment, then there is an issue with the evidence base and the mitigation strategy that stems from it.
- 1.6 In terms of a worse-case scenario, one would expect that this requires all employees to work at the site, rather than a split home/work arrangement. If the end users are not known, then exact working arrangements cannot therefore be known, reinforcing this necessary assumption. Within the Transport Assessment (TA) (original and updated Sept 2023 versions) at paragraph 6.36 and 6.37 it is stated that 20% of employees will be office/management staff, working a standard 0900 – 1700 pattern. This would mean that this 20% of staff would be arriving within the AM peak to accord with their 0900 start to their workday. Table 6-10 of the TA notes the arrival of 1,199 journeys in the AM peak in association with the site. It is not unreasonable to assume this equates to the 20% of office/management staff, given the stated shift patterns for warehouse staff/drivers falling outside this timeframe, and the 10% support staff (cleaners, catering, security etc) will work various work patterns [in essence this would present a best case scenario as some of the support staff may also be included within the 1,199 movement figure stated]. If 20% of the staff generate 1,199 journeys, then this figure multiplied by 5 logically equates to 100% of the movements for all staff. $5 \times 1,199 = 5,995$ staff.

- 1.7 A TA figure equating to 5,995 staff, is therefore below the previously assumed figure of 8,400 employees that was incorrectly included in the report. The shortfall of the traffic generation is therefore likely to be greater than previously considered, as there is between 2,400 and 4,400 staff journeys absent from the data (assuming between 8,400 – 10,400 staff on site as per the Socio-Economic Report). This could represent shortfall in the number of expected movements compared to employee numbers by up to 73% (4,400 / 5,995). Highways, and as a result the Air Quality and Noise Assessments that utilise the transport information within the reports, illustrates serious inadequacies in the reports conclusions and thus the mitigation required. This undermines the credibility of the whole scheme and the ability for anyone to accurately provide comment on the proposals.
- 1.8 Furthermore, the whole highways approach appears to be fundamentally flawed. A nationally significant infrastructure project should be seeking to direct traffic primarily towards the trunk roads. Recognising that there are significant issues with key nodes on the important surrounding highway network but not proposing any improvements (e.g. M69/M1 interchange) simply forces all associated employee traffic to rat run through the villages and other lower order roads. This as an approach cannot be considered logical, even if upgrades to junctions on these roads are proposed. The essential point underpinning the Applicant's proposal is its proximity and accessibility to the trunk road network, which it is then not seeking to ensure unimpeded traffic flows so that it can be used.
- 1.9 These inherent deficiencies flow through the underlying objections to the proposal by SSPC.

2 SITE SELECTION AND EVOLUTION

- 2.1 There has been very little change to the information included to underpin the principle of acceptability of this proposal since the initial public consultation information. The issues raised at this early stage are therefore still considered to exist, outlining severe deficiencies in the information provided and the robustness of the site selection process.

Principal of Need and Site Assessment

- 2.2 The principle of the need for the facility as purported by the Applicant is predicated on two published documents:
- a general 'national need' and support for the transfer of goods from road to rail, as set out in the Department for Transport's National Policy Statement for National Networks (NNNPS) (December 2014); and
 - a Leicestershire based need to maintain and strengthen the county's position in respect of the logistics sector, as set out in the Leicester and Leicestershire Enterprise Partnership's Strategic Economic Plan 2014 – 2020 (LLEP-SEP) (March 2014). This was updated by the Wider Market Developments: Implications for Leicester and Leicestershire (Jan 2017) in terms of the required need.
- 2.3 It is not disputed that there are benefits to encourage the transfer of logistic goods from road to rail, but clearly this needs to be in the correct locations, as outlined in detail through-out both the adopted NNNPS and the draft NNNPS (March 2023). It is not considered however that the Application fulfils the aims intended to reduce traffic and generate carbon benefits of the NNNPS through a number of substantive failures of the proposal. These are picked up within the subsequent sections where appropriate, with the principal issues considered here. Overall, it is not considered that the Application represents sustainable development.
- 2.4 The LLEP-SEP forms the key guiding document for why the selected site has been chosen. The LLEP-SEP set out five potential Growth Areas for Logistics in Leicester and Leicestershire; it is not stated anywhere that they should all come forward, or indeed whether any one location was preferred to the

others. These growth option areas were then developed within the more recent Leicestershire Authorities Warehousing and Logistics in Leicester and Leicestershire: Managing Growth and Change (April 2021) (extract below). Moreover, the LLEP-SEP also outlined key areas of opportunity within the rest of the East Midlands and recognised the need to consider the larger picture in terms of delivery of key strategic infrastructure.

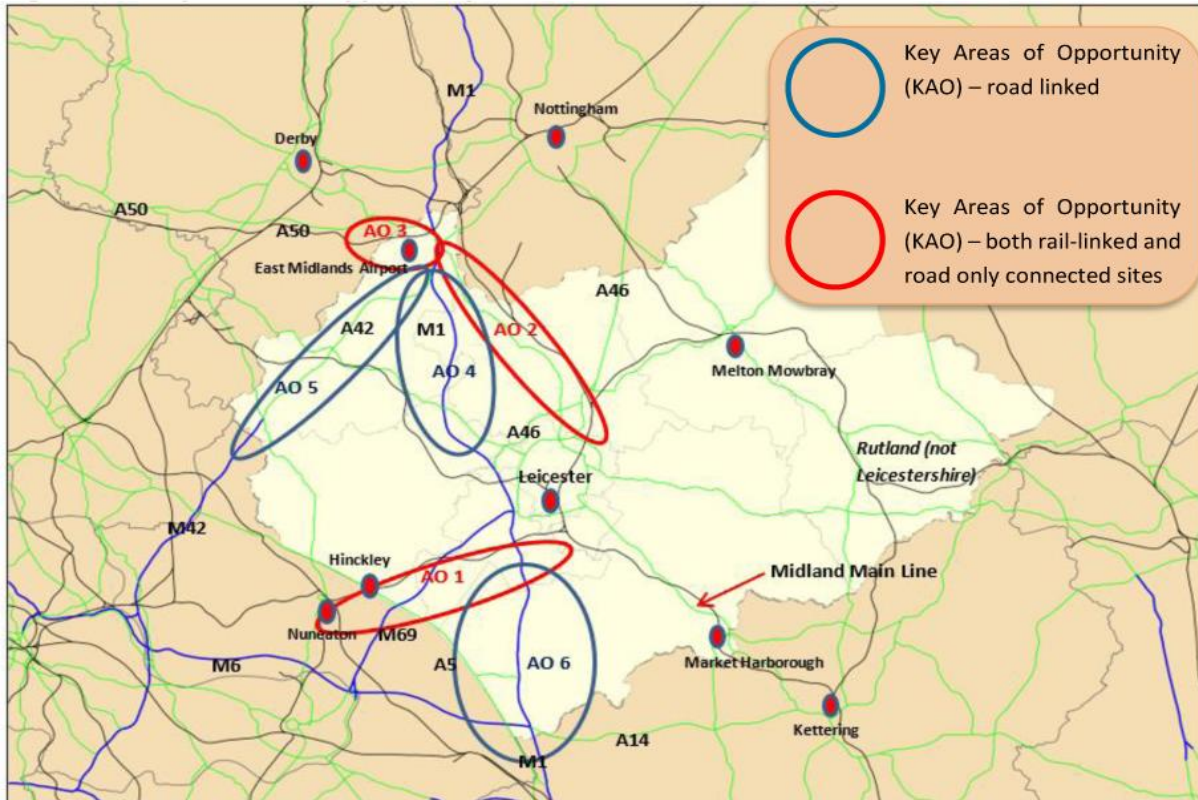


Figure 15 (page 133) of Leicester and Leicestershire Authorities Report Warehousing and Logistics in Leicester and Leicestershire: Managing Growth and Change

- 2.5 Despite the LLEP-SEP considering the wider picture, the approach from the Applicant appears to focus entirely on a Leicestershire based search for a national infrastructure project. Presumably, this is predicated on the need to use the LLEP-SEP as the core document to justify its need in this geographic location, a situation that cannot be used if land say 5 miles to the west is promoted, as this is within Warwickshire. Arbitrary county boundaries should not be used as a defining barrier to undertake a site search for rail-linked distribution centres. The need and use of any such facility clearly extends beyond Leicestershire and thus the assessment of suitable sites must also reflect this. To not undertake such an assessment is considered to result in a seriously flawed background assessment that seeks to identify this site as the most appropriate. The fact that the socio-economic benefits works off the basis of the occupants meeting either a regional or national need illustrates that the Applicant should be aware that there is a conflict in the geographical scale of consideration given to the site location matter.
- 2.6 In terms of the ability for a facility to service the ports, the proposed site is located on the railway line that connects into Felixstowe; this line then extends further west towards Birmingham via a junction to the north of Nuneaton. At this junction, the line connects with the track connecting towards the Southampton port. Put simply, a site just a few miles to the west would be able to serve two ports, rather than a single port, and thus would offer greater flexibility to its use (and to the logistic industry) as well as making it more resilient to future changes due to this increased port coverage. From a *national* or a *regional* perspective, rather than just a county perspective, selecting a site on the line

between Nuneaton and Birmingham is more logical. Delivering resilient infrastructure should be a key consideration of any national infrastructure project.

- 2.7 Notwithstanding the criticism levelled at the Applicant, the actual alternative site assessment undertaken by the Applicant does not even relate to the opportunity area noted in the LLEP-SEP upon which they seek to rely for justification. This identified 'Option 5; South-West Leicestershire' to cover the rail opportunity within the southern part of the county. However, site options 1 – 3 (Brooksby, Syston Fosse Way Junction and Syston Barkby Lane) are all located to the north-east of Leicester and thus does not accord with the baseline position set out within the LLEP-SEP or the subsequent County based economic publications. Whilst located on the same freight line, they are sites that are discounted because they are in the flood plain (sites 1 and 2) and not sufficiently connected to the strategic highway network (sites 1 – 3). They seem therefore to be 'tokenism' sites to have considered, as it is clear that they would not be selected.
- 2.8 The three other sites considered also appear to have an element of tokenism, with all three selected sites 4 – 6 (Whetstone, Littlethorpe and Croft) being within the flood plain. Negative comment was also made in respect of the impact upon the Green Wedge for Whetstone, despite no mention of the impact upon this allocation for the Application site within Hinckley and Bosworth Borough. Issues over the level of access possible to the highway network were also then cited for sites 5 and 6.
- 2.9 Essentially, the appraisal of alternative site options has only covered a very narrow area to conclude that the Application Site is the best available opportunity. As noted above, the scale of infrastructure proposed needs to influence the scale at which the assessment needs to be undertaken. Selecting an arbitrary short section of land along the railway line to meet a national infrastructure project cannot be considered a robust approach. It does not accord with the requirements of the NNNPS paragraphs 4.26 and 4.27 on alternative site considerations.
- 2.10 Additionally, it is recognised that there are already an extensive number of existing and approved commercial rail ports within this part of the region. Nowhere within the Applicant's evidence base is it justified why an existing facility is not being expanded. In terms of the timeframe for delivery, and the quantum of financial outlay to enable the same level of floorspace to be created, expansion of an existing facility would almost certainly perform better than the current proposal. This represents another source of land options that have simply not been considered.
- 2.11 As was indicated many times during the initial Hearings into this National Infrastructure Project, the onus is on the Applicant to provide the justification necessary to support the proposal. Provision of information that is not robust would influence the outcome of the Inspectors Report; it is considered that the justification for selecting the site in question is seriously flawed. This jeopardises the acceptability of all other work that stems from it on the site, as it is unknown whether there would be a preferred site elsewhere that has less impact upon the local area.

Site Evolution and Compliance with Rail-Linked Definition/National Infrastructure Objectives

- 2.12 The indicative masterplan for the site has only been tweaked between the initial public consultation version and that submitted as part of the Application. The key concerns highlighted as part of this initial consultation therefore largely still remain.
- 2.13 The site itself is designed to simply provide a rail port on one side of the site. This appears to be a significant missed opportunity to maximise the number of units that are rail-connected. It is recognised that not all units need to be connected to represent a rail served logistics park. However, with only 4 of the 9 proposed units physically connected, it needs to be made clear that the scheme is delivering

the objectives proposed; this cannot simply be a route by which to circumnavigate the planning system and secure consent for warehouses in the countryside.

- 2.14 In terms of the alignment of the proposed rail port, the ES states that the site is insufficient in scale to accommodate a central rail port. It is not clear whether this is a physical constraint (i.e. the curvature required is too great to allow the trains access), or whether it is down to the land take that it would require (i.e. the developable land area would be too severely reduced to be viable).
- 2.15 The current scheme minimises the quantum of railway line, keeping land-take for this infrastructure to a minimum. Its functionality however becomes reduced. Clearly a central halt, such as with the East Midlands Gateway, is the preferred option where sufficient land is available. Given the short-comings noted within this response on landscaping/visual impact, footpath marginalisation and flood risk issues, it seems clear that the site is in fact not large enough to accommodate all the necessary infrastructure at a suitable scale. Compromises have therefore been made, which in itself has diluted the benefits of the scheme and increased the resultant harm. It is considered by SSPC that the scheme due to its design, as far as the details are provided at this stage, do not accord with the contents of paragraphs 4.28 – 4.35 of the NNNPS.
- 2.16 It is also important to consider another fundamental pre-requisite of national infrastructure projects. For rail freight interchanges, an intrinsic requirement is the ability to connect to the strategic rail and road networks and to ensure that there is capacity for the operation of the facility (paragraph 4.80 of the NNNPS). The Applicant has recognised this through discounting most sites within their site search on insufficient access to the strategic road network. However, it is clear that there needs to be *capacity* within this surrounding network to enable it to function. This appears to be a fundamental failure of the current proposal, as it is accepted that the interchange between the M1 and M69 is already operating over capacity (see Transport Assessment Tale 7-3 – ref 6.2.8.1). As a result, there are substantial delays nearly every AM and PM weekday peak at this junction, and as a consequence there is already a significant proportion of traffic that ‘rat-runs’ through the villages and lower order roads. The modelling it is assumed reflects this and augments it given the expectation is that there would be very little increase in traffic through this junction as a result of the proposal. National Highways have stated that there are no programmed enhancement or alteration works to this junction and thus as a result, this ‘do nothing’ situation will only make the existing situation worse. Access onto the Strategic Road Network (SRN) essentially does not therefore exist in a northerly direction towards the M1 as the junction has insufficient capacity to deal with the development.
- 2.17 It is known that there are continued issues with the highway modelling and the impact upon key transport junctions. It is noted in the National Highways Relevant Representation these related to the M69/M1 junction noted above, plus the M69/M6/A46 interchange, and various junctions along the A5 from the M69 westwards. This in essence highlights unresolved concerns over junctions in all the major traffic directions using the SRN. If the SRN is not available for ease of use without unreasonable delay from congestion, then it should not be considered a viable option as alternative routes will be used by all.
- 2.18 Finally, a third area of significant concern is whether the proposal represents sustainable development and meets climate change expectations. Locationally, the site is in open countryside and difficult to reach by non-car modes. Any opportunities to enhance this (bus upgrades; direct transfer links from Hinckley Railway Station) appear to be largely absent, and given the expected draw for employees (concentrations from Leicester and Rugby for example), it is clear that sustainable transport will not be a viable option without substantial public transport upgrades.
- 2.19 The proximity and interaction of the site with Flood Zone 3 for the rail halt raises concerns about its impact upon increased flood risk downstream (see separate heading below for full details), and the

level of water capture intended to be reused on site. For a scheme of this scale, it is also disappointing to see a high proportion of the water storage in crates underground, minimising its environmental benefits.

- 2.20 From an operational perspective, it is also concerning that the scheme is not being designed to be zero carbon. The on-site energy generation (49.9 MW) appears to be deliberately curtailed to ensure that it does not trigger the requirement for a second Development Consent Order. It was indicated by the Applicant that this threshold is down to the available space to accommodate solar panels, but this appears to simply be factually incorrect. There seems to be no justifiable reason why additional solar panels could not be accommodated on the roofs, or other renewable sources installed on site to remove the need for fossil fuel reliance. The scheme appears to fall well below the possible renewable energy levels that could be delivered, and the reliance on a gas-powered CHP should not be accepted. This is out-dated technology and put simply, the proposal is not achieving the required level of comparable developments, let alone enabling itself to be seen as an exemplar scheme which is what national infrastructure schemes should be doing.
- 2.21 The level of on-site renewable energy generation and option to secure green energy is also very concerning given the transition over the next 10 years to electric vehicles. Clearly a substantial number of charge points will be required for the car parks and fast chargers for the HGVs. This includes the local HGV delivery journeys. This would lower the emissions from tailpipe exhausts.
- 2.22 The transition to this technology and the requirement for fast chargers (circa 1MW) for a 45 min break charge is not at all factored. Given the site supplement for its electrical supply from gas powered generation, then the offset the new technology requirements is not factored and indeed would be burning fossil fuels in order to charge EV's which is nonsensical. Provision should be made at this stage for substantial connection to the overhead national grid power supply that runs within less than 0.5km of the site and would provide a clean power supply that would transition to clean energy as the national grid does. Even when the national grid production is running on fossil fuels, the scale of the associated plant is significant in terms of its efficiency energy in to energy out. It would also mitigate local carbon and associated pollutants being produced and be advantageous with the take up and government mandate to produce no ICE HGV from 2040.
- 2.23 Reflecting all the issues with locational options for travel and the substandard renewable energy generation, it is considered that the proposal does not accord with the climate change expectations for such proposals as set out within the NNNPS para 4.36 onwards.
- 2.24 In conclusion on the need and justification for this proposal in this location, it is considered that the overarching evidence base is simply absent and/or incomplete. These inherent issues stem from both the level of information provided and seemingly the need to achieve a certain level of development which means that the harms generated escalate. It is considered that the scheme does not meet a number of the basic requirements to enable a fully justifiable sustainable rail-connected logistics scheme to be delivered.

3 **LOCATIONAL IMPACT**

- 3.1 The proposed development is seeking to provide up to 650,000 sqm of logistic warehousing and support facilities on 187 hectares of land (main HNRFI site). This would be within buildings predominantly set between 22 and 28 metres in height (Zones A – E) (see Figure 3.2 Parameters Plan – ref 6.3.3.2). This would be set partially within the Fosse Villages area.

3.2 The Fosse Villages Neighbourhood Plan (FVNP) (made June 2021) covers 10 villages/Parish Councils located within Blaby District. The introduction section of the FVNP sets out clearly the character of the area in which the Application site is located:

“The ten settlements within the area each have their own character, although they are generally small to medium scale communities, ranging from hamlets such as Potters Marston (population 30) to Stoney Stanton (population 3,460). The total population of the area amounts to an estimated 11,663, giving an overall population density of 2.2 persons per hectare. It is, therefore, predominantly a rural area.” (paragraph 4)

3.3 This outlines the small-scale nature of the vast majority of the development in this location; it represents a pocket of comparative rural tranquillity set within a number of larger towns and cities (Leicester, Coventry, Hinckley/Nuneaton) to which the current proposal is clearly at odds with.

3.4 The land upon which the warehouse buildings are proposed would be capable of easily accommodating the whole of Stoney Stanton village, the largest settlement within the Fosse Villages. It is therefore quite obviously many times larger than the smaller settlements within the localised area. It does not relate in scale to the area in which it is located.

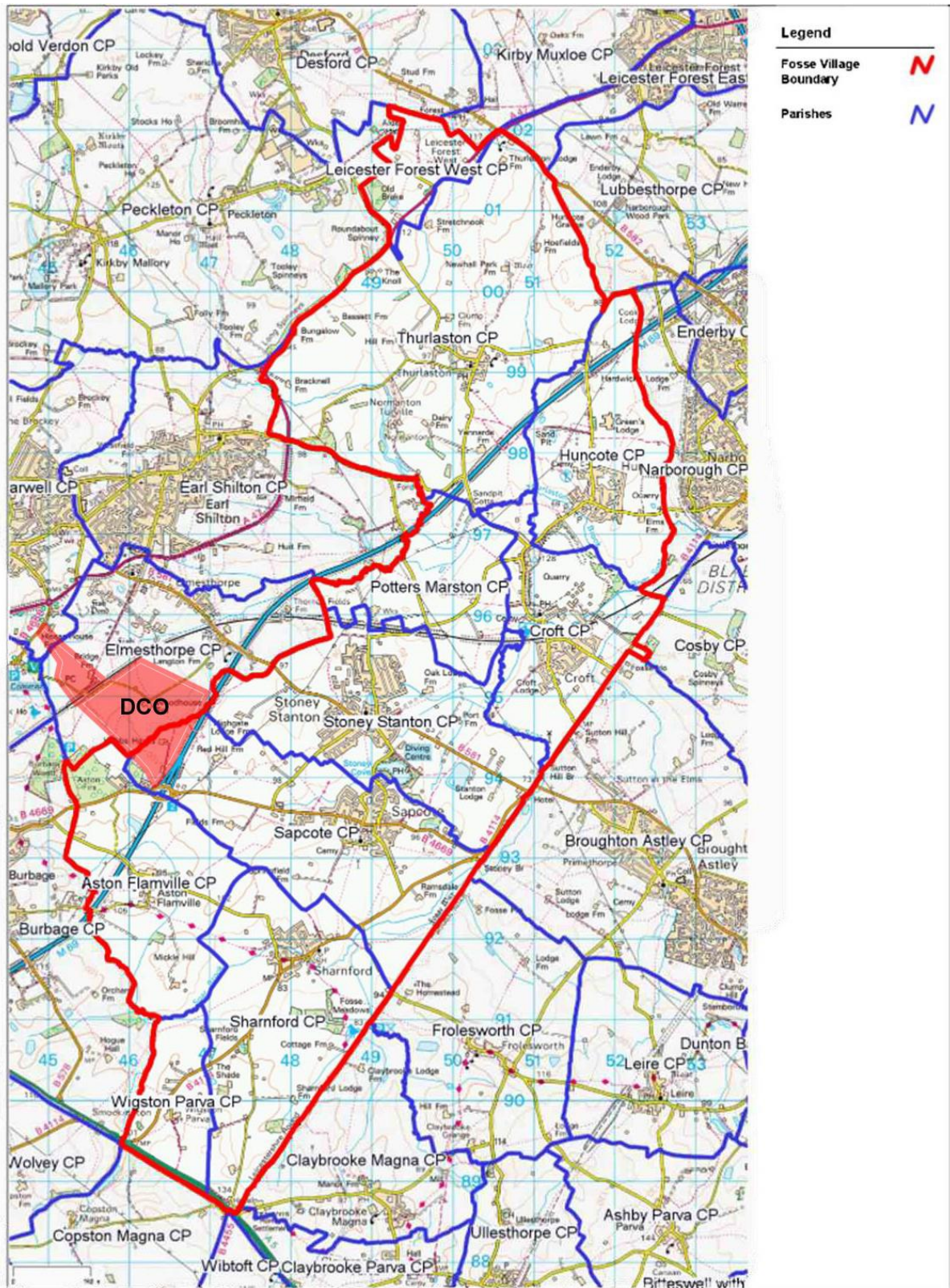
3.5 The grain of development is also significantly different; the villages consist of small-scale buildings (mainly houses) with regular punctuations between buildings, coupled with open spaces, differing building designs and materials and key focal points. The design of the Logistics park will be in stark contrast, generally offering unified extensively sized footprint buildings and little relief to break up the built form. Moreover, the height of the buildings also changes the overall scale compared to the villages; many of the buildings proposed are likely to be around twice the height of the church spires in the surrounding villages – the current focal point on the horizon. The 28 metre warehouses are also likely to be around three times the height of most houses within the villages.

3.6 Augmenting the height of the warehouses proposed, the highest units are proposed on one of the most elevated section of land (Zone D). The villages to the east are set on land 10 – 20 metres AOD lower, augmenting the prominence of the proposal from the east upon the FVNP. The degree of change that the scheme will generate to the local area, regardless of detail of the proposal is therefore immense.

3.7 In terms of emotive issues within the Fosse Villages, traffic and congestion features highly. The FVNP again summarises this as follows:

“Local roads are already overloaded with very heavy through traffic - cars and HGVs on the B4114, B581, B3669 and B582. The road network in the Fosse Villages area has had no substantive improvement whatsoever since the opening of the M69 in 1977. With more development and car use the problems caused by traffic and air pollution will get worse. The virtual total absence of inter-village roadside footways or bicycle tracks ensures there are no safe alternatives to vehicular use.” (paragraph 44)

3.8 This summarises the local situation and the view of residents of the area; the highway infrastructure is already struggling and there are no realistic alternatives to the car for most journeys. Adding in thousands of extra car, van and lorry journeys every day through these overloaded highways will not assist the area at all; it will simply discourage the use of bicycles through safety concerns as result of the quantum of traffic and erode the quality of life for residents. Paragraph 44 of the FVNP outlines the issues in the area, but as noted above, the proposal is not seeking to adequately address them in terms of delivering new non-car borne infrastructure; and it is still very unclear whether it is even meeting its own needs on the junctions it is deemed necessary to upgrade, given the current unresolved highway modelling issues.



Annotated Extract of Fosse Villages Designation Area (outlined red); DCO site shaded red

3.9 The FVNP recognises the need to accommodate some growth, including the potential impact to the area through the Leicester and Leicestershire 2050: Vision for Growth. This included a southern gateway focused around the A5 and a proposed new link between the M69 and M1. The FVNP outlined that the Neighbourhood Plan group would positively engage with proposals that come forward for this

strategy within policy documents. This highlights the general acceptance to change where necessary, providing it is undertaken in a strategic and joined up manner. The key difference between the 2050 Vision and this proposal, is that there are no obvious benefits being given to the local community, just significant harm due to additional traffic and pollution without any of the useful connecting infrastructure.

- 3.10 These matters are considered in greater detail within the landscape and transport sections in particular. It is important to note that the scheme does not relate at all to the local character, but will appear as an alien feature within the countryside. In terms of the jarring juxtaposition between a logistics park and settlement, it would be useful for the Inspectors to consider the relationship between Magna Park and Lutterworth. Both are at an enhanced scale compared to the current DCO/village arrangement, but it illustrates how much Lutterworth is influenced and dominated by Magna Park and the problems that transpire.

4 SOCIO-ECONOMIC EFFECTS

- 4.1 It is acknowledged that HNRFI will generate socio-economic benefits; the direct creation of between 8,400 and 10,400 employment opportunities cannot be considered insignificant, whilst it is recognised that it will also deliver indirect employment and generate income during the construction and operation phases. However, the extent of these benefits and the harms that result from the proposal are not considered to be fully clarified.

Housing Market Analysis

- 4.2 The assessment fails to appropriately deal with the impact upon the housing market, through provision of only limited analysis of the local housing market characteristics. It is important to note that the majority of the immediately surrounding area consists of relatively affluent villages, to which the expected wages of the majority of the staff (ie the 70% warehouse and drivers stated) are unlikely to be able to afford. This means that many future staff would need to live further from the site, adding pressure on community and the availability of housing these areas. Figure 6-4 of the Transport Assessment (Appendix 8.1) illustrates this, with concentrations of employee journeys expected to occur from central areas of Leicester, Hinckley, Barwell/Earl Shilton and Nuneaton. This arrangement has a direct impact upon the options for travelling to work, and the impact upon various communities, especially those close to the site which will have these vehicles rat running through their villages. Greater clarity of the housing market needs to be provided, to show that the appropriate employment opportunities are being created to reflect the area in which it is located.

Employee Market/Source

- 4.3 Reflecting the areas from where the expected staff are expected to be drawn from, it is assumed that there is an infinite employment resource within the Midlands to service all of the logistics industry. This is simply incorrect, and it will influence the ability to attract companies to the facility and for operators to secure (and retain) sufficient staff.
- 4.4 Blaby District Council has a very low level of unemployment at 1.9%. This is almost half that of the national average (3.6%) and notably lower than the East Midlands average (3.2%). Blaby District is in fact the joint lowest authority for unemployment within the East Midlands (see tables below). The immediately adjacent authority of Hinckley and Bosworth also experiences relatively low levels of unemployment at 2.6 %. It is clear that the level of unemployment within these two administrative areas combined extends to 2,500 people of economic working age. The expected need for employees therefore will have to draw from a much wider area, meaning that sustainable transport movements

are unlikely to occur and that the longer travel journeys will impact upon the cost for transport to employees.

- 4.5 In contrast to the low level of unemployment in this area, there is a clear concentration of higher unemployment within the West Midlands around the Birmingham conurbation (Birmingham, Wolverhampton, Sandwell and Walsall). Providing a significantly sized employment opportunity in this area is likely to significantly reduce travel distances and times and have a positive impact upon employment generation in that area for the logistics sector.

Labour Supply

Employment and unemployment (Apr 2022-Mar 2023)

	Blaby (Numbers)	Blaby (%)	East Midlands (%)	Great Britain (%)
All People				
Economically Active†	57,100	90.8	77.7	78.4
In Employment†	56,700	90.2	75.1	75.5
Employees†	51,200	82.2	66.3	66.0
Self Employed†	5,300	8.0	8.6	9.2
Unemployed (Model-Based)§	1,100	1.9	3.2	3.6
Males				
Economically Active†	30,900	91.0	82.2	82.1
In Employment†	30,500	89.9	79.4	78.9
Employees†	26,000	77.1	67.1	66.7
Self Employed†	#	#	12.1	11.9
Unemployed§	!	!	3.3	3.8
Females				
Economically Active†	26,200	90.5	73.1	74.7
In Employment†	26,200	90.5	70.8	72.1
Employees†	25,200	87.9	65.4	65.2
Self Employed†	!	!	5.2	6.6
Unemployed§	!	!	3.2	3.5

Source: ONS annual population survey

Sample size too small for reliable estimate (see definitions)

! Estimate is not available since sample size is disclosive (see definitions)

† - numbers are for those aged 16 and over, % are for those aged 16-64

§ - numbers and % are for those aged 16 and over. % is a proportion of economically active

[view time-series](#)

[compare other areas](#)

[query dataset...](#)

Extract of Employment Activity within Blaby District (source: nomisweb.co.uk)

local authority	numbers	% ▲	local authority	numbers	% ▲
Rushcliffe	1,200	1.9	Bromsgrove	1,500	2.8
Blaby	1,100	1.9	Herefordshire, County of	2,800	2.9
South Northamptonshire	1,000	1.9	Wychavon	1,900	2.9
Derbyshire Dales	700	2.0	Lichfield	1,600	2.9
Rutland	400	2.1	Rugby	1,700	2.9
Harborough	1,000	2.2	Malvern Hills	1,100	3.0
Melton	600	2.3	South Staffordshire	1,800	3.0
North West Leicestershire	1,200	2.3	North Warwickshire	1,000	3.0
East Northamptonshire	1,200	2.4	Stratford-on-Avon	2,100	3.1
West Lindsey	1,100	2.4	Shropshire	5,000	3.2
South Holland	1,200	2.4	Staffordshire Moorlands	1,600	3.2
North Kesteven	1,400	2.4	Tamworth	1,400	3.2
South Kesteven	1,700	2.5	East Staffordshire	2,000	3.3
Hinckley and Bosworth	1,400	2.6	Cannock Chase	1,800	3.3
Bassetlaw	1,500	2.6	Warwick	2,600	3.3
Charnwood	2,500	2.6	Wyre Forest	1,700	3.4
Amber Valley	1,600	2.6	Stafford	2,400	3.5
Daventry	1,200	2.7	Newcastle-under-Lyme	2,300	3.6
Chesterfield	1,500	2.8	Solihull	3,900	3.7
Newark and Sherwood	1,800	2.8	Redditch	1,700	4.1
Wellingborough	1,200	2.8	Nuneaton and Bedworth	2,600	4.2
North East Derbyshire	1,300	2.8	Telford and Wrekin	3,800	4.3
High Peak	1,300	2.8	Worcester	2,400	4.3
Bolsover	1,300	3.0	Stoke-on-Trent	5,900	4.6
Erewash	1,700	3.0	Dudley	7,600	4.7
South Derbyshire	1,600	3.1	Coventry	9,400	4.9
Mansfield	1,800	3.2	Walsall	7,800	5.8
Corby	1,200	3.3	Sandwell	9,100	6.0
East Lindsey	2,100	3.5	Wolverhampton	8,500	7.2
Broxtowe	1,800	3.5	Birmingham	42,200	7.8
Gedling	2,000	3.5			
Oadby and Wigston	900	3.6			
Derby	4,800	3.7			
Northampton	4,500	3.7			
Kettering	2,000	3.9			
Lincoln	2,100	4.2			
Boston	1,400	4.2			
Ashfield	2,400	4.3			
Nottingham	8,200	5.1			
Leicester	8,800	5.1			

Source: ONS annual population survey [Apr 2022-Mar 2023]

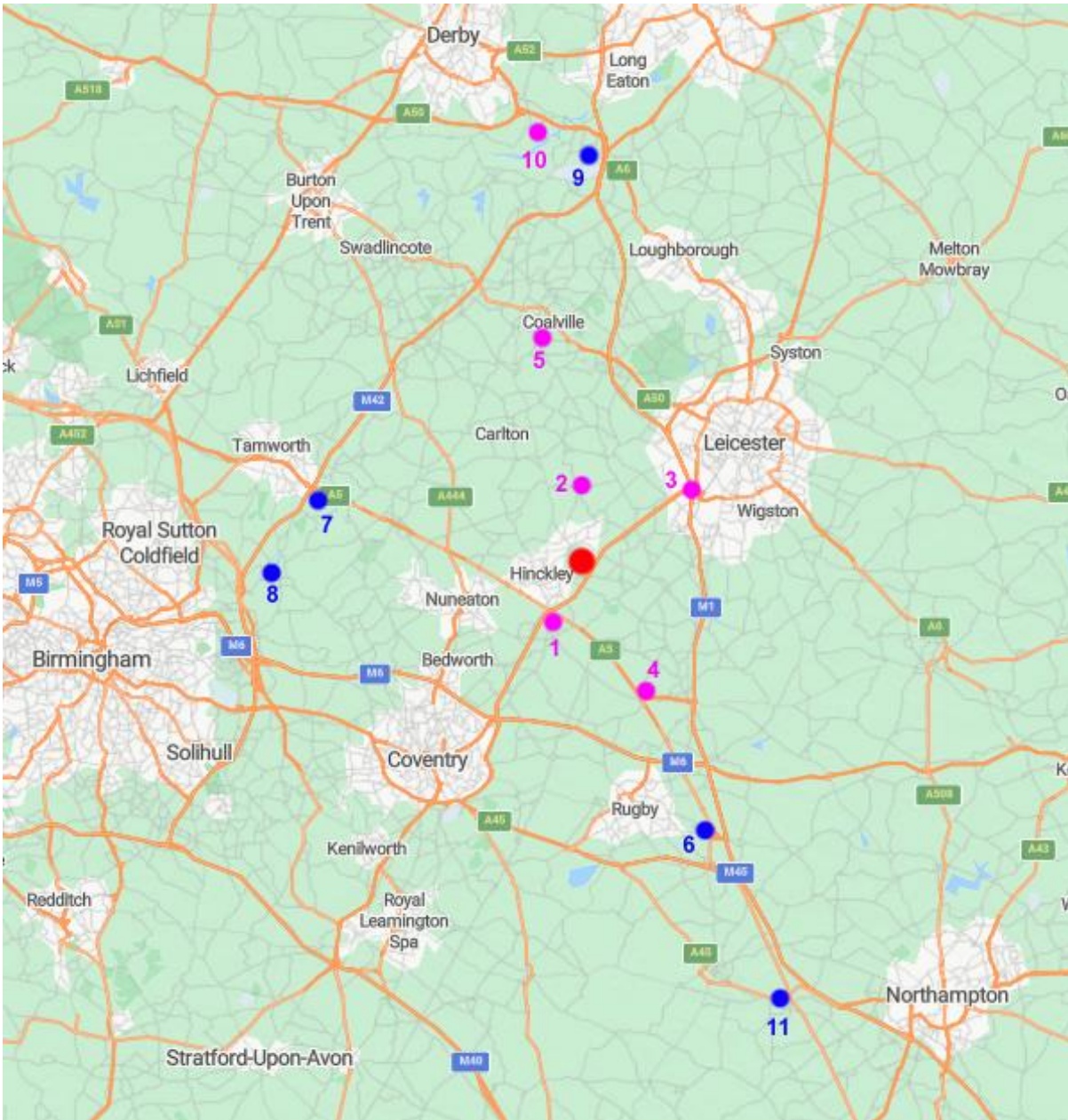
Note: numbers and % are for those aged 16 and over, % is a proportion of economically active
Note: figures and percentages are model based

*Extract of Unemployment by Local Authority within the East and West Midlands [September 2023]
(source: nomisweb.co.uk)*

4.6 Reinforcing the benefit to locating in the West Midlands, it needs to be identified that there are already a substantial number of significantly sized warehouse and logistic parks, including a number that are rail-linked. These include the following that are operational or with existing planning consent:

- Site 1: Adjacent to Hinckley Island, M69 Jn 1
Distance to DCO: 4 km to south-east
Size: 1.4 million sqft under construction including DPD depot
- Site 2: Griffen Park, Desford, Leicestershire [inc. Neovia Logistics and Caterpillar]
Distance to DCO: 7.4 km to north
Size: circa 3.5 million sqft

- Site 3: M1 Junction 21 Employment Parks, including Meridian Business Park, Grove Park and planned Lubbethorpe Urban Extension Employment Park
Distance to DCO: 9.6 km away
Size: N/A but includes significant number of logistics buildings
- Site 4: Magna Park, Lutterworth, Leicestershire, M1 Jn 20
Distance to DCO: 9.5 km to south-east
Size: 13.9 million sqft, including warehousing under construction; largest logistics park in Europe
- Site 5: Mountpark Bardon (I – III), Ellistown, Coalville, A50/M1 Jn 22
Distance to DCO: 16.8 km to the north
Size: 3.2 million sqft inc. Amazon and Aldi Regional Depots; surrounding employment area includes significant number of additional logistic units.
- Site 6: DIRFT (Daventry International Rail Freight Terminal), Northamptonshire, M1 Jn 18 (rail linked)
Distance to DCO: 21 km to south-east
Size: 13.5 million sqft (phase 3 under construction)
- Site 7: BIFT (Birch Coppice), Tamworth, Warwickshire, M42 Jn 10 with A5 (rail linked)
Distance to DCO: 21 km away to the west
Size: N/A, but augmented by adjacent Centurion Park and St Modwen park on M42 Jn 10
- Site 8: Hams Hall Rail Terminal, Coleshill, Warwickshire, M6 Toll Junction 9 (rail linked) Distance to DCO: 25.6 km to the west
Size: N/A
- Site 9: Segro East Midlands Gateway, Leicestershire/Derbyshire border, M1 Jn 23A adjacent to East Midlands Airport (rail linked)
Distance to DCO: 32 km to the north
Size: 4.5 million sqft
- Site 10: East Midlands Distribution Centre, Leicestershire/Derbyshire border, M1 Jn 23A adjacent to East Midlands Airport
Distance to DCO 32 km to the north
Size: 2.5 million sqft
- Site 11: Northampton Gateway Rail Freight Interchange, Collingwood, Northamptonshire, M21 Jn. 15 (rail linked)
Distance to DCO: 49 km to south-east
Size: 5 million sqft (under construction)



Map showing the context of other significant logistics distribution locations around the Application Site; rail linked facilities are denoted in blue; road-only facilities are denoted in purple

- 4.7 In addition to those noted above, there are then also a significant number of other logistic warehouse sites across Leicestershire and the wider region, located on the edge of towns and cities close to key transport nodes. There are also additional allocated sites for employment purposes, such as Enderby (near M1 Junction 21) for a logistics park for over 1.1 m sqft, which is only 9.6 km away to the north-east.
- 4.8 All the existing logistic warehousing means that there are already issues with securing staff in some locations. Magna Park, south Leicestershire cannot fill vacancies so contract staff are bussed in everyday from Birmingham. Magna Park has consent to be expanded from 9 million square foot to 16 million square foot of floorspace, with a number of these units currently being built out. This staffing shortfall will clearly increase in the future for Magna Park, before consideration is given to the other surrounding large logistic park enlargements and creations are considered. These include DIRFT and Northampton Gateway to the south-east of the Application site/Magna Park, the East Midlands

Distribution Centre, East Midlands Gateway, and Mountpark Bardon/Coalville and Lubbethorpe SUE (M1 Junction 21) to the north in Leicestershire.

- 4.9 With substantial logistic parks at or close to Junctions 16, 18, 20, 21, 22 and 24, including 3 rail linked facilities, there is significant competition for the same workforce. If the demand for the facility is nationwide, then there is scope for it to be located at another position in the country where there is not already a high concentration of such facilities and a recognised shortage of employees.

Human Health

- 4.10 The 2017 EIA regulations incorporate requirements to describe the factors that are likely to be significantly affected by the proposal, including population and human health. The need to fully consider human health was indicated as requiring expansion, if not a completely separate chapter in the Environmental Statement (ES), by Blaby District Council at Scoping Opinion stage. Whilst a Health and Equality Briefing Note is now included as Appendix 7.1 of the ES, it is not explicitly outlined as a receptor within the socio-economic chapter. The Summary of Effects (Table 7.26) includes no clear reference to human health, well-being or equality being considered. This shortfall manifests itself in numerous ways:
- Impact upon local residents due to deterioration in environmental conditions to their living environment (air quality; noise; traffic levels/congestion);
 - Impact upon perceived safety to residents in the area for any non-car borne movements: additional traffic restricting ability to access facilities on foot, particularly for young and older residents;
 - Reduction in benefits from using public routes in vicinity of Application site as visual setting changed – particularly important for footpaths on the site which have a lack of safety due to their design and potential for antisocial behaviour as a result;
 - Impact upon safety for traveling on trunk roads due to high volume of HGVs;
 - Impact upon tranquillity of amenity areas. Burbage Common and the Aston Firs SSSI are nearby leisure and recreational activity destinations which it is noted will be unacceptably impacted by noise from construction phase works;
 - Impact upon fauna and the changed perception of the rural setting of the landscape; wildlife may well be replaced with HGV noise, massively changing the feelings of the use of spaces;
 - Impact upon residential amenity where high acoustic fencing needs to be constructed immediately adjacent to dwellings.
- 4.11 If all aspects of local residents lives are altered due to the erosion of the tranquillity of the residential, leisure and social spaces they enjoy, this has a significant impact upon the mental health of the community. Whilst a figure cannot be placed on this in the same manner as the financial economic benefits, it clearly needs to be given significant weight in considerations.
- 4.12 In terms of economic benefits the ES clearly outlines these, including in summary at Table 7.19 to include those benefits specifically generated on site, and those by association within the wider area. However, nowhere does it consider the negative impacts to the area. Transport is again a key factor: any business or service that requires travel between locations will be negatively affected as journeys will be increased and thus absorb more staff time, as well as using more ‘fuel’ in the vehicle. This could impact a wide range of services including for example, florists, plumbers, delivery companies, care in the community, emergency service response times. These services and facilities could well be the lifeline of the surrounding communities and once lost as they cannot service the area (cost) effectively, they may never be replaced. The harms as well as the benefits need to be adequately balanced.

- 4.13 It is also sensible at this point, to highlight the inconsistency and over-emphasis being made on the removal of HGV miles from the public highway. The covering information provided by Tritax Symmetry in all their documentation and presentation material repeatedly suggests 1.6 billion HGV kilometres would be removed (cira 994 million miles). However, the BWB Highways report notes at Table 7.7, page 8-68 (ES Chapter 8) that there would be 83 million miles saved. The difference between these two figures is extensive and appears to be drastically over emphasising the reduction in HGV movements to anyone not looking at the technical report.
- 4.14 However, even the mileage savings noted in the Highways report appears excessive if the information available on the Felixstowe Port website (<http://www.portoffelixstowe.co.uk>) is considered. This notes that 100 million HGV movements are saved in a year across the 76 trains that depart the Port daily. This would suggest that 1.316 million transport miles are saved per train over a year (100/76), so if up to 16 trains a day would serve Hinckley NRFI then this would equate to 21.05 million HGV miles per year. This is roughly a quarter of the figure stated in the BWB report and only a tiny fraction of that stated in the benefits sections of the Tritax Symmetry information. These figures are massively misleading but in part are integrated into the benefits delivered; the HGV miles saved should be considered much lower, and whilst still a benefit needs to be weighted accordingly, and in particular balanced off against the additional congestion harm created to the local area.
- 4.15 The conclusion on socio-economic matters is that it is recognised that there will be benefits generated by the additional employment and spend to the area. However the negative aspects need to also be considered. A key drawback is the impact upon the existing surrounding residents in terms of the general quality of the environment due to the additional traffic, noise and pollution. These all negatively impact upon the physical and mental health of residents. The weight to be attributed to these factors is a view for the decision maker, but it could well be seen as whether the well-being of existing residents of the area is considered to be more or less important than economic growth.

5 HIGHWAYS

- 5.1 SSPC have substantial concerns in respect of the highway impact upon Stoney Stanton and the surrounding area, including the overall approach towards development in this location; the incomplete modelling information and accuracy of the data incorporated; and the effectiveness and appropriability of the mitigation proposed. M-EC, Development Technical Consultant specifically looked at the information provided and the relationship of this upon Stoney Stanton. This Technical Note is attached as [Appendix 1](#), with the conclusions set out below:
- Methodologies for the calculation of employee counts requires a critical review in terms of the captured peak hours and employee shift patterns.
 - Necessity of the furnishing methodology requires additional information; explanation as to what the methodology seeks to achieve as well as reasoning for the diversion from typical assessment methodologies (future scenarios, plus committed development flows, added to development trips giving future scenarios).
 - All methodology and trip generation should be fully approved by the statutory consultees that have raised issues. Concerns raised by member of the TWG that are not exhaustive to those mentioned within this review should be considered in further detail.
 - A full analysis and modelling of the M1 Junction 21 is necessary to get an understanding of the present capacity and future year scenarios. Distribution from this junction into the local

villages if more traffic is added to the strategic road network will need logical consideration.

- Consideration to amend HGV trips to correctly reflect what is presented within Appendix 3 should be actioned.
- Formatting errors require amendment in regards to linked reference and data values within tables to ensure the structural integrity of the data being presented.
- Comments surrounding redistribution of traffic along Hinckley Road / B4669 in regards to the eastern villages should not be written relative to one another as a positive towards Sapcote and Stoney Stanton. Relative to the villages own prior carriageways, traffic redistribution is explicitly negative to residents and this should be excluded as a concluding point.
- Clarity on the 'benefit' of traffic not being fully diverted to Sapcote at the Stanton Lane / B4669 priority-controlled T-junction in relation to Stoney Stanton; comment that this traffics only other routing option is through Stoney Stanton.
- Comment and potential modelling regarding the balancing of traffic in the vicinity of Stoney Stanton is required to fully estimate the impact on the eastern villages. It should be considered that the only routes directly east are through the eastern villages and thus balancing of the traffic would not be sufficient contextually as the choices are either to travel through Sapcote or Stoney Stanton. The statement posing the balancing as a resolution to the significant redistribution should be contextually analysed in regards to the location of routes to the east; the balance of traffic here is unachievable so it should not be posed as a solution.
- The reference to the Eastern villages now being more accessible should be portrayed as a detriment to the Eastern villages. This conclusionary statement should be reviewed contextually against the routing out of Stoney Stanton to nearby locations to understand that the new 'access infrastructure' scheme will not benefit the resident's accessibility and will rather be a detriment, via more through-routing traffic being funnelled towards the village.
- Pedestrian, cycle and bus route trip data should be reviewed contextually to the accessibility of the development and these trips should be distributed accordingly through other modes of travel. This change would alter car trips so further modelling would have to be considered.
- Stating of the software used to produce the capacity assessment models requires amendments to correctly reflect the processes used throughout modelling.
- Further comment regarding the criteria process chosen is required on junctions that did not meet initial capacity criteria but now require further mitigation schemes is required; the criteria process should be reviewed in these instances.
- Formatting errors in regards to references and comments outlining incorrect carriageway names requires review to uphold the structural integrity of the reporting.
- Speed survey data should be provided to back up speed restriction changes to quantify the benefits of such mitigation.
- Reference to the mitigation measures to be provided within Stoney Stanton be listed; the location of features should be specifically outlined within Stoney Stanton as physical restrictions in the village may not allow for features to be enhanced or added.
- The conclusion that traffic calming would deter traffic from the most direct routing through the eastern villages when Stoney Stanton and Sapcote are the main, and only, two routes eastwards needs to be analysed with context to the local area and further expanded upon.
- Further mitigation on the junction should be proposed or an outline of contributions to the local area made to support pedestrian and cycle movements affected by the increasing flow of traffic through the area.

- Explanation of why the Junction 38 LinSig model was conducted should be outlined as physical constraints within the village make signalling the junction not a feasible option.
- Mitigation for Junction 38 needs to be put in place otherwise the junction is not considered solved and no such conclusion that all overcapacity junctions have been addressed can be made.

5.2 The M-EC report concludes that:

“it is clear that the reporting for Stoney Stanton requires further contextual analysis in terms of routing through the village, appropriate mitigation strategies and benefits to Stoney Stanton’s residents. It is evident that the TA requires further time spent focused on formatting, methodologies and ensuring the correct carriageways are referenced to not damage the integrity of the reports. Further modelling is a requirement for Junction 37 and Junction 38 is at present not resolved; the mini-roundabouts are central junctions through Stoney Stanton and thus it is necessary they are considered critically with mitigations provided.”

5.3 It is therefore the view of SSPC that the Applicant has not adequately considered transport impacts through the modelling work and thus cannot generate appropriate mitigation. Failure to correctly identify and mitigate for the impact from a highways perspective results in the proposal failing to accord with the Assessment Principles, as set out in Section 4 of the DoT’s National Policy Statement for National Networks.

6 NOISE, VIBRATION AND AIR QUALITY

6.1 As outlined in the introduction section, it is considered that the baseline information provided for the noise and air quality assessments is incorrect as it is generated based upon the under-estimated level of transport movements captured by the Transport Assessment. The overall impact upon communities and the level of appropriate mitigation cannot therefore be accurately defined or commented upon.

Absent/Incomplete Information

6.2 Notwithstanding the above comment on whether the predicted levels are correct, there are also gaps within the background information provided. This includes night-time noise monitoring at Noise Sensitive Receptor locations (NSR) 5, 9, 18 and 19. This omission is considered important considering the recognised need to mitigate against noise in other nearby NRLs. Without adequate background baseline information it is impossible to confirm that the mitigation proposed will ensure an appropriate environment is maintained for these four locations, particularly where daytime noise levels are noted to be unacceptably elevated in some instances (e.g. NSR 9 by 4.4 dB for operational noise weekday; NSR 19 by 4.9 dB for operational weekend noise (Tables 10.43 and 10.44 of EA Chapter 10). These levels are outlined in the Guidelines for Environmental Noise Impact Assessment as being noticeable and potentially intrusive and considered as a ‘medium’ magnitude of change that should be mitigated.

6.3 It is also significant to note that the Figure 6.3.10.1 that sets out the NSRs identifies a caravan park on Leicester Road Hinckley as NSR 28. However, there appears to have been no background noise assessment undertaken, despite the receptors being within close proximity to the connection of the new A47 Link Road with Leicester Road. The mitigation, without any background noise information is to provide a 3.5 metre acoustic fence (see figure 6.3.10.10). It cannot be confirmed whether the imposition of a fence without any background information will adequately protect the amenity of residents on this site.

Extent of Acoustic Fencing to Mitigate Noise Harm

- 6.4 Substantial fencing is proposed to offset the harm that can be identified from the assessments undertaken. There are two residential areas in particular where the close proximity of acoustic fencing is proposed.
- 6.5 A 3.5 metres fence enclosure tight to the residential curtilage of these caravan parks on Leicester Road Hinckley (NSR 28) is proposed. This is substantially higher than a standard fence to enclose spaces between properties and thus will have a significant effect upon the sense of enclosure, particularly given currently the park is adjoined by countryside.
- 6.6 The impact of necessary acoustic fencing is even worse adjacent to the access point off the upgraded M69 junction 2. The link road in this position will pass in very close proximity to the Aston Firs caravan park. The road will be set on higher land than the new road and have a 6.0 metre acoustic fence imposed along the eastern edge and a 4.0 metre acoustic fence along the northern edge of the caravan park (see figure 6.3.10.10). This ‘boxing in’ of the caravan park will significantly harm the amenity of occupants to an unacceptable level. The fences will be notably higher than the caravans themselves and will become the dominant feature within the park, a position that could be made worse if the fencing is subjected to graffiti (sadly a common trait for fencing associated with the main highway network). Given the narrow strip of land available between the Aston Firs Caravan Park and the new road link, there is not scope to set the fence away from the caravan park to allow vegetative screening. Little care or attention appears to have been given to the impact upon the nearby residents to the proposal.
- 6.7 Turning towards the impact upon residents of Elmesthorpe to the north, it is again clear that the proximity of this settlement causes issues such that an extensive acoustic barrier ranging between 2.0 and 6.0 metres is required along the northern side of the development and half of the western side. This fencing is estimated to be around 1550 metres in length, with just a small break where there is the access point for the trains off the network line. It is likely to be set upon bunding for most (if not all) of its length, augmenting its impact, a position made worse if it is graffitied. The acoustic fence represents a substantial length of a solid boundary necessary to allow an acceptable relationship to be created. This underlines the fact that it is simply introducing an unacceptable use/scale of development into this area if such extreme solutions are required to mitigate the harm.
- 6.8 The proposed fence represents an uncharacteristic feature for the area that will act as a clear barrier to ecology and pedestrian movements. The western part of the fence will also be set within the flood zone so will have serious implications for the movement of flood waters. This is not considered to be an appropriate solution, due to its scale and proximity to noise sensitive receptors.
- 6.9 In respect of the acoustic fencing, it is also difficult to ascertain exactly where these will be positioned as they are not included on the indicative masterplan (figure 6.3.3.1). The masterplan includes bunds in locations where the fencing is proposed; clearly if a fence is proposed on top of the bund then its impact is enhanced in terms of its imposing nature and visibility within the wider setting.

Noise Levels to Wider Area

- 6.10 Many areas around the Application Site already experience high levels of background noise; this is the only saving factor for the proposal not having a holistic unacceptable impact on the *whole area*. It does however, reinforce the importance of protecting the ecological areas to ensure that these remain safe refuge for people and animals from noise. Sadly some of the areas affected and/or not fully monitored include the important Burbage Common Woods and Aston Firs SSSI (NSR 18 and 19 respectively). In part the only manner in which a perceived relationship is considered to be achievable from a noise perspective is to install an acoustic fence on the new bridge on the A47 link road. This will appear as an uncharacteristic floating screen in the middle of what is currently a verdant view northward from

these ecological / public amenity areas; the only item that will make it appear slightly less jarring is the uncharacteristic warehouse buildings being proposed along side it. Two wrongs however, do not make a right, as outlined within Sections 3 (Location) and 7 (Landscape and Visual Impact) of this Written Representation).

- 6.11 The noise assessment considers the impact upon the wider surrounding area using four monitoring locations as background information (see section starting at paragraph 10.223). It is stated within paragraph 10.218 that the acoustic model of the transport impact is based upon data provided by BWB for the baseline, opening year of the development and when established (paragraph 10.218). As evident within the Highway Statutory Consultees to this proposal in their Relevant Representations (Leicestershire County Council; Warwickshire County Council; National Highways), there are outstanding substantive issues with the transport data, and thus clearly there is likely to be errors rolled into the modelling for noise and vibration as a result.
- 6.12 Key concerns over the misleading assessment of transport noise and vibration is that if the level of movements are under-played, then the level of congestion in locations will be under represented. This has particular concerns for vehicles traversing through Stoney Stanton, Sapcote and Elmesthorpe in close proximity to the site, as well as through Narborough due to the additional barrier down time. In respect of this latter point, no meaningful assessment has been made in respect of the impact upon this community. Noise and air quality will clearly be affected in these locations by idling vehicles and the impact of vehicles stop/start movements as greater levels of noise and emissions occur. These same systemic issues equally apply to the air quality assessments' conclusions.
- 6.13 As a final point on noise, it is noted that the Applicant has sought to differentiate between the construction and operational phases. However, it is considered that significant consideration in respect of the impact of the construction phase needs to be given, due to the expected 10+ year construction timeframe for the development. In respect of the construction phase, appropriate constraints on operational hours of construction and how vehicles route to site need to be imposed to ensure that the surrounding area is not detrimentally impacted for this prolonged construction timeframe.

Air Quality Impacts

- 6.14 The issues in respect of air quality largely replicate those expressed for noise, due to the additional pollution generated by higher levels of transport generated directly and indirectly due to the proposal as a whole. The concern over this is augmented by the incorrect information forming the baseline data.
- 6.15 In terms of the existing air quality issues to Stoney Stanton itself, the prevailing wind direction needs to be considered. In the UK this is from the south-west, which when coupled with the topography means that Stoney Stanton receives much of the pollution generated from the M69 and Hinckley area. All the pollution from the Hinckley NRFI, including associated transport movements would travel in the direction of Stoney Stanton. This would further reduce the air quality in the settlement. Stoney Stanton already has higher than average rates of respiratory diseases (especially asthma); further development without appropriate mitigation would augment this. This matter is not considered to have been appropriately addressed.
- 6.16 In conclusion of noise, vibration and air quality, the information provided is considered flawed as it is set against incorrect baseline transport information. The impact from transport noise is expected to be increased due to added congestion in key surrounding villages, affecting the quality of life for residents in Stoney Stanton, Sapcote, Elmesthorpe and Narborough in particular. To ensure an appropriate relationship to the surrounding area requires the imposition of a significant quantum of acoustic fencing. This generates unacceptable visual relationships between existing uses and the proposed development, as well as other substantive issues in respect of flood risk and ecology.

7 LANDSCAPE AND VISUAL IMPACT

- 7.1 The scale of the proposed development results in it occupying the majority of the main site area. This means that there is little room for meaningful landscaping to negate the visual impacts of the development from the north, south and east. The provision of lower lying land to the west within the Application Site then reduces the benefits achievable from this direction. The inability to appropriately landscape the development into the countryside setting is reflected in the large number of residual significant effects remaining at Year 15 (i.e. once vegetation has matured).
- 7.2 Table 11.21 outlines 26 public viewpoints, covering a number of public rights of way and amenity areas, including from Burbage Common and Woods Country Park (PVP42) and St Mary's Church, Elmesthorpe. The latter is a Grade II Listed Building, illustrating an impact upon heritage assets. This level of impact still underlines the concerns noted in Section 4 (Socio-Economic Effects) as it is clear that the Applicant acknowledges the negative impact it will have upon users of key public rights of way within the surrounding area (mainly in the countryside), and general enjoyment of Burbage Common, a key amenity facility.
- 7.3 Reinforcing the fact that the scheme has clearly been considered to maximise development and marginalise the necessary features such as landscaping and public rights of way, two rights of way are to be looked at in more detail. Bridleway V29/7 is a prime example to consider. It currently runs across the centre of the site, within open countryside. It is being redirected so that a north/south link is maintained, but positioned adjacent to the M69 embankment. This squeezes it within a narrow landscaped corridor, on an embankment with the rear/side of units 1 – 4 in close proximity. The route is marginalised, and positioned within an area which will be subjected to very high noise levels and pollution levels. There would have been scope to better integrate this public right of way within the development, offering enhanced safety and security to users as well as potentially a better outlook, rather than marginalise it and have the development essentially turn its back on this route.
- 7.4 The second is the new footpath traversing east-west across the development site adjacent to the link road. Again, the scale of development means that the link road is squeezed towards the south of the site and the new public right of way is then set to the south of this road link. As a result, the easternmost section is set tight between the link road and the 6.0 metre high acoustic fence adjacent to Aston Firs Caravan Park. To the north of the Aston Firs Caravan Park the footpath is then set between a 4.0 metre high acoustic fence and a large bund up to the link road. Other sections further to the west then become squeezed between other boundary fences to the site and the bund to the link road. This does not offer an integrated public route, but a marginalised route with little outlook and a distinct lack of any legibility that it is within the countryside. This will create a safety issue, including graffiti to the acoustic fencing due to a lack of overlooking. This safety concern, given the truncation of other public rights of way, may lead to a perception that residents to the east of the Application Site cannot reach the public recreational nature areas to the west.
- 7.5 Beyond public viewpoints impact, Table 11.22 sets out the residential receptors that still have significant effects at Year 15. Again, this is a significant list with 20 locations noted, many of which include clusters of properties. This again illustrates the failure of the development to appropriately assimilate itself into the area, namely with the settlements in this instance.
- 7.6 Whilst the Applicant has identified a number of locations where significant effects still occur at Year 15, the accuracy of the information provided is also questioned. This in essence should be considered a best case scenario, with scope for the number and/or degree of harm to be exacerbated once the assessment is appropriately justified. The substantive issues are considered to be as follows:

- There is a lack of clarity in respect of judgements provided within the assessment on how susceptibility and value has been derived for all the landscape and visual receptors, and how this has been applied in practice. It needs to provide clear links back to the evidence in order to underpin the professional judgements and a narrative to illustrate how these align with the requirements set out within the Guidelines for Landscape and Visual Impact Assessment 3.
- Justify why the right of way across the site is not a selected viewpoint (bridleway V29/6 (see figure 6.3.11.3 for its location). This is clearly a public viewpoint upon which the effects of the development need to be addressed.
- Clarification that the measures provided to mitigate the harm are the most appropriate options available and the maximum that can be delivered within the available land. This point is important to ascertain whether more can be achieved or if the impact simply is too significant and thus warrants being noted as a serious harm to the setting of the area (countryside and settlements).
- The quantum of information provided in respect of assessing night time and lighting effects. This needs to be comprehensively provided for both the construction and operational phases to ascertain the impact. This is relevant in particular to viewpoints 9, 12, 20, 24, 25 and 32. The need for clarification on the judgements affecting the night time impacts are important in terms of the overall sensitivity, magnitude for change and the overall effects. This is a countryside location with a number of ecological designations within the immediate vicinity that are used by a wide variety of fauna, including protected species. The impact upon these areas by way of light disturbance to foraging areas and linking corridors is important to an ecological perspective, as well as identifying exactly how visible the development itself will be during the night time.

7.7 The conclusion in respect of the landscape and visual impact is that the information provided is substandard and thus not capable of providing a definite conclusion on this matter. The information that has been provided by the Applicant outlines that there is still a significant impact at Year 15, even once the mitigation proposed has become established. Put simply, it is considered by SSPC that the scheme cannot be adequately mitigated as currently proposed and thus causes significant landscape harm to the whole area, affecting both the countryside and settlements.

8 ECOLOGY AND BIODIVERSITY

8.1 The site is located within the countryside and close to a number of ecological designations. The need to ensure appropriate baseline information is undertaken, the impact upon the surrounding ecological designations and the effects upon the migration of ecology are important. Currently, it is considered that there are a number of concerns in respect of the certainty of the impact upon ecology and biodiversity.

8.2 Firstly, it is considered that there has not been a full baseline position established for the whole DCO. Baseline assessments have been undertaken for the main order limits, but for the remainder of the area, it is simply stated within the Ecological Report (6.2.12.1) that it is 'typically of negligible ecological importance'. This sweeping statement covers a number of land parcels that incorporates hedgerow sections, grassland and ditches, which could be utilised by a range of fauna. Without the necessary surveys being undertaken, the statement that it is 'typically of negligible ecological importance' is a matter of opinion and not based upon factual evidence. The full suite of Phase 2 surveys should be undertaken on this land, given it will be impacted upon both the imposition of new highway infrastructure and used to establish the baseline for the biodiversity enhancement assessment.

8.3 Secondly, there is a lack of consideration for habitat fragmentation within the proposal. The scheme seeks to remove all the existing connecting wildlife corridors on the land through the removal of all the

hedgerows. Existing ponds on site are also removed, which can form an important element in migration for newts. The provision essentially of a single narrow corridor along the western edge adjacent to the M69 is not considered sufficient to offset the loss of the existing migration corridors, particularly given the position of this link next to a key highway network (risk of death to fauna is increased) and its distance to the main ecological areas off-site, which are all located to the west not the east. This arrangement will clearly have a negative impact upon the fauna within the area, including protected species.

- 8.4 Thirdly, the lack of clarity in respect of the night time illumination means that it is impossible to accurately determine the impact upon ecology. Light spill will extend into the one linear migration corridor on the site (adjacent to the M69), whilst it will also extend into the undeveloped land to the west of the railway. These are all areas with a dark sky and illumination will affect the breeding and foraging habits and opportunities for many animals, including owls and bats.
- 8.5 Finally, there is concern over the ability to deliver a biodiversity net gain on site, let alone a 10% gain. The lack of a full baseline study for the whole DCO means that it is impossible to accurately calculate the level of improvements necessary. Additionally, there is a high proportion of the site being built upon compared to that undeveloped. Given the illustrative masterplan removes all existing ecological features, the net loss on site is huge. The remaining land appears woefully inadequate to compensate for the losses. Given the scale of the development and its position next to a number of national statutorily designated ecological and landscape areas, there should be a strong drive to ensure that the biodiversity is replaced in this area and not displaced elsewhere. Again, there does not appear to be sufficient land to allow this to occur, reflecting the overdevelopment of the land.
- 8.6 In conclusion on ecology, there is a lack of appropriate assessments to allow a full baseline position to be established. The exact harm upon wildlife, including protected species, cannot therefore be confirmed or biodiversity calculation for enhancements to be appropriately calculated. This is contrary to the policy requirements for proposals. The fragmentation of habitats and removal of transfer corridors also represents a significant concern to the overall ecological value of the area. Light spill has also not been fully analysed to enable the impact upon night-time fauna activity to be considered. The lack of information results in unresolved harm to ecology.

9 SURFACE WATER AND FLOOD RISK

- 9.1 There are serious concerns in respect of the flood risk and drainage strategy of this Application.
- 9.2 Since the initial consultation version, it has been confirmed that the existing railway line is raised above the flood plain, and once complete, the rail port and new connections to the rail line will also be set above the flood levels (see 6.1.14 Table 14.2 under Blaby District Council concerns/responses). This confirmation will ensure that the facility operates even during flood events, but raises concerns about the impact of the additional infrastructure provided within Flood Zones 2 and 3. The rail port will be constructed within these higher flood zones, and thus needs to be set on embankments like the existing railway line which creates two key alterations to flood events which do not appear to be fully accounted within the information provided:
- Raising the ground level significantly to allow the creation of the rail port reduces the storage capacity in the flood zone. This potentially results in displacement elsewhere along the river.
 - The rail port embankment will act as a barrier to the natural flow of flood waters over the land. It will be controlled by the flow rate possible under the existing railway line and that created by any culverts provided under the rail port.

- 9.3 The key concern in respect of the impact on the flood plain, is that there does not appear to be compensation incorporated on site to offset the loss of storage capacity from the flood plain itself. This means that the proposal does not accord with the Environment Agency’s Flood Risk advice and the NPPF/PPG on ensuring that there is no increased risk of flooding created off-site as a result of a development.
- 9.4 Turning towards the drainage strategy, it is severely questioned whether it is appropriate to direct a large proportion of surface water towards below ground crate storage. The Preliminary Ground Investigation Report (ref 6.2.15.2) summaries the groundwater situation at section 4.4.2 to note that there is shallow groundwaters on the land, set at depths between 0.83 and 4.50 metres below ground level. Figure 6.3.16.1 sets out the proposed plateau levels isopachytes, noting that some of the lower land on the northern part of the site is intended to be lowered between 0.5 and 1.0 metres. This could place the surface levels close to ground water levels.
- 9.5 Given the shallow ground level, it is concerning whether there will in fact be sufficient depth to allow underground crate storage. No specific details are provided on the design of these crates, but they are shown to be placed below the parking areas and servicing yards. These areas need to be constructed appropriately with sub-bases and top surface layers, such that the crates would need to be set well below the surface layers and typically are at least 0.5 metres in depth to enable appropriate storage capacity to be generated. If the design is not correct, then the ground waters will simply remove the capacity from these crates, along with the low level drainage ponds, resulting in displacement off-site or on site flooding. Serious concerns in respect of the deliverability of the drainage scheme are raised.



Flooding photographs adjacent to Burbage Common Road dated 2022, near to Woodhouse Farm Shop; this flooding is within the area intended for the employment units to be built

- 9.6 The site is also the subject to significantly more surface water flooding than that indicated from the flood risk maps. There is photographic evidence (see below) of the site being flooded on multiple occasions in recent years. These photographs cover the area in which the buildings are proposed. This matter was highlighted to the Applicant within the public consultation responses but it has simply been

ignored. This surface water flooding issue needs to be robustly integrated into the drainage strategy to protect the wider area from flood risk.

- 9.7 Finally, the intention is to culvert the unnamed stream that runs across the Application Site along the eastern edge. This will run adjacent to the M69 embankment and set above this motorway. Its design, capacity and maintenance programme all need to be robustly designed to ensure flooding of the motorway never occurs. This is a critical element from a safety perspective and overall seems to generally not be a sensible solution.
- 9.8 Overall, there are significant concerns about the proposed flood risk impact and drainage design. It is considered that the scheme reduces the storage capacity in Flood Zones 2 and 3 and therefore has the potential to increase flood risk elsewhere. This approach is not in accordance with policy. Moreover, the design of the surface water drainage is not considered to be deliverable due to a high water table; ensuring the drainage system is appropriately designed and maintained is important given the level of surface water flooding that occurs and the intention to redirect elements of the water on site into a culvert set above nationally important highway infrastructure. This appears to be a high risk strategy which could have been avoided.

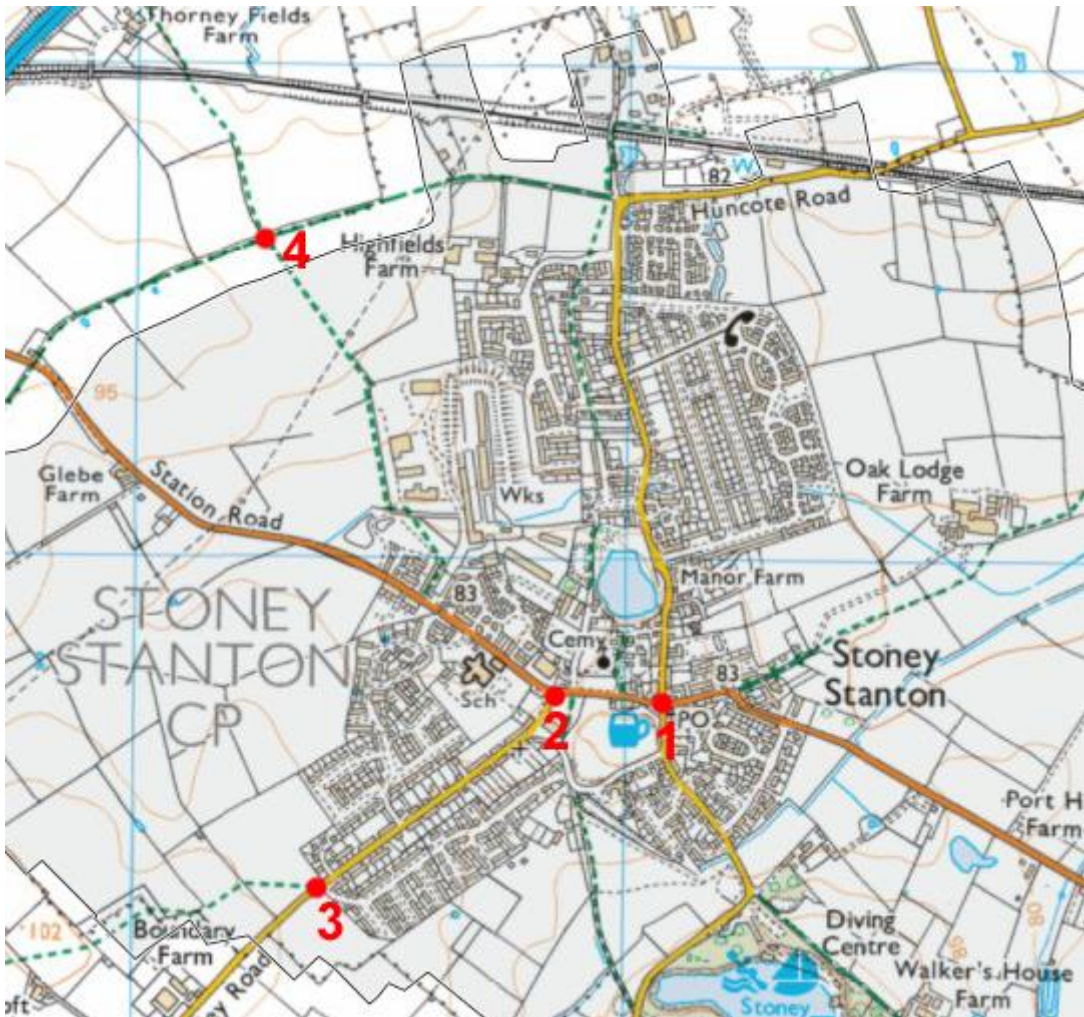
10 OTHER SITE VISIT LOCATION POINTS

10.1 In addition to the site visits already undertaken Stoney Stanton Parish Council would recommend the following additional site visit locations and/or times as set out below. These are also visually illustrated on the plans provided.

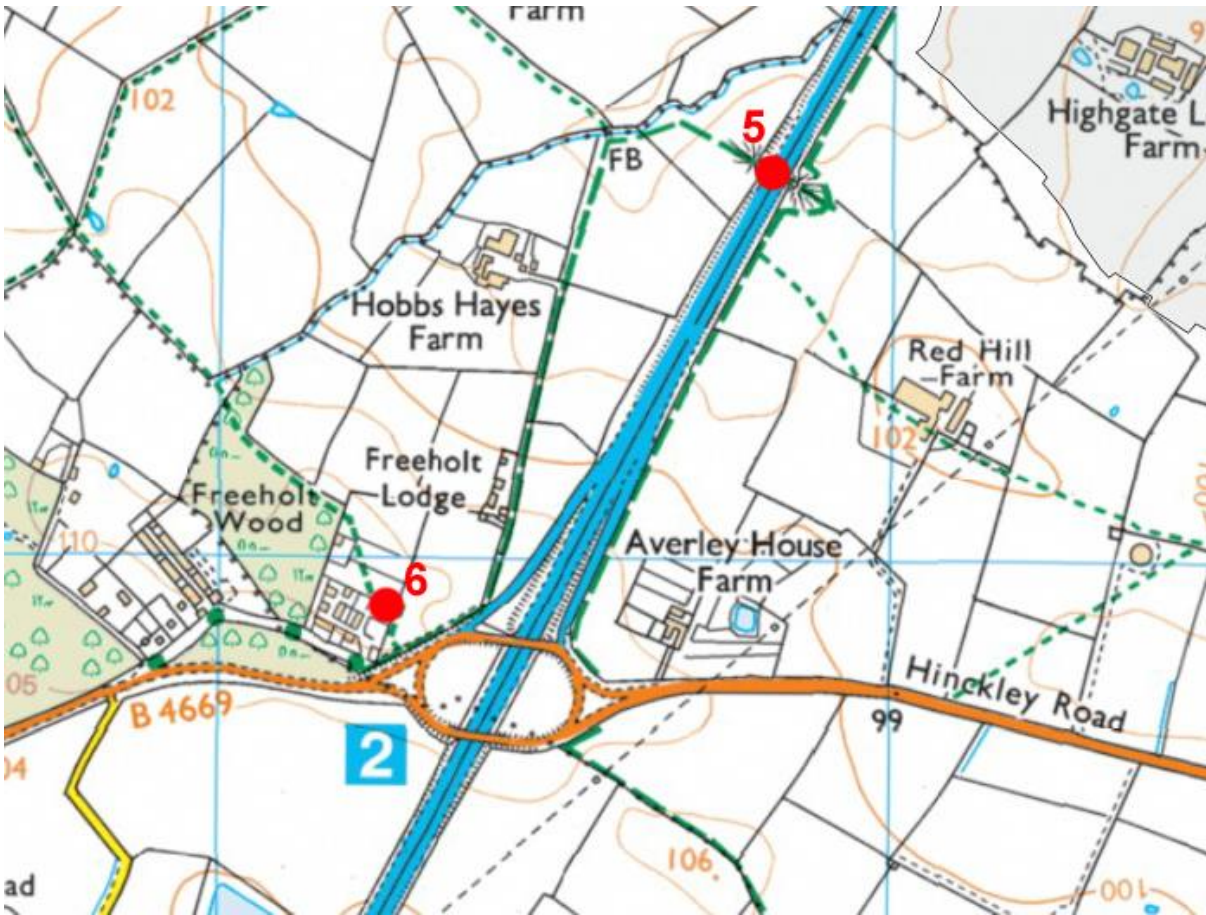
1. Roundabout junction in Stoney Stanton between Broughton Road, Long Street, New Road and Sapcote Road (B581)
Co-ordinates: 52.548020; -1.277754
Time: around 0830 on a weekday
Reason: To allow extent of traffic movements at AM peak hour to be seen.
Site located within public domain
2. Roundabout junction in Stoney Stanton between New Road, Station Road and Hinckley Road (B581)
Co-ordinates: 52.548204; -1.280958
Time: around 0830 on a weekday
Reason: To allow extent of traffic movements at AM peak hour to be seen.
Site located within public domain
3. Hinckley Road, Stoney Stanton at southern edge of village where footpath crosses highway
Co-ordinates: 52.544681; -1.288207
Time: Any
Reason: To allow visibility of appeal site across fields to be understood
Site located within public domain
4. Junction of footpath crossroads to west of Stoney Stanton.
Co-ordinates: 52.556581; -1.289591
Time: Any
Reason: To allow visibility of appeal site across fields to be understood
Site located within public domain; easiest access is along the footpath from Huncote Road to the east.
5. Footpath on bridge over M69 and land immediately either side, North-West of Red Hill Farm. Located close to north-eastern corner of DCO.
Co-ordinates: 52.547000; -1.310850
Time: Any
Reason: To allow visibility of appeal site across fields to be understood
Site located within public domain.
6. Footpath adjacent to Aston Firs caravan park
Co-ordinates: 52.540974; -1.319429
Time: Any
Reason: To allow visual relationship between caravan park and DCO as 4 and 6 m high acoustic fencing proposed on boundary
Site located within public domain.
7. Bridge over M69 on B582, north of Enderby or to drive the M69 up to the M1 Junction 21 and cross onto A5460 towards Leicester
Co-ordinates: 52.595457; -1.217477
Time: 0830 – 0900 and/or 1700 – 1730 (pm peak is worse)

Reason: to understand the extent of traffic queues that occur at rush hour along M69 due to interaction with M1.

Site located within public domain; driving the route will allow Inspector's to experience the congestion first hand.



Site visit map – points 1 – 4, Stoney Stanton



Site visit map – points 5 and 6, foot bridge over M69 adjacent to site and adjacent to Aston Firs Caravan Park



Site visit map – point 7, bridge over M69 close to M1 interchange (circa 1 mile away)

The meeting closed at 9.37pm.

Signed: _____

Dated: _____