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By email: hinckleynrfi@lexcomm.co.uk

Dear Sirs,

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

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

Whilst we welcome the opportunity to provide comments on your consultation for the proposed Hinckley National Rail Freight Interchange, we must convey our extreme concern about the preparedness, quality, and implementation of this consultation.

We recognise that the proposed site boundary is mainly within the administrative boundary of Blaby District Council, with a link road extending into Hinckley & Bosworth Borough Council. However, the site boundary does directly abut our parish boundary, and our 16,000 residents live between 1,400 yards and 3 miles from this proposed development, a development which is at least 6 times bigger than any previous development.

In this context we must point out that consultations of this type are intended to be a briefing process to the public, explaining clearly, the impact of the intended development and how it will affect the lives of the surrounding residents.

In the words of the National Planning Inspectorate; ***“The development consent regime is a frontloaded process. This means the development proposal has to be, “fully scoped and defined”, before submission as an application to the Planning Inspectorate. It is at this stage the applicant must formally consult with all the statutory bodies, all local authorities, the local community, and any affected persons.”***

Consultation

The consultation which has been carried out is flawed in many areas:

- **No appropriate engagement with the residents of Burbage**
No real element of the consultation documentation is aimed specifically to engage with the public, with the exception of the “Community Explanation Document” and “Community Newsletter”. Both documents do little more than saying that a rail terminal is proposed, the location, how it will benefit the national economy and where the consultation event will take place. The consultation events did little to help further these key points. There was NO specific reference to Burbage, its residents or it’s highways in any of the documentation. There was, therefore, NO ability to discuss

the impacts on Burbage, how these could be mitigated or what additional benefits Burbage could obtain from this colossal development on our doorstep.

- **Poor Consultation Events**

Given the country was still in the grip to a large extent of the COVID-19 pandemic, Tritax Symmetry arranged the Burbage consultation in the very small meeting room at the parish facilities which was cramped, dis-organised and totally out of keeping for the interest expressed for such a major development. This is evidenced by the fact that the queue to access the event had a typical waiting time of over 1-hour. When the consultation was extended for a further month to close on 8th April, not one additional consultation event was organised by the company, despite clear evidence that residents were leaving the queue well before reaching the end or not even being tempted to join in the first place. Inside the event, the presentation material again focused on the high level with NO local focus whatsoever. Questions were either not able to be answered or answers focused on the national need and benefit, rather than the local impact. It is unclear why many of the questions were not answered, in some cases confirmation was given that elements of the application were still being prepared and would be in the final version of the application documentation. Without some details being confirmed meant that the consultation is incomplete.

- **Poor Quality Maps**

Maps presented, particularly in the transport chapter were of very low resolution such that areas of highway which were highlighted, could only be guessed as to the actual location. Requests made at the consultation event for higher quality versions did not produce better versions as it was claimed “the GIS system” did not allow better output. This is further evidence of the public not being given the necessary information, at the correct level of detail, about impacts which could be reasonably expected.

- **Confusing Highways Impact**

The transport chapter of the consultation (paragraph 8.67) lists three scenarios for which traffic will be assessed for both 2026 and 2036, six scenarios in total.

- Do Nothing – Without Development (WoD) inclusive of committed development.
- Do Minimum – Without Development With Access Infrastructure (WoDWS)
- Do Something – With Development (WD): including the Access Infrastructure

The highway impact table (Table 8.5) only provides figures for two scenarios, 2036 figures with and without development. Having defined the scenarios earlier in the document, the reader is left to guess what these two scenarios are based upon. There is no presentation of a comparison of current traffic levels to allow the public to make an informed assessment of the highway impact. Further, straightforward information about traffic movements is not provided, such as the number of HGV vehicle trips in and out of the development site each day and the additional number of private and light van trips in and out of the site each day. This is basic information which has not been provided in this traffic chapter. Yet more evidence that the consultation preparation has not given thought to communicating clearly with the general public. The impression taken of the highway impact to Burbage of this development is that overall, the traffic through Burbage will be reduced. Whether there is merit in this analysis or not, given the poor presentation of traffic data, the general public and all members of the Parish Council, are incredulous that such an outcome is possible.

- **Incomplete agreement with partners in the Transport Working Group**

Whilst the consultation correctly documents that a Transport Working Group has been meeting leading up to the consultation, key members of the working group have publicly signalled that final agreement has not been reached to allow a stable and robust platform of traffic analysis to be formed for the consultation to have a valid basis. Whilst many of these technical details are outside the knowledge of the parish council, in layman’s terms we consider this to mean that the consultation has not been based on agreed inputs and outputs of the modelling. Taken together with the Parish’s own observations, this completely undermines the public confidence that this traffic consultation is valid.

For the forgoing reasons Burbage Parish Council are of the opinion that the consultation which has been carried out is flawed and does not provide the basis for legitimate comments from Burbage and its residents. We therefore strongly suggest that Tritax Symmetry should resolve these flaws, obtain agreement with all working group members on an agreed traffic model and bring back a further consultation later in the year.

Detailed Commentary on the Proposals

Whilst Burbage Parish Council strongly urges Tritax Symmetry to carry out a further consultation, we recognise that they may choose, at their own risk, to continue with their application. We therefore provide the following additional comments.

Demonstrating the Need

The consultation material has focused only upon “broad” statements of need from reports for warehousing in different reports without demonstrating a link to specific industries or locations which the terminal would be targeting. Without this specific information it is difficult to see how the traffic trip models can be validated.

The consultation material considers the broad policy of the Government for new Strategic National Rail Freight Terminals without recognising the policy aims to achieve a “Network” of such terminals. This application MUST take account of the terminals which have now gained approval to establish that a network is being geographically spread across the country to meet a National Need.

As the number of these terminals which have received consent increases it is surely essential that the examination of the merits of each case carefully considers the location of any proposed terminal and how the location plays its part in developing a national distribution of such strategic infrastructure. In the 2014 Policy Statement paragraph 2.57 opens “Existing operational SRFIs and other intermodal RFIs are situated predominantly in the Midlands and the North.”, and the previous paragraph 2.56 “The Government has concluded that there is a compelling need for an expanded network of SRFIs. It is important that SRFIs are located near the business markets they will serve – major urban centres, or groups of centres – and are linked to key supply chain routes.”

Since the Government Policy Statement has been adopted, the following further terminals have received approval:

- Daventry International Rail Freight Interchange (DIRFT) received approval for large expansion in 2014. (21 miles)
- East Midlands Gateway Rail Freight Interchange was approved in 2016. (32 miles)
- Northampton Gateway Rail Freight Interchange was approved in 2019. (35 miles)
- West Midlands Interchange was approved in 2020 (38 miles)

In addition, the following major warehouse distribution park is being expanded with no direct rail connection although a rail shuttle to DIRFT is included in the plans:

- Magna Park (8 miles)

All these projects have added terminals in the Midlands. A key objective of the move from road to rail is the reduction in the carbon footprint of the logistics industry. Any further expansion of the number of terminals being built in the Midlands MUST:

- Demonstrate there is a close coupled need in the market they are intended to serve.
- That other regions are not being starved of infrastructure funding which deliver a higher reduction of carbon footprint.

Option Study

The option study, which has been presented as part of the consultation, continues to be superficial and lightweight. The study has not carried out a Cost Benefit (Harm) Analysis which could be expected of a multimillion £ investment plan. This study needs to be reviewed such that the harm which would be

delivered to this location, is demonstrably less than other locations. The study should also clearly state how additional costs have been weighed against element of harm. The option study does not address the clear direction on these matters given by the Inspectorates Scoping Opinion in December 2020, and it is essential that cost benefit analysis is delivered as part of the application.

Burbage Common

The common is the single most important green space in the immediate locality. Without doubt complete mitigation of the impact of having a rail terminal of the planned size next door to this treasured amenity is impossible. Further details of the topics which will be considered in this context are given below. It is essential that the maximum possible mitigation is achieved on all these topics:

- Community Green Space access – sense of place and openness
- General Community health and Well Being
- Environment – Trees ancient woodland – air quality
- Ecology – plant, and wildlife impact
- Light Pollution
- Noise Pollution
- Visual Landscape impact, particularly from the common area, sense of being in the countryside

Community Green Space access – sense of place and openness

Natural and semi natural green open space is at a premium in Burbage, with the pressure of housing developments in the village, there is no current prospect of additional land being made available. The open countryside surrounding the village, is needed to supplement the formal provision of green space within the village, this rail terminal development exacerbates this under-provision by reducing the public footpath networks to the west of the village.

General Community health and Well Being

Insufficient green space is being offered in the design to mitigate for the loss of openness and clean air, presently available to all users.

Environment – Trees ancient woodland – air quality

We consider there are insufficient mitigating measures to both improve the air pollution or reduce the impact on the environment for everyone and wildlife.

The environment could be improved by creating a green corridor of natural trees instead of unsightly acoustic barriers. Blending in with the natural landscape, habitat for wildlife and improving the biodiversity for all.

The increased height needed to cross the Common for the link road, is too prominent and suggested screening only emphasises the mass and visible traffic creating noise and air pollution of great magnitude.

It is not acceptable that there should be increased levels of air pollution in this market town and surrounding area, even if a general saving nationally.

Ecology – plant, and wildlife impact

Burbage Common consists of ancient woodland and open fields which support a huge biodiversity of plants, animals, and birds. There can be no absolute assurance that noise, chemical - both airborne and waterborne, dust and light pollution and the most likely invasion of rats, scavenger foxes etc will not adversely affect, reduce, or even decimate the wildlife on the common.

A planting of mature trees encircling the site would greatly both enhance and mitigate both light and air pollution and would be a minimum to mitigate these issues.

We believe the safety of the ecology of the site is a fundamental element of this proposed development.

Light Pollution

Further information is required on how the plans will minimise the spillage of light, particularly from the link road adjacent to Burbage Common.

The site will be open 24/7 creating a massive constant intrusion of light. If not mitigated effectively the lighting would remove the current dark sky, affecting all breeding and feeding patterns of all wildlife. The night sky would be polluted for both people and wildlife, creating a massive impact of the biodiversity of the area, no doubt visible from outer space.

Noise Pollution

Noise attenuation measures, including acoustic barriers up to six metres in height, with significant impact upon wildlife. The installation plans for these barriers will need to demonstrate how such an impact will be mitigated.

Visual Landscape impact, particularly from the common area, sense of being in the countryside
The proposed mass and height of this development would create an over-bearing effect to those wishing to enjoy clean air and 'the good-life' feeling when outside in the fields and trees.

Biodiversity

Although it is recognised that there will be a requirement in the development plans that a net gain of at least 10% of the biodiversity is achieved. It is essential that this planned gain is delivered in a way such that the local community benefits from enjoyment of this gain and any offsite 'off-set' is not located many miles from the community. It is essential that plans for this very large area of currently open countryside includes ecological corridors for wildlife.

The proposed site is situated right on the edge of Burbage Common and woods. This is a country park. This community asset value of Burbage Common and Woods is built upon the biodiversity which can be accessed at walking distance from both Hinckley and Burbage. An offset should be achieved at locations of a similar distance (i.e. not more than 30 min walk from the settlements of Hinckley or Burbage).

We do not believe the consultation fully answers the following questions and urge Tritax Symmetry to provide further and complete answers prior to submitting their application:

- What impact will this have on the existing environment?
- What will be the effect on families using it?
- How will the proposal to build bunds to hide the site demonstrate how these will not cause more disruption to wildlife, as their corridor of access will be restricted? and possible flooding.
- What additional measures can be implemented to reduce light / noise pollution to minimise the severe effect on wildlife?

Loss of Community Connections

It is essential that public footpaths which cross the development site are respected in terms of the access they give to the local communities and are not subject to excessive diversions which effectively break the connectivity.

We note the plans to reroute the bridleway on a corridor between the warehouses and the M69. This is an example of an excessive diversion, and we need to see what mitigation has been considered to ensure horses are not spooked by sudden noises in this congested area.

Traffic Impacts

Given there is no agreed traffic model with the local highway authorities it is not possible to provide detailed comments upon the highway proposals in addition to the comment already made about the quality of the consultation materials. We offer the following matters of principle which we believe should be addressed.

Motorway Resilience

Full plans should be included in the full application for resilience planning for the closure of the M69 due to accident or any other emergency. These plans should consider the likelihood of such closure, duration and the impact on the local highway network and its ability to cope with the closure. Such closures are not rare, with evidence of a typical 100 days being impacted each year.

HGV Parking Provision

The area already suffers from unwanted and inappropriate HGV overnight parking with associated anti-social practises which result from this parking, due to lack of facilities and toilets. Whilst the consultation states that HGV parking area, with driver welfare facilities will be included within the development plans, it provides no evidence of the number of such parking spaces, which are required to meet the needs of the HGV trips intended. Further the consultation gives no assurance that a robust analysis will be carried out prior to the submission of the application and that the full requirement of HGV parking spaces will be provided in the final application. These matters must be addressed prior to the final application.

Leicester – Nuneaton Railway

The rail route between Leicester and Nuneaton forms part of the strategic freight route between Felixstowe and the Midlands (and further) and this route already has numbers of freight services using the route.

Whatever the merits of a rail freight terminal on this section of railway, we consider it essential that the growth of passenger services on this line takes absolute priority for path opportunities for new services where a credible case is made for these services. Much is made regarding the carbon reduction agenda within the consultation documentation, by increasing freight transportation, but increased passenger services not only provide carbon benefits, but by integrated public transport provide tremendous social benefits in addition.

The detailed documentation provides evidence that the eastern end of this line connecting to the Midland Main Line at Wigston is nearing capacity at present and it is essential that this constraint, together with any other constraint on capacity is identified and a clear implementation plan is put in place. This must be in place before any attempt to increase rail freight on this line is progressed and that any such plans include unambiguously the necessary capacity for increased passenger service already outlined in the Midland Connect Strategy.

In similar concerns about capacity for Freight routes, Solihull Metropolitan Borough Council has said that they will not support the route from Southampton through Birmingham due to capacity constraints in Birmingham. [Scoping opinion adopted by Secretary of State 22 Dec 2020]. A clear demonstration of how such concerns can, and should be, addressed.

Many concerns have been raised regarding the impact of increased service on the operation of the level crossing in Narborough. It is essential that mitigation plans are implemented which fully address these concerns and presented in the final application.

Employment

The consultation considers land use and socioeconomic effect in chapter 7. In our opinion the chapter seeks to draw evidence together from several sources but fails to reach a conclusion as to the cause and effect of the various models. A National Strategic Rail Terminal should be located primarily based upon the demonstrated need for such a terminal in the context of a national network of terminals. In locating the terminal, the location should take account, of a suitable workforce. The assessment given in chapter 7 mixes the local employment position with a “need” for increased employment, paragraph 7.55 *“Strategic housing development at New Lubbesthorpe, Earl Shilton and Barwell are reported to deliver nearly 9,000 new homes to the South-West Growth Area, creating a demand for employment.”*

Figure 7.3 clearly shows an expected workforce being drawn from Leicester, Coventry, and Nuneaton. This is not surprising as the local workforce has no capacity to fill the expected 8,400 jobs. This is not contributing to reduction of carbon due to the increased commuting it would bring. Given such high levels of staff are expected to come from these areas, the plans should provide more opportunity for commuting to take place via rail and thus reducing commuting traffic.

Flood Risk

Local knowledge and experience suggest that flood risk is an extremely important and essential consideration. Whilst there are no major rivers in the immediate area which would suggest flood risk is not the same level as that associated with the flood plains of the River Soar in Leicestershire, possibly because there are no rivers flooding risk should be taken as seriously as river flooding.

The water table in the area, particularly on Burbage Common is already extremely near the surface and is evidenced during levels of high rainfall by extremely boggy conditions. Hinckley & Bosworth Borough Council has plans to develop a modest development (in comparison with the size Rail Terminal proposal), has been halted whilst ground water conditions are re-investigated. This site is only a few hundred yards from the proposed link road adjacent to Burbage Common.

We have read the consultation chapter which covers flood issues and believe the content does not provide the clear explanation to interested respondents in non-technical language that these issues have been fully investigated, assessed and full mitigation measures have been included in the plans, which are prepared in an understandable form to all interested parties.

The documentation already identifies that some watercourses, for example Thurlaston Brook, are currently poor and fail. It is essential that all such current underperformance is fully investigated, and full remedial measures are known and put in place.

On-site Power Generation

A gas fired power station is planned, including a large, tall chimney. This will include an energy centre with an electricity substation; roof-mounted solar photovoltaic panels with a generation capacity of up to 38 megawatts (MW), providing direct electricity supply to the building or exporting power to battery storage in the energy centre.

We seek assurance that this gas fired power station will be used for emergency situations only in the event of national grid supply problems and otherwise would be on stand-by. We also seek assurance that the emissions whilst operational are identified and built into the air quality management plan.

Yours faithfully

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