



East Hunsbury
Parish Council

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

By email: northamptongateway@pins.gsi.gov.uk

30th October 2018

Dear Sirs,

Application by Roxhill (Junction 15) Ltd – Northampton Gateway Rail Freight Interchange

Your ref: TR050006

Our registration identification number: 20010998

East Hunsbury Parish Council object to the Northampton Gateway proposal and make the following comments:

Traffic

We believe that distribution companies do not consider rail as “an efficient, sustainable and potentially more cost-effective alternative for the movement of goods than the traditional road based options”. The assumption has to be, therefore, that goods will be transported to and from the site by HGV.

The chief reason for this situation is the prioritisation of passenger services. As the National Infrastructure Commission recently said “To enact a 30% reduction in road freight intensity would require a three-fold increase in rail freight intensity which, against a backdrop of rising passenger numbers, “could not be accommodated on today’s already busy railway”¹. “

There is therefore a significant risk that prospective tenants will default to a road-based solution for their operations, and not enact the modal shift to rail that is intended.

The parish council have significant concerns about the expected increase in traffic that will be created by this site, both in respect of movements by HGV’s and employees getting to and from work. As the site will operate 24 hours a day the traffic generated will be a constant concern.

¹ “Congestion, Capacity and Carbon: Priorities for national infrastructure”, National Infrastructure Commission

The proposed site for the Roxhill development is adjacent to a proposed SRFI being put forward by Rail Central, and the cumulative effect of traffic movements from both of these sites should be taken into consideration. You should also be aware of the Northampton South SUE development which will see 1,300 new homes built between East Hunsbury and Collingtree.

What this means for East Hunsbury is an increase in traffic on its main through roads, but particularly Rowtee Road which connects the M1/A45 with Towcester Road, which will lead directly to the site. The roads are often slow moving at peak times, and especially if an incident has occurred on the A45 or M1.

The proposal to include a weight limit across East Hunsbury has its limitations as roads will still be accessible by HGV's for loading and unloading, and policing the adherence of the weight limit will be expected to be carried out by the haulage companies themselves.

Not all of the jobs created at the site will be filled by people living in Northampton. The traffic created by people travelling to and from work will impact on the parish, particularly as they will be travelling at peak times but also during times when we would normally expect the roads to be quieter. Travel to work will be a major issue, necessitating a significant upgrade in public transport, at a time when we are seeing funding for existing bus routes cut.

Air Quality

There is an Air Quality Management Area already in place between junctions 15 and 16 of the M1 and we would expect that the impact on this will be considered by Northampton Borough Council, as the expected increase in slow moving traffic will be significant.

Although the proposal includes details of car sharing and bus route improvement measures, we do not believe that this will deter employees from travelling alone by car and many will pass through East Hunsbury in doing so.

The parish council are concerned that air pollution will increase, particularly on Rowtree Road, and seek to protect local residents and school children at East Hunsbury Primary School (which abuts Rowtree Road).

Sustainability

We do not believe that this proposal is a sustainable development and does not meet the criteria of the National Planning Policy Framework [point 187, page 45] "to secure developments that improve the economic, social and environmental conditions of the area".

We accept that there is unmet demand for largescale warehouses to house road-based operations, but do not believe that this proposal is in the right place to meet that demand.

DIRFT is less than 20 miles away and is expanding speculatively. There is considerable doubt whether a second (or third) SRFI is needed before HS2 is operational in 2033.

The proposal relies on the continued growth of the economy and consumer spending to justify its need. Consumer spending is depressed and the economy is not growing as previously forecast. Companies are considering the implications of Brexit for their business and how they operate in the future. The Economic and fiscal outlook published by the Office for Budget Responsibility in March 2018 forecast GDP as follows:

	2017	2018	2019	2020	2021	2022
GDP forecast March 2018	1.7	1.5	1.3	1.3	1.4	1.5

This is compared to previous published outlooks which show how the forecast has changed over time.

	2017	2018	2019	2020	2021	2022
GDP forecast November 2017	1.5	1.4	1.3	1.3	1.5	1.6
GDP forecast March 2017	2.0	1.6	1.7	1.9	2.0	
GDP forecast November 2016	1.4	1.7	2.1	2.1	2.0	
GDP forecast March 2016	2.2	2.1	2.1	2.1		

Job creation

The proposal claims that significant jobs will be created. The main purpose of an SRFI is to encourage the transfer of road freight to rail, therefore, it is reasonable to assume that the majority of jobs already exist on other road-based sites who will relocate for better facilities.

Unemployment in Northamptonshire is low, and there are already a high percentage of logistics job available, and so it is expected that jobs will be filled by employees coming from outside of the county, presumably by car.

The Northampton SUE development is unlikely to provide much of the workforce expansion, as the housing development is intended for people from all walks of life, not just logistics workers.

Conclusion

The parish council does not believe that there is a need or demand for rail connected warehousing at this site. The proposed scale of the development is in excess of that needed in Northamptonshire, and the parish council believe that this proposal and the proposal by Rail Central should be determined jointly so that the effects of any developments can be mitigated appropriately.

In particular, consideration should be made for:

- Disruption to local roads whilst building is taking place, and arrangements for management of traffic;
- Mitigation of the effects of construction traffic to East Hunsbury;
- Mitigation of the noise and disruption of construction to East Hunsbury;
- Mitigation for the increase of traffic on Rowtree Road;
- Mitigating measures to prevent/prohibit the movement of HGV's through East Hunsbury;
- Incentives for use of alternative forms of transport for employees at the site;
- Agreed contribution monies available for the provision of public transport upgrades;
- Agreed shift phasing to reduce the impact on schools and local roads through East Hunsbury;
- Air quality assessment to be undertaken on an ongoing basis on Rowtree Road, with mitigating measures to be put in place if required.

Yours sincerely



Caroline Holgate
Clerk to the Council