

COLLINGTREE PARISH COUNCIL

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By Email NorthamptonGateway@pins.gsi.gov.uk

cc. Andrea Leadsom MP andrea.leadsom.mp@parliament.uk

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

To the Planning Inspectorate

Application by Roxhill Ltd for an Order Granting Development Consent for their Northampton Gateway Strategic Rail Freight Interchange.

Please accept this Written Representation from Collingtree Parish Council, as part of the Examination process for the above application.

In this document we refer specifically to sections of the 'Short Explanatory Document' distributed by the Applicant during the consultation stage as we regard the full set of detailed binders supplied to Parish Councils and Libraries, as unreasonably complex and difficult to access.

The Parish Council believes that many of the references in the document to planning policies, national policy statements, market potential and particularly likely environmental impacts, are highly selective and misleading for members of the general public. The following comments are representative of our concerns.

Section 2 - The site

- It is disappointing that in the description of the site location, the Applicant does not mention Collingtree and Grange Park which are the closest communities. As Collingtree previously been omitted from many of the initial maps of the area, we feel this may be deliberate.
- Under 2.5 it is stated that *‘The number and precise location of the proposed buildings and their detailed appearance are not yet known or fixed.’* This is an insufficient basis for a pre-application consultation.
- 2.13 describes Government policy as *‘encouraging a shift of distribution activity from road to rail to both help deliver environmental improvements, such as air quality and climate change objectives, and remove HGV’s from the roads to help reduce congestion’* However, elsewhere the document concedes that there will be a decrease in air quality close to the site and an increase in HGV’s in the immediate area.
- Under 2.16 it states that *‘the proposal responds directly to national policy on the need for a NETWORK of SRFI’s across the UK’* This proposal does not contribute to a strategic network with DIRFT only 18 miles away and only 2 current proposals for SRFI’s outside the Midlands.

Section 3 Policy & Market Context

- The justification for an SRFI in this location (in 3.3) is based entirely on the ‘Golden Triangle’ concept. This may apply to warehouse location but not necessarily, an RFI. The claim that the proposed location brings the *‘vast majority of the UK within a four hour drive’* can be made for any of the RFI proposals currently in the pipeline. Policy guidance calls for a NETWORK of SRFI’s. This proposal and other emerging schemes from developers are creating a CLUSTER of proposals in the Midlands.
- There has been concern since the 1970’s over Northamptonshire’s dependence on logistics and the limited type of employment they provide. It remains the ‘vision’ of Northamptonshire County Council to attract high quality, high skill employment. This in turn depends on the offer of living in a high quality environment. NCC Planning policy also remains to encourage large scale development in the north of the County.
- The consultation document concedes that a further study is underway to assess the market for Northampton Gateway. We take this as an admission that at this stage, the application is largely speculative.

National Policy

- The document (3.7) quotes NPSNN which states that SRFI’s *‘allow rail to undertake the long-haul primary trunk journey with other modes (usually road) providing the final leg’*. It also states that RFI’s *‘can optimise the use of rail in maximising long haul by rail and minimising the secondary leg by road’*. The consultation has provided no evidence that Northampton

Gateway will optimise the use of rail, that rail trunk haul would be minimised, that secondary distribution would be minimised, that costs to rail users would be reduced and that overall trip mileage of freight on national and local networks would be reduced.

Local and Planning Policy Context

- The Consultation document refers (3.16) to the West Northamptonshire Joint Core Strategy but fails to make clear that the J15 site is specifically excluded from the planning strategy for industrial development. This view was endorsed by the Planning Inspector at Public Inquiry. The impression is given in the consultation document that Northampton Gateway somehow complements the Core Strategy – it does not.

Distribution Market Context

- The Short Explanatory document concedes (3.17) that a further study is being undertaken to assess the local market for rail freight. Even if the demand is there for greatly increased freight by rail – it is still unclear whether the rail network has the ability to provide the capacity. Once again the Stage 2 Consultation is premature in the absence of key data. The government’s principal adviser on infrastructure (The National Infrastructure Commission) has discounted a significant switch to rail freight and said that a one third reduction in road freight would need a threefold increase in rail freight capacity.
- The document argues (3.27) that Northampton Gateway is close to another SRFI at Daventry but serves a different core catchment and on the other hand it argues that core catchments can successfully overlap. Either way this is not consistent with Government policy to achieve a ‘Strategic Network’ of SRFI’s throughout the UK.

Section 4 Likely Environmental Impacts

Although we are sceptical of the reasons why Northampton Gateway should be considered as a development of ‘National Significance’ rather than a development proposal through the normal Local Planning process – it is the environmental impacts that are of the most concern.

Point 4.1 of Section 4 states *“As with any large development scheme, the Proposed Development will provide a mixture of potentially very positive as well as some potentially adverse effects. Through a high quality design which considers the context of the site... many potential adverse effects can be successfully minimised, or even eliminated altogether, and mitigation measures can be incorporated into the design of the development.”*

4.3 goes on to say that all this will be covered in the Draft Environmental Statement but that this is still *‘work in progress and will be finalised in due course’* This is insufficient basis for a meaningful consultation.

Collingtree Parish Council registered its objections to the original Scoping Document in October 2016 listing its concerns over the eleven Environmental Impacts highlighted by the Planning

Inspectorate but particularly focussing on the issues surrounding air, noise and light pollution and traffic congestion on local roads. There has been no evidence provided by Roxhill that shows that these adverse impacts can either be avoided or mitigated. This is illustrated by the following specific examples.

Adequacy of Air Quality Baseline measurement assessment

The application site is close to two AQMA's, one being the length of the M1 bordering the site from Junction 15 to 16 and the other a section of the A45 less than 1 mile away close to the Queen Eleanor roundabout. Almost two thirds of the additional HGV trips generated by Northampton Gateway would pass through one or both of these AQMA's. There is a further AQMA on the A5 in Towcester some miles to the south of the site which is likely to be impacted.

In Collingtree Village, the direct impact will be on some 1370 households. There are 350 existing households and with planning consent for a further 1000 plus another 21 affordable homes to be built for the borough council. All these houses, both existing and consented, are within a short distance of the M1 which forms the northern boundary of the proposed SRFI and warehouse development. In addition there are Allotment gardens, a Cricket Club, a Tennis Club, a junior football training ground and a primary school within 100 meters of this boundary.

The draft Northampton Borough Council Air Quality Report for 2017 sets out how the LA monitors AQ in line with its statutory obligations and within the resources available to it. The NBC Environmental Health Department has confirmed that *continuous automatic monitoring* is now only carried out at one location within the borough and this is located on Wellingborough Road, (X OS Grid 476497) & (Y OS Grid 260960) some 7 miles from the proposed site. The NBC Environmental Health Department has also confirmed that monitoring of AQMA 1 (the M1 Motorway) is limited to **one** diffusion tube in Collingtree Village and **one** tube where the A43 crosses the M1 at the Three Counties Crematorium (3 miles from the proposed site).

The M1 is the boundary between NBC and South Northants DC and the proposed site is entirely within SNC. This authority has minimal test locations as the proposed site is farmland with few receptors other than wildlife habitat. South Northants District Council has only undertaken automatic monitoring at one location in central Towcester – but this has now discontinued. Consequently all the current monitoring of AQ in relation to this major proposal is dependent on the use of diffusion tubes which are then adjusted using data from an automatic analyser 7 miles away. The nearest Defra automatic analyser is 10 miles away at Spring Park, Kingsthorpe. (X OS Grid 476111) & (Y OS Grid 264505). The most recent diffusion tube data available from NBC shows adjusted ($\mu\text{g}/\text{m}^3$) levels of 33.5 at Collingtree High Street and 37.2 at the A43 Cemetery location. The developer Roxhill has also used tubes to monitor four locations in Collingtree showing levels around 34.0.

Collingtree Parish Council has also recently undertaken its own measurements at 10 locations (results validated and adjusted by Gradko Ltd - the same laboratory used by NBC) that show validated results ranging from 54.34 at Collingtree High Street (50 metres from the motorway and well above the legal limit of 40) and reaching 26.50 outside Collingtree Primary School (100 metres).

Additional AQ testing has also been carried out by local Parish Councils at various receptors in the surrounding villages of Milton Malsor, Roade, Blisworth and Towcester. The results indicate that there are significant 'hot spots' all around the proposed site showing measurements ($\mu\text{g}/\text{m}^3$) (ranging from 49.75 to 78.4).

Impact of Highway Proposals on Collingtree and A45

The Northampton Gateway proposals for the A45 corridor will increase pollution and journey times resulting in a net disbenefit to Collingtree and Northampton town, as well as to commuters using the A508 corridor, for the following reasons:

The proposals for the road works from J15 to the Queen Eleanor interchange are a traffic light-controlled feed-in to the A45 from Watering Lane, Collingtree. There appears to be sufficient room to extend the slip road to make traffic lights unnecessary. From there to the Queen Eleanor interchange, which includes an existing AQMA area, the only proposals to prevent increased congestion and pollution from traffic travelling in and out of Northampton town or to and from more northerly areas is to reduce the speed limit and leave any tinkering with the Queen Eleanor interchange to the LHA. They do not overcome the impact of a dramatic increase in traffic volume that would be created in addition to natural growth, or the increases from concentration of logistics companies relying on mass movement of workers, or the transporting of goods via HGVs instead of local delivery vans, and the huge increase in staff needing to make long-distance commutes.

The proposed upgrades will impose a reduction of the speed limit from 70mph to 50mph. This would cause a further disbenefit by increasing journey times. Experience of current actual traffic speeds, especially in the 60 mph section north of the Queen Eleanor junction; suggest that a lower speed would not generally be adhered to thus increasing the likelihood of accidents on an even more congested trunk route.

Another factor to mention is the current M1 Smart Motorway – Junction 15 upgrade taking place at present which will bring traffic closer to many houses in Collingtree village and turn the motorway from 6 lanes of traffic to 8 lanes. Which will see a 25% increase of traffic which can only add to the already polluted air and noise. Works are not due to end until December 2021.

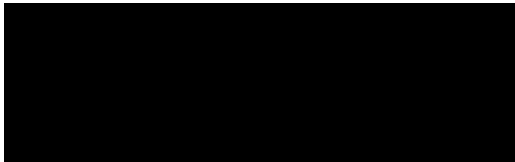
Consultation Programme

There is widespread concern in Collingtree and other communities surrounding the proposed site. Petitions signatures in excess of 12,000 both paper based and online have been obtained. In Collingtree alone 350 residents have signed a petition to our Member of Parliament. Every public meeting in this and adjoining parishes has roundly condemned the proposal. 500 people joined a Protest March across the site. Responses to Roxhill's Public Exhibitions have been largely critical. Some 28 Parish Councils in the area have signed a declaration drawing attention to the requirement of Section 11 of the National Planning Framework which is aimed at preventing new developments creating adverse environmental effects.

We believe that the information presented during the consultation has been selective, misleading, out of date and presented in a form inaccessible to most members of the public. Collingtree Parish Council can see no benefits whatsoever from this proposal that would compensate for the hugely destructive impact of this unnecessary development.

We also fully support the more detailed representations made by the Stop Northampton Gateway Action Group and also those from the 30 parish councils (including ourselves) who are members of the 'Parishes against Pollution' group. We would be grateful if you would ensure that all these representations are fully noted.

Yours faithfully



Shirley Wong
Parish Clerk
Collingtree Parish Council