

**From:** Andrew Bodman [m [REDACTED]]  
**Sent:** 16 October 2018 15:00  
**To:** Northampton Gateway  
**Subject:** Northampton Gateway meetings

Dear Ms Mignano

Registration number: 20011120

It was good to meet you at the Northampton Gateway meetings last week.

I spoke at both the Preliminary Meeting and the Open Floor Hearing sessions. I provide two files which cover the content of what I said during each of those sessions.

In the Open Floor Hearing I made reference to the response Northamptonshire County Council provided to Roxhill following their statutory consultation. I attach a copy of that document and the most relevant page in this context is page 5.

I know that you are not considering the Rail Central SRFI at this stage. However the issues which Northampton Gateway and Rail Central will create on the "Northampton Loop" line will be very similar. Northamptonshire County Council's response to the Rail Central consultation was some five months later and hence their studying and analysis had developed further. Their comments on rail issues will be found on pages 7 and 8. Their comments on page 9 are equally applicable to both applications.

These points will doubtless be included in Northamptonshire County Council's written representation on transport matters. However I thought that early sight of these topics may well be of benefit to the Planning Inspectorate team examining the Northampton Gateway application.

Kind regards

Andrew Bodman

[REDACTED]  
[REDACTED]  
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Northampton Gateway  
Preliminary Meeting 9<sup>th</sup> October 2018

Applications for both the Northampton Gateway and the Rail Central strategic rail freight interchanges have been submitted to the Planning Inspectorate and are running about four months apart. Geographically they would be immediately adjacent to each other.

There are many residents, councillors and council officials that are very interested in both applications due to their proximity to each other. They are likely to wish to attend the meetings and hearings for both strategic rail freight interchanges. I would like to request that the teams allocated within the Planning Inspectorate to each of these SRFIs work together in terms of scheduling meetings and hearings to ensure that no date clashes of meetings occur. This is likely to be particularly relevant in December 2018 and March 2019, although other months could be affected.

Andrew Bodman

Northampton Gateway  
Open Floor Hearing 10<sup>th</sup> October 2018

I observe that the host authority Northamptonshire County Council (NCC) has not been listed as a provider of a Statement of Common Ground concerning rail matters, although Network Rail and Warwickshire County Council have been requested to do so.

From the comments made so far by Warwickshire County Council, it appears that their main interest is to facilitate the ability of the proposed Rugby Parkway station to be served by passenger trains in future, in the event that plans for this station proceed. It is conceivable that Warwickshire County Council may be more familiar with the Chiltern Line than the West Coast Main Line.

In my view, the absence of a statement of common ground from Northamptonshire County Council concerning rail is significant. The host authority is familiar with the usage of the West Coast Main Line including the element which passes through Northampton. It has gained an insight into future usage through a careful study of Network Rail's West Coast Main Line Capacity Plus document as well as using other sources of information. Northamptonshire County Council is therefore well placed to assess the likely impact of additional freight train paths to serve the proposed Northampton Gateway SRFI and their likely effect on passenger rail services.

In their response to the Northampton Gateway's statutory consultation, NCC concluded

*We also note that in the emerging West Coast Capacity Plus Study referred to above, Network Rail have identified a significant future constraint in capacity between Denbigh Hall North Junction and Milton Keynes Central in particular, but also over the entirety of the Northampton Loop, such that increasing freight services over the Loop might require a reduction in the passenger service to Northampton.*

Roxhill does not appear to have taken on board these issues raised by NCC over 10 months ago concerning rail.

It is my understanding that NCC is unable to provide a Statement of Common Ground in respect of rail because there appears to be a lack of common ground.

With the greatest of respect to Warwickshire County Council, I would suggest that host authority's written representation may provide a clearer picture of the impact of Northampton Gateway's additional freight trains than the neighbouring authority's statement of common ground on rail.

I would be happy to provide a copy of NCC's response to Northampton Gateway's statutory consultation to give you an initial view of the situation.

Andrew Bodman

**The Northampton Gateway Rail Freight Interchange – Order 201X  
Local Highway Authority Response to Stage 2 Statutory Public Consultation  
Pursuant to Section 42 of the Planning Act 2008 and Regulation 11 of the  
Infrastructure Planning (EIA) Regulations 2009**

Dear Sir/Madam,

Thank you for consulting Northamptonshire Highways as the Local Highway Authority (LHA) for Northamptonshire. This response is made without prejudice to any views expressed by other functions within Northamptonshire County Council, or those of Highways England with regard to the strategic road network.

This response represents the combined comments of all relevant sections of Northamptonshire Highways, having consulted those teams internally.

**Transport Assessment**

The LHA has met the Applicant of the Northampton Gateway proposals and their highways consultants/engineers, along with Highways England, for some time as part of a Transport Working Group (TWG). This TWG has resulted in agreement over the likely traffic predicted to be generated by the proposed development (both light and heavy vehicles) over the course of a typical day, and in particular the peak hours on the highway network.

A methodology for distributing the development trips on the road network is also agreed, based on utilisation of the County Council's Strategic Transport Model, known as the NSTM. The NSTM has been further validated in the area surrounding the proposed development to ensure that it is fit for purpose as the basis for forecasting future traffic levels.

In line with the Core Strategy Plan Period the future year for assessment purposes is 2031.

Both the baseline and forecast NSTM models have been signed off by the County Council as fit for purpose.

The initial results of the NSTM future year modelling indicate that there will be significant increases in traffic in a number of locations, including: on the A508; the M1 the A45, and; the Northampton southern inner ring road.

The developers have assessed the operation of a number of junctions, as presented within their Stage 2 consultation. The detailed individual junction assessments are yet to be agreed with the LHA. Also, the LHA requires the study area to be extended to include more junctions north of the M1, and in particular the A45 and inner ring road.

*The views, observations, comments and recommendations contained in this response represent those of Northamptonshire Highways on behalf of Northamptonshire County Council as Local Highway Authority and in no other function or authority.*

## Initial highway mitigation proposed

Notwithstanding the above and without prejudice to any detailed comments the LHA will make on the operation of the junctions, the LHA has considered the mitigation proposed to date (primarily on Junctions 15 and 15a of the M1, and along the A508 including a by-pass for the village of Roade) and would initially comment as follows:

- The principle of improving the M1 junctions is agreed, as is the need to consider these junction improvements in the context of the HE's 'Smart Motorway' program.
- The M1 J15 works would require the removal of the existing lay-by on the A45 Northbound. Given how well utilised this lay-by is the LHA is concerned by this in the context of known issues associated with inappropriately parked HGV's in Northamptonshire.
- Junction 15A. The existing Public Footpath KS2/LA13 is down to be reviewed as part of the WCHAR (Walking, Cycling and Horse-riding) Audit. No facilities are provided at the exiting location for users to cross. Potentially some provision may be required at this location and sufficient width/protection for pedestrians may be required within the central refuge.
- The bus stop outside the Development directly as the road splits. This may lead to rear end shunts for vehicle merging into lane 1 behind a stationary bus and reduces the lane entry significantly into the roundabout. The Bus stop should be relocated into a separate layby to address this issue.
- It would be advantageous to ensure the Toucan Crossing on the eastern exit from the new roundabout is staggered and a split stage crossing. In addition careful consideration of the landscaping of the development land needs to be reviewed to ensure a suitable visibility of the Primary heads of the proposed crossing.
- No Gantry sign is proposed on the A508 approach to Junction 15. This is a complex layout that may benefit from a Gantry sign.
- The proposal to physically restrict HGV trips exiting the site from turning right on to the A508 is agreed, as is the principle of monitoring this through the provision of Automatic Number Plate Recognition cameras (the locating of these on the Highway is still under discussion);
- The applicant is proposing to restrict the A508 junction with Courteenhall Road (incorrectly labelled in the consultation plans as 'Blisworth Road') to 'left-in, left-out' manoeuvres only, though the provision of a physical island. The principle of this accepted. However, this scheme along with a proposed roundabout on the A508 Roade By-Pass at Knock Lane would increase the traffic flows on Knock Lane, which is currently a narrow rural road. The LHA would therefore require improvements to Knock Lane to be provided, to include widening of the Stoke Road junction and localised widening along its length, and on the bend.
- Grafton Regis Ghost Island – Based on the previous collisions at this junction it would be beneficial if a Physical Island could be included on the northbound approach to protect waiting right turners. A controlled crossing may also be required to assist in accessing the bus stops.

- The LHA's 'Speed Limit Review Panel' considered all the proposed Speed Limit amendments in the October meeting and provided the following summary:

| Location / Description                         | Change Requested                         | Panel Outcome | Comments  |
|--|--|---------------|---|
| A45 / M1 roundabout                            | Increase speed limit from 40mph to 50mph | Agreed        |   |
| A45 (between M1 and Queen Eleanor interchange) | Decrease speed limit from 70mph to 50mph | Agreed        | <ul style="list-style-type: none"> <li>Only as far as BP garage and not all the way to the Queen Eleanor interchange</li> <li>Could consideration be made to changing the BP garage exit point onto the slip road?</li> </ul> |
| Ash Lane (Collingtree)                         | Decrease speed limit from 30mph to 20mph | On hold       | <ul style="list-style-type: none"> <li>Current consultation ongoing for a different part of Ash Lane. Once resolved panel will pass comment on this proposal</li> </ul>   |
| A508 (between M1 and current 50mph limit)      | Decrease speed limit from 60mph to 50mph | Agreed        |   |
| New Roade bypass                               | Set as 60mph                             | Agreed        |   |
| Blisworth Road (Roade)                         | Re-align and extend 30mph limit          | Agreed        |   |
| A508 (north of Roade – up to new roundabout)   | Decrease speed limit from 50mph to 30mph | Declined      | <ul style="list-style-type: none"> <li>Panel felt that this would not be conformed to, so it should remain as 50mph</li> </ul>  |
| A508 (south of Roade – up to new roundabout)   | Decrease speed limit from 50mph to 40mph | Declined      | <ul style="list-style-type: none"> <li>Panel felt that this would not be conformed to, so it should remain as 50mph</li> </ul>  |

- As it can be seen from the above, further discussion is required regarding the speed limit proposals existing Roade north and south from the by-pass.

## Roade By-Pass

- The LHA is supportive of the principle of a Roade By-pass, and the preferred route chosen.
- The development of the proposals to this stage is comprehensive and appears to comply with all the requirements of DMRB for a 100kph design speed and the transport modelling appears to be WebTAG compliant.
- An S2 rural single carriageway road (7.3m carriageway with 1m hard strips both sides) is being promoted, although the design allows for future dualling.
- Roundabouts have been sized to accommodate future dualling
- Horizontal alignment radii one step below desirable minimum (510m) has been used. This is the most favourable selection as it will avoid dubious overtaking as a single carriageway design, whilst facilitating future dualling.
- Visibility at the pedestrian crossing points at ch. 600 and 2000 should be shown
- Tracking for HGVs are required at the new junctions. The new roundabouts should be tracked for an HGV travelling into the village circulating with an HGV using the bypass. The lane directions are not shown.
- As there is a significant increase in HGVs using the route as a result of the development, consideration should be given to HGVs attempting to pass at the roundabouts and sufficient taper provided for them to merge. In addition there appears to be insufficient overtaking distance throughout the bypass which will encourage passing at the roundabouts so sufficient taper should be provided to allow this.
- Clarification is required as to who will maintain the proposed environmental bund.

## Internal Layout

The detail of the internal layout will be the subject of further approvals, but the applicant should ensure that the parking numbers (cycling, cars, HGV's etc.) are to be in accordance with the County Council's adopted Parking Standards.

As currently shown there is a lack of footpaths within the site.

The main internal spine road needs to be of sufficient width to accommodate parked HGV's. The proposed Lorry Park for on-site HGV's is welcome.

In terms of motorcycle parking provision in the Travel Plan more emphasis should be placed on the many benefits of commuting by M/C as highlighted within the Motorcycle Industry Association (MCIA) recently launched programme in conjunction with the National Police Chiefs Council (NPCC) - Realising the Motorcycle Opportunity – A motorcycle safety and transport policy framework.

We welcome the level of proposed spaces for electric vehicle charging.

## Walking and cycling connectivity and Public Rights of Way

We welcome the provision currently proposed to the development site for walkers and cyclists, but in addition seek the following provision:

The proposed roundabout junction of the Roade Bypass with Blisworth Road/Knock Lane requires provision to assist cyclists travelling between Blisworth and Roade (and vice versa) to cross the bypass.

The Rookery Lane/Ashton Road junction of the A508, which is proposed for re-alignment also requires a facility for cyclists travelling from Ashton to Stoke Bruerne (and vice versa) to safely cross the A508.

The proposal to create a shared-use facility alongside the A508 running south from junction 15 is currently shown as ending at the junction with the un-named road that leads to Courteenhall and Quinton. I suggest that this facility would be much more useful if it was continued alongside the A508 as far as Roade, thereby enabling easy and safe access by pedal cycle from this and surrounding villages. It would appear that there is currently a footway with additional verge width along much of the western side of the A508 from junction 15 of the M1 to Roade, which would probably accommodate a shared-use facility better than some of the eastern side. The existing traffic island situated in the vicinity of the un-named road to Courteenhall could then potentially be amended to allow refuge for cyclists wishing to access the shared-use facility from this minor road.

The Public Rights of Way proposals are yet to be agreed.

The LHA would suggest a meeting to discuss the proposals and agree a way forward.

## Public Transport

The Public Transport Strategy proposed by the developer is yet to be agreed at this stage, and discussion are on-going to ensure compliance with the County Council's adopted Public Transport Strategy.

## Rail Freight Proposals

The County Council, as local transport authority, has a duty to plan for transport, to, from and within its area, including rail. The County Council has therefore prepared the Northamptonshire Rail Strategy (January 2013).

<https://www3.northamptonshire.gov.uk/councilservices/northamptonshire-highways/transport-plans-and-policies/Documents/Northamptonshire%20Rail%20Strategy.pdf>

A key part of our strategy is an improvement in future passenger services to Northampton.

We are somewhat surprised that the draft Environmental Statement for Northampton Gateway does not include an analysis of the impacts of the proposal on the rail network, although we note that Draft Rail Operations and Rail Capacity Reports have been published as part of the consultation. We consider it important that the rail impacts of the development are included in the final Environmental Statement in order to demonstrate any impact on the rail network from the development.

We would point out that there is an apparent inconsistency in the conclusions drawn in Section 9 of the Draft Rail Capacity Report which states at 9.1 that the Department for Transport's intention post-HS2 is to create more capacity on the southern end of the West Coast Main Line for intermediate stations, and at 9.2 that this will create more capacity for freight services on the Slow Lines. Northampton is one of the largest intermediate stations on the West Coast Main Line and yet is only served by the Slow Lines, so we are unclear how both these statements can be achieved without Northampton and Long Buckby alone receiving a poorer service.

The County Council has been involved as a stakeholder in Network Rail's West Coast Capacity Plus Study, and we understand from this that the major constraint on performance of up freight trains is their ability to climb the approximately 1 in 200 gradient from Northampton to Roade following the speed restriction under West Bridge immediately south of Northampton station. An examination of Network Rail's working timetables shows a timing of 8 minutes from Northampton to Hanslope Junction of a passenger train stopping at Northampton, and at least 11 minutes for freight services. This is the section of line on which it is proposed that the rail freight interchange will be built.

While the Draft Rail Capacity Study makes reference to the general availability of paths for freight services it would be useful for more detail to be given of the specific impact of the proposed development.

In particular:

- What is the estimated running time for a train from the rail freight terminal to Hanslope Junction, as this will presumably be less than for a train passing Northampton this be a lesser constraint for pathing purposes.
- What is the coincidence of available paths on up and down lines to allow down (northbound) trains to enter or leave the rail freight terminal. This is important to ensure that these trains do not cause delay to other services.

We also note that in the emerging West Coast Capacity Plus Study referred to above, Network Rail have identified a significant future constraint in capacity between Denbigh Hall North Junction and Milton Keynes Central in particular, but also over the entirety of the Northampton Loop, such that increasing freight services over the Loop might require a reduction in the passenger service to Northampton. We feel that this issue should be addressed in the ES, to ensure that the proposal does not make this more likely.

## Summary

As many of the items above are subject to on-going work and discussions, the LHA shall comment further at the appropriate stage.

Rob Sim-Jones  
Principal Engineer – (Principal Lead) Development Management

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**The Rail Central Rail Freight Interchange and Highway Order 201X  
Local Highway Authority Response to Stage 2 Statutory Public Consultation  
Pursuant to Section 42 of the Planning Act 2008 and Regulation 11 of the  
Infrastructure Planning (EIA) Regulations 2009**

Dear Sir/Madam,

Thank you for consulting Northamptonshire Highways as the Local Highway Authority (LHA) for Northamptonshire. This response is made without prejudice to any views expressed by other functions within Northamptonshire County Council (NCC), or those of Highways England (HE) with regard to the strategic road network.

This response represents the combined comments of all relevant sections of Northamptonshire Highways, having consulted those teams internally.

**Transport Assessment**

Northamptonshire Highways has been working with the Rail Central Team as part of a joint transport working group also attended by HE to agree the inputs and methodology to be applied when predicting the transport and travel impacts of the Rail Central development. The minutes of these meetings are not however agreed.

The use of the Northamptonshire Strategic Transport Model (NSTM) to determine the strategic impacts of the development has been agreed with the Transport Working Group, as has the use of the Highways England VISSIM model for the M1 and associated junctions. The trip generation of the site, based upon the proposed development area has also been agreed, as has the use of the NSTM to distribute traffic and assign it to the highway network.

In line with the Core Strategy Plan Periods across Northamptonshire the future year for assessment purposes is 2031.

Both the baseline and forecast NSTM models have been signed off by the County Council as fit for purpose.

At this point in time the modelling work for the development, based upon the above methodology, is ongoing and yet to be either finalised or agreed. As such any detailed junction modelling and associated reporting of impacts is also yet to be agreed, as is any resultant mitigation strategy. As the scheme develops NCC will continue to work with the rest of the joint transport working group and will comment further when appropriate. As such the current schedule of mitigation works as identified in the consultation material may be subject to change, including geographical coverage and scale / form of works.

*The views, observations, comments and recommendations contained in this response represent those of Northamptonshire Highways on behalf of Northamptonshire County Council as Local Highway Authority and in no other function or authority.*

## Highway Mitigation

A number of highway mitigation schemes are presented within the Stage 2 Consultation documentation.

As referenced above, the impacts of the development and the mitigation proposed are not agreed by Northamptonshire Highways at this stage and further discussion is required to consider the appropriate mitigation strategy for this development.

Notwithstanding the above, please note the following initial comments regarding some of the schemes presented:

- Junction 16 – As part of the A45 Daventry Development Link Road works a new footpath link is being constructed towards Junction 16 from the first new roundabout west of M1 J16. No facilities have been proposed with the works at Junction 16 to accommodate users to cross the various arms to gain access to the footway on the A4500 Weedon Rd. An off highway cycle/pedestrian facility should therefore be included within any works.
- Hunsbarrow Road Roundabout – A visibility screen was installed here a few years ago to reduce entry speed onto the roundabout. This has been extremely effective in reducing collisions and should be retained as part of the design. It is currently in timber but recently Highways England has been using plain Chevreflex systems that are passively safe, this may therefore be the best system to incorporate.
- Towcester Road South Approach to the Mereway (Tesco) Roundabout. There is currently a Bus Lane on this approach. It needs to be detailed how this will be incorporated in to the proposed works.

## **Technical Audit (including Road Safety Audit - RSA, Waling Cycling and Horse Riding Assessment and Review - WCHAR, and Departures from Standards)**

Once an agreed position has been reached over the highways mitigation for the scheme, all highway works will be required to be technically audited by Northamptonshire Highways, and prior to the Development Consent Order (DCO) provisions being agreed the following matters are to be resolved to the satisfaction of Northamptonshire Highways:

- Road Safety Audits (Stage 1)
- WCHAR's
- Any departures from Standard to be agreed with NCC
- Any speed limit changes agreed with NCC's Speed Limit Review Panel
- Signage Strategy
- Any Weight Limit proposals
- Any Stopping Up of the highway proposed
- Any dedication of public highway
- Agreement In Principle (AIP's) for any structures
- Any changes to Public Rights of Way

### **Development Consent Order drafting**

Northamptonshire Highways has been unable to find any suggested drafting for the DCO within the Stage 2 Consultation documentation. Of particular interest is the Protective Provisions for the County Council, which will need to be checked by NCC's legal team.

### **Travel Plan**

The Framework Travel Plan is a good basis to build on and add in detail as occupiers take control of the units. Please ensure adequate parking, and cycle/motorcycle provision is installed at the build stage and access to Electric Vehicle charging points around the Rail Freight Terminal.

### **Public Transport**

As shown in the link below, the commercial bus service passing the Site on Northampton Road has been reduced to broadly hourly throughout the day:

<http://www.northamptonshire.gov.uk/en/councilservices/Transport/journey-planning/pubtrans/Documents/Bus%20Timetables/SM-N89-Sep2017.pdf>

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Bus service provision (to/from Northampton)

In view of the reduction in the commercial bus service on Northampton Road it will be even more appropriate that the developer funds bespoke bus journeys between Northampton town centre and the Site.

To achieve the 20% modal shift target set out in the West Northamptonshire Joint Core Strategy and the Northamptonshire Transportation Plan a bespoke journey to or from Northampton Town Centre should be provided by the developer on each instance where 50 members of staff (throughout the whole site) start or finish work within a 15 minute window. The exception being where the work entrance for these members of staff is within 400 metres safe walking route of the proposed bus interchange (marked B on the Draft Illustrative Masterplan) and a comparable alternative commercial bus journey to or from Northampton town centre is available at the bus interchange within 30 minutes before the start or after the end of the shift. This does clearly rely however on Stagecoach agreeing with the Developer that the appropriate Northampton Road bus journey shall be diverted via the proposed bus interchange.

This '50 members of staff' obligation to be triggered by the First Occupation of the Site and Discharged 5 years after completion of the Site. The route between the new A43 junction and Northampton town centre to be agreed between the Developer and NCC.

The bespoke bus service either to be funded by a Contribution from the Developer direct to NCC, or preferably through a Service Level Agreement between the Developer and a bus company which NCC is party to. This service to operate every day of the year when the '50 members of staff' criteria is met.

Bus service provision (to/from Towcester)

This provision is not currently identified within the proposals; it will however need to be considered for the following reasons:

- The Site is located between Northampton and Towcester
- As shown on the referenced timetable the current Northampton Road bus service operates between Northampton and Towcester, allowing services from the Towcester direction to be diverted via the site at relatively minimal cost
- It is likely that a significant number of workers will come from Towcester, Towcester Vale SUE and the neighbouring villages

Therefore bus service provision to/from Towcester should form part of the public transport proposals for this development.

### Bus stop infrastructure

As stated in Paragraph 3.5(i) of the Public Transport Strategy, bespoke bus journeys should enter the Site at the new A43 junction and run eastwards through the Site to a turning circle adjacent to Units 6 and 7. These journeys should stop at new bus stops on the internal bus route located at points which ensure that the staff entrances to Units 1 – 13 and the Train Maintenance Depot are within a safe 400 metre walking distance. Furthermore, and as stated in the NCC Bus Strategy, the majority of the staff entrances should be within 250 metres of the new bus stops.

Each westbound bus stop (which due to the loop formed by the internal route will be mainly used by boarding passengers) on the internal bus route to be provided with a Trueform-style bus stop pole (with integral flag and timetable case), a metal bus shelter and a raised boarder. Each bus stop flag to include a real time display.

Each eastbound bus stop (which due to the loop formed by the internal bus route will be mainly used by alighting passengers) on the internal bus route to be provided with a Trueform-style bus stop pole (without a real time display) and a raised boarder.

All bus stop poles, real time displays and bus shelters to be owned and maintained by the Developer (or any successor).

### Bus Interchange

As with the internal westbound stops, the Bus Interchange to be provided with a Trueform-style bus stop pole, with an integral real time display, a metal shelter and bus boarder. In addition, the Interchange to be designed so that 2 full-size buses can wait at the stops and pass each other without difficulty.

### Travelcard provision

In order to encourage modal transfer, the Travel Plan will need to consider the provision of free bus travel to and from the site for new starters for a minimum period of three months.

## Walking and Cycling

In response to the Pedestrian and Cyclist Accessibility Note, we would comment as follows:

- Proposed shared-use cycle/footway along Towcester Road between Ladybridge Drive and the site crosses Gayton Road in the vicinity of Milton Malsor - The visibility for users of the footway/cycleway of vehicles approaching eastwards along Gayton Road appears to be quite limited. The junction also currently presents a very wide crossing. The developer should amend the mouth of the junction to narrow it to provide a shorter crossing and improve visibility.
- Additionally to the above, the short section of proposed footway leading from Rectory Lane, Milton Malsor, into Towcester Road should be extended further into Towcester Road in order to mitigate potential visibility issues at the junction.

The draft Transport Assessment states the following:

“Pedestrian Access 5.96 The location of stopped up and diverted public rights of way are shown on the access and rights of way plans (in Appendix 5.4). New 2m wide footpaths will be formed, likely to comprise compacted crushed limestone aggregate or similar. Footpaths will also be set within the proposed landscaping works, including in land to the east of the NLL in the east of the site. Should the adjacent Northampton Gateway development be brought forward (as addressed in Chapter 3: Reasonable Alternatives, and in the cumulative assessments within the technical chapters and Chapter 26: Cumulative Effects Summary) these footpaths will tie into the proposed footpath network associated with that site, though they also provide a “stand-alone” solution to link into the existing footpath network.”

With this in mind, we would query whether the proposed diverted footpath (KX13) could be “cycle-proofed” (i.e. constructed to cycleway width) in the event that Northampton Gateway development is brought forward, thereby allowing for a cycle link between both sites. With the absence of any proposed cycling facilities along Collingtree Road, this link would be more desirable for cyclists approaching from the east side of Northampton than the route via Towcester Road.

As mentioned previously walking and cycling facilities are required across junction 16. These are required to link to the existing shared-use facility alongside the A4500.

## Rail Freight Proposals

The County Council, as local transport authority, has a duty to plan for transport, to, from and within its area, including rail. The County Council has therefore prepared the Northamptonshire Rail Strategy (January 2013).

<https://www3.northamptonshire.gov.uk/councilservices/northamptonshire-highways/transport-plans-and-policies/Documents/Northamptonshire%20Rail%20Strategy.pdf>

A key part of our strategy is an improvement in future passenger services to Northampton. This includes provision of more, faster services to London and other destinations to support the economic attractiveness of the town and county and thereby ensures that the extensive plans for housing growth are supported by strong growth high-quality jobs.

Both Network Rail and the Department for Transport have stated that improved services to intermediate destinations such as Northampton at the southern end of the West Coast Main Line are expected to be delivered using capacity released by HS2 post 2026.

The Preliminary Environmental Report is backed by a Rail Operations Report which contains further detail of the proposed operations of the site and its localised impact on the rail network. The data presented concentrates on the short section of the Slow Lines between Hanslope Junction and Northampton station, referencing the ability to accommodate additional Class 4 (intermodal freight) paths over this section.

Unfortunately the data presented significantly simplifies the situation and would appear to over-estimate the practical availability of paths. Whereas the Fast Lines mostly accommodate trains able to run at 125mph line speed, the Slow Lines have a 90mph maximum speed and accommodate a range of passenger services (able to run at 100 or 110mph but constrained by line speed) or freight services with a typical maximum speed of 60-75mph but often significantly constrained by the gradient profile, in particular the southbound climb after a speed restriction at Northampton station.

Furthermore, timetables paths need to reflect the constraints over a whole journey. So, for example, the service that would logically be the approximately XX.35 departure from Northampton to Birmingham (to maintain the correct arrival pattern in a 20-minute cycle at Birmingham New Street) has to depart at XX.25 in most hours in order to avoid a conflict with a freight train at Northampton. However, the other trains XX.55 and XX.15 departures from Northampton could not be re-timed 10 minutes earlier because this could conflict with other services on the approaches to Birmingham.

The County Council has been involved as a stakeholder in Network Rail's West Coast Capacity Plus Study, and we understand from this that the major constraint on performance of up freight trains is their ability to climb the approximately 1 in 200 gradient from Northampton to Roade following the speed restriction under West Bridge immediately south of Northampton station. An examination of Network Rail's working timetables shows a timing of 8 minutes from Northampton to Hanslope Junction of a passenger train stopping at Northampton, and at least 11 minutes for freight services. This is the section of line on which it is proposed that the rail freight interchange will be built.

While the Rail Operations Report makes reference to the general availability of paths for freight services it would be useful for more detail to be given of the specific impact of the proposed development.

In particular:

- What is the estimated running time for a train from the rail freight terminal to Hanslope Junction, as this will presumably be less than for a train passing Northampton this be a lesser constraint for pathing purposes.
- What is the coincidence of available paths on up and down lines to allow up (southbound) trains to enter or leave the rail freight terminal. This is important to ensure that these trains do not cause delay to other services.

We also note that in the emerging West Coast Capacity Plus Study referred to above, Network Rail have identified a significant future constraint in capacity between Denbigh Hall North Junction and Milton Keynes Central in particular, but also over the entirety of the Northampton Loop, such that increasing freight services over the Loop might require a reduction in the passenger service to Northampton. We feel that this issue should be addressed in the EIR, to ensure that the proposal does not make this more likely.

We are concerned that without clarity on these issues, the pathing of services to and from the development could cause a significant constraint on future passenger rail services to Northampton.



## Cumulative Assessment with Northampton Gateway

It would appear that through the DCO process both Rail Central and Northampton Gateway developments are required to undertake a cumulative assessment of the impacts of both sites.

Being conducted independently by each developer these assessments will be based on different assumptions, and therefore will inevitably provide different results, neither of which will be likely to represent the true situation.

The only meaningful cumulative assessment would be obtained from combining the separate impacts which each developer has used for assessing their own sites. NCC was willing to facilitate such an assessment, and where appropriate act as a neutral party to ensure confidentiality of input of information, and has made this offer to both parties, but this approach has not been successful to date.

Even with such a cumulative assessment undertaken by NCC, there does not appear to be an obligation through the DCO process to secure any mitigation to accommodate the cumulative impacts of more than one DCO application.

It would be unacceptable in highways terms therefore to permit both sites without such an assessment having been undertaken, and the appropriate mitigation being secured to mitigate the cumulative impacts. In particular we are concerned that there are a number of junctions where both developers are proposing improvements to support their own applications, but were both to be permitted a larger scheme than that contained within either DCO would almost certainly be required.

## Summary

As many of the items above are subject to on-going work and discussions, the LHA shall comment further at the appropriate stage.

Rob Sim-Jones  
Principal Engineer – (Principal Lead) Development Management