

MILTON MALSOR PARISH COUNCIL

www.miltonmalsorparishcouncil.org.uk

Correspondence to the Clerk, Mrs Ann Addison
The Paddocks, Baker Street, Gayton, Northampton, NN7 3EZ
Tel: 01604 858226 & Email: [REDACTED]

NORTHAMPTON GATEWAY

A written representation to PINS from Milton Malsor Parish Council

SUMMARY

Milton Malsor Parish Council objects to Northampton Gateway (NG) which would fill more than a third of the rural Parish. Rail Central would occupy a further half and destroy the Parish.

NG conflicts with the West Northants Joint Core Strategy (WNJCS), and parishioner's wishes as set out in:

'Milton Malsor Parish Plan 2005' and

'Options for a Neighbourhood Plan'

No resident has advised the Council of support for NG

NG is not supported by the local planning authority – South Northants Council

NG is a huge industrial area that will bring visual, noise, air and light pollution and adversely affect the conservation area, listed buildings, primary school and country footpaths.

The cumulative effect of Rail Central would be intolerable.

Milton Malsor Parish needs to remain as a green lung and essential weekend retreat among the 42,000 new homes allocated to the area

A SRFI proposed by Ashfield Land on an adjacent site in the Parish was rejected by PINS for inclusion in the WNJCS

There is a proliferation of SRFIs in the area which is contrary to the National Policy Statement. DIRFT has spare capacity up to 2031.

There is no need for further local employment on the scale of NG. Planning proposals in this area from Ikea, Howdens, and for a secondary school have all been rejected

NG propose very extensive changes to the M1 and local road system. This work will take four years and severely disrupt the traffic flow. Junction 15 has already been reconfigured; the Council's experience is that theoretical benefits did not emerge

NG is located on the constrained West Coast Main Line corridor whose priority is passenger capacity and Transmodal has said there is insufficient capacity to service any warehousing beyond the DIRFT 3 expansion.

Rail is cheaper than road if the rail leg is over 170 miles. Proximity of NG to Liverpool, Southampton and Felixstowe ports means that market demand remains doubtful.

The Examiner's view in the Kent International Gateway decision is relevant for Roxhill (Ro):

'to the extent to which the proposal can be reasonably expected to generate train traffic (as opposed to simply acting as a collection of road-based warehouses) is, to my mind, a critical consideration to be taken into account in the overall planning balance.'

OBJECTION

Milton Malsor Parish Council (MMPC) objects very strongly to 'Northampton Gateway' (NG).

NG is a large (210ha) Strategic Rail Freight Interchange (SRFI) proposed by Roxhill (Ro); it would take up at least *a third* of the entirely rural parish and be close to Milton Malsor village. (refer **ordnance survey map, Appendix 1**)

MMPC supports government policy to reduce congestion and improve the environment by shifting freight off the roads but argues that the location of this SRFI is inappropriate because possible economic benefit fails to outweigh its adverse impact on nearby communities, the road network and the surrounding countryside.

Background

Milton Malsor is a small, rural settlement of about 300 homes which appears in the Domesday Book (1086); it has 24 listed buildings and a large conservation area. (refer **Milton Malsor village plan, Appendix 2**)

Main Reasons for Objecting

1) **The West Northants Joint Core Strategy (WNJCS)**, as adopted in 2014, is the foundation stone for all planning policy in the relevant area *until the year 2029*. The WNJCS (page 48) states - *'It is considered that new Rail Freight Interchanges in West Northamptonshire, in addition to DIRFT, would **not** be deliverable within the plan period.'*

If government overturn the WNJCS, which has been checked and approved by the Planning Inspectorate, it will set a precedent for planning procedures nationwide.

2) Balance of labour supply with housing provision:

The WNJCS was developed over many years of consultation, beginning with the Milton Keynes and South Midlands Sub Regional Strategy in 2003. It aims at incorporating central Government's required 42,000 homes and achieving the vision of 'sustainable communities' by carefully balancing housing allocation with centres of employment.

Ro claim millions of pounds of unsubstantiated economic value but offer zero benefit for the local area. NG will create about 7,500 new jobs, but in the expected labour catchment area there is almost full employment. (Currently 0.06% in South Northants and 4.00% in Northampton Borough)

Homes for these new employees will not be provided under the WNJCS which means that most employees would need to travel large distances, thereby adding to local road congestion and air pollution.

Ro say- *'This location will remain highly attractive to a range of occupiers keen to make use of its strong road and rail transport links and labour supply'*. **The strong labour supply claim is false.**

The situation will be exacerbated by Ashfield Land's nearby Rail Central which requires a similar number of employees and has to be considered by the Planning Inspectorate when evaluating the NG proposal.

3) Adequate SRFI capacity is already available in the region:

- a) NG is on the same Northampton Loop Line as the DIRFT SRFI, which is only 18 miles north and on record as having spare capacity until *at least 2031*.
- b) Ashfield Land are finalising their proposal for a similar large SRFI (Rail Central) which is also on the Northampton Loop Line and in Milton Malsor Parish. *(see Appendix 3 which shows both SRFI's)*
- c) In late 2017 D. B. Symmetry gave notice to the Planning Inspectorate that they would be proposing a SRFI at Hinckley (Leicestershire). This SRFI is about 40 miles north of Roxhill's proposal and approx 20 miles North of DIRFT.
- d) East Midlands SRFI (close to East Midlands Airport) has already been approved
- e) In the West Midlands local planning identified a need for a SRFI in 2016 in order to boost employment and a faltering economy. This was supported by a 2005-2009 study making a case for logistics in that area.

Contrast the above with the Council's area where local planning resulted in the WNJCS which does **not** require a SRFI or additional employment.

There is a proliferation of SRFI proposals in the region. This is in conflict with the 'National Policy Statement' which says that sites should be provided at a wide range of locations'.

4) Previous rejection of an SRFI in the same area:

Ashfield Land proposed a similar SRFI - located on the opposite side of the Northampton Loop Line - for inclusion in the WNJCS but it was rejected by the Planning Inspectorate as inappropriate. The reasons for rejection are listed in detail; most of them relate to and remain valid for this adjacent Roxhill SRFI.

5) **Alternative sites:**

Ro have failed to identify and discuss the relative merits of alternative locations for their SRFI. This is required in order to demonstrate that the proposed site is the most appropriate in this area.

Contrast this with West Midlands Gateway (WMG) who submitted a DCO at 3/8/18 and have prepared a comprehensive '*alternative sites assessment*.'

6) **Traffic:**

Ro admit that Junction 15 of the M1 - which has already been extended - is often running above design capacity and leads to dangerous congestion with back up onto the M1 and its slip roads. It has been proposed that a total reconstruction of the junction which *theoretically* provides some spare capacity. The ongoing creation of a 'smart motorway' either side of Junction 15 is more about relieving accident problems than improving the flows on and off the M1 and does not help Ro's case.

- a) Experience with the M25 has shown that large new roads generate local traffic that has not been taken into account and which quickly negates any planned spare capacity.
- b) Extensive widening of a number of junctions on local roads is also planned. The disruption from the reconfiguring of Junction 15 and its feeder roads will give motorists years of misery because construction work will need to be done in phases
- c) Traffic generated by Ashfield Land's 'Rail Central' SRFI proposal will be at a similar level to NG. Junction 15, even in its modified form, will not cope with such a volume.

Ashfield Land's cumulative Traffic Assessment, page 78 says: '*It has been demonstrated that in the vast majority of cases the highway mitigation proposals mitigate against both the Rail Central and Northampton Gateway developments*'.

The '*vast majority of cases*' and double use of the word '*mitigation*' is not convincing.

The Council and residents currently experiences regular problems caused by accidents blocking the M1 which quickly back up and disrupt the local road system.

- d) The incorporation of an aggregate storage facility with an expected 60 to 80 truck movements a day will add to Ro's expected 16,000 vehicle movements a day (including 4,000 HGV) and concentrate more traffic in the local area and on rural roads.

- d) Roxhill's proposed reconfiguration of Junction 15 does not consider the all too frequent effect of accidents or breakdowns on the M1 or its dedicated access roads. We believe that sufficient adequate stress testing should have been carried out to assess the effect of this. We are not convinced that redesigning (once again) and putting ever further demands on Junction 15 is a wise long-term decision in an area designated for extensive housing growth.
- f) Milton Malsor already suffers from 'rat running'. The Parish Council's policy is to maintain its popular rural character by making it less attractive for cars to enter the village.

Roxhill say: *'As a result of the package of highway improvements... the villages would see less through traffic in the future'*. Given that most of their employees will need to come by car from outside the local area, rat running can only worsen.

The Council concludes that the proposed redesign of Junction 15 will lead to long term traffic problems and is not suitable for purpose.

7) Rail access:

Refer to the WNJCS page 48 - *'Local authorities will work with Network Rail and the freight industry to consider RFI's once the opportunities for additional access onto the rail network to support viable Rail Freight Interchanges are confirmed.'*

The key word is *viable*. Ro have not demonstrated that their proposed SRFI is necessary, confers any national economic benefit or has long term commercial viability.

- a) Roxhill have not confirmed any agreement with Network Rail to provide access paths onto the rail network. ('Roxhill only say they- *'are working with Network Rail with dialogue ongoing.'*)
- b) There are problems with slow freight trains on the 1 in 200 gradient. In the 'West Coast Capacity Plus Study' Network Rail found constraints along the entirety of the Northampton Loop (where Roxhill have proposed a connection) such that increasing freight may require a decrease in passenger trains to Northampton'.
- c) Roxhill mention work by Gerald Eve - 'which will help to provide a more locally specific assessment of the need and requirements for a new SRFI in this location'. At time of writing this key work - from only one consultant - has not been made available, which suggests that credible facts could not be mustered.
- d) Network Rail say they cannot accurately forecast available freight paths on the West Coast Main Line until after Phase 1 of the High-Speed Rail opens in 2026. (Ro need a minimum of four).

These observations tie in with the WNJCS which does not envisage SRFI proposals until the Plan ends in 2029.

8) **Pollution:**

- a) **Air** pollution monitored at the nearby M1 motorway has already exceeded legal EU levels of 40 Micrograms per cubic metre. (Checks in October 2017 showed 68.6 on the A43 at M1 Jct1.
- b) The extra road traffic (especially the daily 4,000 diesel truck journeys) generated by this SRFI and traffic concentration at the enlarged Junction 15, plus pollution from shunting locomotives and handling equipment can only increase the risk to health.

Milton Malsor has a Residential Home for the Elderly, a day centre and a large area of sheltered homes. Many occupants have respiratory problems, further air pollution is undesirable.

Ro say that- *'a resulting decrease in diesel truck journeys at scattered points elsewhere on the road network will compensate for the locally concentrated air pollution caused by HGV's entering and leaving the SRFI'.*

As regards local health this argument is clearly invalid.

c) Even though most of the SRFI will be located in a manmade bowl vertical **light** pollution 24/7 is unavoidable. There will be reflection from low cloud and mist that will change the night time village environment from dark, open countryside to a permanent industrial glow.

d) Although mitigated by its bunding, 24/7 **noise** pollution at the village from the handling of steel containers is unavoidable and will provide a constant reminder that our protected countryside has become a permanent industrial area.

Ro discuss many different receptors but their unquantified analysis resorts to many similar statements that - *'the result is negligible at worst'*. This leads to a strong suspicion that, in the aggregate, there will be permanent problems for local residents.

e) The site for the SRFI lies at the edge of a wide shallow valley. Despite the bunding, and screening - which is ineffective in the UK where trees take 20 years to become substantial - visual intrusion is unavoidable over a wide area of open countryside and the communities it contains.

9) **Cumulative environmental impact:**

Ro have offered what is practical to mitigate individual detrimental effects in the area that will be affected by the SRFI. However, even without adding in the effect of Ashfield Land's proposal, the cumulative effect remains immense and will blight a large area of open countryside that has been carefully preserved in the WNJCS, and permanently scar several attractive ancient settlements.

Milton Malsor, Blisworth, Collingtree and Roade, which will no longer be 'rural'. The heritage value of these villages - especially Milton Malsor which is the most affected - is incalculable and becomes essential when considering the 42,000 new homes now being built in West Northants. New residents need a sense of history and belonging, with convenient attractive, quiet places for the family to escape to at a weekend.

10) **Predicted demand for an SRFI:**

The patterns of road and rail transport over the next 20 years are difficult to predict with any accuracy and may change significantly after Brexit is concluded. Recent figures show that the growth in road freight has become negative. To propose such a major piece of national infrastructure without properly derived forecasts is rash and premature.

Roxhill say-'... *'next day delivery and the growth of internet retailing has the potential for significant growth'* and '... *'as consumer expectations continue to grow and evolve there will be an increased pressure on retailers to deliver goods to consumers quickly'*.

11) **Road Freight growth:**

The Infrastructure Commission point out that reducing road freight by one third requires more than a three-fold increase in rail capacity - which could not be accommodated on today's railway. (*'Focussing on congestion, capacity, carbon'* November 2017)

12) **NG is not envisaged in Milton Malsor's Parish Plan 2005:**

This is a planning document, or our 'Options for a Neighbourhood Plan 2013.' The Plan calls for the village to be surrounded by a green field parish
(for both items refer miltonmalsorparishcouncil.org.uk) See also B2 below.

13) **Further reasons:**

In its 'Vision' (Part 2 of South Northants Local Plan)
SNC wants to see 'villages set in attractive open countryside'.

With its quiet setting, pleasant country pub, popular Village Park and equestrian facilities Milton Malsor is such a village. It provides a convenient and very necessary 'green lung' for residents of all the planned new housing.

NG is in what is now 'open countryside'. It will industrialise the area and attract further road and rail-based organisations.

NG offers zero benefit to the parish and will destroy the rural way of life.

2) This huge SRFI is sited in 'open countryside'. It would use up 210 ha of well farmed Grade B agricultural land and result in a loss of mature trees and hedges in a county that already has low tree cover.

3) Northamptonshire Minerals and Waste Local Plan (MWLP), as adopted in October 2014, approved a large (13ha) minerals site (for soft sand) adjacent to Milton Malsor village and East of the Collingtree Road. The site is expected to be worked out over a 10-year period and will generate daily HGV movements on already congested rural roads and Junction 15.

4) The National Policy Statement says - '*facilities such as SRFI's may not be considered suitable close to residential areas*'.

Northampton Gateway is very close to both Milton Malsor and Collingtree villages. With planned 24 hour working both noise and light pollution will permanently affect the residents of both settlements.

5) The SRFI is a permanent large scale industrial business which will impact adversely on the valuable historic environment, built heritage and conservation areas of Milton Malsor and Collingtree villages.

6) A thousand approved new houses at nearby Collingtree Park golf course and many more in the Roade Master Plan will soon almost surround Milton Malsor Parish. This highlights a need to keep our Parish as 'open countryside' in order to mitigate the adverse environmental effects of all this development.

7) Degradation of public rights of way - rerouting alongside the M1 motorway and the railway line will render these footpaths virtually unusable due to the noise and air pollution.

Community footpath walk

A walk on August 5 2017 involved about 450 residents from Milton Malsor, Blisworth, Roade and Collingtree - the four most affected villages, walking to a meeting point on the proposed Ashfield Land SRFI site to demonstrate against loss of footpath amenity and show common cause in resisting both SRFI's.

9) Construction phase

Ro's proposed bunds and excavation are close to Milton Malsor. The prevailing wind is South West, during the construction period it will be difficult to mitigate against dust and noise pollution in Milton Malsor and Collingtree villages.

Construction traffic for the site, and the very extensive road works - which have to be developed in phases - will have an adverse impact on the safety of our rural roads during Ro's projected 4 to 5-year construction period.

Please note that already approved SRFI's have had the SUPPORT of local councils and planning authorities.

10) Northampton Rail Users Group (NRUG)

NRUG supported HS-2 but note that it - '*will not relieve* capacity on the part of the West Coast Main Line (WCML) running through Northampton.

Northampton Gateway would add trains that significantly interfere with passenger trains on that track.'

Summary

Andrea Leadsom MP has said- 'It is incumbent upon the developers to prove that:

- a) There is a need for an SRFI in our area.
 - b) The local infrastructure can support the development.
 - c) Appropriate environmental mitigation measures are taken.'
-
- a) Items - **A** - 1) 3) 4) 5) 8) 10) and 11) above show there is **no requirement** for an SRFI in the area.
 - b) Items - **A** - 2) 4) 6) and 7) **B** – 3 demonstrate that the **local infrastructure is unable to support** an SRFI.
 - c) Items – **A** - 8) 9) 12) and **B** – 1) 2) 3) 4) 5) 6) 7) & 8) state that appropriate overall **environmental mitigation is impossible** for one, let alone two, SRFI's.

Conclusion

Milton Malsor Parish Council has shown that Roxhill has failed to meet the necessary above requirements for building a SRFI in our area, and provides zero local benefit.

On behalf of the residents the Parish Council objects to 'Northampton Gateway' and ask the Planning Inspectorate not to recommend this unnecessary and permanently damaging application.

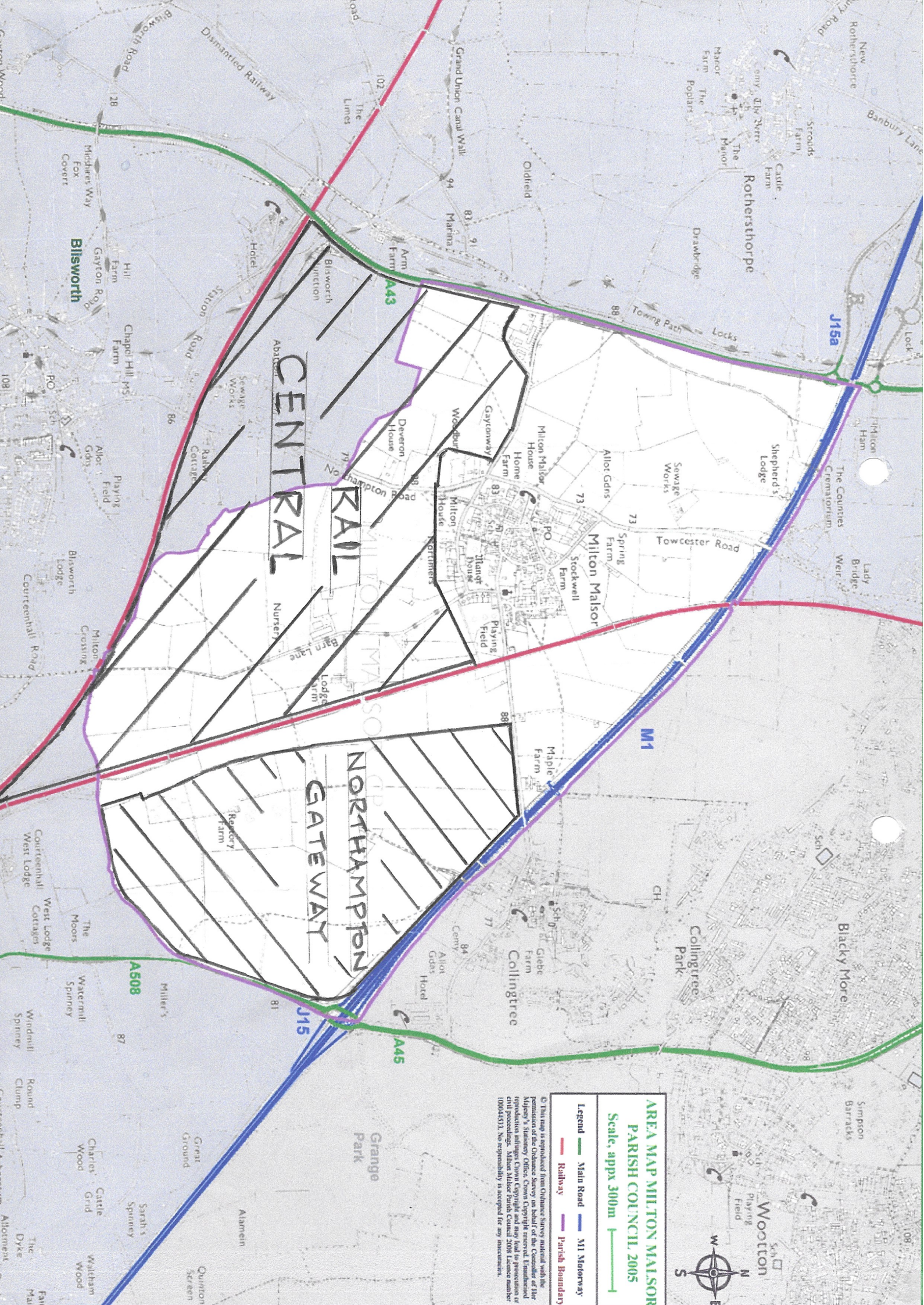
Appendices

- 1) Ordnance survey map showing Northampton Gateway and Milton Malsor Parish
- 2) Milton Malsor Village Plan and Conservation Area.
- 3) Ordnance survey map showing Rail Central and Northampton Gateway.

Yours sincerely,



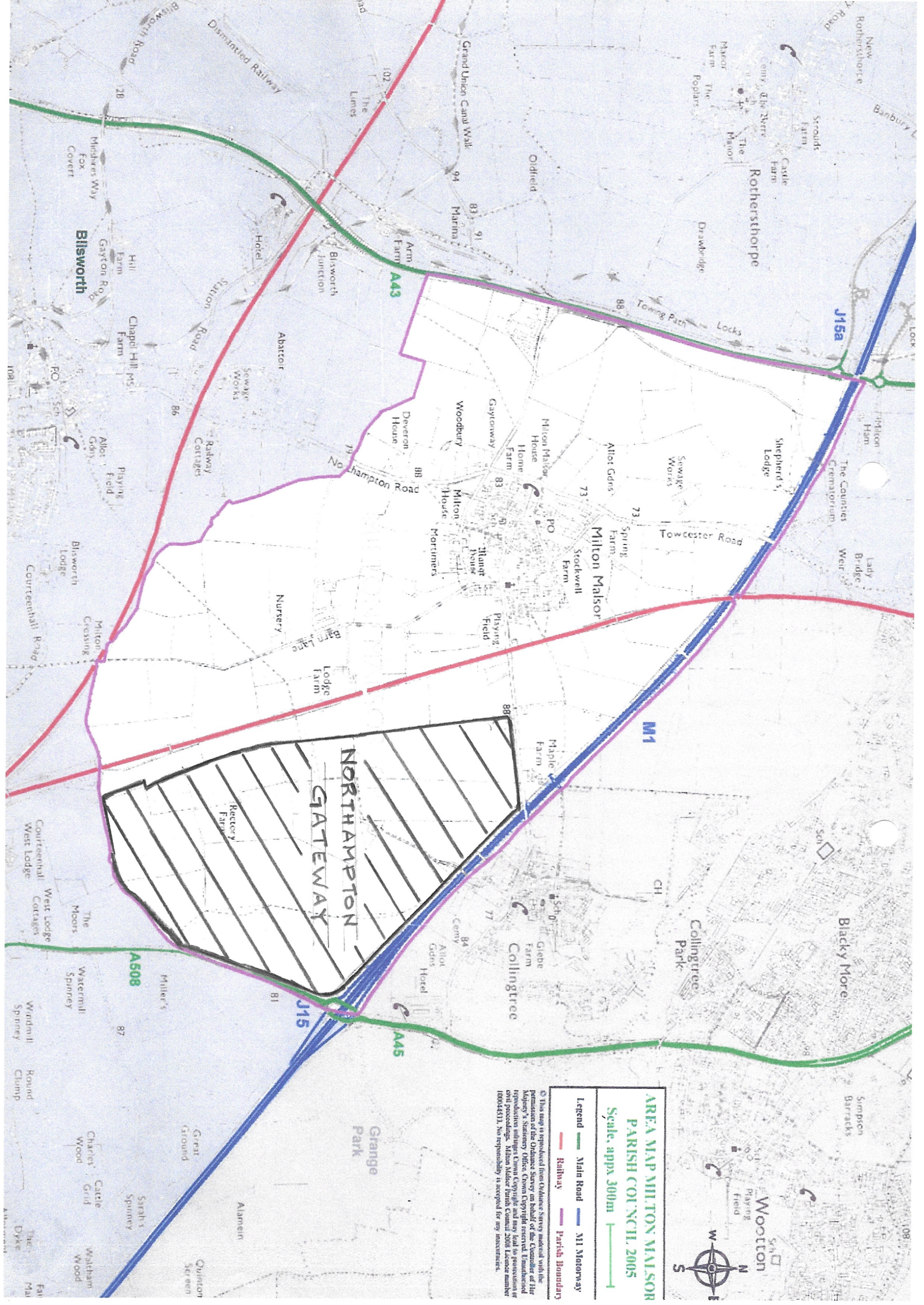
Clerk to Milton Malsor Parish Council
On behalf of Members of the Council



AREA MAP MILTON MALSOR
PARISH COUNCIL 2005
Scale, appx 300m

- Legend**
- Main Road
 - M1 Motorway
 - Railway
 - Parish Boundary

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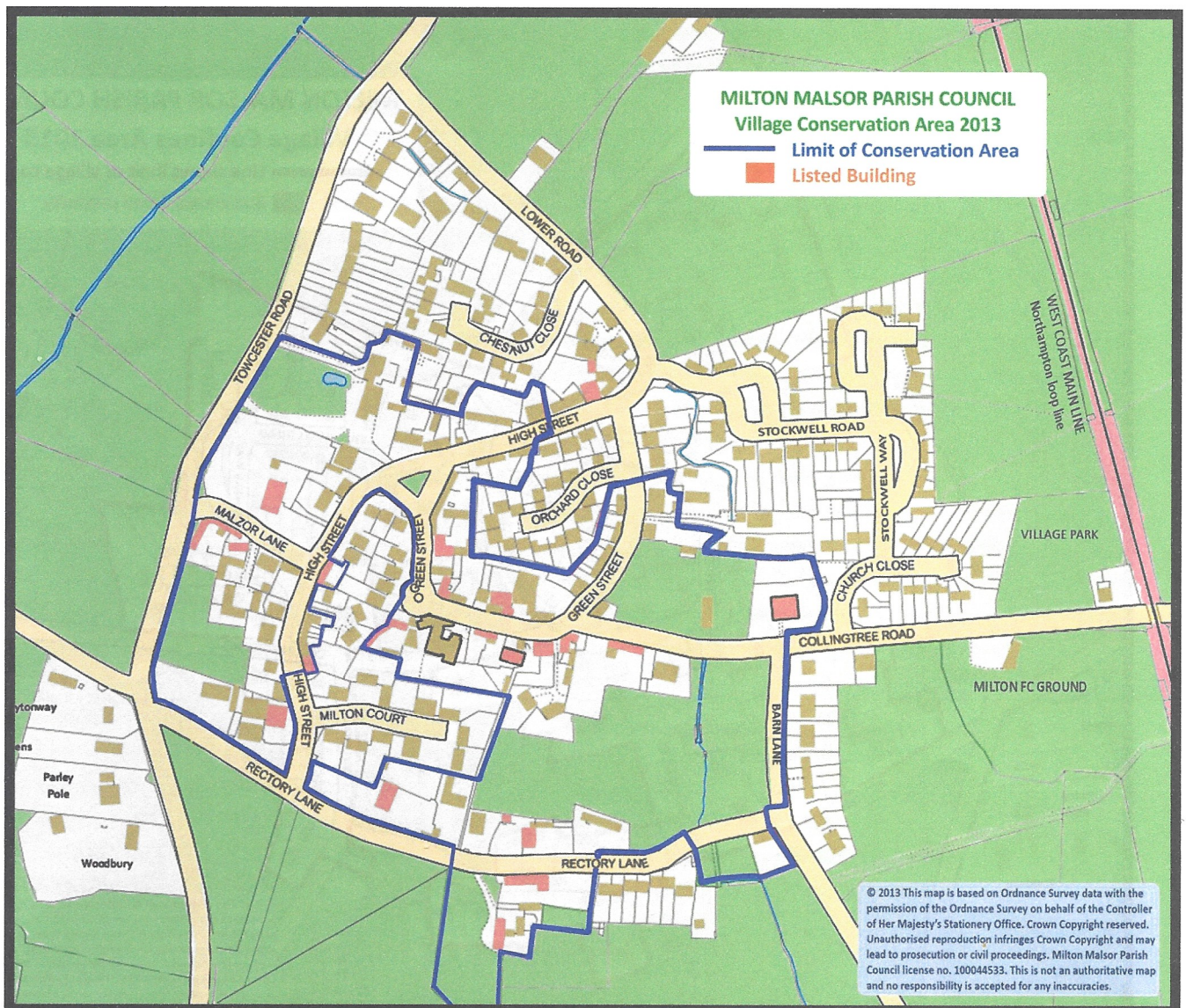


AREA MAP MILTON MALSOR PARISH CO. NCTL 2005
Scale, approx 300m

- Legend**
- Main Road
 - M1 Motorway
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APPENDIX 2: Milton Malsor Conservation area 2013

Scale: appx 500m

