

Response to Written Questions issued by Examining Authority

on 17 October 2018.

from South Northamptonshire Council

(to be submitted by email to NorthamptonGateway@pins.gsi.gov.uk)

Date - November 2018

PINS Reference TR050006

IP REF. SP074

Application by Roxhill (Junction 15) Limited for an Order Granting Development Consent for the Northampton Gateway Rail Freight Interchange.

The following response are provide by the south Northamptonshire Council in response to the written questions and request for information issued by the Examining authority on 17 October 2018.

Question 1.0.8

1. Policies within the current Development Plan would not support the development of this land for housing. The Council currently has significantly more land allocated or with planning permission for housing to meet the identified housing requirement. The allocation of land for housing is matter that would be addressed in the review of the Development Plan. A review of the WNJCS is intended to commence in the near future.

Question 1.0.9

1. The application site is within the important local gap identified under Saved Policy EV8 of the SNLP 1997 between the urban fringe of Northampton and settlements within South Northamptonshire. The local gaps were identified to ensure that the new development would not comprise the identity and character of existing settlements through infilling of gaps that separate them. The proposal by virtue of the location and scale of development would be contrary to this saved policy.
2. The emerging SNLP Part 2 plan will eventually replace the Saved Policies of the SNLP 1997. The emerging SNLP Part 2 plan does not include a specific policy to identify important local gaps. A generic policy, Policy SS2, however seeks to ensure sustainable well designed development will respect the context in which it will be set. This policy continues to recognise the importance of maintaining the individual identity of towns and villages and the significance of the open countryside between

settlements to this. The emerging SNLP Part 2 was the subject of public consultation earlier this year and the Submission Draft is currently the subject of Regulation 19 statutory consultation prior to submission this consultation will close on 16th November 2018.

Question 1.0.19

1. The National Policy Statement for National Networks 2014 (NSPNN) is the primary national policy guidance relevant to nationally significant (transport related) infrastructure projects. This includes specific reference to strategic rail freight interchanges, it must however be considered as a whole to ensure proposals are assessed in accordance with all relevant regulatory regimes.
2. The NSPNN anticipates an expanded network across all regions of the UK given the freight forecasts indicate that hat new rail freight interchanges in areas poorly served would be likely to attract business new to rail (paragraph 2.50). It recognises that existing SRFI's and other intermodal RFI's are situated predominantly in the Midlands and the North and that provision in London and the South East is small scale or poorly located (paragraph 2.57) and acknowledges this is where the challenge for provision lies (paragraph 2.58).
3. Given the proximity of the proposal to the existing SRFI at DIRFT, where the capacity to accommodate further 7.86 million sqft of rail served warehousing exists through the permitted expansion of Phase 3 alongside with new larger intermodal freight terminal. The priority for a further terminal so close to this existing SRFI is very questionable. This would undermine the expressed purpose of the NSPNN to deliver the expanded geographical national network that is so compellingly needed. The simultaneous proposal of two similar RFI facilities on adjoining land is clearly not envisaged within the NSPNN.
4. Over provision within in a geographic location is likely to result in potentially harmful impacts contrary to the intention of the policy guidance. If effective use cannot, or is not, made of the railway to move freight this could lead to warehousing being road served with consequential adverse impacts for national objectives concerning climate change and for the local area if the effects assessed in the Environmental Statement and Transport Assessment are exceeded. This is a significant concern for the West Coast Mail line where the demand for train paths is already high and this demand is expected to increase due to pressure for new passenger services to Northampton and the new station proposal at Rugby. The strategic highway network in the locality experiences use beyond design capacity with consequential impacts for the local highway network which is evidenced in the congestion experienced at peak hours.
5. In considering the proposed NSIP, the Examining Authority and the Secretary of State are required to take into account potential benefits, adverse impacts and measures to compensate for these. In doing so consideration should be afforded to environmental, safety, social and economic benefits and adverse impacts at national regional and local levels.

Question 1.0.30

The potential to serve by road locations a considerable distance away from the RFI will offer little benefit in terms of the objective of national policy to achieve modal shift to rail and thus should be afforded little weight particularly in the context of the location of this proposal as nearby DIRFT already functions as a distribution hub of national significance.

Question 1.8.9

With respect of the noise limits chosen by the consultant for assessing construction noise, it is not clear or explained clearly which criteria have been adopted. A combination of the criteria from Table E.1 and E.2 of Annex E of BS 5228 appear to have been used. The LOAEL appear to have been based on the lowest levels detailed in Table E.1 which details example of thresholds for significant effects at dwellings, whilst the SOAEL appear to be based on criteria in Table E.2 which details criteria for determining receptors eligibility for sound insulation and/or temporary re-housing because of noise from construction works. No SOAEL predicted but two receptors were identified as being between a LOAEL and SOAEL in respect of the bulk earthworks. The predicted construction noise levels are comparable to existing ambient noise from the M1 and so unlikely to be audible (para 8.5.6). However this would suggest that the existing noise climate already exceeds the criteria recommended in E.5 in respect of construction works involving long-term substantial earth moving. To provide sufficient confidence in the conclusions formed the criteria need to be explained more clearly..

Question 1.8.12

No explanation is given in the report why the recommended 0.3mm.s^{-1} has not been used as the LOAEL. The report identifies piling only as a potential vibration source and that no significant adverse impact is expected because the piling works will be located over a 100m from the nearest receptor. The figure recommended within guidance should be used, Further clarification is therefore appropriate to provide confidence.