

Roxhill's 'Northampton Gateway' SRFI

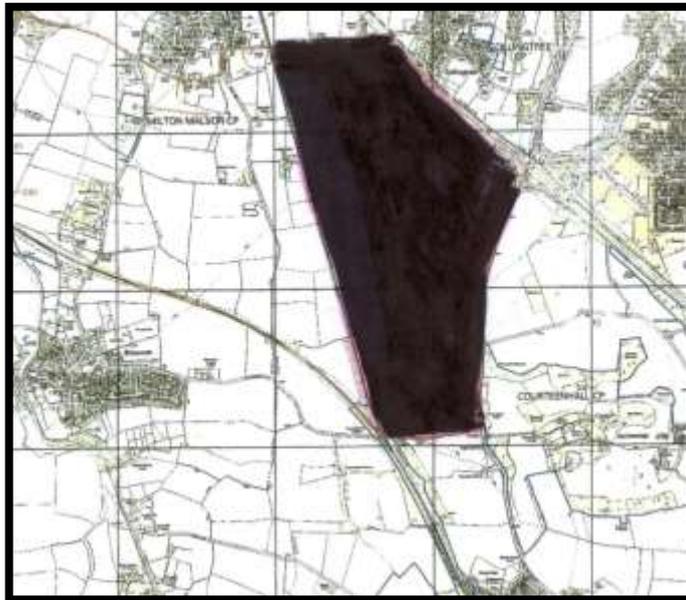
Development Proposal



Our Case Against

Part A

A submission to the Planning Inspectorate on the Environmental and Social Impacts on local communities, of a proposed industrial development of 5 million Sq. ft. on 500 acres of open countryside.



Prepared on behalf of local communities by the
'Stop Roxhill Northampton Gateway' Action Group

PINS Reference: TRO50006

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1. ROXHILL PROPOSAL DESCRIPTION – AN OVERVIEW

The Roxhill Northampton Gateway (RNG) application is for the development of a Strategic Rail Freight Interchange (SRFI) together with landscaping, access and other supporting infrastructure works. It consists of:

- An intermodal freight terminal including container storage and HGV parking, with new rail sidings within the site to serve individual buildings.
- Capability to provide a 'rapid rail freight' facility as part of the intermodal freight terminal.
- Up to 6,000,000 sq. ft / 557,418 sq. m. (gross internal area) of warehousing and ancillary buildings.
- New road infrastructure and works to the existing road network, including provision of a new access and associated works to the A508, a new bypass to the village of Roade, and substantial improvements to Junction 15 of the M1.
- Strategic landscaping and tree planting, including retained diverted public rights of way
- Earthworks and demolition of existing structures on-site.
- The relocation of an Aggregates Depot; this was added to the scope of their proposal **after** the last and final round of Roxhill Northampton Gateways (Roxhill NG's) public consultation meetings late last year (c. Dec 2017).

Reference:

1. <https://infrastructure.planninginspectorate.gov.uk/projects/east-midlands/northampton-gateway-rail-freight-interchange/>

2. EXECUTIVE SUMMARY

Introduction

This submission paper to the Planning Inspectorate (PINS) is in direct response to Roxhills Northampton Gateways (Roxhill NG's) Strategic Rail Freight Interchange (SRFI) proposal and has been compiled by multiple members of the Stop Roxhill Northampton Gateway Action Group (SRNG Action Group) who strongly object to Roxhill NG's proposal. Details of the SRNG Action Groups Contact Details can be found in Appendix A.

SRNG Action Group Objections – An Overview

ES1 – A Strategic Proposal?

Whilst the SRNG Action Group recognize the National Policy Statement for National Networks (NPSNN) policy requirement for the UK's rail network to be expanded to cater for future growth in rail freight traffic and the need for the SRFI network capacity to be extended by the logistics industry to encourage more freight traffic, it is evident that Roxhill NG's proposal is not aligned with the NPSNN policies. For example, Roxhills NG's SRFI proposal does not:

1. Best serve the UK's government driven objectives to expand the network of large SRFI's across the regions especially in areas poorly served by such facilities at present.
2. Take into consideration that the NPSNN clearly states that existing operational SRFI's and other intermodal Rail Freight Interchanges (RFI's) are already predominantly situated in the Midlands and the North at this time.
3. Consider that the NPSNN also state that SRFI capacity needs to be provided at a wide range of locations to provide the flexibility required to match the changing needs of the market.

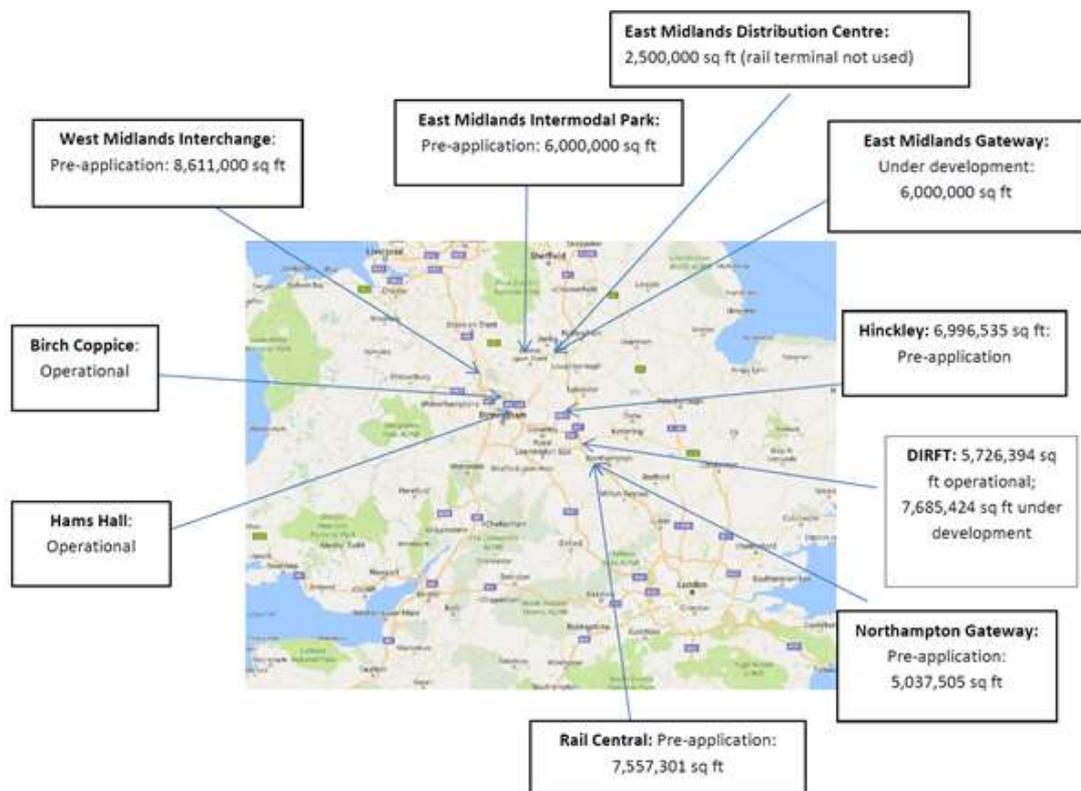
The SRNG Action Group acknowledge that Roxhill NG's proposal has been accepted as a strategic proposal for examination purposes by PINS, however, we challenge the unproven strategic nature of Roxhill NG's proposal for the following/additional reasons:

- Daventry International Rail Freight Terminal (DIRFT), only 18 miles from the Roxhill NG's proposed SRFI site, already provides a SRFI (with more than adequate warehousing capacity) to serve the Midlands area for the foreseeable future. The historic take-up of space at DIRFT is less than 50,000m² per annum. Unless a major change in buyer behaviour occurs or can be proven, DIRFT Phase III will provide capacity for over 15 years, therefore, granting consent for Roxhill NG's SRFI proposal would risk the success of DIRFT by creating a situation whereby both sites would be competing for the same train paths.
- Roxhill NG's proposed site is situated halfway between major centres of production and consumption i.e. London and Birmingham. This contravenes the NPSNN policy to locate SRFI's at major nodes. Planned investment in the Strategic Rail Network should target major freight flows from Felixstowe and Southampton to the West Midlands effectively bypassing Roxhill NG's proposed SRFI location to the West and North. Only when paths are released by High Speed 2 (HS2) would there be any prospect of a significant modal shift from road to rail. The SRNG Action Group feel strongly that future and potential capacity should not be used as a justification for consent of Roxhill NG's SRFI proposal as it cannot be accurately predicted or guaranteed.
- Oversupply of SRFI's in the region and undersupply in regions poorly served or currently lacking a SRFI would magnify regional economic imbalances and undermine national policy.

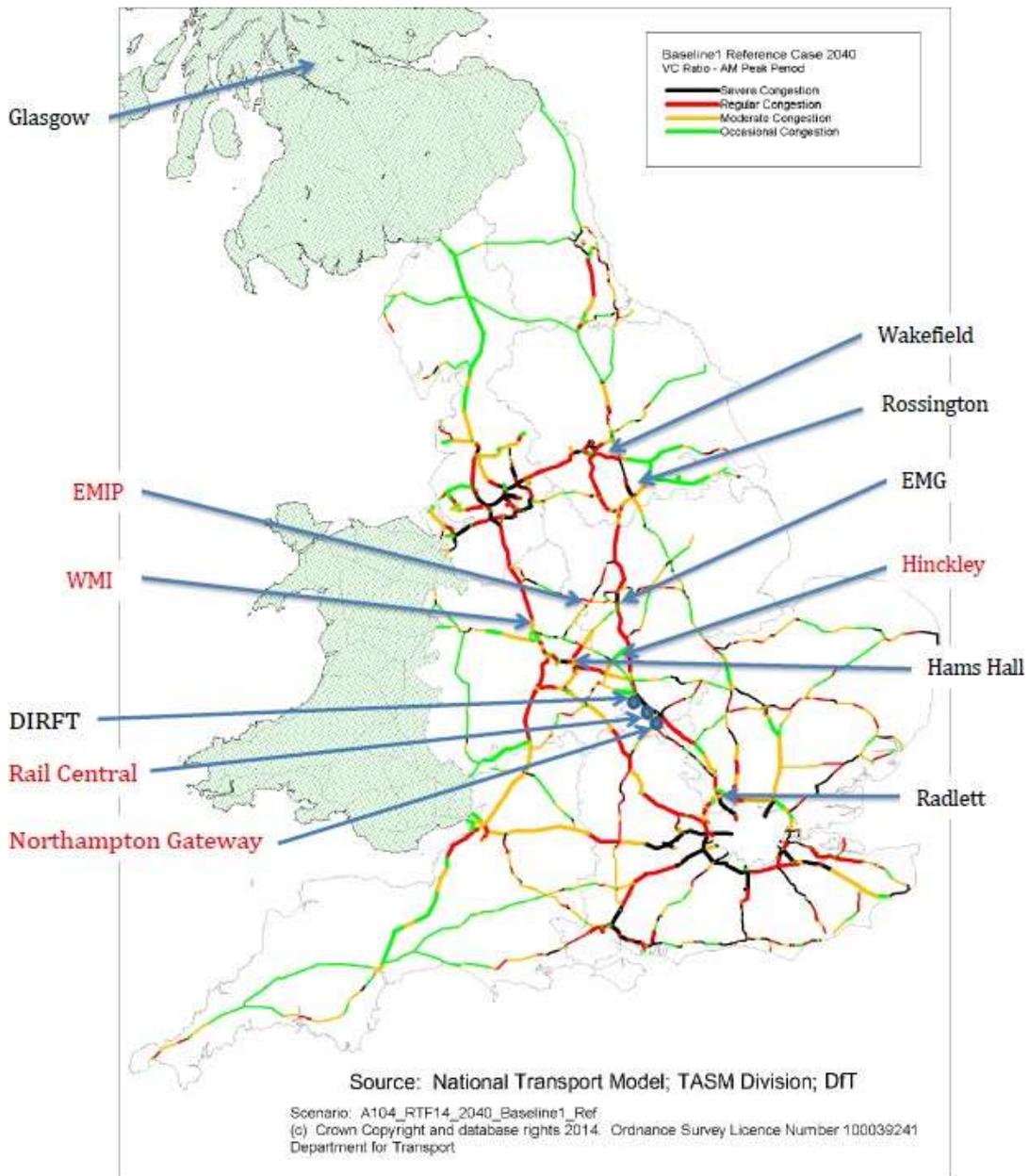
- Roxhill NG's proposed SRFI site is too close to points of origin to permit economic rail freight for most users; a minimum viable rail freight range is 200 km and this is limited to bulk commodities which don't require processing, sorting or repackaging. In addition, Roxhill NG's SRFI proposal does not cater exclusively for such markets.
- Realisation of drawbacks at Prologis Eurohub near Corby meant that its projected rail link was never laid. Indeed, the number of freight train movements in the UK has declined from approx. 416,000 train movements in 2003/04 to approx. 216,000 train movements in 2017/18 (source: <http://orr.gov.uk>). Furthermore, recent reports confirm a decrease in the use of rail freight by 20% down to 0.4% growth from predictions of a 5% increase year on year.
- Roxhill NG's proposed SRFI site has an extensive history of bids and proposals to change its use from arable land to various industrial enterprises. All, thus far, have failed or were abandoned as respectively they contravene the Joint Core Strategy (JCS) and Local Planning processes. Roxhill are undoubtedly aware of these facts given that they were party to (some if not all) earlier/aborted proposals. They have stressed in their consultations that their proposed SRFI site lies within a 'Golden Triangle', but this term relates to road haulage only and not to road and rail – a fundamental misconception which Roxhill appear to have overlooked in their proposal.

The aforementioned key points are reflected in the graphical maps directly below:

RFI's & SRFI's in the Midlands Area – Operational & Proposed



Location of Current SRFIs and SRFI Proposals Across the UK (2017)



Also, it appears that Roxhill have disregarded the genuine strategic considerations as set out by the NPSNN which, in our view, makes their application equivalent to an abuse of process and all the more egregious for their proposal to override local plans and the democratic rights of residents, whose lives (in many cases) have already been blighted by their proposal.

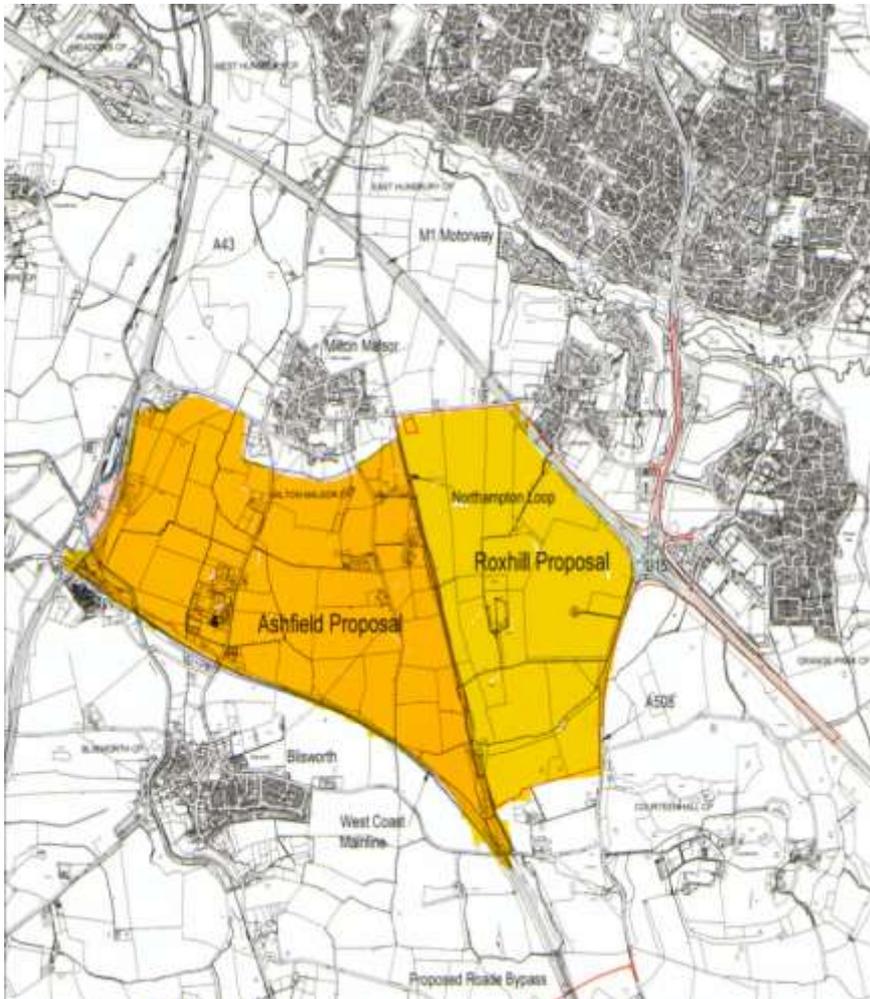
The SRNG Action Groups impression is that Roxhill NG's SRFI proposal is; opportunistic; not strategic i.e. to build warehouses on cheap arable land in a region which is already oversupplied and to build a cosmetic rail facility which bypasses local planning processes which is non-compliant with the governments/NPSNN's guidelines to establish a SRFI network across the regions.

Roxhill have not demonstrated that their SRFI proposal is aligned with the governments/NPSNN guidelines e.g. to facilitate a modal shift from road to rail or to deliver a 'strategic network' across the UK. As mentioned previously, DIRFT, only 18 miles away from the proposed site, is predicted to have sufficient rail freight and warehousing capacity until c. 2030. **There is simply no need for another SRFI in the proposed location.**

The SRNG Action Group are of the opinion that the claimed strategic status of Roxhill NG's SRFI proposal is not genuine and should be rejected by PINS.

ES2 - Alternative Sites & Cumulative Impact

Roxhill have also failed to demonstrate that they have assessed alternative sites across the UK; only one other i.e. the Ashfield Land site, who have also proposed an adjoining SRFI to the proposed Roxhill site. Roxhill have also failed to demonstrate **a) valid** reasons for their **site selection** and **b) the cumulative impact** of their proposal in relation to other Nationally Strategic Infrastructure Projects (NSIP's) such as the aforementioned Ashfield Land SRFI proposal. There is no need for one, let alone two SRFI's in the East Midlands Area. The proximity of Roxhill's proposed SRFI in relation to Ashfield Lands proposed SRFI is clearly demonstrated in the map below:



ES3 - Passenger Train Services & Network Rail Capacity

Roxhill have not proven that the national rail network has the capacity to support their SRFI proposal. If their application were to be approved local residents/commuters will be impacted by a reduction in dependable services and future growth will be restricted. Furthermore, based on the recent Roxhill Preliminary Meetings on 9th and 10th October 2018 it is clear that Network Rail have not yet been able to confirm whether or not there will be sufficient capacity to accommodate Roxhill NG's forecasted requirements.

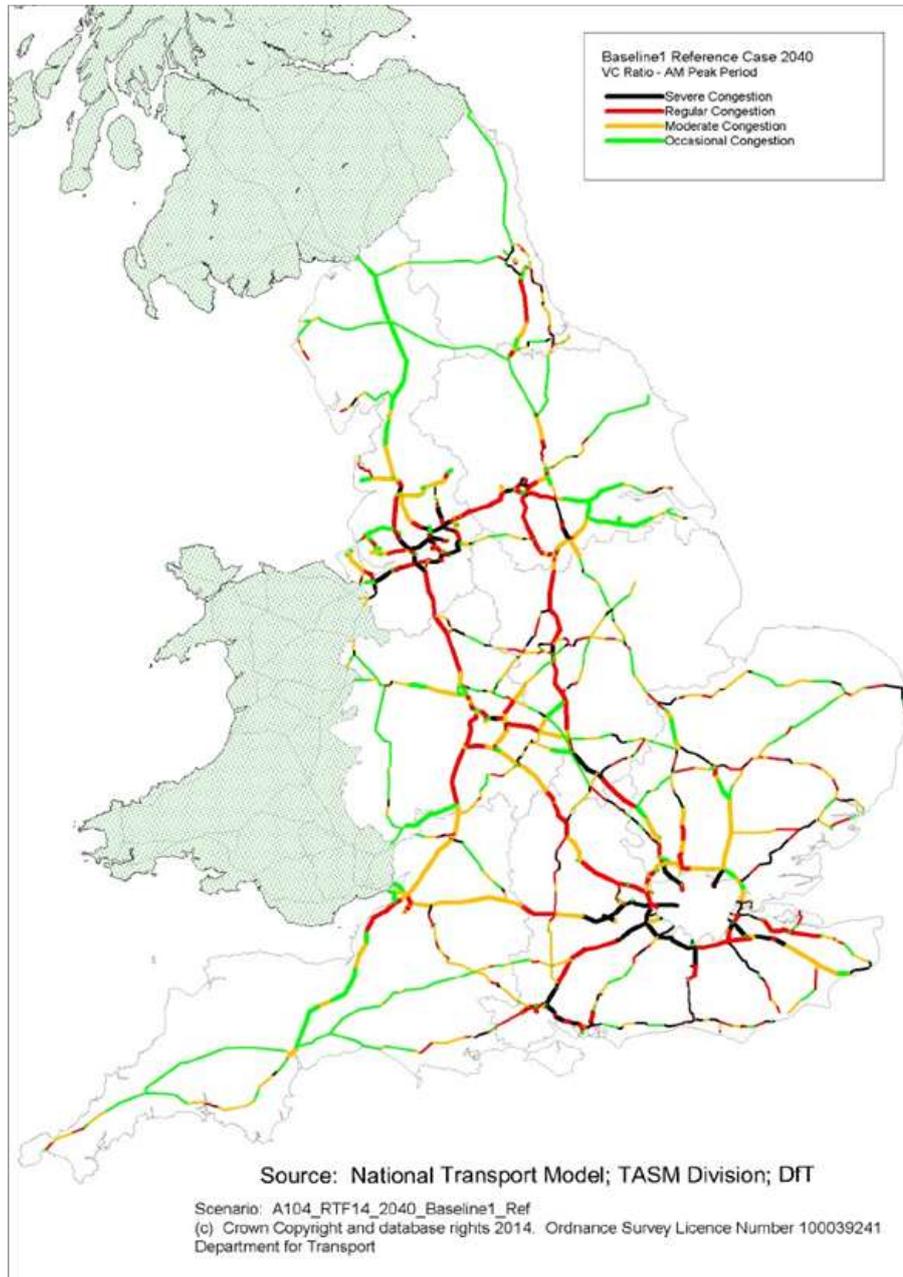
ES4 - Increased Traffic

The scale of Roxhill NG's proposal is such that it would have a significant impact on the local road network. The proposals and information presented give major cause for concern. Some of the traffic forecasts appear to be incorrect or, in the case of the aggregates terminal, missing altogether. Over 16,500 extra vehicles, including at least 4250 HGVs, would be concentrated onto a small area of two intersecting major traffic streams: the M1 and A45/A508. This would effectively double the traffic on the A508 section accessing J15, but the additional road capacity proposed would only act as a funnel into the unimproved and already overloaded A45 and A508 corridors.

Of major concern is that the proposals do not demonstrate that the SRFI site has the capacity to effectively handle traffic into and out of it at peak hours and periods of stress. This would be compounded when there are incidents that close the M1 between J14 and J16. This is a not an uncommon occurrence on this, one of the busiest sections of the M1. There were 17 incidents on the M1 between J16 and J14 in 2017 resulting in closure of which 11 resulted in the closure of the M1 south between J15 and J14 for a total of nearly 66 hours with the consequent impact on the A508, the official diversion route. The traffic modelling has not been stress tested to take this into account. The re-design of the M1 J15 interchange is even more confusing than currently and does not overcome the basic issue of too many access roads.

Roxhill appear to be relying on the proposed bypass to 'clinch the deal' but ignore the overriding disbenefits it would bring. The only route consulted on appears to have been proposed on grounds of least cost rather than most benefit. It would encourage development in-fill and, together with the increased site-generated traffic, would result in even more pollution in an existing quiet rural area than would be the case without the bypass and currently passing through Roade. The economic damage to a significant village asset has been ignored; traffic would be diverted down unsuitable rural roads and increase inconvenience and congestion in other villages. The traffic modelling appears to show significant errors to justify this. The bypass would do nothing to resolve the main issue of too much traffic on the A508 corridor between J15 and the A5 at Stony Stratford. In-fact it would exacerbate it. There are several respected bodies (the government's Standing Advisory Committee on Trunk Road Assessment, the Campaign for Better Transport and the Campaign to Protect Rural England) that have evidenced the fact that bypasses encourage more traffic and eventually defeat the objectives. The cumulative traffic impacts of future developments in surrounding areas in the SRFI 25-mile catchment area have been largely ignored. This is a significant omission as the section of the M1 between J15 and J18 has been identified by the Department for Transport's National Transport Model to become severely congested, the highest congestion category, by 2040.

Congestion on the Strategic Network 2040



ES5 - Air Quality

There is a considerable body of national and local policy legislation and guidance that makes clear that air quality should be an important consideration in planning decisions. These policies clearly emphasise the need to ensure that significant adverse effects on air quality are mitigated - and mitigated in the areas affected. The NPSNN (5.10) requires that the Secretary of State (SoS) should consider air quality impacts over the wider area likely to be affected, as well as the near vicinity of any significant proposed development. In all cases the SoS must take account of relevant statutory air quality thresholds set out in both Domestic and European legislation.

The SRNG Action Group believe that the following key considerations are of prime importance with regards to Roxhill NG's proposal:

- It has impacts on two existing Air Quality Management Areas (AQMA's) in the local area.
- Traffic within the two AQMA's is forecast to grow with or without Roxhills proposed SRFI.
- Roxhills proposed SRFI combined with two additional lanes to be added to the M1 (J 15) would add substantially to daily traffic movements within the two aforementioned AQMA's.
- The prevailing winds are towards sensitive receptors and new approved residential areas.
- Combined with the loss of 500 acres of open countryside, the proposed building heights and earth bunds could affect the existing dispersion of pollutants and create the 'canyon' effect.

Roxhill NG's proposed SRFI will, if approved, have adverse impact on air quality within two adjacent AQMA's and this could exacerbate chronic respiratory diseases within local communities surrounding the site.

Historically, the monitoring methods used in relation to the two affected AQMA's, has been limited. A measurement process dependent largely on a limited number of passive diffusion tubes and with the nearest automatic continuous analyser seven miles away, is not sufficiently robust for this highly sensitive SRFI proposal to be implemented. Roxhill have not proposed any locally specific mitigation measures to address these adverse impacts.

Roxhill NG's proposal as it stands is contrary to European, National, Regional and Local Policies on Air Quality.

ES6 - Intolerable Health Implications & Other Environmental Impacts

If Roxhill NG's SRFI proposal were to be approved, the additional traffic movements will result in an unacceptable increase in air pollutants within the local area. This will place local residents and commuters, passing regularly through the area, as well as potential employees on the site, at deplorable risk. Cumulative exposure could lead to severe health implications including an exacerbation of chronic diseases sensitive to fluctuating air quality and in the long-term this may provoke premature death. The countryside surrounding the villages impacted will be subject to other environmental impacts such as a deterioration in soil and natural water supplies due in-part to compromised air quality.

The health and perception of quality of life and well-being of local residents are likely to be affected by local air quality compromise. Stress-related symptoms including anxiety, frustration, aggression and anger as a result of extended commuting times will be exacerbated. There is the possibility of an increased risk of road traffic accidents due to additional congestion. Exacerbation of chronic respiratory and cardiovascular diseases will place additional pressure upon individuals, families and our overburdened NHS.

ES7 - Landscape & Public Rights of Way (PROW's)

As a direct result of Roxhill NG's SRFI proposal being approved, the loss of open landscape, views, and alterations to a number of regularly used PROW's will have a highly detrimental impact on local residents and the environment.

PROW's will be longer, routes will be diverted, open countryside views will be lost and replaced with unnecessary warehouses. Such changes will severely damage the pastoral character of the area and impact a number of Grade II listed dwellings.

Furthermore, as a direct result of Roxhill NG's proposed Roade Bypass, regular users of the public footpath in the proposed location will be forced to walk and/or ride through an underground public passageway; for horse riders in particular this has significant health & safety implications.

ES8 - Noise Pollution

Roxhills' Environmental Impact Assessment (EIA) should have been made accessible and written in an understandable manner to lay audiences, whilst at the same time accurately presenting their findings. However, Roxhill have failed to achieve these basic requirements in a number of ways i.e. Roxhill have:

- Not acknowledged the inevitable uncertainty inherent in all noise assessment and forecasting techniques.
- Presented in their documentation the most favourable interpretation of the data assembled which is entirely based on the assumptions and predictions of Roxhill's own Consultants and without independent validation.
- Provided documentation in the public domain which contains assertions that have not been backed up with evidence or discussed with representatives of the most affected receptors e.g. Parish Councils.
- Not provide documentation which contains reference to any independent audit of its findings or any form of peer review.

It is beyond dispute that the displacement of 500 acres of arable farmland and countryside by a proposed development of this scale and size will add significantly to existing sources of traffic noise and adversely impact many local communities. Roxhill have failed to show how this adverse impact can be fully avoided or successfully mitigated.

ES9 - Flooding

The documentation and assessments carried out by Roxhill are extremely vague and not at all comprehensive both around the proposed main SRFI site and the proposed Roade By-Pass.

The SRNG Action group feel strongly that Roxhill should undertake a far more defined and comprehensive assessment in order to ensure that flood risks are properly assessed for the whole of the local catchment area, and include any subsequent downstream effects to ensure that all flood risks are suitably and appropriately mitigated.

ES10 - Ecology

The impact to the indigenous natural wildlife in the area such as; Golden Plovers, Great Crested Newts, Swans, Ducks, Moore Hens, Bats, Corvids (Rook/Crow), Red Kites, Herons, Stock Doves, Woodpigeons will be atrocious if the Roxhill NG's SRFI proposal were to be approved.

ES11 - Cultural Heritage

A number of Listed Buildings, Conservation Areas, Registered Park and Gardens will be severely impacted, such as Woodleys Farm Day Nursery, Hyde Farm House and associated separately listed dovecote (Hyde Farm House is the oldest secular building in Roade parish and dates from the 14th century), Milton Malsor Conservation Area, Collingtree Conservation Area, Courteenhall (house, school house and stables) and Blisworth Conservation Area.

ES12 - Employment & the Local Economy

SRFI's should be located in areas where there is an availability of a suitable workforce. South Northants (as at December 2017) have a claimant rate of 0.7% (400 people). Roxhill claim that an additional c. 7,500 staff roles will be created, therefore, the vast majority of employees will need to commute from locations further afield.

Clearly there will be a substantial shortage of local residents to fill the forecasted 7,500 staff roles; a demand will be created for minimum wage blue collar workers which will yield very little income. These facts will lead to an imbalanced local economy through an over-reliance on warehousing employees and supporting service industries; a SRFI cannot exist in isolation, there will be a demand for food vans, the provision of materials and other goods to sustain the site.

Roxhill have not taken any of these factors into account in their proposal.

ES13 – Crime, Local Emergency (999) Services & Local NHS Facilities

Whilst the increase in crime is difficult to predict the SRNG Action Group expect a similar increase based on the DIRFT example; crime in the local areas impacted by DIRFT rose by **176%**.

Local 999 services, doctor surgeries and hospitals will be placed under additional pressure to support Roxhill NG's proposal. Local residents and the predicted number of new employees (c. 7,500) will result in **a)** increased health issues, **b)** increased traffic accidents and **c)** increased crime rates. There will be no additional Emergency 999 Service or other NHS funding to deal with Roxhill NG's SRFI proposal in the locality impacted if their proposal were to be approved.

ES14 - Public Opinion

Many local residents still do not appreciate the ramifications of Roxhill NG's SRFI proposal. This lack of understanding is in part due to **a)** the fact that the Roxhill application is supposedly 'Strategic' in nature which has been interpreted as a 'done deal' which cannot be challenged, **b)** current government guidelines and processes for SRFI applications, whereby Roxhill have bypassed local planning procedures and are therefore not subject to Local Planning Compliance regulations, and **c)** Roxhills statutory consultation periods were highly inadequate and unsatisfactory.

Members of the public who are more knowledgeable and/or have been able to attend one of the Roxhill public exhibitions are almost unanimously against Roxhills proposal (the SRNG Action Group have evidence in support of this statement).

Conclusions

The SRNG Action Group object to Roxhill NG's proposed SRFI application for the following fundamental reasons:

- As stated, Roxhill NG's proposed SRFI in the East Midlands does not contribute towards the governments objective to implement a strategic national freight network to facilitate an effective modal shift from road to rail. The locations most in need are London/the South East. As stated, DIRFT will remain under capacity until c. 2030. These facts appear to have been ignored by Roxhill.
- Roxhill NG's proposal is entirely 'developer led' rather than 'plan led' and seeks to take advantage of existing land options rather than provide a genuine rail linked strategic benefit. It is yet another road-based warehousing scheme dressed in SRFI clothing.
- Roxhill NG's proposal conflicts all national and local planning legislation and guidance, most specifically with the West Northamptonshire Joint Core Strategy (WNJCS).
- Roxhill NG's proposal would inflict enormous environmental damage on a substantial area of open countryside and arable farmland and would undermine the quality of life for residents in several long established and growing communities.

- Roxhills' claimed benefits of their proposal are far outweighed by the vast number of **disbenefits** to local residents, the local economy, the local emergency and health services and the local environment.

If Roxhill NG's SRFI proposal were to be approved it would, as a consequence, bring into disrepute the role and intentions of the NPSNN.

All of the aforementioned key points are covered in more detail in the individual Chapters which follow directly below.

IMPORTANT NOTE: Many of the Chapters which follow refer to Transport and Traffic related issues and concerns. The Transport & Traffic Chapter has been submitted as a separate **Part B submission** and accompanies this Part A submission.

3. PLANNING COMPLIANCE

Introduction

The National Policy Statement for National Networks (NPSNN) sets out the criteria to be met by major infrastructure projects, including Strategic Rail Freight Interchanges (SRFI's). This proposal fails to comply with the criteria in the following areas. ***(The relevant paragraphs are shown below and indexed as in the original Report).***

The need to create a National Network

The location selected would not contribute to a national network but simply add to an emerging 'cluster' of RFI's centred in the Midlands and close to DIRFT at Daventry, the largest SRFI in the UK. This location is unlikely to be sufficiently commercially attractive to freight operators, to encourage a switch from road to rail:

- *2.50 While the forecasts in themselves, do not provide sufficient granularity to allow site-specific need cases to be demonstrated, they confirm the need for an expanded network of large SRFIs across the regions to accommodate the long-term growth in rail freight. They also indicate that new rail freight interchanges, especially in areas poorly served by such facilities at present, are likely to attract substantial business, generally new to rail.*
- *2.54 To facilitate this modal transfer, a network of SRFI's is needed across the regions, to serve regional, sub-regional and cross-regional markets.*
- *2.56 The Government has concluded that there is a compelling need for an expanded network of SRFI's.*
- *2.58 This means that SRFI capacity needs to be provided at a wide range of locations*

A national network of SRFI's is needed. Locating Northampton Gateway a mere 18 miles from Daventry International Rail Freight Terminal (DIRFT), the largest SRFI in the country, would help create a local cluster not a national network. It would also appear from the above statement that Northampton Gateway is unlikely to attract substantial business due to its closeness to DIRFT and hence would be less likely to achieve modal shift from road transport.

The Need to be Near Major Markets

Both Northampton and Milton Keynes are relatively small urban areas (ranked 37th and 35th respectively in national standings) and manufacturing makes up a smaller part of its economic base. Both markets are currently served by DIRFT with little need for yet another SRFI:

- *2.44 The aim of a strategic rail freight interchange (SRFI) is to optimise the use of rail in the freight journey by maximising rail trunk haul and minimising some elements of the secondary distribution leg by road, through co-location of other distribution and freight activities. SRFIs are a key element in reducing the cost to users of moving freight by rail and are important in facilitating the transfer of freight from road to rail, thereby reducing trip mileage of freight movements on both the national and local road networks.*
- *2.45 This requires the logistics industry to develop new facilities that need to be located alongside the major rail routes, close to major trunk roads as well as near to the conurbations that consume the goods.*
- *2.56 It is important that SRFIs are located near the business markets they will serve – major urban centres, or groups of centres....*

The town of Northampton ranks 37th in the list of urban areas and 30th in the list of primary urban areas. Milton Keynes located some 15 miles away is ranked 35th and 31st respectively. In other words, both Northampton and Milton Keynes are significantly smaller than cities such as Manchester or Leeds, and both are already served by the Daventry International Rail Freight Terminal. Furthermore, Northampton has less manufacturing industry than it previously had which means there is no need for two SRFI's (DIRFT and Northampton Gateway) to be situated nearby.

The Need to Prioritise Brownfield Sites

The proposed Northampton Gateway site fails to prioritise and is entirely greenfield, open agricultural countryside:

- *5.168 Where possible, developments should be on previously developed (brownfield) sites provided that it is not of high environmental value.*

The Need to Consider Alternative Sites

Roxhill, has put forward a site for which it had already had purchased options on and had previously sought to develop as a road-based Distribution Centre. There has been no meaningful consideration of alternatives other than the adjoining greenfield site controlled by Ashfield Land and which is similarly non-compliant with NPSNN:

- *4.26. Applicants should comply with all legal requirements and any policy requirements set out in this NPS on the assessment of alternatives. In particular:*
 - *The EIA Directive requires projects with significant environmental effects to include an outline of the main alternatives studied by the applicant and an indication of the main reasons for the applicant's choice, considering the environmental effects.*

Roxhill has considered one alternative site which is that proposed for Rail Central. One alternative is not considered adequate to comply with the EIA Directive. In addition, Roxhill discounted the possibility of Rail Central being built in addition to Northampton Gateway due to a lack of commercial viability for both sites together. There was a suggestion that Rail Central would create greater environmental effects but these effects were not detailed.

The Need for an Available Local Workforce

The constituencies closest to the proposed site all have lower than average unemployment claimant counts and the site is located in the constituency with one the lowest claimant counts in the country. The largest population growth for this area is forecast to be amongst those over working age. There are already major shortages in the region, of HGV drivers and warehouse operatives – the very skills needed by Northampton Gateway:

- *2.52 The availability of a suitable workforce will therefore be an important consideration.*
- *4.87 The existence of an available and economic local workforce will therefore be an important consideration for the applicant.*

The South Northamptonshire constituency has one of the lowest claimants counts in the country and most of the adjacent constituencies have lower than average claimant counts. Numerous logistics centres in Northampton and nearby have a shortage of drivers and warehouse operatives as indicated by the banners and signs on display at these centres. So contrary to the view of Roxhill, there is not a ready supply of an available workforce. Nor will the situation change much in the future as the biggest growth of population in this area will be those over the age of 65.

The Need to be Sustainable

Northampton Gateway would not be 'sustainable' as defined by the NPSNN because of its limited capacity to expand and its inability to cater for the longer trains expected in the future. There is also no certainty that rail capacity of the West Coast Main Line could cope with the additional trains, each way, per day, that Roxhill have forecast:

- *2.47 A network of SRFIs is a key element in aiding the transfer of freight from road to rail, supporting sustainable distribution and rail freight growth and meeting the changing needs of the logistics industry, especially the ports and retail sector.*
- *The siting of many existing rail freight interchanges in traditional urban locations means that there is no opportunity to expand, that they lack warehousing and they are not conveniently located for the modern logistics and supply chain industry.*
- *4.29 Visual appearance should be a key factor in considering the design of new infrastructure, as well as functionality, fitness for purpose, sustainability and cost. Applying "good design" to national network projects should therefore produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction, matched by an appearance that demonstrates good aesthetics as far as possible.*

The proposed Northampton Gateway is immediately bounded on three sides by roads or rail. The possible expansion capability to the south is small. In addition, the site has been designed to cater for 775 metre length trains. In the longer term, consideration is being given within the rail industry for even longer freight train lengths such as 1000 metres. Northampton Gateway would not be sustainable in the future through its very limited site expansion capability and its inability to cater for longer trains. There is also no certainty that the West Coast Main Line will be capable of handling the 28 additional trains each way per day that Roxhill have forecast.

The Need to Consider Cumulative Impact

There is little evidence that Roxhill has considered the combined impact of both Northampton Gateway and Rail Central being approved and developed. This has been commented on by Northamptonshire County Council Highways department as an unacceptable omission. There has also been little consideration of the impact that construction of HS2 on the operation of an SRFI and no consideration of the impacts of new developments outside Northamptonshire, and the effect on traffic forecasts:

- *4.3 In considering any proposed development, and in particular, when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State should consider:*
 - *its potential benefits, including the facilitation of economic development, including job creation, housing and environmental improvement, and any long-term or wider benefits;*
 - *its potential adverse impacts, including any longer-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.*
- *4.16 When considering significant cumulative effects, any environmental statement should provide information on how the effects of the applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been granted, as well as those already in existence).*

Roxhill has not considered the impact that would be created if both Northampton Gateway and Rail Central are approved. In terms of traffic forecasting, Northamptonshire County Council Highways Department considers this omission to be unacceptable. Nor has Roxhill considered the impacts that the construction of HS2 will have on the operation of Northampton Gateway. Roxhill has also overlooked the impact of future development in adjacent districts (outside Northamptonshire) which means the traffic forecasts have been underestimated.

Compliance with National Planning Policy Framework (NPPF)

The NPPF sets out the principles that should apply to local and neighbourhood plans and highlights that they should: add to the overall quality of the area, respond to local character and history, create a safe environment without the fear of crime and are visually attractive. (See reference 1)

Northampton Gateway is in conflict with all of these principles. It will create an industrial landscape operating 24 hours, replacing a healthy recreational area and wildlife habitat with air, noise and light pollution and dominating the many residential communities over a wide area. Point 58 of the NPPF states:

- *58. Local and neighborhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics. Planning policies and decisions should aim to ensure that developments:*
 - *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - *respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;*
 - *create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and*
 - *are visually attractive as a result of good architecture and appropriate landscaping.*

Northampton Gateway will not add to the overall quality of the area; it will be an eyesore. It will not respond to local character and history nor reflect the identity of the local surroundings. Crime is likely to increase in the surrounding areas based on the experiences of the villages adjacent to the Daventry International Rail Freight Terminal. We do not consider that the intrusion of giant warehouses and crane gantries can be overcome by landscaping.

Compliance with Local Planning Policies

West Northamptonshire Joint Core Strategy (see Reference 2)

The WNJCS Local Plan (Part 1) was adopted in 2014 and covers the period up to 2029. It sets out in detail the expectation for Industrial and Employment Areas and makes specific reference to warehouse development and the proximity to DIRFT at Daventry. The Local Plan was confirmed following public examination by a Planning Inspector who referred specifically to arguments put forward for the Northampton Gateway site. The Inspector had concerns about the future pressure on the M1 and the local road network. He was also concerned about the impact of major industrial development into a largely rural environment.

Therefore, Northampton Gateway is in clear conflict with WNJCS and the proposed site was specifically omitted from local planning up to 2029.

The West Northamptonshire Joint Planning Unit is comprised of local government officials. Its Joint Strategic Planning Committee comprises elected Councillors from Daventry District Council, Northampton Borough Council, South Northamptonshire Council and Northamptonshire County Council who were required to produce a Joint Local Development Scheme. The West Northamptonshire Joint Core Strategy Local Plan (Part 1) ^[4] was adopted in December 2014. It covers the period up to 2029.

This document makes several references to warehouses and rail freight interchanges. Reference is made to the Daventry International Rail Freight Terminal (DIRFT):

- *5.71 New large warehousing developments (in excess of 40,000 sq. m) will normally be expected to be provided for at DIRFT.*
- *5.72 Consequently it is considered that new rail freight interchanges in West Northamptonshire, in addition to DIRFT, would not be deliverable within this plan period.*
- *8.43 Development associated with maximizing the economic advantages of Northampton is proposed in a manner that simultaneously reflects the direction of large-scale strategic distribution activities towards DIRFT. This will be achieved by means of a size restriction within the policy as permission for units over 40,000 sqm will not be granted. This allocation is provided specifically to meet the needs of existing companies within Northampton where there are insufficient sites of adequate size to meet their needs. Within the plan support for larger units is provided at DIRFT, so unless justified by exceptional circumstances other occupiers requiring development of over 40,000 sqm and with no existing connection to the area will be directed towards that location.*

Therefore, the only site that the West Northamptonshire Joint Planning Unit expects to see used as a Strategic Rail Freight Interchange is at DIRFT. It has specifically ruled out the establishment of a Strategic Rail Freight Interchange anywhere else within these three districts.

Further details of West Northamptonshire Joint Core Strategy may be found in Addendum B later in this chapter.

A written submission was made to the West Northamptonshire Joint Planning Unit in February 2014 by Oxalis Planning (see Reference 3) on behalf of Roxhill. The proposal was that land south of M1 junction 15 should be included as a new employment site in preference to that already included for land adjacent to M1 junction 16. This particular area of land is almost identical to that now being proposed for Northampton Gateway, except that the 2014 proposal retained a narrow band of unused land adjacent to the Northampton Loop rail line. In their submission Roxhill argued as follows:

- *In particular, key constraints facing the proposed employment allocation at Junction 16 appear to have been downplayed or entirely ignored, producing an unreasonable and unjustified set of conclusions. It is clear that an unfair and inaccurate comparison has been made between the proposed strategic employment site and the alternative potential employment site at Junction 15 (site reference SA49).*
- *Although not reflected in the scoring of the site, the JPU's evidence base acknowledges that the site at Junction 15 has clearer and more defensible boundaries than the site at Junction 16, and has fewer landscape and visual constraints. Well defined established physical features contain the site, including the railway line to the south-west, and remove any risks of the allocation of this site leading to unrestricted 'sprawl' into land west /south of the M1.*
- *The proposed alternative strategic employment site at Junction 15 is available for development. It is controlled under option by a single active and willing developer who is keen to bring the site forward, and positive representations indicating as such were made to the JPU at the previous stage of consultation during 2013.*

Later in 2015, an examination of the West Northants Joint Core Strategy was carried out by the Planning Inspectorate prior to its adoption. The planning Inspector's in his report made some specific comments about the area of land to the south west of M1 junction 15 (see Reference 4):

- *79. Although various alternatives have been put forward, including in relation to J15 and J15A of the M1, none is a realistic or more sustainable location for this plan period, given doubts over deliverability, including regarding transport implications, especially for the strategic road network as advised by the HA and NCC. Additionally, some are of insufficient size to be properly considered as strategic scale allocations, whilst others are less well linked to existing communities and would represent an even greater intrusion of built development into the otherwise largely rural countryside around the town.*

It is evident that the planning inspector had concerns about the future capacity of the M1 and other major roads in this area. He was also concerned about the impact of such an industrial development into a largely rural area. Therefore, this area was specifically omitted from being a development site within the West Northants Joint Core Strategy which is valid through to 2029.

South Northamptonshire Local Plan

A longstanding component of the Local Plan is the maintenance of a 'local gap' as set out in Saved Policy EV8 which aims to prevent the coalescence of villages and hamlets.

The development of Northampton Gateway would be in complete conflict with Policy EV8 and therefore the Local Plan.

The South Northamptonshire Local Plan (1997) contains Policy EV8 which is also listed within saved policies 2007. Policy EV8 commences as follows. (See References 5 6 & 7):

- *In order to prevent the coalescence of settlements the council will not permit development which would significantly intrude into the following important local gaps as shown on the proposal maps:*
 - *Between the Northampton Borough boundary and the nearby villages and hamlets of Harpole, Kislingbury, Rothersthorpe, Courteenhall, Milton Malsor, Preston Deanery, Little Houghton and Cogenhoe.*

This local gap area is indicated with blue dots on the local plan index proposal map. To build Northampton Gateway would be in contravention of Local Plan policy EV8. Roxhill has acknowledged that Northampton Gateway would fall largely within the area defined as a "Local Gap" in its document: Chapter 4 Landscape and Visual Effects Figure 4.1. It has therefore disregarded the associated requirements of the Local Gap as laid out in policy EV8.

South Northamptonshire Council has listed those saved policies which continue to apply after the adoption of the West Northants Joint Core Strategy. They include EV8, EV24 and EV28.

The Local Plan also contains Policy EV24 which is reproduced below:

- *Planning permission will only be granted for development where it will not lead to the loss of, or cause significant harm to, regionally important geological and geomorphological sites and county wildlife sites. Where development is permitted the retention and protection and enhancement of such sites may be secured through planning conditions and obligations.*

Local Authority Responses to the Northampton Gateway Scoping Report

Councils in this area have responded to the Environmental Statement Scoping Report produced by Northampton Gateway. They have included the following:

Buckinghamshire County Council was concerned about the effects Northampton Gateway would have on the road and rail networks.

Collingtree Parish Council raised many issues including non-compliance with the West Northants Joint Core Strategy and local plans, traffic issues and increased noise, light and air pollution.

Milton Keynes Council was concerned about the effects Northampton Gateway would have on the road and rail networks and its socio-economic impacts.

Milton Malsor Parish Council also raised a number of issues. These included being too close to a sand extraction site, the effects on the water table, light noise and air pollution, and a questioning of the availability of train paths.

Northampton Borough Council raised concerns about air quality, noise and vibration, lighting, transport and cumulative impacts.

South Northamptonshire Council raised a considerable number of concerns.

Summary of Planning Compliance Issues

- The proposed Northampton Gateway strategic rail freight interchange does not comply with numerous policies within the National Policy Statement for National Networks and the National Planning Policy Framework.
- The proposed Northampton Gateway rail freight interchange clearly does not conform with the West Northamptonshire Joint Core Strategy. Such rail freight interchange expansion is required to take place only at Daventry International Rail Freight Terminal.
- There are numerous other ways that the proposed Northampton Gateway development does not conform with the West Northamptonshire Joint Core Strategy including three policy requirements. These have been highlighted in Addendum B.
- The West Northamptonshire Joint Planning Unit was specifically asked to make a change to their planning policy prior to its adoption to accommodate an employment site south of M1 Junction 15. The Planning Unit declined this request.
- There are three South Northamptonshire Council saved policies with which the proposed Northampton Gateway does not conform.
- Northamptonshire County Council Highways Department has raised two very significant issues regarding the lack of a full cumulative impact traffic assessment and the likely detrimental effect on rail passenger services.
- Several councils from this area have identified a very wide variety of issues which have been listed in the Northampton Gateway Scoping Report.

Addendum A

A revised version of the National Planning Policy Framework was provided for consultation in the early part of 2018. The following paragraphs are relevant in respect of the proposed Northampton Gateway SRFI.

- *85. Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found outside existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land and sites that are well-related to existing settlements should be encouraged where suitable opportunities exist.*

The proposed Northampton Gateway SRFI would cover approximately 210 hectares of countryside with a series of warehouses up to 21.5 meters in height. Bunding and vegetation will not hide this unsightly and unwelcome change to the countryside. Roxhill forecast that approximately 16,500 additional vehicle trips per day will be generated by Northampton Gateway. This will significantly affect the A508 and A45 which are already heavily congested at peak periods. In the case of the former, all northbound traffic will have to give way to vehicles entering the Northampton Gateway site. We would suggest this impact is unacceptable as will be the effects on minor roads of both “rat running” and the ban on right turns at the Courteenhall Road/A508 junction. Furthermore, the proposed land is not brownfield.

- *105. Planning policies should:*
 - *e) provide for any large-scale facilities, and the infrastructure to support their operation and growth, considering any relevant national policy statements and whether such development is likely to be a nationally significant infrastructure project. For example, ports, airports, interchanges for rail freight, roadside services and public transport projects*

The West Northants Joint Core Strategy (WNJCS) indicates that new large warehousing developments (in excess of 40,000 sqm) are expected to be located at DIRFT. The applicant appears to be overlooking this section of the WNJCS.

- *108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*
 - *c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*

As indicated above in our response to paragraph 85 of the revised NPPF document, we believe that the impacts on traffic and congestion created by Northampton Gateway will be unacceptable.

For ease of reference we provide a cross reference between the paragraph numbers in the original NPPF document and those in the revised NPPF document where we have referred to the original document in the main body of our submission.

NPPF Paragraph Numbers	
Original	Revised
32	109
58	126
78	102
118	173
124	179
125	178
132	190
133	191

Addendum B

Extracts from West Northamptonshire Joint Core Strategy. The parts relevant to Roxhill's proposal are in bold.

The Joint Core Strategy Vision

4.61 Our rural areas will support a network of vibrant rural communities. **Villages will retain their local distinctiveness and character, providing affordable homes for local people set within a beautiful landscape.** The countryside will support a diverse rural economy including leisure and tourism through its waterways, country houses, parks and woodlands.

Infrastructure and Development

4.45 Historically the provision of infrastructure within West Northamptonshire has failed to keep pace with and fully support a growing population. **Elements of the existing infrastructure in the area are already at or close to capacity.**

4.46 Accommodating planned development in the area will require an increase in the capacity of the existing infrastructure. **Significant investment is needed in public transport, new roads, utilities (including trunk sewer improvements and increasing the capacity of water treatment facilities), health, education and emergency services.** There is also a requirement for investment in social infrastructure such as cultural and community facilities, children's play spaces and libraries, in order to build sustainable communities. It is critical that necessary infrastructure is provided in a timely manner.

5.95 Achieving sustainability is a core objective in all proposals for development and this approach will underpin the commitments made by partner Councils to tackling climate change (for example, as outlined in the Northamptonshire Climate Change Strategy¹⁵, the South Northamptonshire Climate Change Strategy¹⁶, and the Sustainable Community Strategies). This JCS sets out the strategic spatial planning policy framework needed to:

- make the places where we live, shop and work more accessible by means that minimise the environmental burden of travel;
- *make such places resilient to future flood events;*
- protect, enhance and reconnect natural habitats;
- minimise the use of energy and water;
- *manage the water environment; and*
- *ensure natural resources are used prudently - including those used in construction.*

Policy R1 - Spatial strategy for the rural areas

The rural hierarchy in the part 2 local plans will have regard to but not exclusively, the following:

- *the presence of services and facilities to meet the day to day needs of residents, including those from surrounding settlements;*
- *opportunities to retain and improve the provision and enhancement of services critical to the sustainability of settlements;*
- *accessibility, particularly by public transport, to the main towns and sustainable employment opportunities;*
- *evidence of local needs for housing (including market and affordable housing), employment and services;*
- **the role, scale and character of the settlement;**
- **the capacity of settlements to accommodate development in terms of physical, environmental, infrastructure and other constraints;**

- **the availability of deliverable sites including previously developed land in sustainable locations;**
- *sustaining the rural economy by retaining existing employment sites where possible, by enabling small scale economic development, including tourism, through rural diversification and by supporting appropriate agricultural and forestry development;*
- **protect and enhance the character and quality of the rural areas' historic buildings and areas of historic or environmental importance; and**
- *enabling local communities to identify and meet their own local needs.*

Policy S1 The Distribution of Development

New development in the rural areas will be limited with the emphasis being on:

- ***enhancing and maintaining the distinctive character and vitality of rural communities;***
- ***shortening journeys and facilitating access to jobs and services;***
- *strengthening rural enterprise and linkages between settlements and their hinterlands; and*
- ***respecting the quality of tranquillity.***
- *In assessing the suitability of sites for development **priority will be given to making best use of previously developed land** and vacant and under-used buildings in urban or other sustainable locations contributing to the achievement of a west Northamptonshire target of 30% of additional dwellings on previously developed land or through conversions.*

Employment Areas

- ***8.5 The plan area already has a considerable amount of employment floorspace in the planning pipeline in sustainable locations already consented through planning applications. DIRFT, Junction 16, Swan Valley***

M1 Junction 16 Employment Site

- ***8.43 The scale of the allocation represents a level of provision that compliments the economic objectives for the Plan as a whole. Development associated with maximising the economic advantages of Northampton is proposed in a manner that simultaneously reflects the direction of large-scale strategic distribution activities towards DIRFT.***
- ***8.44 The scale and extent of B8 (Storage or Distribution) uses will be carefully controlled. This site is specifically allocated to meet the needs of Northampton, and is not intended to provide a strategic distribution park. Overall, B8 uses should be no more than 50% of the total floorspace on the site, subject to the provision for the relocation of existing Northampton based employers. This is in recognition of the provision that has been made for large scale storage and distribution in more appropriate locations within the plan area, particularly at DIRFT. This provision also intends to ensure that floorspace remains available for B2 manufacturing occupiers to continue to build on the strategic advantages for this sector within the local economy. Any B1(a) office provision will be restricted to no individual unit exceeding 1,000 sqm as new office development should concentrate at Northampton Town Centre.***

Addendum C

South Northamptonshire Council (SNC) is in the course of creating a new Local Plan (Part 2). According to SNC's schedule, it is planned that the new Local Plan (Part 2) will be adopted during November 2018. References within this chapter relate to the existing (at the time of writing) Local Plan (Part 2).

We list the new policies which are expected to come into effect when the new Local Plan (Part 2) is adopted, preceded by their corresponding old policy designations. (See Reference 8)

Old Policy EV8 – Local Gap

The corresponding new policy will be SDP1 which states the following:

- *Planning permission will be granted for developments which comply with the following criteria where relevant:*
 - *e. would not diminish the physical and/or visual separation of individual settlements or the component parts of individual settlements and either individually or cumulatively with other existing or compromise the integrity of the gap*

Also, within the new Local Plan (Part 2) the following is stated:

- *Objective 10*
 - *To protect the setting and separate identity of settlements by avoiding their coalescence and retaining the openness and character of the land around existing settlements.*

References

1. Revised National Planning Policy Framework (draft version)
<https://www.gov.uk/government/consultations/draft-revised-national-planning-policy-framework>
2. West Northamptonshire Joint Core Strategy Local Plan (Part 1)
<http://www.westnorthamptonshirejpu.org/connect.ti/website/view?objectId=5130832#5130832>
3. Representation to West Northamptonshire Joint Core Strategy, Proposed Modifications, Oxalis Planning
[http://www.Roxhill Developments OxalisHarley Response 4722497 25 02 14 Redacted](http://www.Roxhill%20Developments%20OxalisHarley%20Response%204722497%2025%2002%2014%20Redacted)
4. Inspector's report for examination of West Northamptonshire Joint Core Strategy
<http://modgov.southnorthants.gov.uk/documents/s10017/Agenda%20Item%206%20Appendix%201%20WN%20JCS%20Inspectors%20Report.pdf>
5. South Northamptonshire Local Plan 1997
<https://www.southnorthants.gov.uk/downloads/39/1997-local-plan>
See Local plan saved policies 2007 (revised December 2014)
See local plan index proposal map
6. South Northamptonshire Local Plan Part 2
<https://www.southnorthants.gov.uk/downloads/65/local-plan-part-2-and-evidence>
See Local Plan Issues Paper October 2013, page 48
7. South Northamptonshire Council Local Plan Part 2
<https://www.southnorthants.gov.uk/downloads/download/486/pre-submission-draft-local-plan-part-2-consultations>
Pre-Submission Draft Local Plan Part 2 – Summary Document, see page 13
8. South Northamptonshire Council Local Plan Part 2
<https://www.southnorthants.gov.uk/downloads/download/486/pre-submission-draft-local-plan-part-2-consultations>
Pre-Submission Draft Plan

4. VALIDITY OF SITE SELECTION & ALTERNATIVE SITES

The site of Northampton Gateway (NG) at junction 15 of the M1 does not comply with the National Policy Statement for National Networks (NPSNN) as follows:

- It does not meet the need for a national network of SRFIs (NPSNN 2.58) as it is within a region already served by Daventry International Rail Freight Terminal (DIRFT); Phase III, currently under development, will add 7.86m ft² capacity. The expansion of the Terminal was approved by the Planning Inspectorate in 2014. It was estimated that for the development of this site to reach full potential would take 17 years and would absorb all expected increases in regional demand. Thus, any additional proposed capacity at Roxhill NG is surplus to requirements. For detail of SRFIs clustered in the region, see Addendum A.
- It is not situated near a major urban centre to produce and consume its goods (NSPNN 2.56). While Roxhill NG would be located close to Northampton this is not a major conurbation. Northampton ranks 37th in the list of urban areas and 30th in the list of primary urban areas ^[8]. Milton Keynes located some 15 miles away is ranked 35th and 31st respectively. Therefore, HGVs would have to travel further to and from destinations, substantially magnifying carbon footprints, which is not compliant with NPSNN (2.44, 2.45) or EC Directives.
- The site is a rural arable area surrounded by villages, not a brownfield urban site as recommended (NSPNN 4.86 & 111). Within a 2-mile radius of Roxhill NG are six settlements: Blisworth, Collingtree, Courteenhall, Grange Park, Milton Malsor and Roade. Collectively they have a population of c. 12,000 according to 2011 census data. Apart from Grange Park, all the settlements contain conservation areas. The choice of site proposed for NG is thus not compliant with the recommendations of NPSNN.
- The site lacks capacity for expansion (NSPNN 2.47), being constrained on three sides by the A508, M1 and rail lines (West Coast Main & Loop Lines), with little scope for expansion to the remaining southern side.

On this basis it is not sustainable.

Furthermore, the site has been designed to be capable of handling trains up to a maximum length of 775 meters. A recent study conducted by The Metropolitan Transport Research Unit (MTRU) on behalf of the Campaign for Better Transport stated that freight trains of 1,000-meter length would provide several advantages fostering modal shift from road to rail. The Chartered Institute of Logistics and Transport recently responded to the National Infrastructure Commission's call for evidence on Freight:

- *Bigger Trains - longer trains (minimum 750m, with a target of 1000m - France is experimenting with 1500m trains) and heavier trains (3500t minimum, with a target of 4000t) allow better use of capacity and make rail more efficient and thus more competitive.*

This is a second reason why the Roxhill NG site would not be sustainable.

There is a clear requirement for a developer to consider the cumulative impacts of a proposed development along with other developments in the area. Yet within the documentation for the October 2017 consultation we find:

- Draft Rail Capacity Report:
 - *This report does not consider the incremental freight capacity demands that would be generated if the Rail Central Blisworth SRFI site were developed in addition to Northampton Gateway, though in principle the same capacity factors apply to both sites. (Transport Appendix 12.6)*

In addition, no report of the cumulative effect on traffic from NG and Rail Central has been provided.

So, the applicants have failed to consider the cumulative effect of the development despite the requirement to do so (Sch. 3 para. 14 of the Environmental Impact assessment (EIA) regulations):

- The only potential alternative site given by the applicants is Rail Central beside M1 J15A. They appear to have discounted and/or ignored other potential sites, such as near M1 J13, or those on the planned northern section of HS2, a region poorly served by SRFIs, in need of consideration (2.58). There are also other port-centred potential sites which could take advantage of existing infrastructure. The applicants have ignored their duty under the NPSNN to evaluate other possible sites.
- The site is in a region of full employment whereas the NPSNN seeks to locate SRFIs in areas with an available workforce, (NPSNN 2.52 & 4.87). See Appendix II for details.
- Selection of the Roxhill NG site would magnify economic imbalances between this and other regions poor in such facilities. It would also add to the local cluster of SRFIs, resulting in oversupply, over-reliance on one industry, as warned against by the West Northants Joint Core Strategy (WNJCS), and consequent potential unviability.

In summary NG contravenes the fundamental aim of the NPSNN – to create a balanced national network of SRFIs.

As the proposal is so at variance with the NPSNN it is somewhat surprising that the site of Roxhill NG is being seriously considered for a DCO. In our opinion it should be rejected out of hand.

Conclusions

- Roxhill NG would add to a local cluster of SRFIs instead of forming a coherent strategic component of a National Network.
- It is not near a major urban centre.
- The site is rural, not brownfield.
- The site lacks capacity for expansion.
- Cumulative impacts are not adequately reported.
- Potential alternative sites are not adequately reported.
- The site has a negligible locally-available workforce.
- The site would magnify regional economic imbalances and increase over-reliance in the region on one industry.

Addendum A

Besides being close to DIRFT, Roxhill NG would add to a cluster of SRFIs (in use, under construction or planned) in the Midlands and in particular the East Midlands. In the Midlands the following SRFIs are either in use or under construction

DIRFT (Phases I-III)	EM (East Midlands)
East Midlands Gateway	EM
Hams Hall	WM (West Midlands)

In the planning process there are the following SRFIs

Northampton Gateway	EM
Rail Central	EM
East Midlands Intermodal Park	EM
Hinckley	EM
West Midlands Interchange	WM

By contrast, ignoring ports, the East of England, London, South East, South West, Wales and North East struggle to muster more than one or two SRFIs between them. On that basis it is clear that **new SRFIs are needed in regions other than the East Midlands if a National network is to be created.**

5. RAIL ACCESS & CAPACITY

Existing Situation

Roxhill NG, if built, would be directly connected to the strategic rail freight network in the form of the West Coast Main Line. However, this line has a capacity issue which was outlined in the Strategic Case for HS2 ^[1].

- *16. The West Coast Main Line is under stress because there is more demand for train services than there are train paths available.*
- *23. Despite a major £9bn upgrade lasting 10 years, it [the West Coast Main Line] has reached its planned capacity.*
- *2.6.1 The West Coast Main Line is the busiest mixed-traffic corridor in Europe....*
- *2.6.6. In July this year, for example, the ORR [Office of Rail and Road] turned down an application by Virgin Trains to run two additional services a day from London to Blackpool and Shrewsbury.*
- *2.6.11 The West Coast Main Line is operating at a level of intensity that is making it extremely difficult to achieve target levels of performance and reliability.*

HS2 Ltd (a government body) makes a clear case that the West Coast Main Line is operating at or near capacity.

Network Rail recognises the constraints it places on freight capacity. As an example, in its Value of Rail Freight report it included the following statements with relation to Felixstowe ^[2]:

- *Between 2001 and 2011 the number of containers passing through Felixstowe – the largest container port in the UK – has doubled to 750,000 equivalent units. Over the same period the number of trains serving the port daily has increased by 25%.*

If rail capacity was unconstrained, then the number of trains should have increased by 100% in the same period. The fact that freight trains from Felixstowe were only able to accommodate a 25% increase in that period highlights the bottlenecks that exist on several of the rail routes from Felixstowe. Analysis of freight trains with an origin of Felixstowe showed that 42% were routed via the southern part of the West Coast Main Line ^[3].

There are organisations who are concerned about the ability of the West Coast Main Line to accommodate additional train paths. A study by the Rail Freight Group and the Freight Transport Association forecast major shortfalls on many rail freight routes by 2030 ^[4]. The routes with the most capacity shortfall (up to 200 trains per day) were forecast as:

- *West Coast Main Line between Crewe and London*
- *North London Line*
- *London, Tilbury and Southend lines*

The forecasts were created by MDS Transmodal. One of their reviews late in 2016 has considered the implications of the DfT's Central Constrained Forecast ^[5]:

However, the DfT's Central Constrained Forecast still anticipates a more than doubling of ports traffic from 15 million to 32 million tones lifted between 2011 and 2030. Given that the DfT study appears to have assumed no more capacity along the principal rail corridors (and in some cases less) it is difficult to see how this can be achieved; almost all this ports traffic uses the West Coast Main Line at some point in its journey.

The review continues with:

- *Given the market enthusiasm on the part of the major distribution center developers for SRFIs, one can only arrive at the conclusion that the volume of rail freight volumes in the foreseeable future will be dictated by the relevant capacity that Network Rail is able to make available to freight operators, and that companies considering new rail freight terminals, traction or wagons will need to consider carefully whether such investments are worthwhile.*

So, there are several sources that agree that the West Coast Main Line has little ability to accommodate further train paths.

Planned Additional Usage

When attending Roxhill's first consultation for Northampton Gateway in December 2016, their rail consultant Rupert Dyer advised that freight trains from Southampton would be joining the West Coast Main Line at Bletchley, once East West Rail has reopened the section of line between Bicester and Bletchley. At a consultation session for East West Rail on 17/7/17, we were advised that this section of track is due to be completed by 2022. The purpose of using this revised route is to reduce the use of the single-track section of line between Leamington Spa and Coventry.

An analysis of freight trains currently using the Leamington Spa to Coventry section ^[6] shows that there are at least 6 freight trains each way per day to/from Southampton using this section of track, which would be transferred to the West Coast Main Line according to the view put forward by Mr Dyer.

East West Rail anticipate running two passenger trains per hour (each way) to/from Milton Keynes which would join the West Coast Main Line at Bletchley ^[7]. Assuming a service of 15 hours per day, that would be an additional 30 train paths each way per day on the West Coast Main Line. There are likely to be other long-distance passenger trains which use East West Rail, and some of these could then join the West Coast Main Line.

Therefore, an additional 36 train paths each way per day (at least) would need to be accommodated on the West Coast Main Line from 2022 as a result of the opening of East West Rail (Western Section Phase Two).

Phase three of the Daventry International Rail Freight Terminal (DIRFT III) was approved in 2014. The Rail Operations Report ^[8] for that proposal indicated that this SRFI would be expected to handle 32 freight trains per day (each way) by 2032.

- *6.3.1 The plan for 40 paths per day could accommodate the forecast 32 trains each day with spare capacity to reflect the difficulty of 'perfectly optimizing' train movements across the national network.*

Earlier in this report, it was indicated that there would be 12 trains per day (each way) serving DIRFT in 2015 and 18 trains per day (each way) serving this facility in 2020 ^[9]. Therefore, acknowledging the need for optimizing freight paths, there will be a need for approximately an extra 20 freight paths each way per day to accommodate the needs of the expansion at DIRFT.

Network Rail has taken these requirements on board ^[10]:

- *Other freight plans include expansion plans at DIRFT. Known as **DIRFT III**, ProLogis plans to replace the existing DIRFT1 Railport with a much larger facility which will cater for 775m length trains and include warehousing and storage facilities. The aspiration is to operate a significant increase in traffic in the future.*

Northamptonshire Enterprise Partnership commissioned a report which was titled Northamptonshire Rail Capacity Study ^[11] and was completed in 2016. It envisaged significant economic growth across the county and that passenger usage would more than double at Northampton rail station by 2043. Extract from figure 6 of this report:

Station	Annual Usage	Annual Usage	Market Study Growth
	2013/14	2043	To 2043
Northampton	2,783,020	5,733,021	106%

This report also contains the following:

- 3.3.2However, the service between Northampton and London remains at three semi-fast trains per hour operated by suburban regional rolling stock and with substandard journey times given the economic importance of commuting and business traffic between Northampton and the capital. The current service provision is therefore unsatisfactory to support the growth plans in the SEP.further illustrates the case for significantly enhanced services within and between the key economies on the WCML.

To address the existing unsatisfactory service provision and to support the anticipated growth in rail usage by Northamptonshire residents, a substantial increase in passenger services will be needed between Northampton and London during the next 25 years. Examination of the London Northwestern timetable (10/12/17 to 19/5/18) shows that there are 57 trains departing each day from Northampton to London Euston. If you assume an increase of 50% in the number of services between Northampton and Euston by 2043, the balance of the required additional demand being covered by longer trains, that would necessitate an extra 28 trains each way per day.

Summary of required additional train paths identified

Scheme	Additional train paths per day
East West Rail	36 each way
DIRFT III	20 each way
Increased Northampton rail passenger demand	28 each way
Total	84 each way

So, we will have a need for an additional 84 train paths each way per day without considering any paths for Roxhill NG.

The current plans for Roxhill NG suggest that the SRFI first becomes operational in 2021 or 2022.

Effects of HS2 Opening

The Department for Transport indicated in 2016 that the West Midlands region has been the fastest growing rail region over the last eight years ^[12]. This region was primarily served at the time by the London Midland franchise. At a meeting with James Carter (Network Access Manager for London Midland) in July 2016, he indicated that the Northampton/Milton Keynes to London Euston route was the fastest growing route within the franchise. London Northwestern Railway, which has replaced London Midland, will undoubtedly wish to satisfy this expanding demand.

Organizations such as the Northampton Rail User Group will also be pressing for continued growth of passenger services on the Northampton – Euston route.

HS2 is scheduled to open from London to the West Midlands by the end of 2026. The number of train paths to be released at that time is unclear. However, the opening of HS2 will not create any additional paths on the North London or East London Lines. These lines are used by London Overground passenger services and by freight trains. The two services have conflicting needs with London Overground services stopping at most stations unlike freight services. Passenger numbers on London Overground have increased by 253% in the last six years ^[13], and that growth has to be accommodated. London Overground trains were lengthened from 4 to 5 carriages by 2016. The frequency of London Overground services is due to increase by 25% in May 2018 ^[14]. It was reported in Rail magazine that London Overground trains began running at night time between Dalston Junction and New Cross Gate on the East London Line from 15/16 December 2017 ^[15]. Both of these changes adversely affect the number of train paths available for freight usage.

Many parts of the North London Line are two track and hence passenger and freight services have to share the same lines. Freight services from London docks (including London Gateway) and some freight services from Felixstowe are routed via the North London Line to access the southern end of the West Coast Main Line.

In the Network Rail Freight Network Study (April 2017), increasing the freight capacity for “Cross London” was classified as a “Highest priority” project ^[16]. However, elsewhere within the report, it suggests the timescale for such projects, if approved, is likely to be within ten years. So, work to improve cross London freight capacity does not appear to have been scheduled yet. Therefore, any freight paths released on the West Coast Main Line by the opening of HS2 will be of largely academic interest until cross London freight capacity is increased.

More recently, Network Rail has published its Freight & National Passenger Operators Route Strategic Plan (February 2018) ^[17]. Appendix C of this document is a Summary of Investment Options. Cross London freight capacity is listed as a possible project for delivery in Control Period 7 (2024-29). However, there is a significant caveat attached:

- *It should be noted that the list mentioned in Appendix C are choices for funders and none are committed schemes. Schemes will only progress from concept, through development, and into delivery, by passing joint, incremental funding decision points with the relevant funder(s). Schemes will also only progress to the next stage of the lifecycle, subject to an ongoing assessment of viability and affordability.*

Rail experts would argue that improvements to rail network capacity should precede the building of SRFI's.

Infrastructure Considerations

Referring again to the Northamptonshire Rail Capacity Study, we find the following in the context of freight ^[18]:

- *WEST COAST MAIN LINE - pressure for capacity between Willesden and Northampton will be significant, and is likely to require investment at pinch points. The most significant consequences of this will be a need for investment in additional track capacity between Bletchley and Milton Keynes, and dynamic freight loops on the Northampton Loop. This will be particularly important if enhanced passenger services between Northampton and London are to be introduced once HS2 Phase 1 opens in 2026.*

The report continues:

- *Conditional Output Freight-1. Provision of new freight capacity on WCML, MML, EastWest Rail and Felixstowe-North via Peterborough to serve Northamptonshire Intermodal Freight Growth, (as per Network Rail Freight Markets Study) without detriment to passenger Conditional Outputs.*

The Northamptonshire Rail Capacity Study finds the need for infrastructure investment on the West Coast Main Line. The report also points out that increased freight paths should not compromise the ability to provide significantly enhanced passenger services. Therefore, infrastructure improvements are needed locally on the West Coast Main Line before additional freight paths are granted to proposed strategic rail freight interchanges, not afterwards. It should be noted that this rail capacity study was written without any reference to the effects of either Rail Central or Northampton Gateway.

Environmental Impact Assessment Regulations 2009

The Secretary of State made the following statement in the Scoping Opinion for Northampton Gateway ^[19]:

- *3.77 The Applicant's attention is drawn to the comments in Appendix 3 on issues of particular concern that consultees wish to see included in the ES:*
 - *Impacts on the capacity of the West Coast main line (Leicestershire County Council, Milton Keynes Council, Milton Malsor Parish Council and Buckinghamshire County Council).*

At the time the Scoping Opinion was written, Network Rail's response had not been received. It subsequently contained the following ^[20]:

- *Considering that there is a need for further feasibility work, the scoping document is silent on the impact of the proposal on the rail network. Given that this is a key risk, Chapter 12 (Transportation) needs to be expanded to consider the full impact of the proposal on the existing and future rail network both in terms of capacity and timetabling, with a detailed study scope to be agreed with Network Rail.*
- *Given that the location of the proposal is predicated on rail connectivity and the primary aim of the proposal is modal shift, detailed assessment of the impact of the proposal on the rail network at this early stage is crucial.*

If the Network Rail response had been received earlier, the Scoping Opinion might have been different. For example, the Secretary of State made the following comments in the Scoping Opinion for the Rail Central proposal ^[21], a SRFI proposed to be situated on the opposite side of the Northampton Loop and with very similar requirements:

- *3.121 The applicant's attention is also drawn to the comments of Network Rail in respect of potential impacts on the existing and future railway network.*

Network Rail's comments had been as follows:

- *Considering that there is a need for further feasibility work, the scoping document is silent on the impact of the proposal on the rail network. Given that this is a key risk, Chapter 17 (Highways and Transportation) needs to be expanded to consider the full impact of the proposal on the existing and future rail network both in terms of capacity and timetabling, with a detailed study scope to be agreed with Network Rail.*

The context of the Secretary of State's (SoS) comments falls within the Environmental Impact Assessment Regulations 2009. Furthermore, the Environmental Impact Assessment Regulations 2017 contain the following ^[22]:(2) *The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors:*

- *population and human health*
- *material assets*

Rail passengers are the population and the railway network are a material asset.

Roxhill's relevant document is the Draft Rail Capacity Report. This document devotes just four paragraphs to passenger services on the West Coast Main Line (6.1.1. to 6.1.4.). Within this section no reference is made to how busy the West Coast Main Line is now nor how much busier it is likely to become as a result of already approved rail developments or the anticipated growth of passenger demand from Northampton rail station. Nor does Roxhill make any suggestion that that additional freight services may have an adverse impact on rail passenger services. It is our view that Roxhill has not complied with the statutory regulations.

Northamptonshire County Council Highways Department recognized this omission in the draft environmental statement and responded accordingly to Roxhill's second consultation for Northampton Gateway ^[23]:

- *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.*
- *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.*

So, there is a risk that existing rail passenger services may be reduced from Northampton and Roxhill chose not to include this possibility in its draft environmental statement for Northampton Gateway. Constrictions on rail passenger services are likely to result in additional car journeys which would create additional air pollution. So, the omission of the impact of additional freight services on future rail passenger services is very significant in the context of the requirements of the Environmental Impact Assessment regulations.

This omission is even more significant in the context that the Northamptonshire Rail Capacity Study expects a doubling of the usage of Northampton rail station by passengers by 2043. Therefore, a possible reduction in existing passenger services would be totally unacceptable.

Roxhill's Draft Rail Capacity Report (*which was the only documentation publicly available during the pre-examination consultation*) mostly looks at the capacity of the Northampton loop. A more relevant section to examine would be further south as the West Coast Main Line becomes busier closer to London. This is best illustrated by reference to the Network Rail West Coast Main Line Route Utilisation Strategy document. While this example is eight years old, the relative usage will be very similar ^[24].

In paragraph 6.2.9 of Roxhill's report, reference is made to a Network Rail report to the Office of Rail and Road, and more specifically Appendix A within that document ^[25]. If you ignore the Virgin and Cross-Country trains (both coloured red in this chart) and focus on the remaining services, it is immediately evident how much busier the slow lines are south of Watford Junction than on the Northampton loop. Furthermore, this four-year-old chart understates the situation as it omits London Overground services between London Euston and Watford Junction, which amount to three trains per hour in each direction.

As previously explained, another important consideration is the usage of the North London Line which would serve trains from Felixstowe and London Gateway ports. Using data from Realtime Trains shows that 382 trains (passenger and freight) were scheduled through Hampstead Heath on 1/2/18 compared to 258 through Northampton on the same day, a 48% greater throughput. In both cases we are considering 2 track lines and differing demands in terms of stopping/non-stopping trains.

Some of the discussion in this Roxhill document relates to theoretical capacity. However, train timetables usually have gaps built in at regular intervals. This allows recovery to scheduled times to take place more quickly after delays. Therefore, not all existing gaps are available in reality for use for new freight services.

Reference is made within the Roxhill Draft Rail Capacity Report to Network Rail's draft Freight Network Study of August 2016. See paragraphs 4.2.1 to 4.2.6. The forecasts in this latter document represent unconstrained growth and are therefore essentially meaningless.

Furthermore, when considering additional freight paths for Northampton Gateway, we are not considering simply four in each direction per day. Their Draft Rail Capacity Document (see figure 3) indicates that between 18 and 28 paths in each direction per day are forecast to be needed by 2043. These figures take no account of the trains that will be using the aggregates terminal. Such train paths were unquantified during the 2017 consultation.

The proposed aggregates terminal operator is currently based in Northampton which is served typically by two trains per day according to an analysis of Realtime Trains data. However, many train paths this operator currently has, these paths should not count towards the minimum requirement of being able to handle four freight trains per day. SRFIs are being created to bring about modal shift from road to rail, and the existing aggregates train paths being transferred to Northampton Gateway do not represent modal shift. See also NPSNN paragraph 2.50.

We contend that the additional freight trains paths planned for Northampton Gateway cannot be accommodated alongside the existing and additional train paths already planned for projects such as East West Rail, DIRFT III and the expected increase in rail passenger demand identified in the Northamptonshire Rail Capacity Study for the Northamptonshire Enterprise Partnership.

Economic Aspects

Reports early in 2017 indicated that the Government had made a 21% cut in the Mode Shift Revenue Support scheme. This is a government subsidy designed to encourage modal shift from road to rail and its value depends on the start and end points of the rail freight journey. The possible consequences of these reductions to the scheme were reported in the April 2017 edition of Modern Railways ^[26]:

- *Not only are existing services now under review, but future expansion plans are also being called into question. This includes some new services to rail, including new routes in the North of England and the Midlands.*
- *Scottish Transport Minister Humza Yousaf has warned that the cut threatens three of the six existing cross-border rail freight flows.....*

An article in Modern Railways June 2017 ^[27] went further:

- *The Mode Shift Revenue Support Grant, paid in recognition of the carbon reduction benefits offered by rail freight, is having to accommodate a £4 million reduction in funding allocation (p18 March issue). As a result, all the Anglo-Scottish domestic intermodal traffic (see box) is under threat.*

Using the Realtime Trains website, this suggests that approximately 50% of the existing freight trains serving DIRFT and Teesport are under threat by the reduction in the Mode Shift Revenue Support Grant. In turn this undermines the viability of these two sites to operate as rail freight interchanges and undermines the case for Northampton Gateway to operate as a SRFI.

The office of Rail and Road (ORR) has been reviewing the charges made to rail freight operators. Issue 826 of Rail magazine ^[28] contained the following:

- *ORR talks about applying fixed cost mark-ups to all rail operators and removing price caps on charges those operators pay to run trains. Despite affirming support for rail freight, ORR Chief Executive Joanna Whittington's words gave me little comfort. Not least because road fuel duties look set to continue to be frozen while rail charges rise.*

Therefore, there is potentially a second form of cost increase facing rail freight operators, which is likely to favor road transport over rail which undermines the case for additional rail freight interchanges.

For rail freight to be a sustainable mode of transport in the long term its operators need to be profitable. It is therefore concerning to read that the majority of the largest freight train operators were recently loss making ^[29]:

- *Financial results for 2017 have revealed that (taken together) rail freight operators had a revenue shortfall against costs of £113 million on a turnover of £790m. This was partly offset by the payment of £19m in Mode Shift Revenue Support (MSRS) grants from the Department for Transport but that still left a loss for the sector of £94m.*

Modal shift cannot continue if the freight train operators continue to rack up losses.

It is also notable that the growth of domestic intermodal rail freight (measured in net tonne kilometers) since 2002-03 appeared to reach a plateau in 2011-12 and there has not been a substantial amount of growth since then ^[30]. Annual percentage growth of domestic intermodal freight was 10.4% per year between 2003-03 and 2011-12 but fell to 1.1% per year between 2011-12 and 2017-18. There was actually a fall of 1.4% in the year 2017-18. This may suggest that the rail network is also suffering from congestion. Or it may be that there are few remaining economically viable new rail freight journeys to be added. There are differing views on what constitutes an economically viable journey distance for rail freight, but the minimum may be of the order of 140 to 190 miles.

The main type of freight handled by SRFIs is containers. The UK port handling the most container traffic is Felixstowe which handles more than the next two ports combined ^[31]. Analysis of existing rail freight journeys from Felixstowe shows that 87% of its journeys are to end destinations in the North West, Yorkshire and West Midlands regions. The shortest equivalent road journey is approximately 160 miles while more than 40% of these freight trains travel on a longer route through North London. None of Felixstowe's end destinations for freight trains are in the East Midlands.

A similar situation arises at our second largest container port, Southampton. 82% of its journeys are to end destinations in the North West, Yorkshire and West Midlands regions. Just 6% of Southampton's rail freight journeys are to the East Midlands, a distance of just under 120 miles. For the purposes of this analysis, freight journeys between car production plants and Southampton have been ignored. This demonstrates clearly that short distance rail freight journeys are not viable as they generally do not occur.

Cumulative Impacts

We have already highlighted that Roxhill have not considered the impact of additional freight train paths on the existing and future rail passenger services between Northampton and London Euston. Nor has the applicant considered the combined demand of both Northampton Gateway and Rail Central for freight paths and how that will impact existing and future rail passenger services. If both of these proposed SRFIs were to be approved, it is very probable that neither would be able to run the full complement of train paths that each is currently proposing.

Furthermore, Euston Station is going to be substantially changed to accommodate HS2 train services in addition to classic rail services. This will require the removal of spoil and other materials and the bringing in of new construction materials. This work will be ongoing until 2033 approximately. Some of this activity will take place by rail. While this is ongoing, Roxhill's NG (if approved) will be constructed and freight trains will start serving this SRFI. No consideration appears to have been made of the cumulative effect of train activity associated with Euston reconstruction and the train services associated with Roxhill's NG.

This lack of consideration of cumulative impacts indicates a non-conformance with NPSNN.:

- *4.3 In considering any proposed development, and in particular, when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State should consider:*
 - *its potential benefits, including the facilitation of economic development, including job creation, housing and environmental improvement, and any long-term or wider benefits*
 - *its potential adverse impacts, including any longer-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts*
- *4.16 When considering significant cumulative effects, any environmental statement should provide information on how the effects of the applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been granted, as well as those already in existence).*

For northbound trains to enter Roxhill's NG 3 sets of points will be required and a further 3 sets of points to re-join the Northampton loop heading northwards. Similarly, a total of 6 sets of points will be needed for access to Rail Central.

Rupert Dyer, Roxhill's rail consultant, advised in December 2016 that each set of points required a total distance of 60 metres. Therefore, the combined distance required for a total of 12 sets of points would be 720 metres. According to the maps provided (separately) by each developer, the entry and exit points to the Northampton loop would be directly opposite each other. That suggests that one or other needs to be repositioned so as to no longer be directly opposite the other one. If that is not possible, then it may necessitate shortening the distance between the incoming and outgoing points to one or both of the SRFIs. This could compromise that SRFI's ability to handle 775 metre length trains.

This potential contention has not been addressed in Roxhill's NG draft environmental statement.

Additional Factors

SRFIs have an adverse effect on the punctuality of passenger services. Without any prompting, Tom Joyner, Passenger Services Director of London Midland, pointed out when attending a Northampton Rail User Group meeting in February 2017, that trains using DIRFT cause punctuality issues for following passenger trains. It seems very likely that freight trains using Roxhill's NG would create additional issues of this nature.

A communication from the Planning Inspectorate on 21st February 2017 indicated the stage that the developer should have reached with Network Rail by the time the examining authority has to make a decision ^[32]:

- *With the above in mind, the critical consideration for a developer is to seek to provide an Examining Authority (ExA) with sufficient information and detail for them to be able to understand and assess the impacts of a scheme; if an ExA was unable to do this there would be a high risk that they could not recommend that consent be granted for that scheme. GRIP stage 3 relates to option selection, and GRIP stage 4 relates to single option development. If a developer had not reached a conclusion with Network Rail on a single option development (GRIP stage 4) this could present a greater high-risk approach, as it could complicate the ExA's ability to assess the potential impacts of the scheme.*

It is SRNG Action Groups understanding that Network Rail has reached GRIP stage 2 regarding the proposed Northampton Gateway SRFI ^[33]. This significantly increases the associated risk as the Planning Inspectorate has indicated.

Conclusions

- The West Coast Main Line currently has extremely few spare train paths.
- There are already plans in place for additional usage of the West Coast Main Line as a result of East West Rail and DIRFT III. It has been anticipated that the number of rail passengers using Northampton rail station will have doubled between 2013/14 and 2043.
- When HS2 opens in 2026, it will release some train paths. However, these will be of little help to freight as HS2 will not release any train paths on the North London Line, an existing bottleneck through which freight trains access the West Coast Main Line at its southern end on their way from Felixstowe and London Gateway ports.
- Rail infrastructure improvements are needed on the West Coast Main Line and these should be delivered before additional freight paths are provided. However, appropriate improvements to infrastructure do not appear to have been scheduled.
- Consideration should have been made on the impact the proposed SRFI will have on rail passengers using the West Coast Main Line, in accordance with Environmental Impact Assessment regulations. No such consideration appears to have been made.
- The growth of rail freight is constrained by numerous bottlenecks in the rail network and is likely to be undermined by the reduced funding for the Mode Shift Revenue Support scheme and the possible increase in track access charges.
- The growth of domestic intermodal rail freight appears to have slowed down.
- There is a greater need for additional SRFIs in the West Midlands and Yorkshire than in the East Midlands.
- At this stage, Roxhill Northampton Gateway's project is insufficiently advanced within the Network Rail GRIP planning process to offer a low level of risk.

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6. AIR QUALITY

This Chapter deals with the Air Quality issues arising from Roxhill NG's Development Consent Order (DCO) application.

Introduction & Scope of Submission

It is our view that this proposed development would lead to an unacceptable deterioration in local air quality and therefore would fail to comply with European Union health-based air quality limit values. Central to this argument is that the application site is in close proximity to two declared Air Quality Management Areas (AQMA's). In addition, there are severe doubts as to whether the AQ measurement methods related specifically to these AQMA's are both robust and complete. Independent measurements suggest that baseline AQ levels are understating current levels and therefore future levels following development are under predicted. The application fails to comply with the policies and principles laid down in European, National, Regional and Local planning policy frameworks. Finally, no specific mitigation measures are proposed to minimise the exposure of the nearby communities affected by the resultant polluted air. This is contrary to paragraph 124 of the National Planning Policy Framework (NPPF) and paragraph 5.13 of the National Policy Statement National Networks (NPSNN).

This chapter focuses on nitrogen dioxide emissions, as this is recognised as the pollutant having the greatest impact on the area surrounding the proposed site. However, there are also substantial doubts that air pollution from particulates will satisfactorily be avoided or mitigated both during and after the construction phase.

European & National Policy Principles on Air Quality

The strongest evidence of health impacts of air pollution, including premature deaths, has been for long-term exposure to particulate matter (PM_{2.5}). There is no recognised concentration threshold for health effects of PM_{2.5}. Nitrogen dioxide plays an important and independent role from PM_{2.5}, in exacerbating asthma, bronchial symptoms, lung inflammation and reduced lung function, especially through short-term exposure.

The Department of Health's Committee on the Medical Effects of Air Pollution (COMEAP) has reviewed the evidence on health impacts of nitrogen dioxide. It has summarised its findings in a Statement issued in March 2015. The Committee concluded that *"Evidence associating NO₂ with health effects has strengthened substantially in recent years ..."* COMEAP intends to consider the best way to quantify these effects, as it has done for PM_{2.5}

Ref: [Link 1 COMEAP Statement \(below\)](#)

In 2013, the World Health Organisation (WHO) published recommended concentration-response functions for the health effects of three pollutants, including nitrogen dioxide. This included functions for long-term (annual mean) nitrogen dioxide exposure. The WHO recommended that: *"the NO₂ impact should be calculated for levels above 20 mg/m³"* a level that is half the current limit value and objective concentration for nitrogen dioxide. The UK's current legal limit for PM_{2.5} is not as strict as the level recommended by the WHO. With the exception of Scotland, the UK limit for PM_{2.5} is 25 micrograms per cubic metre, over double the WHO recommended level of 10 micrograms. This means that many vulnerable people, including those with existing cardiovascular conditions, are potentially exposed to dangerous levels of air pollution.

The British Heart Foundation published a report in July 2018 highlighting the dangers of No2 and PM and recommended that the UK Government adopted the WHO limit values for PM. In response the government has said that they are working towards the WHO limit values.

Further evidential detail is highlighted in the Health Chapter of this Submission.

Ref: [Link 2 WHO Report 2013 \(below\)](#)

European Policy Principles

The European Union has established a set of air quality 'limit values' and 'targets' that provide a key part of the plan to improve air quality across Europe to protect human health and the environment. These are set out in Directive 2008/50/EC of 21 May 2008 on ambient air quality and cleaner air for Europe, as implemented in England and Wales under The Air Quality Standards Regulation 2010 (No. 1001) ("2010 Regulations").

Compliance with the limit values is a legal requirement, with Member States being responsible for assessing and delivering compliance. The competent authority in the UK is the Secretary of State for the Environment, Food and Rural Affairs, who has a duty to ensure concentrations do not exceed the limit values) and who must provide details of all cases where levels of pollutants have exceeded limit values in annual reports.

The UK Government's failure to secure compliance with nitrogen dioxide levels in certain zones under the Directive has recently been the subject of legal proceedings in the case of *R (on the application of Clientearth) v Secretary of State for the Environment, Food and Rural Affairs [2015] UKSC 28*. The judgment in this case left no doubt about the seriousness of the breach of Article 13 (failure to ensure that limit values are not exceeded) or about the national court's responsibility to secure compliance (para 29 in the Judgement. The UK Government has decided not to challenge this ruling. The Government has also made it clear that the existing provisions of the EU Directive will be incorporated into UK law via the Repeal Bill.

Ref: [Link 3 2015 Client Earth Judgement \(below\)](#)

Legal Opinion

In September 2015, leading Planning QC Robert McCracken gave a legal opinion on the approach planning authorities should take regarding conforming to EU Air Quality Directive 2008/50/EC. He concluded that:

- It would be unlawful for Local Authorities to grant consent for a development which would result in a breach of limit values.
- It would be unlawful for Local Authorities to grant consent for a development which would worsen air quality in an area already in breach of limit values. Where limit values are not exceeded LA's must try to prevent a worsening of air quality and only permit development if it is compliant with the principle of sustainable development.

Ref: [Link 4 Legal Opinion \(below\)](#)

National Policy Principles

The Air Quality Annual Report published by the Department for Environment, Food, and Rural Affairs (Defra) in 2017 provides the policy framework for air quality management and assessment in the UK. It provides air quality standards and objectives for key air pollutants, which are designed to protect human health and the environment. Local authorities are seen to play a particularly important role. The strategy describes the Local Air Quality Management (LAQM) regime that has been established, whereby every authority has to carry out regular reviews and assessments of air quality in its area to identify whether the objectives have been, or will be, achieved at relevant locations, by the applicable date. If this is not the case, the authority must declare an Air Quality Management Area (AQMA), and prepare an action plan which identifies appropriate measures that will be introduced in pursuit of the objectives.

The Government has also made clear to local authorities that they have a role to play in meeting the limit values. Defra sent a letter to local authorities in 2014 that related to infringement proceedings by the European Commission against the UK Government for breach of nitrogen dioxide limit values.

This stated:

- *The Government is committed to working towards full compliance with the Air Quality Directive and we will be working with the Commission to ensure compliance in the shortest possible time. Local authorities have already done much to help improve air quality: not just to comply with the legal the local public health benefits. We also know that achieving further NO₂ reductions will not be easy and will need us to work together and to take action by central government and its agencies as well as local authorities.*

This letter emphasises the need for local authority action in relation to limit value breaches by adding:

- *We feel we ought to remind you of the discretionary power in Part 2 of the Localism Act under which the Government could require responsible authorities to pay all or part of an infringement fine.*

Ref: [Link 5 Defra Air Quality Report 2017 \(below\)](#)

National & Regional Planning Policies for Air Quality

National Policy Statement on National Networks (NPSNN)

The National Policy Statement on National Networks was published in December 2014. This makes clear the Government's approach to air quality and, in particular, limit values.

- *5.10 The Secretary of State should consider air quality impacts over the wider area likely to be affected, as well as in the near vicinity of the scheme. In all cases the Secretary of State must take account of relevant statutory air quality thresholds set out in domestic and European legislation. Where a project is likely to lead to a breach of the air quality thresholds, the applicant should work with the relevant authorities to secure appropriate mitigation measures with a view to ensuring so far as possible that those thresholds are not breached.*
- *5.11 Air quality considerations are likely to be particularly relevant where schemes are proposed:*
 - *within or adjacent to Air Quality Management Areas (AQMA); roads identified as being above Limit Values or nature conservation sites (including Natura 2000 sites and SSSIs, including those outside England); and*
 - *where changes are sufficient to bring about the need for a new AQMA or change the size of an existing AQMA; or bring about changes to exceedances of the Limit Values, or where they may have the potential to impact on nature conservation sites.*
- *5.12 The Secretary of State must give air quality considerations substantial weight where, after considering mitigation, a project would lead to a significant air quality impact in relation to EIA and / or where they lead to a deterioration in air quality in a zone/agglomeration.*

- 5.13 The Secretary of State should refuse consent where, after considering mitigation, the air quality impacts of the scheme will:
 - result in a zone/agglomeration which is currently reported as being compliant with the Air Quality Directive becoming non-compliant; or
 - affect the ability of a non-compliant area to achieve compliance within the most recent timescales reported to the European Commission at the time of the decision.

Ref: [Link 6 NPSNN Statement 2014 \(below\)](#)

National Planning Policy Framework (NPPF)

The National Planning Policy Framework (2012) sets out planning policy for England. It places a general presumption in favour of sustainable development, stressing the importance of local development plans, and states that the planning system should perform an environmental role to minimise pollution. One of the twelve core planning principles is that planning should “contribute to...reducing pollution” “To prevent unacceptable risks from air pollution, planning decisions should ensure that new development is appropriate for its location, and the effects of pollution on health and the sensitivity of the area and the development should be taken into account”.

More specifically, the NPPF makes clear that: “Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, considering the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure any new development in Air Quality Management Areas is consistent with the local air quality action plan”.

Ref: [Link 7 NPPF 2012 \(below\)](#)

National Planning Practice Guidance (PPG)

The NPPF is supported by Planning Practice Guidance (“PPG”) (DCLG, 2014), which includes guiding principles on how planning can take account of the impacts of new development on air quality. The guidance is not published as a document, but as text on the website. Below are the relevant paragraphs from the PPG.

The PPG states in paragraph 001 that: “Defra carries out an annual national assessment of air quality using modelling and monitoring to determine compliance with EU Limit Values” and “It is important that the potential impact of new development on air quality is considered ... where the national assessment indicates that relevant limits have been exceeded or are near the limit”. The role of the local authorities is covered by the LAQM regime, with the PPG stating that local authority Air Quality Action Plans “identify measures that will be introduced in pursuit of the objectives”.

The PPG states in paragraph 005 that “Whether or not air quality is relevant to a planning decision will depend on the proposed development and its location. Concerns could arise if the development is likely to generate air quality impact in an area where air quality is known to be poor. They could also arise where the development is likely to adversely impact upon the implementation of air quality strategies and action plans and/or, in particular, lead to a breach of EU legislation (including that applicable to wildlife)”.

The PPG sets out in paragraph 007 the information that may be required in an air quality assessment, making clear that “Assessments should be proportional to the nature and scale of development proposed and the level of concern about air quality”. It also provides guidance on options for mitigating air quality impacts, as well as examples of the types of measures to be considered. It makes clear in paragraph 008 that “Mitigation options where necessary will be locationally specific, will depend on the proposed development and should be proportionate to the likely impact”.

Finally, the PPG sets out in paragraph 009 how air quality considerations fit into the development management process. This makes clear that consideration needs to be given to the effects of a development in relation to limit values, objectives and whether the development would lead to unacceptable risks from air pollution and the role of mitigation.

[Ref: Link 8 NPPG Guidance 2014 \(below\)](#)

Northamptonshire County Council Planning Policy – Highways

NCC Air Quality Strategy 2013 states: “The aim of the Highways Air Quality Strategy is to reduce the number of transport-related Air Quality Management Areas on Northamptonshire County Council roads to zero and maintain that position”.

NCC Air Quality Strategy Air Quality Policy 8 states: “We will work with our partners and stakeholders to increase the importance that is placed on air quality management when new developments are planned. If a proposed development is expected to have a detrimental effect on air quality at a location then funding should be sought from the developer to mitigate the problem”.

[Ref: Link 9 NCC Highways AQ Strategy 2013 \(below\)](#)

West Northamptonshire Joint Core Strategy

Although the West Northamptonshire Joint Strategic Planning Committee is now dissolved pending the formation of a new joint Policy and infrastructure Board, the current West Northamptonshire Joint Core Strategy remains in place and under Policy *BN9* – Planning for Pollution Control states:

- *Proposals for new development which are likely to cause pollution or likely to result in exposure to sources of pollution or risks to safety will need to demonstrate that they provide opportunities to minimize and where possible reduce, pollution issues that are a barrier to achieving sustainable development and healthy communities including a) Maintaining and improving AQ, particularly in poor AQ areas, in accordance national AQ standards and best practice..... Development that is likely to cause pollution, either individually or cumulatively, will only be permitted if measures can be implemented to minimize pollution to a level which provides a high standard of protection for health and environmental quality.*

[Ref: Link 10 WNJCS \(below\)](#)

Local Planning Authorities - Northampton Borough Council (NBC)

The NBC Draft Air Quality Report 2017-18 restates national guidance provided by Defra: “As well as considering the air quality impact when making Local Plans, it is also a material consideration when determining individual planning applications. The National Planning Guidance further states: If a proposed development will lead to an unacceptable risk of air pollution or prevent sustained compliance with EU Limit values or national objectives, Planning Authorities should consider refusing permission. Authorities should consider how the development can be made acceptable (for example through mitigation) or whether permission should be refused”.

[Ref: Link 11 NBC Draft AQ Report 2017/18 \(below\)](#)

In a NBC Cabinet Report dated 13th September 2017, the Council accepted the following principle stated by its Scrutiny Panel. *“The Environmental Scrutiny Panel notes that while vehicle emissions contribute to poor air quality, there are other sources of pollution in the town, including residential, commercial and industrial activity. It should be ensured that the Borough Council uses all measures available to influence all planning activities and the development of the local plan and licensing, to help mitigate any adverse effects and to ensure that any developments in the future do not adversely contribute to poor air quality”.*

Ref: Link 12 NBC Cabinet Report 2017 (below)

In 2017 NBC produced a Low emissions strategy which incorporated principles set out in the West Northamptonshire Joint Core Strategy including Policy B9 – Planning for Pollution Control which states:

- *Proposals for new development which are likely to cause pollution or likely to result in exposure to sources of pollution or risks to safety will need to demonstrate that they provide opportunities to minimise and where possible reduce pollution issues that are a barrier to achieving sustainable development and healthy communities, including:*
 - *Maintaining and improving air quality, particularly in poor air quality areas, in accordance with National Air Quality Standards and best practice;development that is likely to cause pollution, either individually or cumulatively, will only be permitted if measures can be implemented to minimise pollution to a level which provides a high standard of protection for health and environmental quality.*

The Low Emissions Strategy also restates point 9.4 of the NPPG which states:

- *If a proposed development will lead to an unacceptable risk of air pollution or prevent sustained compliance with EU Limit values or national objectives, then Planning Authorities should consider refusing permission. Authorities should consider how the development can be made acceptable (for example through mitigation) or whether permission should be refused.*

Ref: Link 13 NBC LES (below)

Local Planning Policies - South Northamptonshire District Council

The SNC Air Quality Status Report for 2017 states:

- *Of the seven pollutants for which an air quality objective has been set only Nitrogen Dioxide is monitored by South Northamptonshire Council. The main source of the pollution is from road transport due to the major trunk roads, A43, A45, A5 and A508, and Motorways, M1 and M40, that pass through the district.*

An Air Quality Management Area was declared in September 2005; the designated area incorporates the Watling Street (A5) from the Saracens Head cross roads to Silverstone Brook adjacent to 131 Watling Street Towcester. Road traffic statistics have shown an increase in the percentage of heavy goods vehicles on the trunk roads besides an increase in traffic generally. In addition, diesel vehicles are emitting a higher fraction of primary nitrogen dioxide nationally, especially where particulate traps are fitted. South Northamptonshire Council will continue to monitor air quality in its area to ensure that air quality within the AQMA and elsewhere does not deteriorate and to evaluate progress as the Action Plan is implemented. Nitrogen dioxide continues to be monitored at key locations across the district and in and around Towcester. The chemiluminescent analyser, remains located within the AQMA and is co-located with 3 nitrogen dioxide diffusion tubes. The monitoring locations of nitrogen dioxide is reviewed as and when necessary and considers potential development locations.

Ref: Link 14 SNC AQ Status Report 2017 (below)

Parish Councils – Parishes against Pollution (PaP)

In April 2017, 29 parish councils that are in areas adjacent to the M1/ A45/A43 and A508 and that are particularly impacted by cumulative developments generating additional traffic, adopted and recorded in their minutes, the following statement of principle. *“Along with neighbouring Parish Councils, we are alarmed at the number and scale of major traffic generating developments in our area and their likely environmental impact. We draw attention to the specific requirement of the National Planning Policy Framework (NPPF) namely “preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water and noise pollution or land instability”. We strongly urge that this requirement is stringently and robustly followed and the cumulative impact considered when major planning decisions are being taken”.* The parishes supporting this statement have substantial populations and fall within both Northampton Borough Council and South Northamptonshire District Council. The total population represented is approaching 100,000.

Ref: Addendum 1 - Parishes Against Pollution Joint Statement 2017 (below)

Air Quality Assessment - European Union Limit Values

The relevant limit value for nitrogen dioxide set in EU Directive 2008/50/EC is 40 µg/m³ as an annual mean (over a calendar year). This was to have been achieved in all zones and agglomerations by 2010. The Directive allowed Member States to apply for time extensions, as long as they could show that the limit value would be achieved by 2015. The UK Government did not apply for a time extension for some zones/agglomerations, as it recognised that it would not achieve the limit value by 2015. The assessment by Defra is that the limit value will not be achieved in some zones/agglomerations, in particular in London, until sometime after 2030.

Exceedances of the limit value are identified by the UK Government and reported annually to the Commission. These exceedances are identified by monitoring and modelling carried out by the competent authorities and bodies designated by the Member States. In the UK, the Secretary of State for the Environment, Food and Rural Affairs is the designated authority.

Ref: [Link 15 EU Directive 2008/50/EC \(below\)](#)

UK Government Objectives

The annual mean objective for nitrogen dioxide is numerically the same as the limit value, but the requirements for assessment can differ. The objective, which is 40µg/m³ as an annual mean, was to have been achieved by 2005, and is still in place.

Technical Guidance LAQM.TG (16) makes clear that objectives apply at locations where members of the public are likely to be regularly present and where they are likely to be exposed over the averaging period of the objective. The annual mean objective is considered to apply at the façades of residential properties, schools, hospitals etc

Ref: [Link 16 Defra LAQM.TG 16 \(below\)](#)

Safe Limit Values

In giving evidence in 2015 at the Heathrow Expansion Planning Inquiry, the recognised authority Prof Duncan Laxen stated “*It is evident that exposure to nitrogen dioxide below the annual mean standard of 40 µg/m³, which is the limit value and objective for this pollutant, should not be considered to be safe. There can therefore be no complacency in achieving a concentration that is just below the standard*”. The World Health Organisation has stated that levels over 20 µg/m³, should be of concern.

Ref: [Link 17 Prof Duncan Laxen 2015 \(below\)](#)

Northampton Gateway 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 (µg/m³) 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. A table of locations and measurements is attached.

Ref: Addendum 2 - Table of measured AQ Levels in parishes adjoining the site and Addendum 3 Gradko Lab Report for Collingtree (both below)

All these tests, whether by Northampton Borough, the developer Roxhill or local Parish Council's, are based on measurements using diffusion tubes. Defra guidelines recommend that these results should be regarded as indicative and ideally, should be validated using *continuous automatic monitoring* or techniques such as an 'Chemiluminescent Analyser' as recommended in the EU Air Quality Directive.

Adequate Monitoring

Dr Therese Coffey (Parliamentary Under Secretary of State for the Environment) has confirmed in a written reply to Constituency MP Andrea Leadsom, that as well as being in line with Defra LAQM guidance, local authorities must ensure that the monitoring sites and equipment used, are adequate to permit meaningful evaluation of local air quality."

Ref: Addendum 4 Letter from Dr Coffey (below)

Because of the sensitivity of this proposal in this location, it is essential that planning decisions are taken on the basis of accurate and fully validated air quality measurements. However, given the almost total reliance on diffusion tubes by both Northampton Borough and South Northants District Councils and recognising the limitations and margin of error (up to 25%) of this measurement method, it is necessary to question the quality control procedures employed. This applies also to measurements carried out by the applicant/developer. The following questions should be addressed:

- Who are the manufacturers of the specific tubes used?
- Do the tubes have a traceable batch code together with a Certificate of Analysis or Certificate of Conformity as evidence of their conformity with original specification?
- Is the accreditation of the tubes carried out in a United Kingdom Accreditation (UKAS) certified laboratory?
- What is the laboratory's UKAS number and last certification date and reference number for the calibration method?
- What is the protocol for locating the tubes adjacent to the M1 AQMA in order to average out inaccuracies and what are the maximum/minimum distances from source?
- Following on from (5) has the current location of tubes allowed for the fact that the M1 will after becoming a 'Smart' motorway and will be at least one lane nearer to receptors in Collingtree and Hunsbury?
- If the continuous, automatic electronic detector at Simpson Barracks is the reference standard for calibration of tubes used at the M1 AQMA, do the tubes co-located with the instrument have the same batch number as the tubes used at the AQMA?

Ref: Link 18 Urban Planning Parliamentary Joint Committee (below)

Cumulative Traffic Growth & Air Quality

The proposed site is adjoining AQMA 1 (M1 Motorway) and less than a mile from AQMA 5 (Queen Eleanor Roundabout A45) There is a further AQMA in central Towcester managed by South Northants Council.

All Traffic forecasts predict a significant increase in traffic using the M1, junction 15 and adjoining roads even without the proposed Northampton Gateway development.

Roxhill forecast that 36% of the HGV movements generated by their proposal would depart from Junction 15 of the M1 northwards along the A45. These vehicles will travel through AQMA 5 which runs from Wooldale Road to the Queen Eleanor roundabout. NBC Environmental Health Officer has confirmed in a written reply that *“Due to the number of large developments in the pipeline outside Northampton that could have a combined net increase of traffic flows through the AQMA’s, from a cumulative perspective potential nominal increases in NO2 concentrations could feasibly occur within both AQMA’s. Due to the above and the fact that we have limited control over increasing cars on our roads, we are retaining both AQMA’s and are continuing to monitor NO2 concentrations within the AQMA’s”.*

The Northampton Gateway proposal is expected to generate 17,000 additional vehicle movements each day around the site, including 4,000 HGV’s. The installation of ‘All lane running’ as part of the SMART motorway between J 13 & 16, begins 2018 and is expected to increase traffic concentration on this section.

In November 2013, the Highways Agency (now Highways England) ruled out hard shoulder running between junctions 8 and 18 of the M60 and covered by the Greater Manchester AQMA, because of the detrimental impact it would have on air quality. In a precedent-setting decision, the Agency’s environmental assessment concluded that allowing more cars to use the road between Swinton and Sale would breach UK and EU standards protecting public health and the natural environment. In their consultation report 10, the Highways Agency stated that:

“We looked extensively at the option to provide all-lane running on the M60 section between junctions 8 and 18. However, our environmental assessment concluded that creating this improvement would result in an increase in traffic using the motorway which would then have a detrimental effect on air quality.

Canyon Effect

The current dispersal of some traffic pollutants from the M1 AQMA across 500 acres of open fields will be prevented by 5m sq. ft of warehouse buildings creating a 20-metre-high corridor along the site boundary with the M1 and with the potential to deflect those pollutants back towards Collingtree, Grange Park and East and West Hunsbury. The Master Plan for Northampton Gateway proposes a 15-metre-high earth bund along the M1 motorway and in front of the 20-metre-high buildings. This is likely to create the well documented ‘canyon effect’ whereby pollutants are concentrated between the two raised boundaries at this section of the motorway and then dispersed eastwards by the prevailing winds. The prevailing winds are predominately from the south west and towards residential areas within Northampton Borough.

Traffic Patterns

The A5 through Towcester is also an AQMA. And it is inevitable that there will be some additional traffic passing through Towcester if Northampton Gateway is approved, which will impact on this existing AQMA.

Roxhill have indicated that all commercial vehicle fleets based at Northampton Gateway would need to be compliant with current Euro emission regulations (currently Euro 6). However, there is no evidence provided as to how this could be enforced.

It should also be noted that the vast majority (up to 90%) of incoming containers to Northampton Gateway are likely to be moved by road rather than rail. Therefore, incoming goods will arrive by HGVs from across the UK and Europe. The operators of Northampton Gateway will have no control over what Euro emissions standards these vehicles will meet or be able to prevent the reported illegal disablement of pollution control systems. (On 11th February 2018, the Daily Telegraph reported that based on figures from the DVLA it is calculated that 1 in 14 diesel HGV's has fitted illegal devices to disable pollution control systems)

Ref: [Link 19 Press Report Disabling of Pollution Control Systems D.T. Feb 2018 \(below\)](#)

Northampton AQMA 1 (M1) & AQMA 5 (A45) Planning History

In 2003 AQMA's 1 & 5 were identified as areas likely to breach legal AQ limits and monitoring began to be carried out by Northampton Borough Council. Monitoring with diffusion tubes has continued since then with results submitted annually to Defra. However, it should be noted that NBC failed to provide annual reports to Defra in years 2011, 2013 & 2015.

- In 1999 a planning application No. 991007 was made by the Highways Agency on land it owned at Wards Farm, Collingtree High Street and alongside what is now AQMA 1. It was opposed by Collingtree Parish Council on Air Quality grounds but eventually approved by NBC
- In 2011 an application (N/2011/0437) on a plot off Ash Lane and adjoining the AQMA was withdrawn after objections from NBC Environmental Health on Air Quality grounds.
- In 2013 an application (No N/2013/1035) by Bovis Homes was refused by NBC on a number of planning grounds, including Air Quality and the proximity of the site to AQMA 1. The Applicant appealed and prior to the Appeal Inquiry the AQ objection was withdrawn by NBC following an agreement by the applicant to waive legal costs in the event of the appeal being successful. Consent was then gained on appeal but with conditions regarding mitigation of noise from the M1. Discussions on the fulfilment of the Planning Conditions are still ongoing. Detailed evidence on Air Quality was presented to the Inspector at the Appeal Inquiry by Collingtree Park Residents Association and this is attached.

Roxhill's (Draft) Environmental Impact Statement - Air Quality

The NPSNN states: Where the impacts of a development project are likely to have significant air quality effects in relation to meeting EIA requirements and/or affect the UK's ability to comply with the EU Air Quality Directive, the applicant should undertake an assessment of the impact of the proposed project as part of the environmental statement.

This should describe 1) existing AQ levels 2) forecasts of air quality at the time of opening and taking account of the impact of the scheme 3) any significant AQ effects, their mitigation and any residual effects, distinguishing between the construction and operation stages and taking account of the impact of road traffic generated by the project.

The Draft Environmental Statement was the only information publicly available during the Pre-application Consultation period. It contains many questionable and inconsistent assertions:

- 9.1.3 The description of the overall development does not include the planned Aggregates Depot, which has implications for Air Quality.
- 9.1.7 The statement that the construction of a Road bypass is 'likely to lead to predominately beneficial local air quality impacts' has not been justified.

- 9.1.9 An estimate is given of the scheme leading to a reduction of HGV trips equivalent to 93,000,000 miles per year. There is no authoritative source given for this.
- 9.2.4 Although the Draft ES quotes the NPSNN guidance in relation to Air Quality Zones, it does not also quote its guidance in relation to AQMA's.
- 9.2.6 The Draft ES quotes the NPSNN in relation to strategic mitigation but omits reference to locally specific mitigation.
- 9.3.8 It is stated that during construction the daily on-site HGV movements are expected to be less than 200 and therefore their impact on air quality has not been assessed - this is not acceptable.
- 9.3.19 The ES describes the complex process of modelling (Northamptonshire Strategic Transport Model) to assess dispersion of pollutants in relation to receptors. However, it concedes that further review is needed prior to submitting an application. This further review was not been available during pre-application consultation.
- 9.3.21 The Draft ES concedes that an assessment of the cumulative effects of the Rail Central proposal will not be available during the pre-application process.
- 9.3.26 It is conceded that monitoring data of AQMA 1 carried out by NBC has not been used and that the developer is using data from its own AQ Consultants.
- 9.4.6 It is stated that both NBC and SNC 'have widespread monitoring networks for NO2 including a number of automatic real time monitors. This is not correct. NBC has only one real time monitor located 6/7 miles from the site. South Northants Council does not have any real time monitors. Historically NBC has only used one diffusion tube location to monitor AQMA 1 at Collingtree.
- 9.4.7 The Table 9.3 showing NO2 concentrations measured by the Automatic Monitor at Wellingborough Road, Northampton is unhelpful as it does not show results since 2013. Therefore, the statement that 'mean concentrations of NO2 in NBC and SNC tend to be below the EU Directive limit' is misleading.
- 9.4.15 The ES in Table 9.6 shows the developers own recorded concentrations at Collingtree and on the A45. These show that current baseline measurements are already close to the EU Directive limit. However, independent monitoring by Collingtree Parish Council (validated by Gradko Laboratory) shows that these measures are understated and cast doubt on the baseline assessments in the Northampton Gateway application.
- 9.4.17 The ES states that concentrations decline rapidly with distance from the M1. The monitoring undertaken by Collingtree Parish Council shows that this decline is not as rapid as stated.
- 9.5.16 The assessment of sensitive receptors within 350m of the site in Table 9.8 is questionable and understates the number of dwellings within the distance bands. It omits a Primary School, a Playing Field and residential areas in Collingtree Park including a Nursing Home.
- 9.5.17 The claim that a large proportion of the sensitive receptors listed in Table 9.8, are downwind of the prevailing wind is strongly disputed. This error affects the validity of calculations on the number and location of sensitive receptors.
- 9.5.41 The ES acknowledges that the M1 alongside the site will be widened by two lanes but has not included the likely traffic growth in its Air quality calculations. This also means that the AQMA boundary will now be nearer to the closest receptors in Collingtree.
- 9.5.49 The results of an assessment of the likely NO2 concentrations in AQMA 5 (A45) are not shown in the Draft ES and therefore were unavailable during the pre-application consultation.
- 9.6.6 The strategic mitigation benefits listed in the ES are speculative and there is no hard evidence to show that each freight train will remove 40-70 HGV's from roads in the UK.
- 9.6.7 In considering mitigation, the Draft ES understated the current impact of M1 air pollution on the wider community surrounding AQMA 1 and omitted both the SUE 5 housing development to be built in Hunsbury/Collingtree Park and existing properties in Grange Park. The fact that the possibility of a sealed noise barrier along the Eastern Embankment of the M1 is being investigated – highlights the inappropriateness of this location for this scheme.

Mitigation

All planning guidance at national, regional and local level stress the importance of mitigating any negative impact from a development that decreases air quality and that the mitigation should be location specific. This importance is further emphasised if the impact is within an AQMA.

Roxhill has not proposed any mitigation that would reduce the likely increase in nitrogen dioxide levels in the environs of the site and have simply refer to unsubstantiated estimates of reductions in vehicle emissions nationally if there is a very significant switch from road-based freight transport to rail based transport. Roxhill also propose as mitigation, the provision of footways, cycle ways and bus routes to serve Northampton Gateway. As discussed in the Employment section of this submission, this will not be relevant as few of the 7000 plus employees are likely to live locally and will require vehicle travel, further increasing traffic and pollution. Other mitigation measures suggested will rely on long term behavioural changes in transport patterns resulting from 'modal shift'.

Roxhill further argue that air quality issues resulting from their development will be limited a very small number of receptors within a very small area and that air quality elsewhere in the immediate area is generally good and will remain so. This is at variance with AQ measurements taken recently in surrounding communities (including Collingtree, Milton Malsor, Roade, Grange Park and Blisworth) Taken as a whole, this data shows several receptors close to or in excess of the 40 µg/m³ legal limit and many receptors (including schools) that are over the 20 µg/m³. This is the threshold set by the World Health Organisation (WHO) in 2013 when they recommended that there should be concern at levels at half the legal limit and that "the NO₂ impact should be calculated for levels above 20 µg/m³"

There is the added concern for receptor communities along the boundary of the proposed site and on the east of the M1 Motorway, including Collingtree Village and the major housing developments planned for Hunsbury and Hardingstone. The 15-meter-high earth bund proposed to screen the 20-meter-high warehouse buildings will have the effect of restricting dispersion of motorway emissions to the west and redirecting pollution (and noise) back towards the communities in the east. This so-called 'Canyon Effect' is well documented and will result in increasing the impact on Air Quality within the two AQMA's. No meaningful or locally based mitigation of Air Quality impacts has yet been proposed or has been shown to be achievable.

Conclusions

There is a considerable body of national and local policy legislation and guidance that makes clear that air quality should be an important consideration in planning decisions. These policies clearly emphasise the need to ensure that significant adverse effects on air quality are mitigated - and mitigated in the areas affected.

The National Policy Statement for National Networks requires (5.10) that the Secretary of State should consider air quality impacts over the wider area likely to be affected, as well as the near vicinity of the scheme. In all cases the Secretary of State must take account of relevant statutory air quality thresholds set out in domestic and European legislation.

We have highlighted the following:

- Northampton Gateway has impacts on two existing AQMA's
- Traffic within the two AQMA's is forecast to grow with or without the proposed scheme
- The scheme would add substantially to daily traffic movements within the AQMA's
- Two additional lanes are to be added to the M1 within AQMA1
- Together with the loss of 500 acres of open countryside, the proposed building heights and earth bunds could affect existing dispersion of pollutants and create the 'canyon' effect.
- The prevailing winds are towards sensitive receptors and new approved residential areas

We have shown therefore, that there is every likelihood that the Scheme proposed will have adverse impacts on air quality within two adjacent Air Quality Management Areas and on the local communities surrounding the site. We have also highlighted the view of leading authorities including WHO that given the new evidence on the health effects of exposure to nitrogen dioxide, there should be concern over levels even half that of the current air quality objective of 40µg/m³. The WHO guidelines also state that even 10 micrograms of PM should be considered unsafe.

We have also shown that historically, the monitoring methods used in relation to the two affected AQMA's, has been limited. A measurement process dependent largely on a limited number of passive diffusion tubes and with the nearest automatic continuous analyser seven miles away, is not sufficiently robust for this highly sensitive development. Finally, the applicant has not proposed any locally specific mitigation measures to address these adverse impacts.

The National Policy Statement for National Networks also states (5.13) The Secretary of State should refuse consent where, after considering mitigation, the air quality impacts of the scheme will:

- Result in a zone agglomeration which is currently reported as being compliant with the Air Quality Directive becoming non-compliant; or
- Affect the ability of a non-compliant area to achieve compliance within the most recent timescales reported to the European Commission at the time of the decision.

We maintain that the Scheme as it stands is contrary to European, national, regional and local policies on Air Quality.



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Addendum 1 – Parishes Against Pollution Joint Statement

Received **11 July 2018**
From **Rod Sellers** on behalf of **Parishes Against Pollution**

Representation

W

We wish to register the 'Parishes Against Pollution Group' as an interested party in the Northampton Gateway Examination process.

PAP is a group of 29 Parish Councils in the South of Northamptonshire that has a shared concern over the environmental impact of major traffic related developments and the increasing cumulative consequences for air, noise and light pollution. The participating parishes are:

Ashton – Blakesley – Blisworth – Bugbrooke – Cold Higham – Collingtree – East Hunsbury – Gayton – Grange Park – Great Houghton – Greens Norton – Hardingstone – Harpole – Hartwell – Helmdon – Hunsbury Meadows – Kilslingbury – Little Houghton – Milton Malsor – Pattishall – Quinton – Roade – Rothersthorpe Shutlanger – Silverstone – Stoke Bruerne – West Hunsbury – Whittlebury – Wootton

All these Parish Councils have minuted their support for the following declaration:

"Along with neighbouring Parish Councils, we are alarmed at the number and scale of major traffic generating developments in our area and their likely environmental impact. We draw attention to the specific requirement of the National Planning Policy

Framework (NPPF) namely "preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water and noise pollution or land instability". We strongly

urge that this requirement is stringently and robustly followed and the cumulative impact considered when major planning decisions are being taken".

Consequently we wish to register our objections to the 'Northampton Gateway' Rail Freight Terminal proposed for land between the communities of Collingtree, Grange Park, Milton Malsor, Roade and Blisworth which we believe will have significant traffic and environmental impacts on the whole of this region.

W

Addendum 2 – Table of Measured AQ Levels in Parishes Adjoining the Site

Table showing Nitrogen Dioxide levels measured at locations adjacent to the AQMA 1 adjoining the proposed Northampton Gateway site.

These measurements were undertaken by or on behalf of the relevant Parish Councils in each area and followed the recommended protocol for diffusion tube monitoring. The results were adjusted and verified by Gradko Ltd, the laboratory used by Northampton Borough Council and other local authorities. These figures have not been adjusted for local bias.

Parish	Location	Post Code/ O.S. Ref.	Start Date	End Date	Result µg/m³	Adjusted
Collingtree 1	Lodge Avenue. Lamp post o/s Primary School	NN4 ONQ	12/10/2017	02/11/2017	26.34	
Collingtree 2	Barn Corner. Lamp post o/s New Rectory	NN4 ONP	12/10/2017	02/11/2017	26.22	
Collingtree 3	High Street. Lamp post o/s No. 8	NN4 ONG	12/10/2017	02/11/2017	29.45	
Collingtree 4	Ash Lane. o/s No. 29	NN4 OND	12/10/2017	02/11/2017	32.45	
Collingtree 5	Collingtree Road. Telegraph pole Maple Farm	NN4 ONB	12/10/2017	02/11/2017	22.49	
Collingtree 6	High Street South . Lamp post opposite No. 70	NN4 ONE	12/10/2017	02/11/2017	51.32	
Collingtree 7	High Street South. Telegraph Pole (438) o/s No. 65	NN4 ONE	12/10/2017	02/11/2017	49.75	
Collingtree 8	High Street South (Collingtree Court) Drain pipe of No.80	NN4	12/10/2017	02/11/2017	60.38	
Collingtree 9	Watering Lane. Adjoining side entrance to Allotments	NN4	12/10/2017	02/11/2017	31.51	
Collingtree 10	Watering Lane. Playing Field attached to Tennis Court Lighting Pole.	NN4	12/10/2017	02/11/2017	32.03	
Road 1	A508. Junction with Northampton Road on East side.	NN7 2PF	31/03/2017	28/04/2017	34.91	32.12
Road 2	A508. South of Junction 15 of M1	OS SP755546	31/03/2017	28/04/2017	37.74	34.72
Road 3	A508. East side opposite Courteenhall Rd.	OS SP753531	31/03/2017	28/04/2017	64.41	59.26
Blisworth 1	Gayton Rd/High St – Lampost on Green	NN7 3BN	8/10/2017	22/10/2017	18.5	
Blisworth 2	High St. Finger post, Old Coach House	NN& 3BZ	8/10/2017	22/10/2017	23.5	

Parish	Location	Post Code/ O.S. Ref.	Start Date	End Date	Result µg/m ³	Adjusted
Blisworth 3	Stoke Rd Next to VAS Allotments	NN7 3BT	8/10/2017	22/10/2017	12.8	
Blisworth 4	Courteenhall Rd Opposite Ladyfield Rd.	NN7 3DD	8/10/2017	22/10/2017	11.3	
Blisworth 5	Northampton Rd. Entrance to Butterfly Nursery	NN7 3DN	8/10/2017	22/10/2017	23.2	
Blisworth 6	High Street. Lampost at School Crossing Patrol	NN7 3BJ	8/10/2017	22/10/2017	24.0	
Blisworth 7	Chapel Lane. Opposite Little Lane	NN7 3BU	8/10/2017	22/10/2017	13.0	
Blisworth 8	Courteenhall Rd./A508 Give Way sign at junction	NN7 2QA	8/10/2017	22/10/2017	22.3	
Blisworth 9	A43 Gayton Rd Bridge	NN7 3HN	8/10/2017	22/10/2017	27.6	
Blisworth 10	Knock Lane	NN7 2ND	8/10/2017	22/10/2017	31.8	
Blisworth 11	A43 by J15A	NN4 9QS	8/10/2017	22/10/2017	68.6	
Blisworth 12	A43/A5 Roundabout	NN12 6GX	8/10/2017	22/10/2017	78.4	

Addendum 3 – Gradko Lab Report for Collingtree



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LABORATORY ANALYSIS REPORT

NITROGEN DIOXIDE IN DIFFUSION TUBES BY U.V.SPECTROPHOTOMETRY

REPORT NUMBER L07881R
BOOKING IN REFERENCE L07881
DESPATCH NOTE 38272
CUSTOMER Stanley Knill Attn: Stanley Knill
 Friends of the Earth
 1st Floor, The Printworks
 139 Clapham Road
 London, Stockwell
 SW9 0HP
 Greater London
DATE SAMPLES RECEIVED 06/11/2017
JOB REFERENCE None Provided

Location	Sample Number	Exposure Data		Time (hr.)	µg/m ³ *	ppb *	TOTAL µg NO ₂
		Date On	Date Off				
Lamp standard lodge ave o/s primary school NN4 0NQ	1034508	12/10/2017	02/11/2017	504.00	26.34	13.75	0.96
Lamp standard barn corner NN4 0NP	1034509	12/10/2017	02/11/2017	504.00	26.22	13.69	0.96
Lamp standard o/s 8 high street NN4 0NG	1034510	12/10/2017	02/11/2017	504.00	29.45	15.37	1.08
Telegraph pole ash lane NN4 0ND	1034511	12/10/2017	02/11/2017	504.00	32.45	16.93	1.19
Telegraph pole Maple Farm NN4 0NB	1034512	12/10/2017	02/11/2017	504.00	22.49	11.74	0.82
Lamp standard opposite no. 70 High street south NN4 0NE	1034513	12/10/2017	02/11/2017	504.00	51.32	26.78	1.88
Telegraph pole (438) o/s 65 high street south NN4 0NE	1034514	12/10/2017	02/11/2017	504.00	49.75	25.97	1.82
Drainpipe attached to 82 high street NN4 0NE	1034515	12/10/2017	02/11/2017	504.00	60.38	31.51	2.21
Watling Lane, tree on left of cemetery - side gate	1034516	12/10/2017	02/11/2017	504.00	31.51	16.45	1.15
Flood light post on east side of Tenor St, Watering lane NN4 0NL	1034517	12/10/2017	02/11/2017	504.00	32.03	16.72	1.17
Laboratory Blank				504.00	0.08	0.04	0.003

Comment: Results are not blank subtracted
Results have been corrected to a temperature of 293 K (20°)

Overall M.U.	±7.8%	Limit of Detection	0.010 µgNO ₂
Tube Preparation : 20% TEA / Water		Analysed on UV 08 Camspec M550	
Analyst Name	Molly Thacker	Report Checked By	Adam Robinson
Date of Analysis	20/11/2017	Date of Report	20/11/2017

Analysis carried out in accordance with documented in-house Laboratory Method GLM7

The Diffusion Tubes have been tested within the scope of Gradko International Ltd. Laboratory Quality Procedures calculations and assessments involving the exposure procedures and periods provided by the client are not within the scope of our UKAS accreditation. Those results obtained using exposure data shall be indicated by an asterisk (*). Any queries concerning the data in this report should be directed to the Laboratory Manager Gradko International Ltd. This report is not to be reproduced, except in full, without the written permission of Gradko International Ltd.
 Form LQP32b Issue 7 – Oct 2016 Report Number L07881R Page 1 of 1

REPORT OFFICIALLY CHECKED

Gradko International Ltd
 This signature confirms the authenticity of these results
 Signed: _____
 L. Gates, Laboratory Manager

Addendum 4 – Letter from Dr. Therese Coffey DEFRA



**Department
for Environment
Food & Rural Affairs**

Nobel House
17 Smith Square
London SW1P 3JR

Dr Thérèse Coffey MP
Parliamentary Under Secretary of State
for the Environment

T 03459 335577
defra.helpline@defra.gsi.gov.uk
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Rt Hon Andrea Leadsom MP
House of Commons
London
SW1A 0AA

Your ref: AL/TG/1801
Our ref: MC2018/02184/ST

14th February 2018

Dear Andrea,

Thank you for your letter of 15 January on behalf of your constituent about air quality.

As Mr Sellers will be aware, local authorities have obligations to review and assess air quality and to declare Air Quality Management Areas (AQMAs). They are declared at locations where there might be a problem and then take remedial action to improve air quality in regard to the National Planning Policy Framework. They make assessments and locate where new development may have an impact on local air quality. Through this, AQMAs assess local air quality and address it when concentrations are over the health-based Air Quality Objectives and the public are likely to be exposed.

As local authorities carry out these assessments, they are required to be in line with the statutory local air quality management (LAQM) guidance provided by Defra. The guidance sets out how to approach local monitoring and describes the variety of measurement equipment that is commercially available, e.g. diffusion tubes. The LAQM guidance recommends that local authorities pay careful attention to the type of equipment to be used and the locations where they are placed. Defra also provides a helpdesk providing technical support to local authorities.

However, the decision on which method to use is for individual local authorities to take, albeit with regard to the guidance and how they seek to implement it. I would expect the Council to continue to review the situation to ensure that the monitoring sites and equipment used, are adequate to permit meaningful evaluation of local air quality.

Local authorities have a range of tools they can use to assess and improve air quality where problems are identified, for example putting in interventions to reduce road-traffic related emissions to reduce people's exposure to air pollution and improve the overall air quality. In its latest air quality report (ASR 2016), South Northamptonshire Council identified its priorities for improving air quality. I would encourage Mr Sellers to raise his concerns with the Council.

Yours sincerely,

[Redacted signature]

DR THERESE COFFEY MP



7. HEALTH IMPLICATIONS

Introduction

This chapter focuses upon the negative cumulative health consequences associated with the Roxhill NG proposal. It will impact upon the quality of life of local residents, commuters and potential future employees working on the site. From the outset, The Department for Transport (DfT) National Policy Statement for National Networks (NPSNN), 2014 advises in section 4.82:

- *The applicant should identify measures to avoid, reduce or compensate for adverse health impacts as appropriate. These impacts may affect people simultaneously, so the applicant, and the Secretary of State (in determining an application for development consent) should consider the cumulative impact on health.*

Roxhill NG's Environmental Statement Scoping Report for Northampton Gateway (October 2016) insinuated that baseline prevailing health data would be collected within the socio-economic aspects chapter of the Environmental Statement:

- Section 3.1.95 implies that the Construction Environmental Management Plan (CEMP) could but may not definitely feature mitigation of, 'Air, noise, dust, light and odour issues.'
- The document does not confirm how the health impact of these pollutants will be measured or recorded but acknowledgement of their presence is included within the Potential Environmental Effects sub-section.
- Roxhill acknowledge the requirement for health-related 'environmental' issues inflicted by Northampton Gateway to be discussed as part of their Nationally Significant Infrastructure Project (NSIP) application. They did not commit to preparing and presenting a standalone Health Impact Assessment. Within the response document (Planning Inspectorate Scoping Opinion – section 4.38 and 4.39 (December 2016)) the Secretary of State for Transport advised consideration of a need for a Health Impact Assessment (HIA). Justification for omitting this useful adjunct, within the application, would need to be provided by Roxhill.

The Roxhill Northampton Gateway SRFI – Short Explanatory Document (2017) showed no evidence of health-related mitigation management, implying a lack of insight or acknowledgement of the burden to local communities and individuals. This SRFI is simply a business transaction. This was corroborated by limited mention of health associated issues within the Roxhill Draft Environmental Statement (2017) - Cumulative Impacts Chapter. Adverse noise pollution was acknowledged at receptors close to the Roade Bypass but the impact upon residents was seemingly ignored.

Paragraph 15.19 of the Roxhill Draft Environmental Statement (2017) seemed particularly patronising to local residents who do not wish for this proposal to proceed:

- *There is a degree of balance in assessing overall cumulative effects between the potential adverse effects in relation to views and landscape change, and lighting effects, and adverse impacts on some receptors relating to noise and air quality, with positive effects in relation to economic benefits, reduced flood risk and improved drainage, and improvements to transport reliability, journey times and reduced congestion.*

In the long-term some of these positive aspirations may prove fruitful but they do not outweigh the potential negative cumulative health impacts inflicted upon local road-users and inhabitants during site development and alternative use compared to the current productive agricultural environment. The arable fields, trees and hedgerows participate as a 'green lung' but this positive environmental symbiosis will be lost if soil is submerged in concrete.

A search of The Planning Inspectorate website in August 2018, which contains Roxhill's current Northampton Gateway application documents, does not identify the presence of a Health Impact Assessment (HIA).

Further investigation revealed health-related topics scattered throughout several chapters of Roxhill NG's Environmental Statement. This frivolous approach to dispersing health information across many sub-sections of technical and legislative-focused prose down-grades emphasis on the health topics.

Within the consultation report (Document 6.1) Roxhill record feedback from local residents during the Public Consultations. Within sub-section 1.3.5 they include the following acknowledgement:

- *Concerns about the potential for additional noise and air pollution impacts on nearby communities, some of which are already very concerned about air quality associated with the M1 motorway with a perception that air quality is generally poor;*
- This is not a 'perception'. It is a fact.
- Air Quality Management Areas have been applied to the M1 motorway and the A45 in the local area for many years (as outlined below) in response to air pollution.

Within sub-section 1.3.6 of the consultation report Roxhill insist that they have amended their proposed development in response to comments received and will contribute to minimising additional pollution issues by including:

- *a range of low emissions and sustainability measures geared around supporting the Northampton Borough Low Emissions Strategy to help reduce air quality concerns in some parts of the local area.*
- The inclusion of this statement by Roxhill confirms their appreciation for the current local air quality challenges. Despite their aspirations the vast number of HGV movements both around the proposed Northampton Gateway site as well as to and from it will contribute to negative adverse impact upon local air quality.
- In addition to air quality issues light and noise pollution and their mitigation in local areas worst affected are discussed within Roxhill's environmental statement. These concerns will be discussed within the body of the chapter.

For the sake of an unwanted SRFI, which cannot be justified for all of the reasons stated within this document, the positive contributions to our lived environment proffered by Roxhill do not outweigh the negative impacts and dis-benefits which the development will inflict upon us, the local residents.

Acknowledgement or consideration of negative health inequalities and the cumulative impacts of the development is vague within the proposal and potential mitigation remains sparse.

The SRNG Action Group are concerned about the lack of consideration given to the health, well-being and quality of life of local residents if agricultural land, roads and public rights of way are disrupted and disfigured for the sake of the Roxhill NG proposal.

Residents of Collingtree, Milton Malsor and Grange Park are most likely to be affected by the proposal due to the proximity of their homes to the site, with acknowledgement to the prevailing winds which will potentially carry noise and air pollution from the site towards dwellings and will contribute to health inequalities.

Residents of Roade and neighbouring villages and suburban areas will suffer secondarily on the basis of multiple potential health, well-being and quality of life related issues including but not limited to:

- Additional traffic disruption, congestion and consequent stress-related symptoms.
- Compromised air quality – including dust, particulates and gaseous emissions from HGV's and diesel trains. Dust/smoke in close proximity to trunk roads could cause accidents and mitigation to minimise this issue would be required.
- Noise pollution.
- Light pollution.
- Walking and cycling issues around the proposed Roxhill NG site.
- The marketing and counterchallenge of the Roxhill NG proposal and the impact upon local residents.

In order to seek clarity in definitions of health-related concerns the principles of The World Health Organisation Constitution (1946) acknowledge that:

- *Health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity.*

WHO (2012) agreed a definition of wellbeing as existing in two dimensions, subjective and objective. It comprises an individual's experience of their life as well as a comparison of life circumstances with social norms and values.

The mental health advocates, Mind UK, acknowledge that there is no medical definition of stress, and health care professionals often disagree over whether stress is the cause of problems or the result of them.

Traffic Related Health and Well-being Concerns

As previously discussed, an Air Quality Management Area (AQMA) is located along the M1 corridor which bounds the north eastern boundary of the proposed site. There has been a reportable issue with air quality since 2003 and this has not been revoked. There is a second AQMA located on the A45 north of junction 15 which extends to the Queen Eleanor interchange in Northampton. The impact of increasing motor vehicle movements (discussed in the transport chapter) as a consequence of Roxhill's NG proposal will provoke cumulative health risks to both humans and wild and domestic animals due to exacerbated air pollution.

Congestion

Congestion has become progressively more prevalent over time on all roadways leading up to Junction 15 of the M1. This extends beyond the traditional rush hour periods and is compounded by regular road traffic accidents on the trunk roads. Rather than reduce the traffic burden on the local routes the Roxhill NG proposal would compound the issue due to initial road closures during the improvements phase, additional 24-hour employee movements and HGV freight transportation.

Stress can manifest in many forms including anxiety, frustration or anger in being unable to avoid or overcome a perceived problem. The impact would be classed as short-term but a regular occurrence related to rush hour commuting. The cumulative impact, from an anecdotal perspective, involves local residents and commuters passing through the area anticipating extended commuting times and anxiety related to tardiness in the workplace.

An extensive literature search did not identify research to support the impact of congestion upon health and well-being but considerable empirical discussion. Dwight and Weisenthal (1999) interviewed drivers during high and low-congestion conditions during a single commute. During periods of low congestion time urgency predicted driver stress and during periods of high congestion aggression predicted driver stress.

In 2016 a group of researchers from the University of Surrey showed that drivers stuck at traffic lights were exposed up to 29 times more harmful pollution particles than those driving in free-flowing traffic (Kumar et. al. 2016). The British Heart Foundation confirm the threat of higher concentrations of air pollutants within vehicles in their 2018 video:

<https://www.bhf.org.uk/informationsupport/support/practical-support/air-pollution>

Some consolation can be drawn from improvements in automobile technology as in-car air conditioning has been noted to facilitate lower rates of in-cabin pollution (Leavy et. al., 2017). Not all vehicles benefit from this technological improvement and it comes at an environmental cost as more fuel is consumed during the cooling process. Drivers without air conditioning facilities face greater risks from air pollution as would cyclists and pedestrians, leading to further health inequalities.

Traffic Related Air Pollution (TRAP)

In 2008, the effect of human-produced (anthropogenic) particulate air pollution on mortality in the UK was estimated as equivalent to nearly 29,000 deaths at typical ages, and an associated loss of total life of 340,000 life years (COMEAP, 2010). These figures include deaths attributed to traffic related air pollution. According to the World Health Organisation (WHO), in 2012 there were over 11,000 estimated outdoor air pollution-related premature deaths from coronary heart disease and stroke in the UK.

On February 1st 2018, Client Earth announced that London has breached air pollution limits for the whole year, just 31 days into 2018 (<https://www.clientearth.org/london-breaches-air-pollution-limits-2018/>). The limits were broken on Brixton Road, Lambeth on 31 January. Under EU rules, a limit of 200 µg/m³ cannot be broken for more than 18 hours in a calendar year.

The impact of this untimely breach and potential consequences include litigation and key decision-makers being made accountable for the issue. This may facilitate the challenge against Northampton Gateway as Roxhill have already admitted to the possibility of slightly negative adverse impact upon air pollution, if they are successful in their bid.

Air pollution impacts upon multiple physiological systems. The physiological consequences of TRAP will be dealt with here in isolation.

Road transport accounts for 31% of nitrogen oxides (NO_x), 19.5% of fine particulate matter (PM_{2.5}) and 18% of coarse particulate matter (PM₁₀) of UK emissions. It frequently accounts for more than 64% of air pollution at urban monitoring sites (National Institute for Health and Care Excellence (NICE), 2017). This comes from exhausts and other sources such as the wear of tyres, brakes and the road. Non-exhaust sources account for around 21% of PM_{2.5} from vehicles.

Unlike exhaust emissions, no regulation currently exists to control non-exhaust particles and, with trends towards heavier vehicles, concentrations may increase over time (Royal College of Physicians (RCP), 2016). Pollution from tyre, brake and road wear also means that electric and alternatively fuelled vehicles can never be emission free. This issue would also encompass rail transportation.

In 2011, the House of Commons Environmental Audit Committee confirmed that the costs to UK society from poor air quality was on a par with those from smoking and obesity. This reduces life expectancy, on average, by six months and costs the UK approximately £16 billion per annum (DEFRA, 2010).

Dr Andrew Jeffrey, Consultant Respiratory Physician at Northampton General Hospital, confirms that air pollution is a major cause of premature ill health. It exacerbates existing long-term conditions including asthma, COPD and ischaemic heart disease. The major source of the most harmful air pollutants are diesel engines and the slower a vehicle is moving the more local impact this has. Whether or not the local roads slow down as a result of greater volumes of traffic, diesel trains and lorries will be moving very slowly around the proposed Roxhill NG site.

The Royal College of Physicians (2016) believe that a combination of increased numbers of diesel vehicles and technological difficulties in abating their real-world emissions has meant that urban concentrations of airborne particulate matter (PM) and NO₂ have not improved, as was once hoped. European limits for NO₂ were set in the late 1990s, to be met by 2010, but today busy roads in UK urban areas still fall short of meeting these limits; in places, they are being exceeded by up to threefold (DEFRA, 2014).

Dr Jeffrey advises that the prevailing wind direction throughout the UK (and Northampton is no exception) is from the South West. The proposed developments lie directly south west of the town of Northampton. Air pollution generated on the proposed site and on the M1 will be blown directly onto Northampton with the closest areas (and most likely to be affected) being Grange Park, Collingtree, East and West Hunsbury and Upton - all currently desirable residential areas. It is likely that residents of these areas will experience more frequent exacerbations of chronic airway diseases such as asthma and COPD. Their risk of heart disease will rise.

Dr Jeffrey also raised the issue of temperature inversions. He stated that these phenomena are more frequent away from the coast and affect Northamptonshire quite frequently.

A temperature inversion occurs when cooler air is trapped under warm air. In these circumstances the air close to the ground cannot rise up to the stratosphere, as would normally happen, but is trapped close to the ground. The pollutants, including particulate matter would normally rise with the cooler air and be dispersed but in this situation, they remain trapped in the local area, close to the ground and available to breathe. During the summer of 2017 a combination of high traffic levels and a heat wave (which can contribute to these inversions) caused one area of Northampton to have the highest air pollution levels recorded in the UK.

A review of recent scientific literature enhances our understanding of traffic-related air pollution (TRAP) upon physiological mechanisms, with cumulative consequences upon health.

The Royal College of Physicians (RCP) and the Royal College of Paediatrics and Child Health (RCPCH) published a working party document in 2016 to publicise their concerns regarding the 'cradle to grave consequences of the impact of air pollution on our health. They considered and reviewed all sources of air pollutants but a sub-section was dedicated to TRAP. The RCP call for research into the adverse health effects of pollution, in addition to lung and cardiovascular disease to accommodate systemic effects such as obesity, diabetes, changes linked to dementia, and cancer, as well as effects on the developing foetus and in early childhood.

Studies of ambient pollution's effects have repeatedly demonstrated increased cardiovascular and respiratory morbidity and mortality for a variety of outcomes but those that have studied TRAP specifically have largely focused on asthma and related phenomena, and cardiovascular disease.

Laumbach and Kipen (2012) reviewed many data sources to facilitate their overview on TRAP related health consequences. They identified a Danish study (Andersen et.al., 2011) where 57,00 Danes over a 35-year period were studied for their exposure to traffic pollution over time and an end point of the first hospital admission for treatment for chronic obstructive pulmonary disease (COPD). This outcome was associated with chronic nitrogen dioxide (NO₂) exposure, with a stronger association in asthmatic patients. This was the first longitudinal study of COPD with hard outcomes in association with modelled TRAP exposures and seems to confirm the previous findings of cross-sectional studies that TRAP is likely to be a cause of COPD. There is an increasingly robust literature that supports a causal relationship between various aspects of TRAP and new-onset asthma or worsened asthma in children and adults. These risks need to be both incorporated into public policy and explored for their role in medical decision making at the individual level.

Acute exposure to diesel exhaust fumes has been shown to significantly reduce lung function in asthmatic patients (up to a 6% decrease expired air lung capacity), along with stimulating an increase in sputum inflammation.

Diesel exhaust particles have been shown to stimulate the body's immune response in a negative manner by triggering a cascade reaction in inflammatory cells and enzymes. As a result of this process it has been proposed that damage to the cells which line the nose and structures which transport air in and out of the lungs and incorporate mucus and specialist cells (which look like hairs and move in a rhythmic fashion to transport dirt and unwanted particles up and out of the delicate lung tissue) are damaged and work less effectively. The unwanted particles which the body recognises and responds to as an allergen (something which the body believes it is allergic to) are then in close proximity to the immune cells in the lining of the nose and lungs and this provokes an asthma episode.

Glinianaia et. al. (2004) estimated that traffic-related air pollution exposure of pregnant women accounts for more than one-fifth of all cases of low birth weight at term. There is consistent evidence that exposure to particulates during pregnancy increases the risk of low birth weight.

On August 3rd 2018 Nicola Davis discussed research carried out by Dr N. Aung in The Guardian newspaper. Dr Aung and his team, at Queen Mary University of London, report in the journal, *Circulation*, that they found that exposure to nitrogen dioxide and fine particulate matter is linked to an increase in size of the ventricles of the heart. Participants in the study were exposed to pollution levels below the current UK guidelines, which stem from EU legislation. Scientists do not yet understand the mechanism behind this process but warn that this early warning sign may explain the increased risk of heart failure in those exposed to higher levels of air pollution.

The research was part-funded by the British Heart Foundation (BHF). Prof Jeremy Pearson, associate medical director at the BHF called on the government to adopt the World Health Organisation air pollution guidelines which dictate lower concentrations of NO₂ and particulate matter than current EU targets.

Additional Noise Pollution as a Consequence of the Roxhill NG's Proposal

Evidence of the non-auditory effects of environmental noise and vibration exposure on public health is growing. Observational and experimental studies have shown that noise exposure leads to annoyance, disturbs sleep and causes daytime sleepiness, affects patient outcomes and staff performance in hospitals, increases the occurrence of hypertension and cardiovascular disease, and impairs cognitive performance in schoolchildren (Basner et. al., 2014).

Noise, defined as unwanted sound, is a pollutant whose effects on health have been neglected, despite the ability to precisely measure or calculate exposure from peak levels or energy averaged over time. Although people tend to habituate to noise exposure, degree of habituation differs for individuals and is rarely complete (Basner et.al. 2011). If exposure to noise is chronic and exceeds certain levels, then negative health outcomes can be noted.

With an estimated 100 million Europeans affected by harmful levels, road traffic is by far the largest source of noise pollution in Europe, according to an assessment published by the European Environment Agency (EEA) in April 2017. The World Health Organization (WHO) has classified noise from road traffic alone as the second worst environmental stressor affecting human health in Europe, behind only air pollution caused by very fine particulate matter (Moszynski, 2011).

Unfortunately, the proposed development could exacerbate both road and rail activity on a 24-hour basis. This would add to noise pollution and vibration both around the site and in villages and homes which border the railway lines including Roade, Blisworth and Milton Malsor. Proposed additional trains accessing Northampton Gateway may do so at night due to the difficulty of fitting extra train paths onto the West Coast Main Line during the daytime. This will exacerbate sleep disruption and night-time pollution.

Roxhill NG's proposal has potential to create more noise than an ordinary railway line. It may operate as a marshalling yard with considerable shunting manoeuvres. The cranes for lifting containers from railway wagons onto trucks will generate noise. There are plans to have an aggregates depot here which will create significant noise.

From the EEA map (accessed via noise.eea.europa.eu) one can focus on Northampton, in isolation, and learn there are in excess of 49,000 people in the Northampton Urban Area exposed to more than 55 dB from road noise during the day.

The boundary of the urban area on the map does not extend to Collingtree and across the M1 to the proposed site but immediate proximity to the M1 and additional noise from the Roxhill NG proposed site may provoke unacceptable noise levels.

Roxhill NG's proposal will generate noise during the assembly, day-to-day working and decommissioning phases. On-site employees may be exposed to noise levels in excess of recommended volume where hearing protection is recommended or mandatory (between 80 – 85 dB) as advised by the UK Governments' Control of Noise at Work Regulations (2005). These individuals may be exposed to noise-induced hearing loss over time.

Local residents are less likely to experience excess noise levels from the proposed Roxhill NG site but cumulative non-auditory health effects may be inflicted upon those in close proximity to both the site and the roads and railways as traffic volume increases.

The most investigated non-auditory health endpoints for noise exposure are perceived disturbance and annoyance, cognitive impairment (mainly in children), sleep disturbance, and cardiovascular health. WHO estimated that in high-income western European countries (population about 340 million people), at least 1 million healthy life-years (disability-adjusted life-years) are lost every year because of environmental noise (Fritschi et.al. 2011).

Ohrstrom et. al. (2006) described annoyance as a result of noise interfering with daily activities including sleep and rest. Negative responses to noise stressors can include anger and stress-related symptoms which in severe forms can impact upon perceived health and well-being.

Exposure to environmental noise has been linked to negative cardiovascular system effects including hypertension, ischaemic heart disease and stroke (Babisch 2011). Noise exposure can lead to an increase in blood pressure, changes to heart rate and release of stress hormones. Chronic long-term exposure can affect homeostasis leading to a greater risk of myocardial infarction and stroke over time (Tomei et. al., 2010, Davies et.al., 2012).

Noise and air pollution have been shown to have different mechanisms of action (cognitive and autonomic stress versus an inflammatory process) but the negative health outcomes can be similar leading to much greater mortality and morbidity rates (Huss et. al., 2010, Sorensen et. al., 2011, Gan et. al., 2012).

Humans perceive, evaluate and react to environmental sounds even when sleeping (Dang-Vu et. al., 2010). Enduring disturbed sleep due to environmental noise is thought to be the most intrusive non-auditory effect as a lack of quality sleep of sufficient duration effects alertness and performance during waking hours, as well as health (Fritschi et.al. 2011). Repeated noise-induced arousals interfere with sleep quality through changes in sleep structure, including delayed sleep onset, early awakenings, reduced deep (slow-wave) and rapid eye movement sleep, and an increase in time spent awake and in superficial sleep stages (Basner et. al., 2011).

Noise-induced sleep disturbance can lead to many short-term effects including impaired mood and cognitive performance and increased daytime sleepiness (Basner, 2008) but in the long-term nocturnal noise may be more relevant in contributing to long-term health issues, including cardiovascular disease, than daytime exposure (Jarup et.al. 2008).

Paragraph 3.2 of the NPSNN as above (2014) states that:

- *The Government recognizes that for development of the national road and rail networks to be sustainable these should be designed to minimize social and environmental impacts and improve quality of life.*
- This statement was adhered to when the A43 was re-routed to avoid Blisworth and Milton Malsor twenty-seven years ago. Both villages became more peaceful places to live and quality of life within those communities improved.

Roxhill NG’s proposal will increase traffic through surrounding villages if adequate measures are not taken to prevent all employee traffic (at times of shift changes) from using local minor roads. Local residents’ sleep patterns (particularly those of children) will be disturbed e.g. at 06:00 and 22:00 with cumulative health impacts already discussed.

In 2009, WHO published the Night Noise Guidelines for Europe, an expert consensus mapping four noise exposure groups to negative health outcomes ranging from no substantial biological effects to increased risk of cardiovascular disease (see table H1). WHO regards average nocturnal noise levels of less than an average level (L_{Aeq}) outside 55 decibels (dB) to be an interim goal and 40 dB a long-term goal for the prevention of noise-induced health effects.

Table H1 - WHO definitions of health effects of different average night noise levels.

Noise level	Health Impacts
Below 30 dB L_{Aeq} night outside	Although individual sensitivities and circumstances may differ, it appears that up to this level no substantial biological effects are observed. $L_{A,eq,night,outside}$ of 30 dB is equivalent to the no observed effect level (NOEL) for night noise.
30 – 40 dB L_{Aeq} night	A number of effects on sleep are observed from this range: body movements, awakening, self-reported sleep disturbance, arousals. The intensity of the effect depends on the nature of the source and the number of events. Vulnerable groups (for example children, the chronically ill, and elderly people) are more susceptible. However, even in the worst cases the effects seem modest. $L_{A,eq,night,outside}$ of 40 dB is equivalent to the lowest observed adverse effect level (LOAEL) for night noise.
40 – 55 dB L_{Aeq} night	Adverse health effects are observed among the exposed population. Many people have to adapt their lives to cope with the noise at night. Vulnerable groups are more severely affected.
Above 55 dB L_{Aeq} night	The situation is considered increasingly dangerous for public health. Adverse health effects occur frequently, a sizeable proportion of the population is highly annoyed and sleep-disturbed. There is evidence that the risk of cardiovascular disease increases.

New dwellings are currently under construction in Roade village, on a brown field site in very close proximity to the West Coast Main Line. As part of the planning application process Persimmon Homes commissioned a noise assessment related to the railway and general traffic noise (LF Acoustics, 2015). They recorded noise in excess of 70 dB for the majority of the night-time period on 14/05/2015 at a location. At 03.00 a recording of 96.3 dB ($L_{Amax,F}$ – which considers variability in the sound level) was noted. The recorded noise level was confirmed as 65.5 dB, which falls into the WHO noise category of ‘increasingly dangerous for public health’ (Table H1).

Noise mitigation techniques were advised within the house-building planning application but a considerable amount of noise pollution is already generated on a 24-hour basis by railway activity. If Roxhill’s NG proposal were to increase rail freight traffic further, additional noise and air pollution will be inflicted upon local residents.

A resident of Milton Malsor, who chose to remain anonymous, personally recorded noise data from her bedroom and garden related to railway activity. Her home is less than 200m from the railway line. From her bedroom, on 11/09/2016 she recorded up to 60 dB of noise at very regular intervals as trains passed (01.45, 01.58, 02.05, 02.14 and so on). This is higher than the WHO recommendations. During the daytime on 13/09/2016 she recorded, from her patio, the passage of a freight train producing 70dB of noise.

Railway noise and vibration has considerable impact upon local residents and road traffic noise exacerbates the impact of this audible pollutant.

The prospect of a Road bypass will manoeuvre a proportion of air and noise pollution to an alternative location and in doing so this will obliterate natural habitat and some of the green buffer that the village relies upon to counteract the negative impact of man-made pollution.

Artificial Light Pollution

Those living closest to the proposed site (including neighbouring cottages, Collingtree and Grange Park residents and certain properties in Blisworth) already suffer from the intrusion of lighting from the M1 and industrial properties north of junction 15 of the M1. Anecdotal evidence of the visual impact of Swan Valley Industrial Estate (extending from junction 15a of the M1, towards Upton) and artificial light at night shows significant skyglow – the glow seen over towns and roads from upward light (Environmental Protection UK, 2013) - across the south west aspect of Northampton's suburbs. Access to The Campaign for Rural England– Light pollution and dark skies map with focus upon Northampton illustrates the issue very succinctly (<http://www.nightblight.cpre.org.uk/maps/>) Humans and animals are able to and have to adapt to their physical environment over time. At present many local residents are aware of 'skyglow'. This is inconvenient, especially to those who enjoy astronomy or struggle to sleep when back ground light cannot be properly excluded. It can also contribute to adverse impact upon both physical and mental health due to altered sleep patterns, disruption to circadian rhythms and normal hormone secretion and changes in metabolic rate.

Unfortunately, there are no recommended set levels for light to be considered a statutory nuisance (Gov.uk. 2015). Railway premises or goods vehicle operating centres appear to be exempt from statutory notice laws regarding this pollutant. Despite this the Government and Public Health England acknowledge that artificial light can compromise health.

In April 2018 The Independent published an article written by Harriet Agerholm, reiterating the warnings of Public Health England (PHE) of the impact of new LED streetlights which interfere with sleep-wake cycles:

- *Humans have a natural body clock that has an approximate 24-hour cycle. However, light is the main trigger to ensure that we stay entrained,"* said John O'Hagan, head of the PHE's Centre for Radiation, Chemical and Environmental Hazards.
- *It is likely that bright light, of almost any wavelength, could have an impact. Disruption of the circadian system can have a major impact on sleep quality and daytime alertness, which in turn impacts wellbeing and safety. It is a bit like having permanent jet lag.*

Fonkena et. al. (2010) performed studies on mice to identify the impact of altering the light and dark cycle they were exposed to and the consequent impact upon calorific intake. They proposed a causal relationship between night time light exposure and obesity in their research subjects. This may be a cumulative factor influencing light at night and obesity in humans.

A 2016 study in the International Journal of Obesity (Rybnikova et.al.) combined satellite images of night-time illumination with obesity rates, found that people in more brightly-lit areas tended to be heavier, even after considering factors such as wealth, which might influence obesity.

Motta (2017) is an amateur astronomer and cardiologist. He has researched the effect of night light on circadian-rhythm disruption. Numerous papers over the past 20 years have led medical researchers to conclude that light at night increases the incidence of certain cancers, most notably breast cancer (Haim & Portnov, 2013, Spivey, 2010). Researchers now estimate that up to 30% of breast cancers are secondary to light at night suppressing circadian rhythm. The research basis for this conclusion has become so compelling that the International Agency for Research on Cancer (IARC) recently declared circadian-rhythm disruption as a class 2A carcinogen placing it on the same level of severity as the effects of tobacco smoke on lung cancer. Light-at-night and circadian disruptions have been suggested to play a role in other cancers including endometrial, ovarian, prostate, colorectal, and non-Hodgkins lymphoma but evidence comparable to that obtained for breast cancer has not yet been recorded.

The biochemical mechanism for this has been thoroughly researched and is thought to result from the suppression of melatonin production by the pineal gland. This gland produces the hormone melatonin while we sleep. Repeated exposure to lights for night-shift workers or in our bedrooms markedly suppresses melatonin production. Previous research has shown that this hormone helps the immune system suppress the development of several types of cancers.

Walking and Cycling Issues Around the Roxhill Northampton Gateway Proposal

The DoT (2016) high-lighted their long-term goal that by 2040 walking and cycling should be a normal part of everyday life. They site improvements in overall health including reducing the risk of long-term conditions including cardiovascular disease as well as improvements to mental health and a sense of well-being.

During the second Public Consultation Phase, initiated by Roxhill, SNC touched upon the proposed enhanced cycle and footpaths in proximity to the road alterations but acknowledge that it is unlikely to be a welcoming environment for those healthier modes of transport due to high traffic volumes and consequent pollution. They advised:

- *Pedestrian and cycling links should be attractive, segregated, safe and continuous. Priority should be given to pedestrians and cyclists at road junctions. (SNC, 2017).*

The National Institute for Health and Care Excellence encourage active travel such as walking and cycling to help reduce traffic-related air pollution but they acknowledge that cyclists and pedestrians are vulnerable to road-traffic-related air pollution as well as other injuries on the road. Both factors discourage people from taking up these zero-emission modes of transport (NICE, 2017).

Chung et.al. (2017) reported in The Lancet that even short-term (two-hour) exposure to particulate matter from traffic fumes appears to thwart the benefits of walking on the heart and lungs among older adults (aged 60 or over). They report that short-term exposure to pollution is associated with stiffening of the arteries and impaired lung function. Once again builders and subsequent employees on-site may be exposed to ongoing unacceptable levels of air pollution if Roxhill's Northampton Gateway proposal was to proceed.

Cycling beside the A508 and the M1 will not enhance health or well-being due to the poor air quality and the noise of constant traffic.

The Marketing and Counterchallenge of the Roxhill NG's Proposal

Roxhill's approach to the planning application and creation of the concept of the Northampton Gateway proposal reflects a business transaction with minimal regard to the negative implications of the project to the local area and its residents.

Regular glossy correspondence, consultation meetings, compulsory purchase documents by roadsides and negotiations with land-owners artificially reinforce their intention to succeed but the outcome is not currently guaranteed, pending the judgement of PINS and the SoS.

Preceding Roxhill documents have vaguely acknowledged human factors and interaction with the proposed development but little acknowledgement has been made to the enforced changes placed upon local communities, in favour of higher level environmental and economic consequences.

Local communities have utilised every opportunity to illustrate the strength of feeling toward Roxhill NG's proposal. Andrea Leadsom, MP, has been integral in our representation. She noted and acted upon feedback provided at the oversubscribed Roade Parish Council meeting in April 2017 as well as communication from individuals and the SRNG Action Group (<https://www.andrealeadsom.com/news/20180223/srfi-update>). Subsequent communications with the developers and interested parties continue to capture the views and dis-benefits perceived by local people.

We have worked, in collaboration with members of Stop Rail Central Action Group, to advise and update local opponents of both SRFI schemes as the consultation processes and subsequent planning applications unfold. Many platforms have been utilised to ensure that the local target audience has been informed including local print media, designated websites and social media, leaflet drops and access to face-to-face discussion with action group members at local events. The multitude of access to information opportunities has facilitated a much deeper appreciation and understanding of the current proposals.

PINS have no doubt received many hundreds of considered objections during the Pre-examination phase of the Roxhill NG's proposal from concerned individuals who wish to be informed and involved in subsequent discussions.

Conclusions

- The cumulative health impacts of the speculative rail freight interchange, marketed as the Roxhill NG proposal, have been discussed and their impact upon local residents, potential employees and commuters have been highlighted. From a health perspective the local disbenefits heavily outweigh any potential benefits of the proposed scheme.
- With the current 2018 Clean Air Strategy Consultation taking place, support from The Royal College of Physicians (RCP) and the Royal College of Paediatrics and Child Health (RCPC) and campaign groups including the BHF and Doctors against Diesel (an evidence-based campaign led by doctors, nurses and health professionals (<https://doctorsagainstdiesel.uk/>)) there is likely to be enforced reduction and alteration to the current unacceptable levels of air pollution across the UK, with particular reference to diesel fuelled transportation.
- It is inequitable for targeted locations (for example SRFI's) to accept more hazardous levels of local pollution for the sake of an aspirational greater good for the UK. This appears to be the strategy of Roxhill in promoting the Northampton Gateway proposal and many of their other successful warehouse developments and acquisitions.
- The Industrial Strategy Commission (2017) introduced the notion of health and social care as drivers of industrial strategy. Dame Barker and team described the concept of all people having equitable access to Universal Basic Infrastructure. This currency involves both hard (physical and natural) capital and soft (human-capital building) infrastructure.

- Representative strategic thinkers (Dame Barker, Lord Adonis etc) urge for reconsideration of current concepts and a firm equitable approach to development and protection of the environment, society, health and inter-linking industrial strategy must be sought rather than developer-led anarchy and unprecedented haphazard devastation without justification for decimation of the UK's rich agricultural heritage. The Roxhill NG proposal appears to represent qualities of the latter. Roxhill are currently developing The Warwick and Coventry Gateway on the edge of Coventry. We do not wish for our local environment to undergo devastation of the extent shown below.



- The Director of Public Health Annual Report 2016/17 reiterates the good intentions of Northants County Council to provide local residents with access to a healthy local human habitat. This aspiration is reinforced by Northamptonshire's Health and Wellbeing Strategy (2016-2020) which states:
"By creating communities that are strong and resilient, empowering people to pro-actively keep themselves well, and achieving parity of esteem between mental and physical health, the burden on our health and social care system will be eased. This strategy makes explicit our commitment to include housing, infrastructure and planning, public safety and crime, education and employment as wider determinants of health and wellbeing."
- Our communities will be influenced by any large-scale changes within close proximity to our chosen home locations. We do not submit to helplessness or resignation to a fate without considerable questioning and challenge. Our health and well-being will potentially be affected by the infliction of the Roxhill Northampton Gateway proposal and we urge decision makers to consider our lived experience in combination with economic, environmental and legislative considerations both for and against yet another SRFI within the countryside.

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8. ENVIRONMENTAL ISSUES

8.1 Ensuring the Accuracy & Objectivity of Environmental Impact Assessments (EIA's)

Introduction

It is widely accepted internationally, that however sophisticated the assessment techniques used, there is always some uncertainty over the predicted outcomes. Academic studies have estimated that predicted outcomes are inaccurate in between 24% and 35% of cases studied (reference link 1 below) and the applicant must demonstrate how this uncertainty has been managed. Studies have also shown that technical consultants employed to carry out the assessments, can never be entirely objective and are prone to self-fulfilling prophecies (reference link 2 below). It is also desirable that promoters and their consultants are able to provide 'audits' of forecasted outcomes from previous applications. For example, an audit of outcomes from the Environmental Impact Assessment for Roxhill's East Midlands Gateway SRFI would be helpful in this regard.

In 2011 the Institute of Environmental Management produced a report outlining 'Best Practice' and set out the following principles (reference link 3 below):

- *All parties must recognise that scoping is a 'live' process that develops through the assessment process and thus practitioners should aim to develop an appropriate terms-of-reference for the assessment that can be maintained and updated as the design of the proposed development is progressed through the pre-application process.*
- *There is an increasing expectation that engagement should occur from the early stages of pre-application. EIA practice already undertakes consultation and engagement activity beyond the expectations of the EIA Regulations; however, there is a need to develop better ways of engaging to ensure that concerns are heard and can be acted on appropriately.*

Enhancement

The research has identified that the inclusion of environmental enhancements to increase a development's positive impacts are still much less common than actions to mitigate predicted negative effects. However, with the increasing emphasis on local community involvement in the UK's development consent regimes future EIA practice will need to give greater consideration of opportunities to provide environmental and community enhancements. Developers are increasingly recognising the clear reputational benefits that can be gained from identifying and delivering positive environmental impacts through their developments and the potential influence this can have in generating support for their proposal.

Non-Technical Summary (NTS)

Providing an NTS under a separate cover from the main ES has now become standard practice in the UK, allowing wider access to the EIA's findings. However, whilst accessibility has improved other issues have appeared including: documents becoming overly long - regularly exceeding 20 pages in length; and the use of the NTS as a form of public relations (Reference link 4) for the proposed development rather than accurately presenting the EIA's findings. For NTS to remain effective and credible communication tools EIA co-ordinators must be directly involved in the writing process and more widely practitioners must continue to explore developing effective methods of presenting the assessment findings to engage communities.

Environmental Management Plans (EMP)

An EMP is a document that sets out the mitigation, compensation and enhancements actions identified by the EIA in a manner that allows them to be readily implemented during the construction and operation of a development. The research has found that engaging a site contractor to help develop such actions that make up the content of the EMP is a key factor in the successful implementation of an EMP in practice. The inclusion of a draft EMP within ES is becoming increasingly common and IEMA's study has found that nearly 80% of UK EIA practitioners would support making this a mandatory requirement within the revised EIA Directive.

Monitoring

IEMA's research has identified that EIA practitioners would like to see the EIA Directive strengthened to include more emphasis on monitoring the actual environmental effects that result from a development that underwent EIA. However, there are other mechanisms that are beginning to deliver more effective monitoring in practice, although these are yet to become standard practice. They include: recognition amongst developers that the environmental effects of their developments increasingly influence their corporate reputation; and the commissioning of environmental professionals to monitor and manage the implementation and maintenance of environmental compensation and enhancement measures for a number of years after a new development is constructed." (Reference link 4 below).

It is our belief that Environmental Impact Assessments have lost credibility over recent years and are increasingly perceived by local communities as lacking in objectivity and biased in favour of the promoter of the development. Local communities expect that an EIA should be an objective scientific report whilst developers and consultants see it as part of the advocacy process of gaining planning consent. We believe it inevitable that the aims and objectives of those preparing the EIA will shape its content and conclusions. Added to this is the high level of uncertainty in all forecasts and predictions and there is little evidence that the Northampton Gateway proponents have engaged with local communities to explain and justify their position.

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8.2 Landscape

Introduction

Areas concerned comprise a c. 245-hectare block of agricultural land south-west of M1 J15, bounded by the A508, and the West Coast Main Line (WCML) and Northampton Loop Line (a section of the WCML), the proposed main site, and a strip of c. 28 ha. agricultural land, the proposed Roade bypass, forming an arc from the A508 c. ½ km. north of Roade, re-joining the A508 c. ½ km. south of Roade near a disused railway crossing. The Landscape Report was drafted by FCPR Environment and Design Ltd.

The Main Site

The Northampton Gateway (NG) site is mainly flat, rising approximately 15 metres to the south and west, comprising open arable fields and hedgerows with two small woods, a group of disused barns, a shooting school, a small watercourse flowing to Wootton Brook, a tributary of the Nene, and three small ponds. It is bounded to the west by stands of mature trees. It is crossed by two rights of way, one from the A508 in the direction of Collingtree, the second from Collingtree towards Blisworth. Its western edge abuts the WCML and Northampton Loop Line, partly set in a cutting.

Extensive views north-west across the site towards Northampton, Milton Malsor and Blisworth are available to receptors in West Lodge on Blisworth Road, and a dwelling by the A508, to north-bound travellers from the elevated A508 south of the site and along the site edge to M1 J15. Similar views are also available to south-bound travellers on the A508, and to ramblers on the rights of way. The site is unlit at night.

The beneficial psychological effect of transition from urban to pastoral landscape on leaving M1 J15 in a southward direction cannot easily be quantified, but is an important amenity recognised in psychological studies, which **should not lightly be discarded**.

Instead of an open pastoral landscape, for c. 1-kilometre travellers would run the gauntlet of a heavy industrial site with at least seven vast warehouses and associated crane gantries partly sunk in the subsoil, and partly masked by bunds and vegetation. Receptors in dwellings beside Blisworth Road and the A508 which overlook the site would see a **major adverse** change to the landscape, as would northbound travellers. Ramblers would face considerably longer routes on diverted footpaths with inferior views along the railways and A508, from the A508 towards Collingtree, and from Collingtree towards Blisworth.

With 24/7 road and rail activity the site would be floodlit at night. Vibration, noise, dust and effluent pollution would arise from aggregate and other works on site. Despite attempted mitigation toxic emissions would inevitably affect passers-by, horse-riders, ramblers, the receptors mentioned and, on the prevailing south-west wind, plumes and noise would also reach Collingtree, Grange Park, and possibly, Wootton.

The South Northamptonshire Local Plan (1997) contains Policy EV8 which designates a band of land to the south of Northampton as a “Local Gap”, which means a local green space. In some other parts of the country this would be known as a “Green Belt”. This Local Gap area is protected from building development. Therefore, the building of NG would be in contravention of NPSNN 5.170 and 5.172 as well as Policy EV8 of the Local Plan. The draft Local Plan also lays down the same policy, contravened by this application¹.

The loss of open landscape, views, and detriment to diverted rights of way cannot be mitigated and should be classified **major - adverse**.

We would wish to refer to the recent decision of the Planning Inspectorate concerning the Travis Perkins planning appeal. The planning inspector made the following comments in his report ²:

- *37. The development would harm the character and appearance of the area..... Further conflict exists with Policy E20 of the LP which requires that the design of any new building adequately reflects the character of its surroundings in terms of layout, siting, form and scale, amongst other things.*

As the Travis Perkins appeal site is approximately two miles from the proposed NG site, the opinion of the planning inspector appears equally valid for the NG site.

It is also a statutory requirement that developments should not worsen the concentration of harmful emissions in nearby areas (already classified as AQMAs) which inevitably would occur if the DCO were granted.

It seems impossible to achieve those policy aims with the proposed development of the main site, which therefore is unacceptable, and **should not be permitted**.

Road Bypass

The Bypass Bridge

Consultants to the applicants have stated that bridge construction across Road cutting Site of Special Scientific Interest (SSSI) would not commence until up to 30% of site warehousing was completed and occupied. The A508 through Road would therefore be subject to traffic flows from up to 2m ft² of warehousing, assuming no contract slippage at either site. **This is unacceptable.**

We also understand that erection of the bridge would take over a year, with at least two phases, as work above the railway lines is not permitted except at times such as Christmas when the WCML is out of use. Bridge erection would absorb at least two such periods. The A508 through Road would therefore be subject to potential additional traffic from say, another 2m ft² of warehousing during the construction period.

During construction there would also be major traffic disruption on the A508, and vibration, noise, light, dust and emissions pollution from contractors' activities.

No model or picture, or the planned dimensions of the bridge was presented during consultations, so no comment on its appearance and suitability to the landscape can be made. However, foundations, services and other plant would intrude into the geology of the SSSI cutting. The completed bridge, associated equipment and services would constitute a permanent SSSI intrusion and landscape alteration; its effect should be rated **major – adverse**.

The Bypass Route

The planned route of the currently unlit bypass may be considered in two parts:

- **Part 1:** The stretch from the A508 north of Road to the WCML crosses comparatively level open arable fields, falling gently westwards, with receptors in properties fronting Bailey Brook Lane and Woodleys Farm Day Nursery beside the A508. The view and rights of way across open fields would be interrupted by traffic and (presumably) hedging on the bypass and by the bridge over the WCML Road Cutting SSSI. Less than half a kilometre distant from dwellings in Bailey Brook Lane, traffic would generate vibration, noise, fumes and, at night, light pollution. It would lie less than a kilometre from Grade II listed Woodleys Farm Day Nursery which would also be subject to the pollution mentioned above. It would severely damage the pastoral character of the area and also impact east of the A508 on Courteenhall Park and its Grade II listed buildings. There would also be destruction and severance of woodland fronting the railway cutting SSSI to accommodate the roadway and bridge.

This would be in conflict with Policies BN1, BN5 and S10 of the JCS which seek to recognise the importance of green infrastructure corridors in contributing to sense of place and ensure that they are conserved, managed and enhanced; to conserve and enhance landscapes, local distinctiveness and sense of place, including the landscape settings of towns; and generally, protect, conserve and enhance the natural and built environment.

The permanent effect of this part of the bypass on the landscape should be classified **moderate-adverse**.

Part 2: The stretch from the WCML re-joining the A508 by the disused railway line some half a kilometre south of Roade opposite an important wildlife refuge on the far side of the A508 would lie within half a kilometre of Roade dwellings on Dovecote Road, along Blisworth Road and Knock Lane, and closer to Grade II listed dwellings along the bridleway – Hyde Farm and Dovecote Farm (with dovecote). These, horse-riders and ramblers on several rights of way crossed by the bypass route, would be subject to vibration, noise, light and fumes from the bypass. It is also proposed to construct an underpass on the bridleway near Hyde Farm, with consequent stress, increased hazard and loss of amenity to ramblers, horses and riders. The bypass route passes through a noted wildflower meadow abutting Knock Lane. It would partly destroy the meadow and permanently impair its amenity value. Views over open undulating fields would be severely affected by the bypass's presence in the landscape. The applicants plan to use for surface drainage a large pond in the grounds of a Grade II listed dwelling, Hyde Farm, below the bypass. They do not seem to have assessed impacts on the pond and downstream of increased inflow and potential overflows.

In the cases above, it is relevant to quote again from the Planning Inspector at the Travis Perkins planning appeal:

- *37. This would be in conflict with Policies BN1, BN5 and S10 of the JCS which seek to recognise the importance of green infrastructure corridors in contributing to sense of place and ensure that they are conserved, managed and enhanced; to conserve and enhance landscapes, local distinctiveness and sense of place, including the landscape settings of towns; and generally, protect, conserve and enhance the natural and built environment.*

The permanent effect of this part of the bypass on landscape and receptors should be classified **major-adverse**.

Conclusions

- Proposed development of the main site contravenes international, national and local regulations by transforming an important rural green gap into an industrial estate. It is unacceptable.
- The bypass bridge had not been described at all. This is unacceptable.
- The bypass will intrude and create unacceptable impairment of the rural landscape.

References

- DRAFT LOCAL PLAN - POLICY NATURAL ENVIRONMENT 1 – RURAL CHARACTER: Appropriate development proposals on sites outside defined settlement confines will only be permitted where they do not cause significant harm to the character, quality, distinctiveness or sensitivity of the landscape, or to important features or views, or other perceptual qualities such as tranquillity unless the benefits of the development clearly outweigh the impacts. Developments should not have an unacceptable effect on the rural tranquillity of the area, including the introduction of lighting or noise occurring as a result of the development, taking account of the relative remoteness and tranquillity of the location. New lighting will generally not be permitted in unlit areas and the type, size, design and operation of any lighting may be controlled where necessary by the use of conditions. Development proposals should be informed by, and be sympathetic to, the distinctive landscape areas identified in the Northamptonshire Landscape Character Assessment or any successor document(s), and contribute, where appropriate, to the conservation and enhancement, or restoration and recreation of the local landscape considering its wider landscape character type.
- <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3138580>

8.3 Public Rights of Way

Introduction

Public Rights of Way (PROW'S) are an important feature in the countryside in South Northamptonshire. They represent both an important recreational facility and as a safe means of travelling between communities without the need to use highways open to other traffic.

Section 136 of the 2008 Planning Act states:

- *An order granting development consent may extinguish a public right of way over land only if the decision maker is satisfied that:*
 - *An alternative right of way has been or will be provided, or*
 - *The provision of an alternative right of way is not required*

In considering any changes to a public right of way an Appointed Examining Authority would be required to have regard to the content of the National Policy Statement for National Networks (NPSNN) in making its recommendation to the Secretary of State (e.g. the mitigation conditions in paras 5.184 and 5.185). Moreover, the Secretary of State must make its decision in accordance with the NPSNN.

Section 5.184 of the NPSNN states:

- *Public rights of way, Nature Trails and other rights of access to land (e.g. Open access land) are important recreational facilities for walkers, cyclists and equestrians. Applicants are expected to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other public rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve access. In considering revisions to an existing right of way consideration needs to be given to the use, character, attractiveness and convenience of the right of way. The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements in respect of these measures might be attached to any grant of development consent.*

Section 5.185 of the NPSNN states:

- *Public rights of way can be extinguished under Section 136 of the Act if the Secretary of State is satisfied that an alternative has been or will be provided or is not required.*

Roxhill Northampton Gateway (Roxhill NG's) Proposal

The plans put forward by Roxhill NG for a Strategic Rail Freight Terminal (SRFI) propose numerous diversions to or the stopping up of existing rights of way over land between the villages of Blisworth, Collingtree, Roade and Milton Malsor. They will also have an impact on some of the rights of ways between these villages and other local communities.

All of the proposed changes are considered below.

- Stopped up with no Substitute Provided:
 - Public footpath RZ3 and Public bridleway RZ6 both of which connect the villages of Roade and Stoke Bruerne would be severed by the proposed Roade bypass and would be stopped up. Bypass crossing points with adequate central refuge islands will be required for both these rights of way.
 - Public footpath KZ19 connecting Blisworth to Roade links with footpath KZ30 towards Courteenhall. This link must be retained by the provision of an adequate crossing point, with a central refuge island, on the A508.

- Stopped up With Substitute Provided:
 - Public footpath KX13 connects the villages of Milton Malsor and Blisworth to Collingtree. This route is currently 1.19Kms long, all through open fields with extensive countryside views and is fully accessible containing only one small low stile. It also provides part of a circular route between Milton Malsor and Collingtree when combined with footpaths KX10 and KG4 to the north of Collingtree Road. The proposed diverted route would have a total length of 1.98Kms an increase of 0.79Kms. Just under 1.00Kms of this route would be alongside Northampton loop railway line, 0.5Kms alongside the Milton Malsor to Collingtree Road and 0.4Kms alongside the M1 motorway. The only views from this route would be of the manmade earth bund around the site, itself an alien feature, the railway line and road network. This route would also need to cross the new rail line that would be constructed to allow trains into the site.

The proposed diversion is considered unacceptable in that it is considerably further than the existing route, has no visual amenity and would suffer from noise and air pollution along its entire length, particularly from the M1 motorway. Furthermore, it would be less accessible to the less able due to the need to cross the railway line.

Roxhill have incorporated a short link from their proposed diversion onto the Collingtree Road east of the railway line. This link serves no purpose as in order to use it pedestrians would have to walk some distance along Collingtree Road where there is no footway and under the railway bridge. The severe dip at this point makes pedestrians 'invisible' to oncoming traffic making it highly dangerous.

- Public footpath KX17 connects the village of Roade and Collingtree, the route is mainly through open fields with extensive countryside views, is fully accessible and has a total length of 1.47Kms of which 0.2Kms is alongside the M1 motorway. The proposed diversions here are more complex.
 - A shared cycle and footway is proposed alongside the A508 starting near where the existing KX17 leaves this road. Whilst this route is only marginally longer than the existing footpath the entire route is alongside either the A508, (0.7Kms) (2) or the M1 motorway (0.85Kms) (2) including Junction15. This route also has to cross the HGV/Van/Car entrance/exit to the rail terminal and a separate pedestrian and cyclist access road. This route, shared with cyclists has no amenity or recreational value, would suffer massive noise and air pollution and the only views would be of the rail terminal, the A508 and the M1 motorway including junction 15. This route could not be considered, in any way, an alternative to the existing footpath.
 - A pedestrian only footway, avoiding the A508 is proposed as a substitute for the existing footpath KX17. This route would run around the perimeter of the site initially in the opposite direction and reach a point near Milton Malsor where it would meet the diverted footpath KX13 as described in 2.1 above. The total length of this route would be 3.79Kms compared with the 1.47Kms. 1.94Kms of this route would be alongside the Northampton loop railway line and 0.96Kms alongside Collingtree Road and the M1 motorway. The considerable increase in length of this route, an additional 2.32Kms, noise from rail and road traffic, air pollution particularly from the motorway and the lack of visual amenity combined with the fact that there would need to be two crossings of the railway making the route less accessible makes the proposal totally unacceptable.
- Public bridleway RZ1 links the villages of Roade and Stoke Bruerne. This bridleway would be severed by the Roade bypass and it is proposed to provide a tunnel under the bypass. This is considered to be totally unsuitable for horses and could cause significant safety issues.

Cumulative Impact

Ashfield Land (Rail Central) are proposing a SRFI on land to the west of the Northampton loop line and included in their proposal are plans to divert the section of footpath KX13, which runs through their site, this being the continuation of the path referred to in section 2.1 above. The total current length of this footpath, from Blisworth to Collingtree is 2.24Kms (1.05Kms through the Ashfield Land site and 1.19Kms through the Roxhill developments site). The entire length of this path is through open fields with extensive countryside views.

The cumulative effect of the two proposed diversions would see this route increased in length by over 2.5Kms (1.75Kms through the Ashfield Land site and 0.79Kms through the Roxhill developments site) to 4.78Kms. This path currently provides a safe and convenient way for residents of Collingtree and Milton Malsor to reach the recreational facilities at the Blisworth sports fields and Scout Hut which are situated a short distance from the end of footpath KX13. The combined effect of these diversions would see the entire length of the path, 4.78Kms being adjacent to either the railway lines or the road network and would include an additional bridge over the railway. The overall effect would be to severely diminish the use of these rights of way.

Whilst some of the proposed changes would be acceptable if provision is made for central pedestrian refuge islands, the diversions to footpaths KX13 and KX17 along with bridleway RZ1 are totally unacceptable. The two footpaths would suffer from:

- A complete loss of attractiveness and visual amenity
- Becoming less accessible to the less able
- Increased length
- Severe noise pollution
- Severe air pollution

The character, attractiveness and convenience of these long-standing rights of way would be completely lost to the extent that they would rarely be used therefore have a detrimental effect on the health, wellbeing and recreational facilities of local residents.

Conclusion

The proposed footpath diversions would have a severely negative impact on the local communities. The ability to use many of the footpaths for recreation and communication would be greatly restricted by:

- The visual impact of massive warehouses and overhead gantries would ruin what are currently attractive countryside views.
- The noise and air pollution created by the additional trains, the loading and unloading of containers and the thousands of car and HGV movements would destroy these paths as a means of recreation.
- Many of the paths would not be accessible to a significant number of local people due to the increased distance and the multiple crossing, by bridge, of the rail lines.

8.4 Ecology

The Proposed Main Site

Surveys, performed by specialist agents, of the main site comprising some 245 hectares of mainly agricultural land south-west of M1 J15, note that it hosts common vertebrate and invertebrate populations, plants, and fungi. It offers a wintering ground for golden plovers and its ponds habitats for Great Crested Newts.

The consultants concede that the loss of arable land to industrial use is irremediable and permanent. The effect should therefore be rated **major – adverse**.

We understand that survey work on the path of the proposed bypass and at M1 J15 is still outstanding. This needs to be completed before its adequacy can be assessed.

It is unlikely that a substitute wintering ground could be provided for the golden plovers. Mitigation measures for some grassland and the ponds might prove viable.

The surveys, covering limited periods, did not compile comprehensive lists of vertebrate species using the site. For example, there are no reports of corvids (rook and crow) which regularly forage there, nor of Red Kite though within their range, nor of waders and water fowl – heron and others which will periodically visit the ponds. Stock doves are the only Columbidae mentioned though other species (woodpigeons, collared doves etc.) utilise the site. There is little mention of migrants, apart from golden plovers. There is no mention of deer though at least one species, Muntjac, albeit alien, almost certainly enters the site to frequent woods there and along Roade Cutting. It is likely that other deer species also utilise them. A casual visit in Spring 2018 to the eastern part of the site near derelict barns, in half an hour flushed no less than three skylarks nesting in that small area. This species is on the Red List of species in *The Birds of Conservation Concern 4* report provided by the RSPB, are highest conservation priority, and are protected under the Wildlife & Countryside Act 1981.

According to research conducted by the Northamptonshire branch of the Wildlife Trust, there is a potential wildlife site within the main site proposed for NG. It is designated with number 236 on a map provided by the Wildlife Trust. It may be classified as a “potential” wildlife site, but must have special features to be so rated. The Roxhill NG Masterplan issued in December 2017, indicates that most of this potential wildlife site would remain after development. However, the northwestern corner would be removed to make space for railway tracks. In addition, a wooded area would not be far from the lorry park and the rail locomotives, at least 90% of which would be polluting the air with noise and toxic emissions. There is every probability that all special characteristics of the site would be lost.

A further potential wildlife site lies south of the Hilton Hotel near Collingtree, between the M1 southbound exit slip road and the A45. The proposed changes to M1 junction 15 would remove some of this potential wildlife site. See Appendix 12.11, page 22 for revised plan of this junction. The Wildlife Trust map referred to in the previous paragraph also shows this potential wildlife site. This is a second example of a contravention of Policy EV24.

The Proposed Road Bypass

The bypass and its borders would occupy up to 28ha of farmland, grassland and scrub. It would impair habitats of birds, reptiles, invertebrates, and mammals as well as reducing potential nesting sites.

A bridge of unknown design over the West Coast Main Line (WCML) would intrude foundations into the Roade SSSI's geology. **Damage would be permanent and irrecoverable.** It is an offence to damage an SSSI without consent from relevant Authorities.

The planned bypass route passes through a wildflower meadow by Knock Lane. It would **partly destroy and permanently impair the meadow.**

The planned south end of the bypass rejoins the A508 opposite a large disused quarry and elevated rail track constituting an important wildlife refuge and potential reserve. Additional traffic noise, vibration, light and toxic emissions would impair the site's ecological value.

During construction phases extending over at least twelve months noise, vibration, dust, and atmospheric and light pollution would disturb wildlife and inhibit breeding. If it opened traffic on the bypass would emit toxic fumes as well as causing roadkill.

The effects should be classified as **major – adverse** reducing in later decades to **moderate – adverse.**

Wildlife Corridors

The project would sever wildlife corridors – viz. a bridge and roadway over the WCML would bisect the continuous strips of grass, scrub and woodland on both sides of the SSSI cutting, dividing them into distinct sections.

It is noted that the applicants' Ecology Report states at 5.4.33 that there is no woodland on the route. This is incorrect: the fringes of the cutting are covered with woodland, part of which would be cleared to allow roadway access. A carriageway across open farmland would also divide territories and cause roadkill.

The construction of sidings and buildings on the main site would extend the distance of exposure across the Northampton Loop Line, increasing stress and hazard to wildlife. Improvement works at M1 J15 would interdict wildlife movement along or habitation of verges, and completed, permanently destroy their value. For the foreseeable future noise, light, vibration, dust, and emissions from the site's 24/7 activity would impede/nullify wildlife habitats.

The effect should be rated **major – adverse.**

Cumulative Effects

The combined effect of NG and of Rail Central, a similar, larger project, whose site abuts and partly overlaps that of NG, is rated by the consultants as **minor.** It is very hard to understand how the loss of over 500 hectares of agricultural land in an important local green gap to industrial development could be so construed. Surely the permanent effect would be **major - adverse.**

The applicants' proposed mitigation measures assume management best practice would continue indefinitely in future, but this cannot be guaranteed or enforced. For example, no allowance is made for site extension and further construction. A more likely outcome is creeping neglect of landscape features, general industrial encroachment, decline, and ultimately habitat losses.

General Issues

Consideration of the application should be made in the light of data from British Trust for Ornithology (BTO) annual surveys showing that UK abundance of common farmland breeding birds has declined by 56% since 1970. This can be attributed to three main factors:

- Loss, break-up and subdivision of habitats through construction and urban encroachment – such as this proposal.
- Use of pesticides and other methods to control invertebrates. These have reduced food sources as well as posing direct threats to wildlife – as will this proposal.
- Climate change – which may be intensified by emissions from this proposed development.

Avian abundances may be near a tipping point, leading to population crashes and extinctions as already seems to be the case with the Turtle Dove.

With pressure for expanded construction and looser planning policies, wildlife habitats will come under greater stress, with general incursions into farm and waste land leading to more fragmentation and losses of habitats.

The decline in populations of common farmland birds may be regarded as an early indicator signalling compromise of the ecosystem. It is reasonable to infer that loss, break-up and reduction of habitats puts all wildlife species at risk of decline and/or extinction, albeit at varied rates.

In this context, what the consultants assess as a minor reduction in habitats actually has major implications. Preservation and improvement of wildlife habitats are policies implicit in the Natural Environment and Rural Communities Act 2006, which puts biodiversity conservation on a statutory basis. Besides contravening UK legislation, EC Directives and policies in the Local Plan¹, NG would also impair human welfare in terms of pollution, quality of life, and other as yet unforeseen ways. This is reinforced by the latest IPCC report.

Accordingly, no reduction of habitats should be permitted unless a scheme is of critical importance. The NG site cannot be so regarded; its role is already more than fulfilled until at least 2031 by DIRFT, less than twenty miles away.

On the basis of all the above, **the application should be refused.**

Summary

- Development of the proposed main site would destroy a large arable area and wildlife habitats, including those of Red List Species. It contravenes legislation and the draft Local Plan. Disbenefits far exceed notional benefits.
- The proposed bypass route would disrupt, divide and destroy wildlife habitats, again including those of Red List species. The consultants' report incorrectly states that it contains no woodland. There could be other undetected errors in their findings.
- The cumulative effect of the combined development of NG and Rail Central sites is underestimated; it would be major-adverse.
- Regard should be taken to the indicator signified by the decline in common farmland bird numbers. Further encroachment could also have severe, unforeseen consequences for human populations.

Notes & Considerations

- South Northamptonshire Local Plan Part 2: Pre-Submission Draft for Consultation: Draft Policies and Proposals (excluding Settlement Confines) POLICY NATURAL ENVIRONMENT 5 – BIODIVERSITY AND GEODIVERSITY: Development proposals should seek to conserve biodiversity and geodiversity, and actively enhance biodiversity in order to provide net gains wherever possible. Development proposals will be expected to incorporate measures to enhance biodiversity within or around a development site, and to contribute to the consolidation and development of local ecological networks, including beyond the District's boundary. Measures should be appropriate and compatible with existing biodiversity, ecosystems and designated wildlife sites. The Council will seek to ensure new development maintains, enhances, and extends networks of natural habitats. Proposals for improved access, recreation and tourism within such networks will be supported where they are compatible with biodiversity aims. Development proposals will not be permitted where they would result in significant harm to biodiversity or geodiversity, including protected species and sites of international, national and local significance, ancient woodland, and species and habitats of importance identified in the United Kingdom and Northamptonshire Biodiversity Action Plan.

8.5 Cultural Heritage

Introduction

This chapter will demonstrate that the proposed Northampton Gateway Rail Freight Interchange would be extremely detrimental to the local rural historic landscape, environment and various heritage assets.

The Roxhill's NG would contravene the following Objectives of the Pre-Submission Draft South Northamptonshire Local Plan Part 2 as set out on page 3 of the Summary Document:

- **Objective 9**
 - *To protect and enhance the tranquillity and natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets, biodiversity and the environmental character of the locality and surrounding landscapes.*
- **Objective 10**
 - *To protect the setting and separate identity of settlements by avoiding their coalescence and retaining the openness and character of the land around existing settlements.*

Issues & Objections

In general the SRNG Action Group considers that the applicant has not taken sufficient notice of the following recommendations made by Historic England in their Scoping Opinion - see Doc 5.1 Scoping Opinion, page 85:

- *We recommend that an approach is taken that derives its cue from the sensitivity of individual effects of such change within their settings. We consider that such an approach provides a more meaningful context for discussion over one based on an approach to assessing sensitivity in line with the grade of designation irrespective of other influencing factors. The Examining Authority must, in our view, ensure that the EIA will provide a robust assessment of the impact of the proposed development on the setting of designated heritage assets including, but not limited to visual impacts together with other factors such as noise and vibration. The applicant has failed to supply suggested photomontages from viewpoints 8 and 15 and generally underestimates the effects of the proposed development on local communities and their cultural heritage.*

In particular our Group agrees with the County Archaeological Advisor's statement that in her professional opinion *the Cultural Heritage assessment in relation to below ground archaeological assessment is inadequate and does not follow the EIA regulations nor the guidance provided within the NPPF.* (TRO50006-000763 - NCC & SNDC Additional Submission)

Methodology - Inadequate Assessments of Significance of Heritage Assets & Damage to Same

The applicant acknowledges that the proposed SRFI and Roade Bypass would be damaging and outlines methods of mitigation but assessments of the significance of some heritage assets and the impact of the development on their significance are inadequate and unacceptable. Hyde Farm House and the associated Dovecote were not properly assessed because they were said to be 'not visible from publicly accessible locations. Mere reliance on listing descriptions is not sufficient in order to assess the significance and setting of this medieval manor house. Also, there is no reference to Woodleys Farm, a listed building which is very close to the proposed bypass site and would be badly affected by it.

An inadequate last-ditch programme of archaeological evaluation trenching was carried out on the Main Site too late for results to be included in pre-application consultations. The Bypass Site was not included in the programme. The applicant's proposal to carry out further archaeological works on both sites including more trial trenching if/when consent is given is unacceptable as the nature of the project is such that if important archaeological remains were to be identified it could be extremely difficult to preserve them in situ.

Built Heritage including Listed Buildings, Conservation Areas & Registered Parks & Gardens

- **Woodleys Farm** (now Woodleys Farm Day Nursery), very near the northern end of the proposed Roade Bypass (see Appendix 10-2, Figure 10, 1982 Ordnance Survey Map), is not mentioned by the applicant. This very attractive Grade II listed building dates from the 17th century and was once an important coaching inn, the New Inn, with stabling (said to be for 100 horses) on the opposite side of the turnpike road (now the A508). At least one 19th century landlord was a noted horse dealer. The New Inn features in a story by Charles Dickens, who is thought to have stayed there. The Bypass would detract from its setting and highway alterations and increased traffic would make access, which is already dangerous, even more difficult. The applicant should be fully aware of Woodleys Farm as it was mentioned in South Northamptonshire Council's Scoping Opinion - see Doc 5.1 Scoping Opinion, page 120, Section 3 - Cultural Heritage.
- **Roade Aqueduct (BH12)**: Historic England commented in their Scoping Opinion that *a robust assessment of the potential impact on the significance of the Grade II listed Roade Aqueduct within the development area including that derived from its setting will be required* (see Doc 5.1 Scoping Opinion, page 86). The applicant acknowledges that the aqueduct is *an important historical structure, and has a high level of illustrative value. The asset also has aesthetic value, which can be appreciated from the twentieth-century foot bridges across the cutting.* [In fact, the foot bridges are nineteenth-century.] ... The Bypass Site is said to *contribute to the setting of the asset, crossing the cutting. This contributes as part of the infrastructure which makes up the railway tracks, and therefore makes a positive contribution to the asset.* (Chapter 10, 10.5.49-50). In spite of recognising the importance and high sensitivity of the asset, the applicant grossly underestimates the impact the Bypass would have on it: *A new crossing over the Roade cutting will impact on Roade Aqueduct by increasing traffic in this location and changing the character of the setting from a cutting principally associated with rail to a more urbanised setting. The majority of the road however will be unlit so there will not be a large amount of increased light spill other than from traffic. It is considered however that setting only makes a minor contribution to the importance of these assets. The bypass will likely therefore result in a low impact, resulting in a permanent minor adverse significance of effect.* (Chapter 10, 10.6.19) This is totally unacceptable. The setting of the Aqueduct would be transformed not only by the road and traffic but by a large modern bridge of unknown design next to it. It is very unsatisfactory that the applicant has failed to provide any illustrations of the proposed bypass bridge. Local residents would also suffer from air pollution, noise and vibration as well as light pollution.

The Aqueduct and proposed bridge site are within a Site of Special Scientific Interest, which would also be damaged by the development.

- **Hyde Farm House (BH13) and associated separately listed Dovecote (BH14, now at Dovecote Farm not at Hyde Farm as stated in 10.5.44):** Hyde Farm House is the oldest secular building in Roade parish and dates from the 14th century. The Hyde estate then belonged to the Augustinian Abbey of St James (in Duston) and had its own open field system, water mill and fishponds (a paper on *The History of the Parish of Roade* by the Rev. Maze W Gregory, 1862, states “Near the house are the remains of fish ponds, which were drained about the beginning of this century”). The site is known as the “deserted Medieval settlement at Hyde”. The applicant recognises that BH13 and BH14 are High Sensitivity Receptors but underestimates the importance of their wider setting, which forms part of the settlement site and cannot be said to make *only a minor contribution to the overall significance of the heritage assets*. The assessment of significance of effect on these Receptors as *Minor Adverse* is totally unacceptable considering their closeness to the proposed bypass and the adverse effects of noise and vibration 24/7 plus light pollution as well as visual impacts. The associated bridleway, part of which belongs to Hyde Farm House, would be altered to go under the Bypass, to the disbenefit of all who use it. Altogether the effects of the development would be Major Adverse.
- **Milton Malsor Conservation Area (BH3), including Mortimers (BH1) and the Church of the Holy Cross (BH2):** Milton Malsor Parish Council’s Scoping Opinion said ***Cultural Heritage - Holy Cross Church, Milton Malsor - a Grade 11* listed, Circa 13C building - the distance from the Church to the development site should be mentioned. Actual distance to the historic village of Milton Malsor should be mentioned.*** The applicant has not given the distances requested.

South Northamptonshire Council’s Milton Malsor Conservation Area Management Plan states: ...10.1 *The most prominent threat is the development pressure that is placed on Milton Malsor due to its proximity to Northampton. This threat might not damage the fabric of specific historic buildings but it will affect the conservation area’s setting and significance. It is necessary to ensure that any new development does not affect this setting* ...10.2 *Action 14: The impact of development on the character and appearance of the conservation area should be considered. This applies equally to development outside the conservation area if it is likely to affect the setting of the conservation area.* The development would seriously harm the character and setting of Milton Malsor. In addition, the proposed mitigation measures would not be sufficient to protect residents from noise, vibration and light and air pollution. The significance of the effect on the village of Milton Malsor would be Major Adverse, not *negligible adverse* as stated by the applicant.

- **Collingtree Conservation Area (BH4):** The applicant points out that the M1 limits the setting of the conservation area, that the sound of traffic makes a negative contribution to it and that the motorway *also creates a hard boundary and area of separation between the Main Site and the conservation area. The Main Site therefore makes no clear contribution to the setting or significance of the asset.* In fact, the setting will clearly be severely affected. At present many residents enjoy access to walks in open countryside just across the motorway. Instead they would be faced with a mass of colossal warehouses and increased traffic and pollution in what is already an Air Quality Management Area. Again, the effect of this would be considerably greater than *negligible adverse*.
- **Courteenhall RPG, Courteenhall House, School, School House and Stables (BH7-10):** All the above are High Sensitivity Receptors whose wider setting would be affected by the development. Although the development would not be visible from these Receptors, residents would suffer from increased traffic problems, noise and pollution.

- **Courteenhall War Memorial (BH 15):** The applicant states that, as part of Highways Mitigation Measures, the kerb lines will be altered past the Memorial and a footway created running some distance to its west but it is not considered that this will *pose any material harm to the asset*. (Chapter 10.5.12) In fact the damage to the setting of this High Sensitivity Receptor would be considerable. As the inscriptions on the Memorial face the road they would not be visible from a new footpath running behind it.
- **Road Conservation Area (BH11)** The applicant states that the proposed Road Bypass will draw traffic away from the centre of the Conservation Area and this will *result in a low beneficial effect on the asset*. However, those living near the Bypass would suffer from noise, vibration and air pollution 24/7 and light pollution at night. Although a Bypass has long been desired by many, the proposed one is too near the village and the general view is that the NGRFI would be too high a price to pay for it as the disbenefits would far outweigh the benefits.
- **Blisworth Conservation Area** is not mentioned, presumably because of its distance from the two sites. However, the character of the area would be severely affected by increased traffic and pollution, including more rat-running along Stoke Road.

Archaeology - Main SRFI Site

- **Incomplete investigations:** Only 58 trial trenches were put in. This was contrary to the advice given by the County Archaeological Advisor two years ago. She had asked for a 2% sample in the areas where the geophysical survey had identified potential archaeology and a 3% sample in the rest of the areas which were identified by the geophysical survey as blank. Geophysical surveys do not always identify areas of significance. The assessment requested is common procedure, not considered particularly onerous, and the applicant had plenty of time to do the work.
- **Proposed mitigation:** It is stated that *the applicant will carry out a further phased programme of post-consent archaeological works to be undertaken in advance of construction in accordance with NPS policy and that the works would commence with a further stage of archaeological trial trench evaluation across the Main Site and Bypass Corridor ... followed by targeted areas of archaeological excavation prior to development. These will be carried out under Written Schemes of Investigation (WSI) that conform to recognised standards and guidance and which will have been prepared in consultation with and approved by the Local Planning Authority's archaeological advisor.* (10.7.2-3) The County Archaeological Advisor disagrees with this proposal and the SRNG Action Group considers that the outstanding assessments should form part of the submission.
- **Significance of below ground anomalies could be underestimated:** The site contains a wide range of Archaeological Receptors (ARs) from Prehistoric to Medieval/Post Medieval periods including ridge and furrow cultivation remains and ditched enclosures representative of Iron Age and Romano-British settlement activity. The applicant states that *the archaeological remains known to be present within the Main Site are considered to be of no more than local importance and therefore of low sensitivity.* (AR 10.5.55) This assumption is not acceptable because the site has not been adequately investigated.

Archaeology - Bypass Site

- **Incomplete investigations:** Trial trenching has not been done on the Bypass Site.
- **Proposed mitigation:** It is stated that post-consent archaeological works including trial trench evaluation would be carried out across the Bypass Corridor. This is unacceptable as a full assessment of the Bypass Site should form part of the submission.
- **Significance of below ground anomalies is uncertain and could be underestimated:**

According to Appendix 10.2, page 34, 5.3.4: *Geophysical survey within the Bypass Corridor suggests the presence of Prehistoric settlement activity of likely local significance extending into this study site. Potential for activity relating to the Medieval activity and Post-Medieval/Modern transport networks and Second World War infrastructure is also noted. The proposed development could impact upon these buried remains through construction groundworks.*

 - **The Geophysical Survey Report of Sept 2017 (Appendix 10.4, page 3) states:**

4.1.1 *A positive, sub-rectangular anomaly, some 37m x30m in size [1] has been identified in Area 17, [see AR8 in Figure 10.1 - Heritage Receptors] and corresponds with the location of a cropmark visible on aerial photographs (MNN125297) likely to be representative of a former enclosure, containing small discrete responses which are likely to relate to backfilled pits. To the north-west of the enclosure further linear anomalies [2] [see AR7 in Figure 10.1] have been detected. These are indicative of cut features and may relate to a larger enclosure / field system associated with [1], and form part of one area of settlement. ... 4.1.3 The morphology of all of the probable archaeological responses detected indicates that they are likely to have a late prehistoric origin.*

Without further investigation the significance of such remains cannot be properly determined and the low assessments of the residual effects of their removal (*Minor Adverse*) are unacceptable.

Mis-numbering of references to AR8 and AR7 in Chapter 10 page 19:

- 10.5.56 refers to ‘*the presence of an undated cropmark enclosure (AR11) within the southern area of the Bypass Corridor and the site of a former Second World War monitoring post and potential associated military activity (AR11) in its central limits.*’ Presumably the undated cropmark enclosure is AR8 on Fig 1 (this was numbered AR11 in Figure 10.1 of the pre-application draft, on which the site of the Second World War monitoring post was numbered AR14).
- 10.5.57 begins by referring to ‘*the cropmark enclosure AR11*’ but again this must be AR8 as it is said to be ‘*likely to relate to activity of Romano-British date*’. The paragraph ends with a reference to ‘*...sub-surface anomalies (AR8 and AR10).*’ As AR10 is the ‘*Route of former Turnpike Road*’ [now the A508] it can be assumed that ‘AR10’ is actually AR7. In the pre-application draft the present AR7 and AR8 were numbered AR10 and AR11. **This mis-numbering is very confusing and misleading and indicates the haste with which this part of the application was put together.**

Historic Environment & Landscape

- **Hedgerow boundaries:** A number of hedgerow boundaries within the Main and Bypass sites which are considered important under the Hedgerow Regulations 1997 would be wholly or partially removed during the construction of the proposed development. The applicant admits that this would result in a *Minor to Moderate Adverse environmental effect on low sensitivity receptors*. Ecological mitigation will involve *relocation of important hedgerows* but this will only partially reduce the impact on the environment.

- The change from rural to industrial landscape would not only result in loss of farmland and wild life habitats but affect the character and setting of surrounding villages. Should the application be successful, there would be a very serious risk of further development leading to coalescence, urbanisation and loss of community identity.

Cumulative Effects

- **The Northampton South Sustainable Urban Extension (SUE):** The likely cumulative effects of the NGRFI and the approved Northampton South SUE on the Milton Malsor and Collingtree Conservation Areas are stated to be of negligible adverse significance. The SRNG Action Group considers that the adverse effects on those villages of the proposed NGRFI alone would be unacceptable and the cumulative effect would be even more severe.
- **The emerging Rail Central Strategic Rail Freight Interchange (SRFI):** This would be next to the proposed Roxhill NG site and the cumulative effect of all three developments on the surrounding area would be catastrophic.

Conclusion

- SRNG Action Group considers that the significance of many heritage assets and the impact on them of the proposed Roxhill NG are severely underestimated by the applicant. The detrimental effects of the proposed development on those assets, the historic environment and the quality of life of local communities are unacceptable and unjustifiable. No amount of mitigation can compensate for the conversion of farmland (part of which falls within an Area of Important Local Gap) into a vast, noisy and noxious industrial site which is not needed so close to DIRFT and would cause so much destruction and disruption.

References

1. Pre-Submission Draft Local Plan Part2 - Summary Document, Page 3
<https://www.southnorthants.gov.uk/downloads/65/local-plan-part-2-and-evidence>
2. Application Doc 5.1 Scoping Opinion, pages 85 & 86, Historic England Scoping Opinion
3. TRO50006-000763 - NCC & SNDC Additional Submission
4. Appendix 10.2, Archaeological DBA, Oct 2017, page 50, Figure 10, 1982 Ordnance Survey Map
5. Application Doc 5.1 Scoping Opinion, page 120, excerpt from South Northamptonshire Council Scoping Opinion
6. Application Doc 5.1 Scoping Opinion, page 92, Milton Malsor Parish Council Scoping Opinion
<https://www.southnorthants.gov.uk/downloads/file/2059/milton-malsor-conservation-area-appraisal-and-management-plan>
7. Appendix 10.2, Arch DBA, Oct 2017, page 34, 5.3.4, re geophysical survey, Bypass Corridor
8. Appendix 10.4, Geophysical Survey Report, Sept 2017, page 3, 4.1.1

8.6 Flooding, Sewerage & Ground Water

With reference to the Environmental Statement submitted with the application, and the Consultation Documentation considered during the Public Consultation Exercise.

The land proposed for the development equates to approximately 210 hectares. The impermeable area i.e. including all buildings, hardstanding's and on-site infrastructure equates to approximately 141 hectares. The landscape and bunding areas including existing woodland and storm water balancing pond areas that surround the development are approximately 79 hectares.

Yet of the 210 hectares the "Main Site Drainage Strategy" plan only deals with a catchment area of approx. 116 hectares. All of the land within the development area should be considered within the Flood Risk Assessment (FRA), and any resulting conclusions addressed, along with the necessary flooding mitigation measures, to ensure that the scheme "will deliver some betterment over the existing regime", as assured in the Executive Summary of the FRA contained within the application.

The site itself being broadly level with a fall of about 10 metres across the whole site, the impact of which is that it may be impossible to obtain sufficient 'fall' in the rainwater drainage system for it to function by gravity alone. The level of the existing site, compared with the existing natural drainage, results in the water table being close to ground level. If as stated within the consultation documentation, they seek to 'set-down' the railyard, buildings, etc. by 6 metres as indicated in their consulted upon Design and Access Statement in order to mitigate the adverse visual impact of the development, they may have no choice but to pump all rainwater into the collecting pools.

Section 7.1.4 of the Environmental Statement contains the text:

- *An assessment has been made of existing flooding problems on or close to the Main Site, with the aim of ensuring no additional risk of flooding is created, and where possible to provide measures to reduce flooding off-site.*

The statement says that flooding has only been assessed 'on or close to the main site'. Flooding currently occurs on, and downstream of the site, it does not sound as if this has been fully assessed?

We are not filled with any confidence that the FRA admits that it only has the 'aim' of ensuring no additional risk of flooding is created. This sounds like merely an aspiration rather than a firm guarantee that the development will not have an adverse impact on the levels of flooding, either on site, or downstream.

The statement also goes on to say that they will only provide measures to reduce off-site flooding 'where possible'! This is a wholly insufficient response to the situation.

A far more defined and comprehensive assessment is required in order to ensure that the flooding risk is completely assessed for the whole of the local catchment area, and includes any subsequent downstream effects. This is to ensure that all flooding risk is suitably mitigated to the betterment of communities impacted by the development.

In the Ground Water section of the Environmental Statement provided during the consultation process, Section 7.4.19 stated that:

- *Groundwater testing was undertaken by RSK on behalf of Roxhill Developments Ltd and is discussed within the Ground Investigation Report (ref. 312598-02 (00)) for the main SRFI produced in November 2014 (part of Chapter 6). It found that typically groundwater was encountered at several metres below the existing ground level, or that water was not encountered at all in some of the trial pits.*

However, the submitted application documentation now states in Section 7.4.16 that;

- *Groundwater testing was undertaken by RSK on behalf of Roxhill Developments Ltd and is discussed within the Ground Investigation Reports (ref. 312598-02 (00)) for the Main Site produced in November 2017. It found that typically groundwater was encountered at several metres below the existing ground level, or that water was not encountered at all in some of the trial pits.*

We are more than a little surprised that RSK have adopted the bad practice of using the same reference number for the two investigative reports conducted, which according to the applicant were conducted some 3 years apart. Is this an administrative error? We have been unable to locate these reports within the application. Hence have not had the opportunity to scrutinise, or comment on these documents.

Section 7.6.18 of the Environmental Statement contains the text:

- *The Lead Local Flood Authority have reviewed calculations and drawings and entered into a Statement of Common Ground (SOCG).*

Should we not have sight of these in order to be able to properly scrutinise the application?

Section 7.6.22 of the Environmental Statement contains the text:

- *Where practicable, flow is conveyed from proposed plots to attenuation features on the surface via swales and ditches which will provide additional treatment to runoff, and also provide the potential for new habitat, forming part of the green infrastructure provided on site as part of the wider landscaping scheme.*

From the phrase at the start of the sentence, 'Where practicable', there are clearly in the applicant's mind, scenarios and situations where they envisage that the proposals are inherently impracticable! No details are provided within the application as to the solutions to the scenario where their submitted proposals are an impracticability in reality.

Due to the lack of fall in height across the site we consider that it is highly unlikely that the surface water can be moved across the site to the sustainable drainage scheme without the recourse to pumping.

Section 7.6.26 of the Environmental Statement contains the text:

- *A bespoke strategy for each area has been proposed which seeks to demonstrate that additional runoff volume can be incorporated within the existing drainage networks.*

The bespoke strategy 'seeks to demonstrate', it does not therefore provide any material comfort that it can 'demonstrate', that additional runoff volume can be incorporated within the existing drainage networks. We need concrete assurance that the existing drainage network can accommodate the additional outflow, by if necessary incorporating more storage capacity within the site, and sufficient restrictions to the outfall from the site in order to reduce the flows into the existing drainage network.

Section 7.6.28 of the Environmental Statement contains the text;

- *The proposals to mitigate flood risk to the Main Site involve raising land around the new site access roundabout and adjacent to the A508 to impound water within the boundary, and form floodplain compensation areas adjacent to the existing channel of the Courteenhall Brook (on the southern side). This will have the effect of removing areas proposed for development from the floodplain, and also reduce pass forward flows downstream of the M1 in extreme flood events. The details of this strategy are presented within the Technical Note that accompanies the FRA.*

This is an admittance that the site in itself cannot contain the levels of surface water arising within the site, effectively requiring the raising of the height of the A508 to form a bund to contain the flood water.

This is information that was not contained with the consultation documentation, and hence was not consulted upon, further compromising the consultation process.

Similarly, at Section 7.6.30:

- *A Flood Risk Assessment incorporating the Technical Notes describing the hydraulic modelling has been produced by BWB Consulting and forms Appendix 7.1 of the Environmental Statement. The completed FRA reflects a scheme of mitigation incorporating runoff from the surface water drainage strategy, agreement to which has been sought from the Lead Local Flood Authority and is confirmed within the Statement of Common Ground.*

This is information that was not consulted upon, further compromising the consultation process.

We would also point out that the liability as Lead Local Flood Authority currently rests with Northamptonshire County Council (NCC), which will very shortly cease to exist. There are currently no confirmed proposals as to who would take on this role.

The lack of openness by NCC in making the decision to enter into a Statement of Common Ground (SOCG) agreement 'behind closed doors', and the nature of this agreement, with no public consultation is wholly unacceptable and completely contrary to natural justice. I would also point out that the documentation referred to in the SOCG has been amended by the applicant, since the parties signed the document in March of this year.

The agreement entered into within the SOCG that the outflow from the site, Environmental Statement Appendix 7.3, will not exceed 4l/s/ha is merely an aspiration, and does not confirm the Local Lead Flood Authorities acceptance of, the proposed drainage scheme.

The surface water in the collecting ponds exits into the existing drainage network through what are effectively restricted sized pipes known as Hydrobrakes, these come in various sizes, and hence flow rates, to suit a particular site.

The Main Site Drainage Strategy, Environmental Statement Appendix 7.3 (Sustainable Drainage Statement), very carefully, and one might suggest deliberately, excludes mention of the Hydrobrake specifications that had been detailed within the consultation documentation during the consultation phase.

Without details of the Hydrobrake specification it is completely impossible to demonstrate that the surface water outfall to the existing drainage network is designed to be within the agreed limits of 4l/s/ha.

The Hydrobrake systems can be supplied with an overflow system, such that in the event of the amount of surface water entering the collecting ponds exceeds the Hydrobrake capacity, or the Hydrobrake becomes blocked, excess surface water is allowed to overflow the control system and discharge unregulated amounts of water into the existing drainage network. No details as to whether this is the applicants proposed solution to this scenario is contained within the application documentation, and clearly in order to maintain the outflow rate of 4l/s/ha no overflow system should be allowed to be included in the development to allow this to be exceeded.

Again, given that this information appears to have been deliberately excluded from the submitted application documentation, we are very concerned as to whether this has been made available to, and properly scrutinised by, the Lead Local Flood Authority, in this case Northamptonshire County Council.

Guarantees from the developer that they can restrict outfall rates to less than 4l/s/ha are not to be relied upon, given the lack of detail supplied, and this rate of outflow would certainly not be to the betterment of down flow environments as claimed in the documentation.

Section 7.6.31 of the submitted application documentation states that:

- *Runoff from highway and car parking areas will require treatment before discharge to the local watercourses. Where appropriate, pollution control methods such as oil separators and sediment interceptors will be used on site.*

Who will decide where it is appropriate to locate these pollution controls?

Environmental Statement Appendix 7.3 (Sustainable Drainage Statement) purports to contain a Statement of Common Ground agreed with Anglian Water, in Appendix 2, but this has been omitted, do they have AW's agreement that the drainage scheme is satisfactory?

Contrary to Technical Guidance contained within the National Planning Policy Framework, Section 9, there is no evidence that the developer has consulted the Emergency Services to consider an evacuation plan in the event of flooding.

The Construction Environmental Management Plan (CEMP), Appendix 2.1, is like a wish list for good environmental construction practice, and deals with very many issues, including possible contamination to ground and surface water. The CEMP, and the phase specific P-CEMPs are to be written by the contractors engaged to perform the works on the site.

Who will provide oversight that these documents are sufficiently comprehensive, wide ranging and provide appropriate environmental protection when they're submitted by people with a vested interest to make them as vague and unenforceable as possible?

Who will be there on a daily basis to ensure that the CEMP, and P-CEMP are fully monitored and complied with?

What suitable legal enforcement powers will be in place to provide immediate punitive sanctions should non-compliance be discovered?

8.7 Noise Pollution

Introduction

The proposed site is currently surrounded by many sources of noise although the site itself is open farmland and other than seasonal farming processes, does not create noise. The ambient noise is largely traffic related, particularly the M1 Motorway, with some occasional additional noise from the Northampton Loop rail line. The prevailing winds are from the West and therefore the impact of the motorway noise mainly affects communities to the East namely Collingtree, East Hunsbury and Grange Park. Because of the open countryside to the West some of the traffic noise (as with some of the air pollution) is dispersed over open fields. If the site is developed as proposed, this dispersal will no longer take place. In addition, the 20-metre-high warehouse buildings and the substantial earth bunds, proposed for visual screening will deflect even greater noise and air pollution towards communities in the East. To that will be added noise from the 24-hour operation of the SRFI and the traffic noise created by the 4,000 HGV movements a day attracted to the site. This will be further exacerbated by the widening of the M1 by two extra lanes thus concentrating even more traffic noise into this vulnerable corridor.

Planning History Relevant to Noise

In 1999 a planning application No. 991007 was made by the Highways Agency on land it owned at Wards Farm, Collingtree High Street and alongside what is now AQMA 1. It was opposed by Collingtree Parish Council on Noise and Air Quality grounds but eventually approved by Northampton Borough Council.

In 2011 application (N/2011/0437) on a plot on Ash Lane adjoining AQMA 1 and opposite the proposed site, was withdrawn after objections from NBC Environmental Health on Noise and Air Quality grounds.

In 2014 an application (N/2013/1044) on a plot on Ash Lane adjoining AQMA 1 and opposite the proposed site, was allowed but only subject to the provision of ventilation systems allowing windows to be kept closed because of noise from the M1 the noise levels measured in 2017 were 68db by day and 65db by night.

In 2013 an application (No N/2013/1035) by Bovis Homes was refused by NBC on a number of planning grounds, including Noise due to the proximity of the site to AQMA 1. Consent was then gained on appeal but with conditions regarding mitigation of noise from the M1 including permanent closure of some windows. Discussions on the fulfilment of the Planning Conditions are still ongoing.

In 2016 Roxhill in conjunction with Courteenhall Farms applied to South Northants Council for consent for a 2.67 million sq. ft Distribution Centre on the same site as now proposed. As well as being contrary to the West Northamptonshire Joint Core Strategy the application met strong opposition, not least on grounds of Traffic noise, and was withdrawn.

National Planning Policy Framework

The National Planning Policy Framework (NPPF Section 11 Para 109)) states that the planning system should contribute to and enhance the natural and local environment by: *preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water and noise pollution or land instability.*

Parishes Against Pollution Group

There is a widely shared concern throughout communities in the area surrounding the proposed site.

A group of 29 Parish Councils in the region of the proposed site have made a joint declaration on the cumulative impact of noise and as an interested party, have registered their concerns over the Roxhill proposal with PINS.

“Along with neighbouring Parish Councils, we are alarmed at the number and scale of major traffic generating developments in our area and their likely environmental impact. We draw attention to the specific requirement of the National Planning Policy Framework (NPPF) namely “*preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water and noise pollution or land instability*”. We strongly urge that this requirement is stringently and robustly followed and the cumulative impact considered when major planning decisions are being taken”.

Legal Context & Obligations Under EU EIA Directive (2014/52/EU) - Cumulative Impact

- The EIA Regulations implement the EU Directive “on the assessment of the effects of certain public and private projects on the environment” (usually referred to as the EIA Directive) for the PA2008 regime.
- Schedule 3 paragraph 14 of the EIA Regulations, which refers to the selection criteria for screening Schedule 2 development, states that: *‘the characteristics of the development must be considered having regard, in particular, to... ..(b) the cumulation with other development’*.
- In relation to the information for inclusion in an ES, Schedule 4 Part 1 of the EIA Regulations lists *‘A description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent or temporary, positive and negative effects of the development resulting from:*
 - *the existence of the development;*
 - *the use of natural resources;*
 - *the emission of pollutants, the creation of nuisances and the elimination of waste,’* (paragraph 20) and *‘a description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment’* (paragraph 21).
- 1.4 The need to consider cumulative effects in planning and decision making is set out in planning policy 4, in particular the National Policy Statements (NPS)⁷. For example, the Overarching NPS for Energy (EN-1)⁸ paragraph 4.2.5 states that” *When considering cumulative effects, the ES should provide information on how the effects of the applicant’s proposal would combine and interact with the effects of other development⁹ (including projects for which consent has been sought or granted, as well as those already in existence)”*.
- 1.5 NPS EN-1 paragraph 4.2.6 goes on to state that the Secretary of State should consider how the *“accumulation of, and interrelationship between effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.”*

World Health Organisation Statement on Noise

Excessive noise seriously harms human health and interferes with people's daily activities at school, at work, at home and during leisure time. It can disturb sleep, cause cardiovascular and psycho physiological effects, reduce performance and provoke annoyance responses and changes in social behaviour.

Traffic noise alone is harmful to the health of almost every third person in the WHO European Region. One in five Europeans is regularly exposed to sound levels at night that could significantly damage health.

WHO/Europe uses evidence on the health effects of noise to identify the needs of vulnerable groups and to offer technical and policy guidance to protect health.

Extract from Roxhill's Non-Technical Summary (NTS) on Noise and Vibration

- 3.61 A comprehensive set of noise and vibration surveys were undertaken around the Proposed Development site to establish the existing (baseline) conditions, and to form the basis of an assessment of the potential impacts and effects that may arise from the construction and operation of the proposed Northampton Gateway.
- 3.62 The results of the surveys showed that a range of noise conditions exist in the areas around the Proposed Development. The noise environment at most locations is typically dominated by road traffic noise from the M1 motorway, particularly around the Main Site. Other locations are affected by the noise from the A508 which runs through the centre of Roade, as well as railway noise from both the West Coast Main Line and Northampton Loop line.
- 3.63 Any current vibration effects are primarily associated with trains passing sensitive receptors that are close to the railway lines.
- 3.64 The Proposed Development would change the noise environment to some extent through the expected increase of road and railway traffic, as well as introducing new sources of noise associated with the operation of the SRFI. There would also be temporary sources of noise and vibration during the construction process.
- 3.65 Using relevant methodologies for each type of source, the expected levels of noise and vibration have been predicted at sensitive receptors around the Proposed Development site. Using the results, the associated potential impacts and effects have been assessed.
- 3.66 The assessment of construction noise has shown that, in general, there would be no adverse effects due to noise from the works associated with the Proposed Development at nearby receptors. For a small number of locations, adverse and significant adverse temporary effects that have been predicted, mainly around the centre of the proposed Roade Bypass site near the junction with Blisworth Road. To manage the impact at these locations, Best Practicable Means would be used to mitigate and minimise the effects. In addition, the effects around the Main Site would be reduced by the phased implementation of the earthworks bunding around the boundary.

- 3.67 The change in the number of freight trains expected to use the Northampton Loop line from operation of the SRFI has been found to be unlikely to result in any adverse impacts or effects associated with increases in railway noise or vibration at nearby receptors. The exception is at a few locations where there could be a significant adverse effect at night due to the maximum noise levels from the train pass-bys. However, the assessment methodology took no account of the likely reduction in train noise due to new, quieter rolling stock coming into use. Consequently, it is felt that any adverse effects will not be as great as assumed.
- 3.68 The assessment of the expected change in road traffic noise at receptors around the Main Site and associated with the Highway Mitigation Measures has indicated largely negligible impacts due to the Proposed Development. Significant adverse effects have been predicted at just three receptors, with one of these being a temporary effect and mitigated by the opening of the Roade Bypass relatively soon after. At the other two receptors, both located on a section of the A508 just south of the Main Site, it is possible that the significant adverse effects will be avoided and mitigated under the Noise Insulation Regulations.
- 3.69 For the receptors in and around Roade, the opening of the Roade Bypass is predicted to result in a range of effects reflecting the removal of road traffic current travelling on the A508 through the centre of the village onto the new bypass to the west. No significant adverse effects have been indicated as likely. Some major adverse impacts are predicted at receptors close to the bypass site where levels of road traffic noise are currently relatively low. However, careful use of landscaping and additional fencing around key sections of the bypass would mitigate and minimise those adverse effects.
- 3.70 The construction of the Roade Bypass will reduce the traffic noise currently experienced by receptors closest to the A508 running through the centre of Roade. Reductions in road traffic noise of between 3 and 10 dB(A) are expected.
- 3.71 No significant adverse effects have been predicted as a result of sound from operational activities taking place at the SRFI on the Main Site. Some adverse impacts have been predicted at receptors to the west of the Main Site under broadly south-westerly winds when the underlying road traffic noise from the M1 is typically lower. The design of the Main Site includes landscape bunds around the SRFI, particularly on the west side, to help mitigate and minimise the impacts by screening the associated operational sources from the nearby receptors.
- 3.72 Overall, the assessment of the likely impacts and effects from noise and vibration associated with the Proposed Development identified potentially significant adverse effects at only a few locations. For each, mitigation has been proposed, which would avoid these significant adverse effects. Elsewhere, where practicable, measures have been identified to mitigate and minimise other adverse impact.

A Critique of Roxhill's Non-technical Summary Regarding Noise

A non-technical summary is intended to be accessible and easily understood by lay audiences, whilst at the same time accurately present the EIA's findings. Roxhill's NTS fails to achieve this in the following ways:

- It fails to acknowledge the inevitable uncertainty inherent in all assessment and forecasting techniques.
- It presents the most favourable interpretation of the data assembled and is entirely based on the assumptions and predictions of Roxhill's own Consultants and without independent validation.
- It contains assertions that have not been provided and discussed with representatives of the most affected receptors e.g. Parish Councils.
- It contains no reference to any independent audit of its findings or any form of peer review.

In addition, it does not acknowledge the absence of independently obtained baseline measurements of existing noise levels on which the assessments and forecasts are based. Local parishes and groups have carried out their own measures and these are contained in the following table.

Local Noise Measurements Relating to the Proposed Site

Parish	Location	Date	Db level
Collingtree	Cemetery, Watering Lane	9 th April 2018	56db
Collingtree	Bus Stop, Ash Lane	9 th April 2018	58db
Blisworth	Football Field Blisworth	9 th April 2018	58db
Blisworth	Courteenhall Road	9 th April 2018	50db
Blisworth	Former Young's Nursery A43	9 th April 2018	52db
Milton Malsor	Flowercraft, Barn Lane	9 th April 2018	54db
Milton Malsor	Muir, Collingtree Road	9 th April 2018	64db

These figures demonstrate that ambient noise levels at receptors surrounding the proposed site are already significant

Mitigation Measures proposed

The mitigation measures to contain operational noise consist largely of earth bunding along the boundary of the site together with long term tree planting. Roxhill has openly suggested that in the case of communities to the East of the site there will be negligible impact because of the existing ambient noise from the M1 motorway. This is an unsustainable argument not the case as existing and occasional noise from the interior of the site (e.g. Clay Pigeon Shooting School) can be clearly heard in Collingtree, Milton Malsor and Roade. As regards the mitigation measures proposed during the construction phase, these are simply 'best practice' measures that should be expected to apply on any development site.

Health Implications

The evidence for the long-term health implications through exposure to excessive noise is well established and fully outlined and validated within the Health section of this submission (see the Health Chapter above).

Conclusions

- This proposal is for a 24-hour industrial operation of 5million sq. ft of warehousing serviced by 4000 HGV movements per day together with container lifting machinery and an aggregates handling depot.
- It must be beyond dispute that the displacement of 500 acres of arable farmland and countryside by a development of this scale and size will add significantly to existing sources of traffic noise and adversely impact many local communities.
- Roxhill have failed to show how this adverse impact can be fully avoided or successfully mitigated.

9. EMPLOYMENT

Introduction

Strategic rail freight interchanges should be situated where there is availability of a suitable workforce; The NPSNN is quite specific about this:

- 2.52 *The availability of a suitable workforce will therefore be an important consideration.*

A very similar statement is made in paragraph 4.87. Yet the South Northamptonshire constituency has one of the lowest benefit claimants counts in the country; other constituencies nearby also have low claimant counts and have done for some time ^[1].

Claimant Rate by Constituency

April 2018		
	Rate %	Number
Buckingham	0.7	360
South Northamptonshire	0.8	480
Mid Bedfordshire	1.3	705
North East Bedfordshire	1.6	935
Daventry	2.3	1095
Northampton North	2.7	1185
Wellingborough	2.5	1320
Milton Keynes North	1.9	1330
Northampton South	3	1545
		8955

United Kingdom	2.9
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The Logistics Study commissioned by South Northants Council (SNC) indicates a lack of a surplus pool of labour ^[2]:

- 10.21 *"..... given the largely 'full employment' position in the District, could create some significant challenges".* Therefore, employees will have to commute from further afield.

This study also indicated that Northamptonshire had almost twice the rate of staff working in the logistics sector as the national average in 2016. See table 5.3 in the report.

The level of vacancies in this sector remains stubbornly high, especially in regard to HGV drivers. Unemployment is low, but wages are not rising because margins are under pressure.

Referring back to the SNC Logistics Study, we find:

- 7.5 *"The shortage of HGV drivers is currently estimated at 45,000 and for every individual seeking an HGV role, there are up to 18 positions being advertised. In a survey of logistics firms, 75% said they faced difficulty when attempting to recruit for driving positions".*

While this refers to the UK, it demonstrates a general shortage of HGV drivers.

The draft environmental statement for NG states: Section 3.4.6 "The forecast growth of the population in South Northamptonshire between 2011 and 2029 is an additional 15,890 people".

That is very misleading; more relevant is growth in the working age population. This is expected to rise from 54,200 to 55,700 between 2011 and 2029 – i.e. an increase in 1500 people^[1]. So, there will not be a significant increase in local staff to operate within warehouses and drive vehicles. A large increase in retirement age population accounts for most expected overall local population growth.

The Applicant has grossly overstated the available working population.

The Office of National Statistics released population projections on the 25th May 2016 that cover the period 2016 - 2039. The highlight of the projection is the increase in population over the age of 65. Whilst the overall population of South Northamptonshire is expected to rise from 89,000 currently to 101,000 by 2036, the working age population (15-64) is expected to remain at 55,000 for the next 20 years. We can therefore conclude that the 7,500 jobs claimed by the Applicant will not be taken up by residents of South Northamptonshire.

Over the same period, the population of Northampton is expected to increase from 224,000 to 263,000. The working age population is expected to increase from 147,000 to 162,000 by 2036, requiring creation of approximately 15,000 jobs. The current proportion of logistics jobs in Northampton is about 10%, reflecting the diversity of talent and vocation in the population. Not everyone wants to work in logistics. The Applicant claims the 7,500 jobs are new. Adding 7,500 jobs would represent a 55% increase in the Northampton logistics sector. If correct, then the project is of a scale that would provide over half of the required employment for additional residents of Northampton. However, if current preferences for employment are maintained less than a thousand of these jobs will be taken by Northampton residents. We therefore dispute the Applicant's claim that 60% of the workforce will travel from Northampton.

Some may infer that employees for NG can be found further afield in places such as Coventry, Leicester and Bedford. However, warehouse jobs are relatively low-paid as are those for HGV drivers. So, people living there may not find it financially viable to commute such distances. That raises the question - where can employees for this site be found?

A further issue needs consideration, the rise of automation in the warehousing sector. A recent survey by Localis titled the Automation Impact ^[3] analyzed which parts of the country were most at risk from implementation of higher levels of automation. The report reached the following conclusion:

- *We projected Northamptonshire to be the worst impacted of England's forty-seven strategic authority areas.*

As mentioned in the Validity of Site Selection section, the WNJCS warns against over-reliance on one employment sector. If NG were approved, the jobs created could rapidly disappear with the spread of automation through the logistics and warehousing sector in this county.

Non-existent Journey Savings

We have already indicated that Northampton is likely to provide a minority of the employees due to high levels of employment and existing shortages of warehouse operatives and drivers at logistics parks in the area. It therefore appears likely that many employees will have to travel from further afield including places such as Wellingborough, Rushden, Milton Keynes, Buckingham, Brackley, Daventry, Kettering and Towcester. The average distance of these settlements from NG is 15.8 miles. Let us assume average commuting distances of 10 miles.

The travel plan provided by Roxhill forecasts 9871 single journeys per day (light vehicle usage). With a journey distance of 10 miles, that is 98,710 miles per day (commuting). That equates to 98,710 x 7 = 690,970 miles per week, or 690,970 x 52 = 35,930,440 miles per year.

Roxhill claimed at an East Midlands Gateway presentation that “... a container train can remove 43 heavy goods vehicles from our roads”.

Though there is no an obligation for tenants of NG to utilize the rail facility, assuming some use, calculating HGV travel miles for this site:

- Assuming 16 trains per day each carrying 43 containers = 688 HGVs
- Assuming an average HGV journey length of 115 miles = 79,120 miles per day
- This equates to 553,840 miles per week / 28,799,680 miles per year

HGV journeys saved will be one way from ports. On the basis that 50% of HGV container journeys are “offset”, this equates to 14,399,840 miles per year.

Thus, road usage would be magnified not reduced by NG’s existence, at odds with the argument for constructing SRFIs, to reduce road traffic miles by transferring goods onto rail. NG will not foster modal shift, a fundamental reason for creating SRFIs, as most of the labor force would need to travel more distance than could be saved by fewer HGV trips.

Cumulative Impacts

If both NG and Rail Central were approved, it would be even more difficult to recruit the required number of employees as both SRFIs would be seeking staff from a very limited pool of available labour. Employees would therefore need to travel even greater distances, creating additional air pollution and congestion and further discrediting the claimed modal shift.

Conclusions

- The WNJCS seeks to maintain a balance of employment opportunities and avoid over-reliance on one employment sector. A further 7,500 logistics positions in the area will exacerbate over-reliance (a 55% increase in the region from NG alone).
- The available labour pool has been overstated by the Applicant using the figures for gross increases in population rather than in those of working age (15,890 compared to 1,500). Those locally available for employment in the logistics sector barely fill employment opportunities created by the current allocation of commercial development areas in the WNJCS. The Applicant’s contention that 60% of the workforce will travel from Northampton and 90% from within the study area is incorrect.
- Labour would need to migrate from other employment positions in the area magnifying staff shortages: the development will not create new employment but will mostly perpetuate labour migration.
- The shortage of labour would force workers to travel further, negating carbon savings obtained by increasing the ratio of rail to road freight movements (one of the four primary aims of the NPS), and greatly exacerbating current stresses on national and local road networks.
- Should Rail Central also be granted a DCO a further 8,500 jobs is mooted and the proportion of workforce theoretically employed in logistics would then increase by close to 100%.

References

1. House of Commons Library briefing paper; People claiming unemployment benefit by constituency.
<https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-8307>
2. South Northamptonshire Logistics Study
<https://www.southnorthants.gov.uk/downloads/file/3037/logistics-study-2017>
3. Localis: The Automation Impact
https://www.localis.org.uk/wp-content/uploads/2018/03/015_Automation_AWK.pdf

10. PUBLIC OPINION

Introduction

This Chapter draws attention to public opinion(s) which have not being taken seriously by Roxhill in respect of their Northampton Gateway proposal.

Engagement & Support from Members of Parliament

An open meeting was hosted by Roade Parish Council in the local village hall on 21st April 2017. The hall was jam-packed to its maximum capacity and many local residents had to stand outside for the duration of the meeting. Over 300 people attended. Andrea Leadsom MP was in attendance and a key speaker. The meeting was also attended by representatives from both developers i.e. Roxhill (Northampton Gateway) and Ashfield Land (Rail Central). Both developers were questioned by local residents, in some detail, about their respective 'speculative' Strategic Rail Freight Interchange (SRFI) proposals. Local residents spoke and questioned both developers articulately and intelligently. There was unanimous opposition from local residents to both SRFI proposals and their discontentment for either 'speculative' proposal going ahead were strongly expressed.

As at 1st March 2018, Andrea Leadsom has received correspondence from a vast number of local residents who have expressed their concerns and opposition to either one or both of the above-mentioned 'speculative' SRFI's.

Prior to and since the aforementioned meeting, Andrea Leadsom continues to be inundated with feedback from local residents who will be severely impacted if one or either of the 'speculative' SRFI proposals are approved. She continues to represent the views of her constituents to relevant members of Parliament and to both developers directly. In an update from Andrea Leadsom earlier this year, she described the ongoing feedback from her local constituents as '*near uniform opposition across all affected communities*'. See **Addendum A** for further detail.

A smaller meeting was held on 20th October 2017 in Milton Malsor parish hall. Chris Heaton-Harris MP was a key speaker, however, there was no representation from either of the developers. While the number of attendees were fewer, the opposition was just as widespread and again, local residents strongly expressed their feelings and objections.

Public Footpath Walk – August 2017

The Chronicle & Echo reported: *On 5th August a 500-strong group of residents took part in a protest walk along public footpaths that cross the site of the two-proposed warehouse and rail freight depots that would completely change the Northamptonshire landscape and their way of life. Villagers from Collingtree, Blisworth, Milton Malsor and Roade showed their opposition to the Roxhill and Ashfield Land proposals which, if both approved, would see 1100 acres of land bordering the four villages near J15 of the M1, filled by a 13 million sq. ft rail freight interchange. The residents took to the footpaths to highlight the scale of the countryside that would be swallowed up and protested at the environmental damage that would be caused by the massive increase in traffic.*

Source: <http://www.stoproxhill.co.uk/>

Petitions Signed by Residents Impacted by Roxhill's Northampton Gateway Proposal

All petitions below have been managed by and collected on behalf of the Stop Roxhill Northampton Gateway (SRNG) Action Group.

In June 2017 a 'Stop Roxhill Northampton Gateway @ J15' online petition was set up. Thus far, 1513 local residents have signed the petition and have included, in most cases, their reasons for objecting to Roxhills 'speculative' SRFI which include **but are not limited to** the following:

- *Negative impact to quality of life*
- *The destruction of beautiful villages*
- *Local infrastructure will not support the increase in traffic*
- *Negative impact on wildlife, countryside and green space*
- *Negative impact on air quality, light and noise pollution*
- *M1 motorway and surrounding roads will become gridlocked*
- *Not needed due to DIRFT which still has capacity*
- *Not the right location*

Source: <https://goo.gl/L5YeFa>

Last Accessed: 30th October 2018

In addition to the 1513 electronic signatures aforesaid, a further 2,881 paper petitions have been signed by local residents between 5th June 2017 and early March 2018 and obtained at a variety of local events throughout 2017 such as The Umbrella Fair at the local racecourse, the Northampton Carnival and the Blisworth Canal Festival.

Furthermore, in the village of Collingtree alone, petition forms were delivered to all households (after Roxhill's 2nd stage statutory consultation meetings in October 2017) and collected by members of the SRNG Action group. A total number of 350 signatures were obtained and sent to Andrea Leadsom MP who subsequently acknowledged receipt in writing to each family personally.

In summary, from early June 2017 to October 2018 a total of 4,744 petitions against Roxhills Northampton Gateway proposal have been obtained by the SRNG Action Group.

Roxhill Statutory Public Consultations – October 2017 – Roade Exit Poll Data

At the consultation sessions run by Roxhill in October 2017, **Exit Polls** were conducted by the SRNG Action Group. For Roade village alone:

- 87 residents completed an exit poll questionnaire, of which
 - 2 were in favour of the proposal ***
 - 76 were against the proposal, and
 - 9 were undecided

*** Of the 2 people in favour of the proposed SRFI, one person wanted the green bypass route and the other wanted the blue bypass route. Neither of them made any qualitative comments.

Proposed Road Bypass Route

During the first consultation Roxhill had shown 2 potential Road Bypass routes – a blue one and a green one further from the edge of the village. In their Newsletter Update dated July 2017, Roxhill showed both routes, describing the shorter blue one as their preferred option and asking for further comments as they had had ‘a relatively low number of specific responses to this issue’. They said that comments they had received indicated that on balance the inner of the two routes [the blue one] was preferred.

The SRNG Action Group considered that there had been a low response because people who were against the proposed development thought that comments on the route would be interpreted as in favour of the application. The October 2017 consultation did not include the green route but the Group’s exit poll form included boxes for people to tick ‘Proposed blue route’ or ‘Previously proposed green route further from houses’. The results showed that the majority preferred the green route, indeed, preferences, if Roxhill’s SRFI should be successful, were as follows:

- A total number of 66 people responded, the result being that **79%** of people preferred the ‘green’ as opposed to the ‘blue’ route – **See Addendum B** for further detail.
- Qualitative comments put forward by local Road residents included the following:
 - *Totally opposed*
 - *No reason/no need*
 - *Whole idea is ludicrous. Can’t fill existing warehouses, why more?*
 - *Needs to be a national strategy not a commercially driven build/strategic understanding needs improving*
 - *Wrong area*
 - *Light/noise/air pollution*
 - *Increased traffic, causing more congestion, noise and air pollution/totally irresponsible to cause irredeemable traffic problems and pollution*
 - *Neither bypass route adequate/bypass better east of Roade/further away from Roade/further away from houses preferable*
 - *Further from houses – noise & air pollution are key health issues nationwide (this is simply moving the problem)*
 - *Blue route for bypass impacts on existing residents*
 - *Prefer no bypass [against SRFI]*
 - *More roundabouts must increase travel time*
 - *Ruin the countryside/landscape*
 - *Negative environment aspects outweigh any economic benefit*
 - *Very helpful staff*

Roxhills Public Consultations – Oct 2017 – Additional Comments & Concerns

All public exhibitions were held in over a 7-day period which precluded many local residents from attending due to work commitments and holidays.

The Towcester consultation had virtually no publicity.

Roxhill have regularly omitted Collingtree from their location maps in their public consultation materials (particularly the early location maps to their site), on the basis that their site is less environmentally sensitive than their competitors (Ashfield Land).

Roxhill – Ignoring Public Opinion?

Roxhill state that they have taken public opinion into account as a result of their Stage 2 Consultations in October 2017; see **Addendum C** for further detail. However, Roxhill appear only to be considering public opinions when it suits them, several examples of which are provide below (there are many other examples not included in this document):

Example 1

On 24th November 2017 Mr Alastair Inglis, a resident of Roade, wrote to Roxhill, via email on behalf of the SRNG Action Group. Below are some of the points he raised:

- *We question why you removed the western Bypass route options. Based on the Roade exhibition exit poll data, 87% objected to your proposals and, of those that responded to the potential choice of Bypass route in the event of the scheme being approved, 79% preferred the green route.*
- *There are documents that have been prepared in a way that is not intelligible to the general public which results in disengagement and gives rise to impressions of deliberate obfuscation, viz the Book of Reference which lists hundreds of properties potentially affected by Compulsory Purchase Orders or compensation which are listed randomly making it difficult to access by concerned owners.*
- *On the Display boards at the Exhibitions there were a number of very significant areas where you have made statements which rely on reports from consultants that are not yet available and, when completed, may not be supported, vis in the Environment sections.....*
- *There were claims made that are unsupported by the documentary evidence; information presented in such a way that made it impossible to make value judgements and quotations from government policies and market studies by independent consultants that were highly selective and misleading.*
- *In all the documentation and information, we have been able to review so far, we have seen no overall benefits for our community and strongly object to this proposal.*
- *The above illustrates our concerns at the inadequacy of your consultation. The lack of vital information on environmental issues is of particular concern.*
- *In none of the information presented at the exhibitions and in the Short Explanatory Document has there been any justification for the need for a SRFI in this location.*

Mr Inglis received a standard, automated response via Roxhill's website, however, Roxhill have not responded to him on any of the points he raised above.

Example 2

Also, on 24th November 2017, Mrs Sharon Nola (Hyde Farm House, Roade) wrote to Roxhill, in this case directly to Mr Pardoe (Roxhills Senior Development Director for the Northampton Gateway proposal) and stated the following:

- *Dear Mr Pardoe,
Following on from the email that I sent you yesterday (below), I would like to add the following in respect of the proposed Roade By-Pass route:*
 - *We are aware that exit polls were carried out by local residents at your recent Phase 2 consultation events. Mr Blyth (a resident of Roade) who was involved in the exit polls has kindly shared the following information with us: **79% of people** who ticked the bypass boxes i.e. green route or blue route within the exit poll questionnaire **preferred the green route.***
 - *This information, whilst important, clearly has no bearing on how local residents have reacted to your broader proposal i.e. the SRFI / warehousing / J15 changes. It only relates to the By Pass.*

We trust that you will take this information into account in an appropriately and timely manner and we look forward to receiving updates from Roxhill in due course with respect to how local residents have reacted to your broader proposals.

Regards,

Sharon Nola & Dino Nola

Hyde Farm House, Roade, NN7 2LX

Mr & Mrs Nola, being personally and directly impacted by Roxhill's proposals, did indeed receive a response from Mr Pardoe (Roxhill) on 22nd December 2017; relevant quotes from his response were:

- *Approximately 360 people attended the recent (Stage 2) exhibitions.*
- *The Bypass Options Report helps explain the rationale and judgements reached in identifying the inner route as the preferred alignment for the Bypass. This formed part of the consultation material. Further information can be found online using the following link: http://northampton-gateway.co.uk/downloads/2017/5_EIA/Appendices/12/App12-15/App_12-15.pdf
*It reflects both highways and environmental (primarily ecology) considerations.**
- *We explicitly sought local views about the alignment of the Bypass in December 2016 as part of the Stage 1 Consultation. Around 10 people offered a response to direct consultation questions about this issue. We also made Roade Parish Council and representatives of the community aware of the options and the request for local views about the Bypass at a public meeting held in late November 2016 which was attended by around 200 people.*
- *We again sought views in July 2017 through a newsletter updated – this prompted approximately a further 10 responses on the Bypass Issue. In addition to being a very small sample, the results regarding which alignment is preferred are far from conclusive. I note you refer to a survey or questionnaire conducted locally regarding preferences about the Bypass route, but Roxhill has not received this same message from our own consultation with the community, nor from dialogue with the Highways Authority and local planning authority.*

Based on examples 1 & 2 above, it would appear that Roxhill are being highly selective in listening to public opinion. They were sent a written response from Mr Inglis, on behalf of the SRNG Action Group, quoting the exit poll stats and written confirmation of the exact same stats from Mr & Mrs Nola i.e. 79% of people preferred the green route. They also appear to be omitting key facts e.g. in their aforementioned response they have failed to mention what the 20 people who replied to them directly on this topic had to say or whether their preference was for the blue or the green by-pass route.

Example 3

During Roxhills Statutory Consultations in October 2017, Lyn Bird (8a Fox Covert Drive) wrote to Roxhill via email and copied Andrea Leadsom MP. In her email she stated the following:

- *I voice my concerns to Roxhill, local and central government and the Northamptonshire community, of future trunk and minor road traffic chaos, if the speculative rail freight interchange which is marketed as Northampton Gateway is considered as a viable addition to our market town.*
- *As a local resident who uses the A508 and A45 to commute to my place of work, Northampton General Hospital, I and my fellow commuters have suffered the extended journeys to and from Northampton this week as a result of fairly low-key road works, on the A508, which have required traffic lights to control vehicle flow. This resulted in slow commutes of long duration and consequently increased levels of air pollution.*
- *Alternative routes were identified through the back roads where cyclists were followed patiently by more than eighty cars that simply could not pass them safely, resulting in increased vehicular pollution being inhaled by all concerned.*
- *If one set of traffic lights causes this level of commuter misery imagine what a grand scheme to 'enhance junction 15 of the M1' and 'a Roade Bypass' will do to traffic chaos before you add in the additional HGV activity once the huge site becomes operational.*
- *As Mrs Shirley Wong advised in a letter written on behalf of Collingtree Parish Council in 2016 in response to the developers original scoping report, '...rather than become a 'Gateway' the junction will become a barrier into Northampton'.*
- *During the recent roadworks I observed an ambulance negotiating its way through the traffic on the A508 to attend an emergency. As would be expected all vehicles tried to move aside to allow them to pass. This will become a more difficult pursuit with more local vehicle movement as a result of the potential development.*
- *The needs of local residents must be considered more thoroughly by the people that represent us. Potential small gains in the transfer of some freight from road to rail, via Northampton Gateway, for the nation may render misery to the people who have to suffer living in its shadow, from both a health and well-being, transport and economic perspective.*
- *For Roxhill this is merely another speculative project for profit. For us, this is our home.*
Regards,
Lyn Bird (8a Fox Covert Drive)

Ms Bird did not receive any response whatsoever from Roxhill.

Example 5

The Roxhill Northampton Gateway website provides links to issues raised during their 2017 presentations in Blisworth and Milton Malson but has not included the very vocal presentations in Collingtree and Roade where, again, local residents strongly voiced their objections.

Example 6

Roxhill have consistently omitted Collingtree from their location maps (particularly the early versions) and have argued that their proposed site is less environmentally sensitive than their competitors i.e. Ashfield Land. This oversight in key information provided by Roxhill to local residents has resulted in a lack of feedback.; local residents cannot be expected to form a knowledgeable opinion when key information is not made available to them.

The above summarises only some examples, yet there are numerous others. Roxhill have asked local residents impacted for their feedback but have failed, in many cases to listen to the feedback, take feedback into account in their revised plans and not even had the courtesy to acknowledge feedback in many cases. This is simply unacceptable and no amount of glossy PR and/or marketing materials produced by Roxhill can excuse or compensate for their unpardonable inactions. Roxhill should not be permitted only to consider feedback which suits their financial business model.

Summary

- Both Roxhill and Ashfield Lands proposed developments are 'speculative'. There is no need for one other SRFI in the Midlands (let alone two) when DIRFT is predicted to remain underutilized until 2031. Members of the public feel very strongly about this key strategic point.
- In addition to the specific objections by local residents summarized above, there is a great deal of public concern that Roxhill are bypassing local democracy.
- Multiple consultee councils (SNC/NBC/NCC) have included Roxhills Northampton Gateway proposal at a variety of meetings and on each occasion members of the SRNG Action Group have attended and spoken out against Roxhills 'speculative' SRFI proposal.
- From early June 2017 to October 2018 a total of 4,744 petitions against the Roxhill Northampton Gateway proposal have been obtained by the SRNG Action Group who have electronic/hard copy evidence that can be provided on request.
- The Stop Roxhill website (established two years ago) consistently gets 200 hits every 30 days from local residents.
- The documentation provided by Roxhill to members of the public during their Stage 2 consultations was **a)** vast i.e. 13 PLUS lever arch files, **b)** very technical in many areas and, **c)** claims made / benefits quoted by Roxhill were frequently unsupported by 'factual' evidence, which made it unfeasible for most members of the public to express an informed and intelligent opinion during the stipulated consultation timeframes.
- In respect of the proposed Roade By-Pass, we would also like to highlight that in Roxhills public/hard copy newsletter sent to all residents in July 2017 two route options for the Bypass were presented i.e. the 'green' and the 'blue' route as shown in Addendum B. However, in their equivalent newsletter dated October 2017 (sent out prior to their Stage 2 public consultation meetings), the 'green' route was no longer visible in the map, therefore, the degree to which they consulted the public on their preferred Bypass route during their Stage 2 public consultations is highly dubious.

- Andrea Leadsom MP and the SRNG Action Group continue to receive communications from members of the public who are clearly opposed to the Roxhill Northampton Gateway proposal for a multitude of valid reasons. The strength and opposition of feeling across all villages potentially impacted is undisputed.

Addendum A – Andrea Leadsom News – March 2018

Residents continue to contact me daily with their concerns about the two proposed Strategic Rail Freight Interchanges, Northampton Gateway and Rail Central.

I am very aware of the near uniform opposition across all affected communities. The two action groups, Stop Roxhill and Stop Rail Central, are doing an excellent job in providing updates, coordinating meetings, and getting to grips with the policy guidance to inform their planning application responses.

I have been clear throughout that, for my part, I will do all I can to reflect and support the position that my constituents have taken on this issue, which is their clear opposition. There are genuine concerns about the strategic location of the two sites given the proliferation of existing SRFIs across the East Midlands, new development on open greenfield sites, questions about the capacities of both the local road network and the West Coast Main Line to handle additional traffic, environmental issues like air and noise pollution and well as visual blight, and many other points including people being forced out of their homes.

You can read my previous updates in the dedicated SRFI section of my website, as well as my responses to all the various consultations so far and copies of relevant correspondence.

Roxhill concluded their further round of public consultations for the Northampton Gateway development on the 2nd February, and are currently analysing the responses. Although no specific date has been given for the submission of their planning application to the Planning Inspectorate, PINS, it is anticipated that this could be imminent and certainly within the coming weeks. Submission to PINS will start the formal process of considering the application in detail, and will allow residents and people like me the opportunity to raise objections and concerns in the proper setting. There will also be public hearings to afford the opportunity to put these issues forward in person.

I have uploaded copies of my letter of the 13th November to Roxhill's Managing Director, Graham Pardoe, about capacity and feasibility, as well as their briefing note in response. I subsequently wrote back to Roxhill on the 22nd November with a series of questions, and they responded formally with a full update.

Ashfield Land, as you will know, have recently been a little further behind Roxhill in developing their proposals for their Rail Central site, despite having been the first one out of the proverbial starting gates. Following their initial public consultation back at the end of 2016, Ashfield Land have informed me that they will be formally announcing the dates next week for the statutory pre-application consultation which they will be holding across March and April. This will also include dates for a series of public exhibitions which I understand will take place between Thursday 15th March and Saturday 24th March in Blisworth, Milton Malsor, Roade and Towcester. Ashfield Land anticipates that, following this round of consultations, they will be preparing to submit to PINS this summer.

You may be interested in reading this letter I received in November last year from James Digby, Director at Ashfield Land, which updated their position on their statutory consultation process. This was in response to letters I sent on the 13th November and the 18th November.

I have been informed by Ashfield Land this morning that they have formed a partnership with Gazeley, the European division of global logistics company GLP, to take the scheme into construction and operation subject to planning consent. I attach a copy of their briefing note so you can read more for yourselves.

We await the submission of Roxhill's proposals to PINS and the start of Ashfield Land's statutory consultation. I continue to do everything possible to ensure residents' concerns and views and being heard, and I will be putting them to the Planning Inspectorate when consideration of the proposals begins. I am extremely grateful to the hundreds of residents who have contacted me about the two proposals and, of course, to the action groups for the all of the work that they are doing on behalf of their communities.

I will update again in due course, but please do not hesitate to get in touch if you have any questions.

Source: <https://www.andrealeadsom.com/news/20180223/srfi-update>

Last Accessed: 1st March 2018

Addendum B – Roxhills By Pass Route Options – Green & Blue



Source: Roxhills Northampton Gateway Public Newsletter, dated July 2017 (a paper copy sent to residents impacted via post). The above image has been scanned from the aforementioned newsletter.

Addendum C – An Extract from Roxhills Northampton Gateway Newsletter



**NORTHAMPTON
GATEWAY**
STRATEGIC RAIL FREIGHT INTERCHANGE

FURTHER CONSULTATION

DECEMBER 2017

Location	You said that	So we will
East Hunsbury	You are concerned about the potential for additional HGVs using Rowtree Road.	Provide a 7.5T environmental weight restriction in East Hunsbury including Rowtree Road, within the area bordered by Towcester Road, Mere Way and the A45.
Stoke Bruerne	You are concerned about the potential for additional HGVs through Stoke Bruerne, and in particular past the primary school.	Provide a 7.5T environmental weight restriction through Stoke Bruerne and Shutlanger.
Knock Lane / Blisworth Road (Roade)	The road is relatively narrow and you are concerned about additional traffic.	Widen the road around the bend between the two long straight sections of road. This will enable vehicles to pass more comfortably than present at this point where the visibility is reduced due to the bend. This work will take place within the existing highway and does not require additional land outside the highway.
A508 Rookery Lane / Ashton Road junction (junction for Stoke Bruerne and Ashton)	Although improvements are welcome in principle, the junction proposal is wrong as it would make it more difficult to turn right out of the minor roads onto the A508 or to go straight on.	Change the junction proposal to provide a large central area (known as 'single lane dualing'). This will enable drivers turning right from the minor roads, or going straight on, to make the turn in two moves i.e. crossing during a gap in traffic from the right and then turning or crossing during a gap in traffic from the left.
	There are no pedestrian or cyclist facilities proposed - how can we cross if there is more traffic?	Provide pedestrian and cycle crossing points over the A508, making use of the large central island. We will also provide a footway on the east side of the A508 along the frontage of the properties.

These changes are not considered significant in scale, but Roxhill has taken the view that it should make sure they are understood locally.

The amended description of development is now as follows:

- An intermodal freight terminal including container storage and HGV parking, rail sidings to serve individual warehouses, and with the capability to also provide a 'rapid rail freight' facility and an aggregates facility as part of the intermodal freight terminal;
- Up to 468,000 sq m (approximately 5 million sq ft) (gross internal area) of warehousing and ancillary buildings, with additional floorspace provided in the form of mezzanines;
- A secure, dedicated, HGV parking area of approximately 120 spaces including driver welfare facilities to meet the needs of HGVs visiting the site or intermodal terminal;
- New road infrastructure and works to the existing road network, including the provision of a new access and associated works to the A508, a new bypass to the village of Roade, improvements to Junction 15 and to J15A of the M1 motorway, the A45, other highway improvements at junctions on the local highway network and related traffic management measures;
- Strategic landscaping and tree planting, including diverted public rights of way;
- Earthworks and demolition of existing structures on the SRFI site.

Source: Roxhills Northampton Gateway Public Newsletter, dated December 2017 (a paper copy sent to residents impacted via post). The above image has been photographed and copied from the aforementioned newsletter.

11. CRIME

Introduction

In order to provide an objective comparison, a study was undertaken on the crime statistics for the area surrounding the Daventry Rail Freight Interchange (DIRFT). This location was chosen because it is similar in nature and size and, being only 15 miles away, similar in its geography. It is important to note that the crime figures within the Rail Freight Interchange itself have remained stable; it is increases in the surrounding areas that paint a stark picture.

Crime Statistics – Comparable Benchmarks

DIRFT commenced operation around 1997. Crime statistics compiled for the area within which DIRFT was built show a marked increase over recent years, which can reasonably be attributed to the arrival of a massive logistics site in what used to be a rural environment. DIRFT falls into 2 wards: Barby & Kilsby and Crick wards and between 2000/2001 to 2015/16 crime in these areas rose by **176%**

Crime Tree LV4 Desc	2007-2008	2008-2009	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	Total	Average	Percentage
ARSON	3	1			3		2	3	5	17	2.83	0.65%
CRIMINAL DAMAGE	26	26	39	32	38	28	16	33	29	267	29.67	10.16%
DRUG POSSESSION	5	7	6	8	13	12	11	8	6	76	8.44	2.89%
DRUG TRAFFICKING	9	4	8	6	6	8	6	2	3	52	5.78	1.98%
MISCELLANEOUS CRIMES AGAINST	4	12	5	10	8	29	16	26	43	153	17.00	5.82%
PUBLIC DISORDER	1	2	2	2	1	3	3	6	9	29	3.22	1.10%
OTHER SEXUAL OFFENCES	6	2	3	5	4	7	8	14	15	64	7.11	2.44%
RAPE		1	1			2	4	1	7	16	2.67	0.61%
ALL OTHER THEFT OFFENCES	7	26	36	52	76	40	41	48	30	356	39.56	13.55%
BICYCLE THEFT		1	2	1	6		1	1		12	2.00	0.46%
DOMESTIC BURGLARY	13	20	27	9	23	10	16	10	16	144	16.00	5.48%
NON-DOMESTIC BURGLARY	12	14	32	35	20	30	24	26	29	222	24.67	8.45%
THEFT FROM MOTOR VEHICLE	18	28	27	40	49	34	47	30	44	317	35.22	12.07%
THEFT OF MOTOR VEHICLE	8	5	13	9	4	9	3	4	5	60	6.67	2.28%
VIOLENCE WITH INJURY	25	26	21	35	42	39	86	110	104	488	54.22	18.58%
VIOLENCE WITHOUT INJURY	16	9	14	19	22	24	36	66	69	275	30.56	10.47%
POSSESSION OF WEAPONS	2		2	2					5	11	2.75	0.42%
ROBBERY OF PERSONAL VEHICLE		2	1	2			1	3	1	10	1.67	0.38%
INTERFERENCE	2		4	3	5	2	3	5	18	42	5.25	1.60%
SHOPLIFTING		2	1	1		2	1	2	2	11	1.57	0.42%
ROBBERY OF BUSINESS	2		1		1	1				5	1.25	0.19%
Total	159	188	245	271	321	280	325	398	440	2627	291.889	100.00%

Reference: C1507 Ian Kelly | Freedom of Information and Data Protection Team Leader; Information Unit; Tel: 101 Ext 346940; ian.kelly@northants.pnn.police.uk Force Headquarters, Wootton Hall, Northampton, NN4 0JQ

Description of Crime	Percentage increase in Crick/Barby&KilsbyWards 2007/08 to2015/16	Percentage increase Nationally 2004/05 to 2015
Arson	66	-55
Criminal damage	11	-55
Drug possession	20	2
Drug trafficking	-66	9
Misc crimes against society	975	-19
Public disorder	800	1
Other sexual offences	150	47
Rape	700*	148
All other theft offences	328	-41
Bicycle theft	0	-17
Domestic burglary	23	-40
Non-domestic burglary	141	-42
Theft from motor vehicle	144	-52
Theft of motor vehicle	-38	-67
Violence with injury	316	-19
Violence without injury	331	58
Robbery of personal property	100*	-45
Vehicle interference	800	-43
Shoplifting	200*	19
Robbery of business property	-200*	-31

**Please note where these figures were 0 in 2007/2008 and an increase or decrease has been identified this has been classed as 100% for 1 crime, 200% for 2 crimes etc.*

N.B the availability of crime statistics does not allow for exact comparisons by year

Only 4 out of 21 recorded crimes have decreased in the Crick/Barby and Kilsby wards in comparison to national figures. Miscellaneous crimes against society have increased 975% yet nationally decreased 19%. Public disorder has increased 800% in the local area, yet nationally only increased by 1%. Rape has increased 700% (please note there were 0 reported rapes in 2004/2005 and 7 in 2014/2015 which is how this figure is accounted for). It is noted that there has been an increase nationally of 148% but a significant degree of variance is still evident. Perhaps most significant in relation to the proposed development is the increase in vehicle interference, which has increased 800% locally but nationally has decreased by 43%.

Daventry District Council completed a study in relation to Lorry Parks in 2008 (<https://www.daventrydc.gov.uk/EasysiteWeb/getresource.axd?AssetID=13908&type=full&service=Attachment>) The study found that there are issues around lorry parks - drivers not using them, preferring local roads. This would have a severe detrimental impact on our local area as traffic is already a huge issue. Within the study it was also highlighted that there have been difficulties in moving lorry drivers to more appropriate parking facilities due to language barriers.

It is evident that there is an increase in crime in the areas surrounding DIRFT, but nationally the reported crime is going down. With their close proximity to the warehouse park Collingtree, Roade, Blisworth and Milton Malsor will suffer the most. This will not only make the villages less desirable (the majority of villagers have moved here for a quiet and peaceful way of life), but will also impact upon other aspects of life such as car and household insurance premiums. The effects of increased crime in the villages will be exacerbated by the high proportion of elderly residents.

The previous Police and Crime Commissioner, Adam Simmonds, has stated that the budget is balanced until 2018 but if the government spending review goes ahead, the Police will have to cut costs by 20% which means they are likely to have to reduce the 1220 police currently serving Northamptonshire. <http://www.northants Telegraph.co.uk/news/top-stories/pcc-says-government-cuts-may-mean-northants-police-cannot-sustain-1-220-officers-in-future-years-1-7051177>

Therefore, if as predicted, based on information within this chart, crime does increase, there are no moderating factors in the form of a more visible police presence to minimise the impact on local communities.

Crick residents formed a team of volunteers to pick up litter left by lorry drivers parking along the A5. Litter is a major blight on a rural environment which will be significantly worsened by the proposed industrialisation.

Summary

- Whilst warehouse facilities themselves are secure there is clear evidence that their presence increases the incidence of crime in surrounding areas. There are many vulnerable and elderly residents in the adjoining villages whose lives would be seriously affected.
- There is a great concern over the vast influx of a transient and unknown (and unfamiliar) workforce into a small rural community. Vulnerable members of society using local roads for pursuits such as dog walking and jogging will all be exposed to increased hazards.
- Illegal and unsolicited parking will occur in surrounding villages. An increase in HGV parking outside designated areas and unsocial behaviour and littering in the surrounding rural environment can be anticipated, as has been experienced in villages around DIRFT.
- There will be no corresponding increase in Police funding to deal with increased crime in the area or to deal with the unsocial behaviour that accompanies developments such as these.

12. SUMMARY OF KEY CONCLUSIONS & OBJECTIONS

It is evident from the above that Roxhill NG's proposal is not aligned with the NPSNN policies. Roxhill's NG proposal does not:

1. Reflect consideration of the fact that existing operational SRFIs and other intermodal RFIs are predominantly clustered in the Midlands,
2. Take account of the NPSNN policy that SRFI capacity should be provided at a wide range of locations especially in areas poorly served, to provide the flexibility required.

We also oppose Roxhill's NG proposal for the following reasons:

- Daventry International Rail Freight Terminal (DIRFT), only 18 miles from the Roxhill NG's proposed site, already provides a SRFI (with more than adequate warehousing capacity) to serve the region for the foreseeable future. NG is therefore redundant.
- Roxhill NG's proposed site is situated halfway between major centres of production and consumption i.e. London and Birmingham. This contravenes the policy to locate SRFIs at major nodes.
- Planned investment in the Strategic Rail Network targets major freight flows from Felixstowe and Southampton to the West Midlands, effectively bypassing NG's site to the West and North. Only if rail paths were released on HS2's completion would there be prospect of significant modal shift from road to rail. But Potential capacity cannot be used as justification for consent to a proposal as it cannot be guaranteed.
- Oversupply of SRFIs in this region and undersupply in regions poorly served or lacking SRFIs would magnify regional economic imbalances, contrary to government policy.
- The site is too close to points of origin to permit economic rail freight for most users; a minimum viable rail freight range is 200Km, limited to bulk commodities not requiring processing, sorting or repackaging. NG's proposal does not cater exclusively for such markets.
- NG's proposed site has an extensive history of bids/proposals to change use from arable to various industrial enterprises. All failed or were abandoned as they contravened the Joint Core Strategy (JCS) or earlier Structure Plans. Roxhill are aware of this as they were party to previous aborted proposals.
- Roxhill stressed in consultations that their proposed SRFI site lies within a 'Golden Triangle.' But the term relates to road haulage, not to road and rail – a fundamental misconception.
- Roxhill have not demonstrated that their SRFI proposal would facilitate a modal shift from road to rail. Tenants are under no obligation to use rail facilities. Rail Central predict less than 10% rail freight use, and NG's statistics are likely to be similar – hardly a modal shift.
- Roxhill have also failed to show that they have assessed alternative sites across the UK, contending that only one other is suitable, the adjoining Rail Central site. But other potential sites exist, for example, the *Northern Powerhouse* along HS2's planned route, another near M1 J13, and at ports with existing appropriate infrastructures. This is a serious failure of compliance.

- Roxhill have not shown that the national rail network has capacity to support their proposal. Also, local residents/commuters may suffer a reduction in services and/or restricted future growth. At Roxhill's Consultations on 9th and 10th October 2018 it was made clear that Network Rail had yet to confirm there would be capacity for NG's requirements.
- The estimated 24/7 additional c. 16,500 vehicle movements around the site, c. 4,250 of them HGV movements, would yield significant increases in noise, light, and air pollution, congestion and increased or delayed trip times for road users, including NG staff, contrary to policy and EC Directives.
- NG would impact adversely on two Air Quality Management Areas (AQMAs). Traffic in the AQMAs is forecast to grow without NG. NG's traffic combined with two additional lanes to be added to the M1 past J 15 would add substantially to traffic movements and emissions. The prevailing wind is towards sensitive receptors and new approved residential areas. The proposed tall buildings, gantries and earth bunds combined with loss of a 'green lung' could affect existing dispersion of pollutants and create a 'canyon' effect. Roxhill have proposed no mitigation measures to address such impacts, nor is a solution likely to be found.
- The countryside and settlements impacted will be subject to a range of environmental insults - deterioration in air quality, soil and natural water supplies. Residents' health, quality of life and wellbeing would be affected.
- The loss of open landscape, views, and alterations to regularly used PROWs would severely damage the pastoral character of the area and impact a number of Grade II listed dwellings, Conservation Areas, Registered Park and Gardens. They would be affected by emissions, light, noise and vibration. Users of the public footpath crossing the proposed Roade Bypass would be forced to walk and/or ride through an underground public passageway; for riders this would have significant health & safety implications.
- Replacement of c.500 acres of arable farmland and countryside by an industrial development of this scale and size, sterilising large parts of the site, would severely impact indigenous wildlife including species on the Red List such as skylarks.
- SRFIs should be located in areas where there is a suitable local workforce available. Roxhill claim an additional 7,500 posts would be created at NG. South Northants (as at Dec 2017) have a claimant rate of 0.7% (400 people). There would thus be a large local staff shortfall, and the majority of employees would need to commute from distant locations, cancelling any claimed carbon footprint savings from the purported modal shift of goods to rail.
- SRNG Action Group anticipate a similar increase in crime to that experienced around DIRFT; crime in nearby areas rose by 176%. Police and other emergency services would experience additional unbudgeted pressures as a result of Roxhill's proposal.
- NG would extinguish an important Green Gap and foster urban coalescence of Northampton with settlements south of the M1.
- Roxhill NG's proposal is 'developer-led' rather than 'plan-led,' seeking to take advantage of existing land options rather than to provide a genuine rail-linked entity. It is yet another road-based 'big shed' scheme dressed in SRFI clothing.
- The clear inference is that the NG proposal is opportunistic not strategic: to build warehouses with a cosmetic rail facility, bypassing local planning processes, on cheap arable land in a region already oversupplied, contrary to NPSNN's policy to establish an SRFI network across the regions.

- The disregard for genuine strategic considerations makes the application akin to a planning gambit, tantamount to an abuse of process, all the more egregious for its bid to override local plans and the rights of residents, whose lives may have already been blighted by the proposal.
- This and many other submissions demonstrate that NG is unfit for purpose. It is in the wrong place at the wrong time, and would do little or nothing to achieve the national modal shift envisioned. Rather it would hinder chances of successful nationwide realisation by diverting resources from regions lacking SRFIs to an oversupplied Midlands cluster.
- This is no small matter. The distortion would at best perpetuate, at worst magnify, regional economic imbalances. Locally it would increase pollution, and destroy a significant rural green space. Wildlife habitats, already impaired by intensive farming, would be sterilised. It would intensify the misery of countless road and rail users and permanently blight the existence of c. 12,000 inhabitants.
- The environmental, health, and economic costs are too great for the scheme to proceed.
- If a DCO for NG were granted despite all objections, it would evince the inadequacy of current means to create a national network of SRFIs, and make a significant contribution towards policy failure, at costs, in monetary terms and media ridicule, rivalling those of the discredited Identity Card, or even the 1940's East African Ground Nuts Scheme.

APPENDIX A - SRNG ACTION GROUP TEAM MEMBERS DETAILS

Name	Parish	Address	Email
Rod Sellers	Collingtree	[REDACTED] [REDACTED]	[REDACTED]
Alastair Inglis	Roade	[REDACTED] [REDACTED]	[REDACTED]
Stephen Blyth	Roade	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]
Vivian Blyth	Roade	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]
Lyn Bird	Roade	[REDACTED], [REDACTED]	[REDACTED]
Terry Armstrong	Roade	[REDACTED] [REDACTED]	[REDACTED]
Brian Sumpton	Milton Malsor	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]
Sharon Nola	Roade	[REDACTED] [REDACTED]	[REDACTED]

APPENDIX B - GLOSSARY OF ABBREVIATIONS

ABBREVIATION	FULL DESCRIPTION
AC	Air Conditioning
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BTO	The British Trust for Ornithology
CE	Client Earth
CfBT	Campaign for Better Transport
COPD	Chronic Obstructive Pulmonary Disease
CPNI	Centre for the Protection of National Infrastructure
CPRE	Campaign for Rural England
CWS	County Wildlife Site
DCLG	Department for Communities and Local Government; now replaced by MHCLG (see below)
DCO	Development Consent Order
Defra	Department for Environment, Food, and Rural Affairs
DfT	Department for Transport
DIRFT	Daventry International Rail Freight Terminal
DoT	Department of Transport
EC	European Commission
EIA	Environmental Impact Assessment
ES	Environmental Statement i.e. Roxhills which can be either their draft or latest version
EU	European Union
EWR	East West Rail
ExA	In the context of SRFIs, there are none, however, abbreviation relevant in the context of other planning applications e.g. the examining authority is probably the local authority, e.g. SNC.
FoE	Friends of the Earth
FTA	Freight Transport Association
FTE	Full Time Employee
GCN	Great Crested Newt
GRIP	Governance for Railway Investment Projects
HE	Highways England; previously HA Highways Agency; please use HE Not HA
HGV	Heavy Goods Vehicle
HS2	High Speed Two Railway
IEA	International Ergonomics Association
JCS	Joint Core Strategy
LAQM	Local Air Quality Management
LAQM TG	Local Air Quality Management Technical Guide
LIR	Local Impact Report
LPC	Local Parish Council or LPC's in the plural
MHCLG	Ministry for Housing, Communities and Local Government
MIND UK	Mental Health Advocates UK
MML	Midland Main Line
MTRU	Metropolitan Transport Research Unit
NBC	Northampton Borough Council
NCC	Northamptonshire County Council
NCCHD	Northamptonshire County Council Highways Department
NGSO	Northampton Gateway Scoping Opinion
NICE	National Institute for Health and Care Excellence
NO ₂	Nitrogen Dioxide
NO _x	A more generic term covering a group of nitrogen oxides
NPPF	The National Policy Planning Framework
NPSNN	National Policy Statement for National Networks
NR	Network Rail
NRCS	Northamptonshire Rail Capacity Study
NRUG	Northampton Rail User Group
NSIP	National Strategic Infrastructure Project
NSTM	Northamptonshire Strategic Transport Model (strictly speaking the March 2010 version, although it may be used to refer to the later version)
NSTM2	April 2017 version of the above
NUTS 2	Nomenclature of Territorial Units for Statistics
ONS	Office for National Statistics
ORR	Office of Rail and Road

ABBREVIATION	FULL DESCRIPTION
PAP	Parishes Against Pollution
PEIR	Preliminary Environmental Information Report
PINS	The Planning Inspectorate
PINS SO	The Planning Inspectorate Scoping Opinion Document
PPG	Planning Practice Guidance
PROWS	Public Rights of Way
RC	Rail Central i.e. the Ashfield Land SRFI proposal
RCP	Royal College of Physicians
RCPCH	Royal College of Paediatrics and Child Health
RFG	Rail Freight Group
Roxhill NG	Roxhill Northampton Gateway
ROR	Rail Operators Report
SACTRA	Standing Advisory Committee on Trunk Road Assessment
SEP	Strategic Economic Plan
SNC	South Northamptonshire Council
SNLP	South Northamptonshire Local Plan
SoCG	Statements of Common Ground
SoS	The Secretary of State
SRFI	Strategic Rail Freight Interchange
SRN	Strategic Road Network
SRNG Action Group	Stop Roxhill Northampton Gateway Action Group
SSSI	Site of Special Scientific Interest
SUE	Sustainable Urban Environment
TP	Travel Plan
TRAP	Traffic Related Air Pollution
UKAS	United Kingdom Accreditation Service
UKSC 28	United Kingdom Supreme Court (28 was a specific action brought by Client Earth)
VPH	Vehicles Per Hour
WCML	West Coast Main Line
West NJCS	West Northamptonshire Joint Core Strategy
West NJPU	West Northamptonshire Joint Planning Unit
WHO	The World Health Organisation
WNJPU	West Northamptonshire Joint Planning Unit

Roxhill's 'Northampton Gateway' SFRI

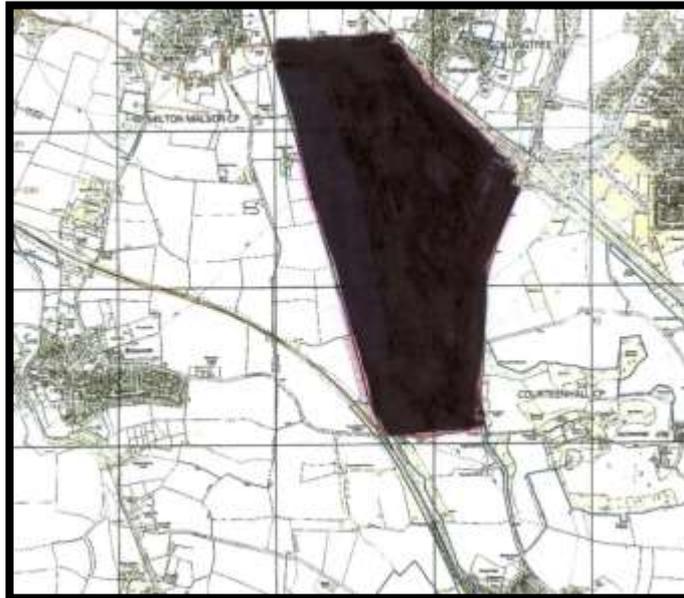
Development Proposal



Our Case Against

Part B

A submission to the Planning Inspectorate on the Transport & Traffic impacts on local communities, of a proposed industrial development of 5 million Sq. ft. on 500 acres of open countryside.



Prepared on behalf of local communities by the
'Stop Roxhill Northampton Gateway' Action Group.

PINS Reference: TRO50006

Unique Registration ID Number: 20011012

IMPORTANT NOTE: This Transport & Traffic Chapter has been submitted as a separate Part B submission and accompanies Part A submission. There are a number of references in this section that refer to related issues in other chapters in Part A.

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1. INTRODUCTION

1.1 The scale of the Roxhill's Northampton Gateway (Roxhill NG) proposal is such as to have a significant impact on the local road network. The proposed re-modelling of the M1 J15 and additional works to J15A; the bypass around Roade; other modifications to junctions along the A508 corridor between J15 and the A5 at Old Stratford; and additional works for the A45 corridor between the M1 and the Queen Eleanor Intersection all support this. This is confirmed by the Executive Summary item vi) in Doc 5.2 ES TR App 12.1 Transport Assessment.

1.2 Major traffic concerns are the efficacy of the road infrastructure design and traffic modelling as they:

- produce forecasts that appear to be incorrect,
- do not demonstrate that the SRFI site has the capacity to effectively handle traffic into and out of it at peak hours and periods of stress.
- do not resolve a basic design flaw in the proposed J15 re-design.
- omit stress testing for major road closures/blockages, a particular problem on the M1 locally
- ignore the disbenefits of the proposed Roade bypass
- underestimate the impact of the proposed amendments to the A508 corridor with potential unintended consequences
- ignore the scale of the cumulative impacts

1.3 The disbenefits of the above outweigh any benefits to residents of Roade, Blisworth, Milton Malsor, Collingtree and surrounding villages as well as the majority of users of the A508 along its length from M1 J15 to the A5. Additionally, the impact of the huge volume of traffic generated by the site will have a major impact on the wider community and users of the M1, A43 and the A45 through Northamptonshire.

1.4 The proposal does not appear to conform to two elements of the National Policy Statement for National Networks (NPSNN), namely that national road and rail networks need to be sustainable through minimising social and environmental impacts and improving quality of life (para 3.2) and that the scheme needs to show that steps have been taken to minimise road casualty risks and to contribute to overall improvements in safety on the Strategic Road Network (SRN) (para 4.66). The opposite is illustrated in the Sections that follow.

2. ROBUSTNESS OF FORECASTS

1.1 The traffic forecasts are understated for the following reasons.

2.2 Roxhill state in Doc 5.2-ES Chp 12 Transportation, para 12.5.5: *Therefore, whilst this approach was undertaken in accordance with the requirements of the Transport Working Group, it presents a worst case, as it does not include for the required 20% reduction in SOV journeys to and from the SRFI site that is the target identified in the FTP.* The phrase 'worst case' is also used for a forecast 16,531 daily 2-way site-generated traffic movements, including 4245 HGVs. In ES TR App 12.1 TA App 5, Table 7, the person trips forecast indicates that the non-HGV traffic has been reduced to 92% to mirror data from Swan Valley single occupancy vehicles (SOV). Table 8 forecasts 17,657 person trips every 24 hours, including the 4245 HGV drivers. This is an extra 1126 trips at 100% SOV which more accurately demonstrates a worst-case scenario. In addition, the traffic generated by the aggregates facility has not been included. These undermine the reliability of the forecasts.

2.3 The Travel Plan (TP) (ES TR App 12.1 TA App 1) assumes that the experience of Swan Valley (74% using SOV, 10% car sharing, 9% public transport and only 4% walking 1% by motorbike and none cycling), on the northern side of the M1, will be improved upon at Northampton Gateway (Figure 5, p17). However, the key to this is for people to be living close enough for these modes to be effective: the prospect of cycling at night or along a very busy A45 with its attendant noise and pollution is unlikely to be attractive; and cars sharers would need to live in areas that are within practical distances and work the same shift hours. No data has been produced on where sufficient numbers of likely car sharers, walkers and cyclists live. Swan Valley is on the northern side of the M1 and is conveniently closer to residential areas than Northampton Gateway. The West Northamptonshire Joint Core Strategy (WNJCS) does not envisage jobs or housing for such a considerable number of people and the unemployment level in its area is only fractionally more than the total number of jobs forecast, a large proportion of which are unlikely to be seeking such jobs or be suitable (see Chapter 9 page 111). The result would be a high proportion of out-of-town commuting. The forecasts are based on full occupancy in 2025 (para 1.10), only 4 years after opening. This is a surprisingly short time span and suggests credence for the view expressed in para 2.6 below. This is also at odds with all other traffic forecasts which use 2031 as the full occupancy date, but maybe only because this is a requirement. Additionally, the impact of the Northamptonshire County Council (NCC) plans to withdraw support for public bus services is not yet fully known (some routes have already been curtailed or discontinued) but are likely to affect the projections for public transport availability to and from the site and thus further reduce the viability of the projected TP. Even if a bus service is run, there is no certainty that it would serve the rail station or other appropriate areas or cover the shift patterns. Para 2.11 of the TP states *Public transport promotion sits at the heart of the Travel Plan initiatives*. No comparison has been made with DIRFT or any other SRFI more akin to Northampton Gateway. The scheme does not appear practicable in the real world of the logistics industry. How long would it be before the TP funding would be wound down? 2/3rds of the £3/4 million costs relate to Management and Marketing of the scheme – an easy target for unprotected cost savings.

2.4 The forecast for 2-way site-generated traffic movements in 2031 is 16,531 per day. The current (2016) Annual Average Daily Traffic Flow (AADF) along the A508 through Road to J15 is 16,560 (www.dft.gov.uk/traffic-counts/cp.php?la=Northamptonshire#57251). The NNC Local Highways Authority (LHA) forecast 21,832 daily vehicle movements, without the development, between Courteenhall Rd and J15 by 2031. [email 26.04.18 – see Addendum 1 below]. When added to the Roxhill forecast, less the 10% expected to turn south from the site, this totals 36,710 and equates to 1530 vehicles per hour (vph) if averaged over 24 hrs on the A508 dualled section. This equates to 765 one way or 2 every 9.4 seconds every hour of the day and night travelling 2-abreast up the dualled section of A508 from the site entrance to J15 and the same southwards. This assumes all traffic running normally with no hold ups, but does not allow for concentrations during daytime hours, or peak hours, or any additional journeys by the extra person movements highlighted in 2.2 above or the traffic generated by the Aggregates terminal.

2.5 If these figures are compressed to cover shift hours (05:30 – 22:30) then the above figures would average 1080 vph one-way over the whole period. This equates to 2 vehicles every 5.5 seconds every hour for the 17 hours along the dualled section of the A508. In practice there would be several peaks (peak hours, shift changeovers) which would increase the concentrations, but these statistics illustrate the huge volumes of traffic crossing paths at the site entrance. Queuing on this highly sensitive section of the A508 and J15 and the consequent air and noise pollution would be considerable.

2.6 The attraction of Northampton appears to be the concentration of logistics companies due to the historic locational advantage of being within the so-called Golden Triangle, described by Roxhill as *an area centred around the main strategic road corridors in the centre of the country which provide excellent connectivity to the vast majority of the UK population within a 4 hour drive*. They continue *The Local Enterprise Partnership (LEP) for Northamptonshire, and the Local Authorities, recognise the area's strengths in logistics and distribution due to its accessibility to national road and rail networks, and to national markets*. (Chapter 6.5B paras 3.3 and 3.4). Rail Central (RC), an even larger SRFI proposed on the opposite side of the Northampton Loop line, have recently stated that 90% of containers would be transported by road (NBC Planning Committee Minutes 10.04.18 at <http://www.northamptonboroughcouncil.com/ieListDocuments.aspx?Mid=8544>). That is hardly 'last-leg delivery' or 'modal shift' as intended by national policy. If this is the norm for SRFIs then one can only conclude that Roxhill intend to take advantage of the location for an estate for principally road-served distribution centres, as intended with the previous planning application to South Northamptonshire Council (SNC) for approximately 2.7 million sq ft of warehousing on this site, withdrawn in June 2015, ref S/2014/2468/EIA at <http://snc.planning-register.co.uk/plandisp.aspx?recno=74108>). This could result in considerably more HGV movements than forecast and a greater impact on the local, regional and national road networks.

2.7 Current unemployment in the immediate area is particularly low and most employees will need to travel further than Roxhill has anticipated. The numerous vacancy banners permanently displayed at local logistics company premises in Grange Park, Swan Valley and Brackmills support this.

2.8 The aggregates terminal announced in Consultation 3 is an existing facility in Northampton, but no traffic or employment information were supplied and no adjustments have been made to the traffic or employment figures in the Application. This will inevitably increase the projected figures included in the Consultation documents but it is not possible to assess their significance.

2.9 The reduction of employees for mezzanine floors (ES TR App 12.1 – TA App 5, TN2 paras 5.17 to 22) and the total trip generation calculations used could, in fact, be considerably larger, for the following reasons:

- a. Buildings of the proposed height are capable of accommodating considerably more than the proposed configuration of 1 mezzanine floor, as evidenced by the Gazeley 'Altitude' building at Magna Park, Milton Keynes (*It is designed to be as flexible as possible and is capable of accommodating five mezzanine floors*). <https://motortransport.co.uk/blog/2018/03/23/gazeley-gains-altitude-magna-park-takes-fight/>).
- b. A reduction of 50% in area of mezzanine floor with the same capacity as the ground floor is not based on evidence of similar 20m high warehouses, but on evidence from Prologis on smaller warehouse units (ES TR App 12.1 – TA App 5, TN2, para 5.2). This is misleading. The goods stored on the mezzanine still need a vehicle to transport them in and out. This would not be restricted by the number of loading bays as all would not be in use 100% of the time. Para 5.18 goes on to state *Roxhill do not hold empirical data regarding mezzanine trip rates and no empirical trip rate information was available from the Transport Working Group. It is also noted that the employee density for B8 uses given in the HCA employment density guide are based on*

c. *GEA, which is not influenced by mezzanine floor space.* Why should Roxhill rely on the Transport Working Group for such data? Would these be the first 20m high warehouses in the UK? That the buildings of the size envisaged by Roxhill are designed for multiple mezzanine floors (with around 20 loading bays per floor for Gazeley's Altitude building if 5 mezzanines are incorporated) suggests that potentially both employee and traffic projections have been grossly understated.

2.10 The cumulative effect of the above would generate more vehicle movements than forecast, especially for distant employees. On what grounds can long-distance commuting be justified? Emissions from additional HGV movements and commuters will neutralise savings from the notional use of rail freight to move goods.

2.11 Out-of-county commuting transfers economic benefits to other areas. This is not the type of job that should be, or is, encouraged by any of the West Northamptonshire Councils in an already heavily overburdened logistics area. The East-West rail link is likely to bring greater benefits. This is underpinned by the National Infrastructure Commission's Partnering for Prosperity report on the East-West Arc in the statement on page 3: '*100 new business start-ups per 10,000 residents in Northampton (second only to London)*' (<https://www.nic.org.uk/our-work/growth-arc/>) How many of these are likely to require rail freight services over passenger rail services?

2.12 There are additional areas of suspect forecasting in the sections that follow, notably at para 6.7 which shows a recent local traffic count recorded a higher figure in 2017 than Roxhill's projections for 2031 without Northampton Gateway.

2.13 ES TR App 12.1 – TA App 5 – TN2 makes a number of unsubstantiated points, suggesting an inference that Roxhill's NG is just a route to achieving what they failed to achieve in the above mentioned application on this site and undermining the validity of the HGV trip forecasts

- a. Para 7.2 bullet 2 makes a case for modal shift to rail by quoting the Tesco operation at DIRFT shipping goods to Central Scotland. The straight line from Daventry to Glasgow is around 450 kms, a justifiable distance for rail freight. But how does Roxhill justify the location of Northampton Gateway so close to DIRFT with so much spare capacity?
- b. Para 7.6 assumes that because DIRFT captures 56% of container traffic handled by the intermodal terminal that Northampton Gateway will achieve the same. How does Roxhill know if there is any to capture in this location? To reduce the figure to 40% (para 7.7) and call it 'robust' is arbitrary. This suggests that Roxhill is confident of road-served business so is producing some apparently favourable forecasts.
- c. Para 7.8 states that a 40-mile radius is '*an appropriate area*', but no evidence is given to support this view.
- d. Para 7.9 states: *It is however reasonable to assume that as the market grows, the excellent strategic freight network connectivity potential at Northampton Gateway SRFI would support movement of this traffic by rail.* The only evidence given to support this statement is that tenants at DIRFT are shown in the accompanying table as *Most products distributed to/from surrounding area* without any qualification as to the volume of 'most' or size of the 'surrounding area'
- e. Para 7.11 states: *it is impossible to say with certainty the split of container movements or the final pattern of local distribution* and then goes on to claim, without giving any evidence of demand: *However, such movements are likely to be commercially viable for the Northampton and Wellingborough areas*

3. SITE ACCESS

3.1 The proposed site access roundabout on the A508 is insufficient to accommodate the projected site-generated traffic volumes, for the following reasons.

3.2 It is proposed that the site would have a single access via a roundabout on the A508 approximately 500m from M1 J15. The roadway would be dualled between these two points. The Dept for Transport (DfT) 2016 traffic movement figures record this section of the A508 handles in excess of 16,500 daily vehicle movements, including nearly 1100 HGVs (www.dft.gov.uk/traffic-counts/cp.php?la=Northamptonshire#57251).

3.3 The projections for Roxhill's NG (ES TR App 12.1 – TA App 5, TN2– para 8.4) is for 838 vehicles entering the site during the AM peak hour, including 138 HGVs. This equates to 1 every 4.3 seconds. It indicates there would be a virtually continuous stream of vehicles entering from J15 with right-of-way round the roundabout and across the A508 sufficient to impede northbound traffic. Although the roundabout would be dualled it is highly unlikely that the two streams would synchronise to produce gaps sufficient for vehicles to pass through without stopping, especially HGVs which can be up to 5 times the length of an average car and slow to start off from a standstill. The VISSIM model shown at the Consultation Exhibitions conveniently did not illustrate this.

3.4 The VISSIM modelling displayed at the Consultations is suspect. The YouTube marketing videos for the software developer, the PTV Group, includes one that appears to illustrate an unintended collision! (see around the 50 second point on Ramp Metering at <https://www.youtube.com/watch?v=W7ZUqDNWoYs>). The software version used for Roxhill will probably have been tailored for their use. In which case, why was the simulation displayed at the Consultations so suspiciously inaccurate? Has it been independently verified?

3.5 Roxhill have projected (ES TR App 12.1 – TA App 20, para, 2.6) 15% light vehicles (LVs) and 9% HGVs would travel northwards to the site on the A508. As Roxhill appear to have no idea what type of business will occupy the site, this appears to be a guesstimate. However, the forecasts represent 125 vehicles per AM peak hour needing to access the site from the south. As most, if not all, of the projected 13 HGVs included in this figure would have to stop (averaging 1 every 4.6 minutes) at the site roundabout it is doubtful that all their arrivals would coincide with a large enough synchronised gap in the dualled stream of 838 vehicles crossing with priority to enable them to continue seamlessly, thus creating inevitable tailbacks.

3.6 Access to the site itself presents additional problems, especially at peak hours. The roadway into the main site narrows to a single lane in each direction before the inner site roundabout is reached. The volume in the morning peak hour at this point (1 vehicle every 4.3 seconds in the single lane) suggests that there would be difficulty accommodating such numbers at this concentration slowing down, especially HGVs, to arrive at a variety of site destinations. In addition, there is a slip road to the largest warehouse and office complex just as the main entrance road narrows to single lane. This leads to a parking area for 916 cars, 33 motorcycles and 220 bicycles. The slip road is a little over 100 metres in length which gives it a capacity of about 20 cars before vehicles have to slow to make a sharp turn to find a parking space.

3.7 There are two further entrances to warehouse/office units in quick succession. The first is off the inner roundabout leading to parking for 580 cars, 17 motorcycles and 102 cycles. The second is immediately after the roundabout on the opposite side of the road necessitating crossing the pathway of up to 196 vehicles projected to be leaving the site at the same time (1 every 18 seconds). The capacity of this car park is 529 cars/vans, 20 motorcycles and 127 cycles.

3.8 The capacity of the car parks is an indication of the volume of vehicles needing to use them. Added to this, there is a bus stop located on the inner roundabout and another on the far (east) side of the A508, just before the roundabout, with a pedestrian controlled crossing. This will bring traffic to a standstill in both directions when activated, most likely at peak periods.

3.9 There would be an additional 387 HGVs to contend with manoeuvring within the site moving goods between trains and warehouses (ES TR APP 12.1 – TA App 7, para 4.4). This mixture of HGVs, vans, cars, motorcycles, cyclists and pedestrians in juxtaposition at a very busy period would appear to be a recipe for congestion and accidents. Just one vehicle stopped before any one of the entrances to the first three units would bring traffic to a halt in both directions on the A508. This would have serious consequences for J15 and probably the M1 as well. With vehicles entering at 14 per minute, how long would it take for these queues back up and bring J15 to a standstill? The site is not covered by the Northamptonshire Strategic Transport Model (NSTM2) and no stress testing of the road network is required. Roxhill's representatives have confirmed this has not been done (Four Parish Councils meeting at NCC LHA on 9.03.18).

3.10 Additionally, there is a single emergency access located between the main site access roundabout and J15. This access leads onto the internal access roundabout. If an incident occurred sufficient to bring traffic to a standstill (and experience indicates that it doesn't take much to achieve this), the emergency services would be unable to gain access.

3.11 Any of the above are likely to cause queuing back round the roundabout to J15 with attendant consequences for both junctions as no provision has been made for arriving vehicles unable to gain access.

3.12 The distance from the site entrance to the Courteenhall Rd to Blisworth is just over 1 km. This distance could contain around 165 mixed-type vehicles before blocking the access. Contrary to claimed figures of queues of 400m at peak hours (Ch 6.5B Short Document, para 4.56), traffic currently regularly backs up towards Roade past the proposed site entrance, a distance of 500m, and it is not unusual for it to reach the Courteenhall Rd turn, a total distance of 1.6 km.

3.13 The result, with the current rate of growth on the A508, would be a stream of vehicles on the A508 heading north reaching the site entrance at the rate of more than 1 every 5.3 seconds only to be interrupted by an unsynchronised dual stream with priority crossing at the rate of 1 every 4.3 seconds. This assumes no hold ups due to congestion on site, as highlighted above. The likely result would be traffic queues on the A508. It would only take an average of 170 vehicles (20% of the peak hour number) to block the Courteenhall Rd turn to Blisworth thus also blocking both left-turn only streams with their additional consequent impacts on congestion, frustrations and pollution. Site access from J15 via an underpass would alleviate some of the issues, but not eliminate those raised in 3.6 – 3.9 above

3.14 It is proposed that all HGVs will have to use an exit lane that uses a height barrier to prevent any from turning south on the A508 and a monitoring system to identify any that travel south via J15. It was stated at the NCC LHA-facilitated meeting on 9.03.18, with representatives from Roxhill and the four Parish Councils most affected, that this height barrier would be raised to allow right turns in the event of gridlock on the M1. This is a not infrequent occurrence: of the 17 incidents on the M1 between J16 and J14 in 2017 resulting in closure there were 11 resulting in the closure of the M1 south between J15 and J14 for a total of nearly 66 hours affecting the A508 (Highways England ref 18710249 Pt 2 30.04.18 – see Addendum 2 below). Such events already add considerably to congestion on the A508. There was no indication how the barrier would be controlled. How long it would be before it became an inconvenience and left permanently raised?

3.15 ES TR APP 12.1 – TA App 7 HGV Trip Distribution, para 3.10 states: *It is proposed that in the absence of specific end user information, the location of the ports listed in Table 2 will be used within the NSTM as origin/destination points for distribution of the HGV movements on a national scale.* There appear to be no interested clients on which to base any assumptions thus indicating Northampton Gateway is purely speculative with the likelihood of using scarce rail capacity on the West Coast Main Line (WCML) and/or, in the absence of rail requirement, becoming just a huge road-served industrial estate as intended with the previous planning application, as highlighted earlier. Any predictions will, therefore, be just speculations to suit Roxhill's objectives.

3.16 It is stated at para 4.7 in the same ES TR APP 12.1 – TA App 7, that *for the warehousing element a 70%/30% split between national distribution and regional distribution has been assumed*. Section 4.11 indicates that 36% of HGV traffic would use the A45 north, 29% would use the M1 south-east, 26% the M1 north-west and 9% inward only via the A508. The fact that 70% of HGV trips is expected to be national indicates long haul HGV trips are envisaged from the site, and is yet another indicator of the true intentions for this site. The objective of national policy for Strategic RFI is to reduce long-haul HGV trips, not increase them. This should be achieved by locating SRFIs and RFI close to the areas they serve as required by national policy: NPSNN para 2.50 *'across the regions'*

4. J15 CHANGES

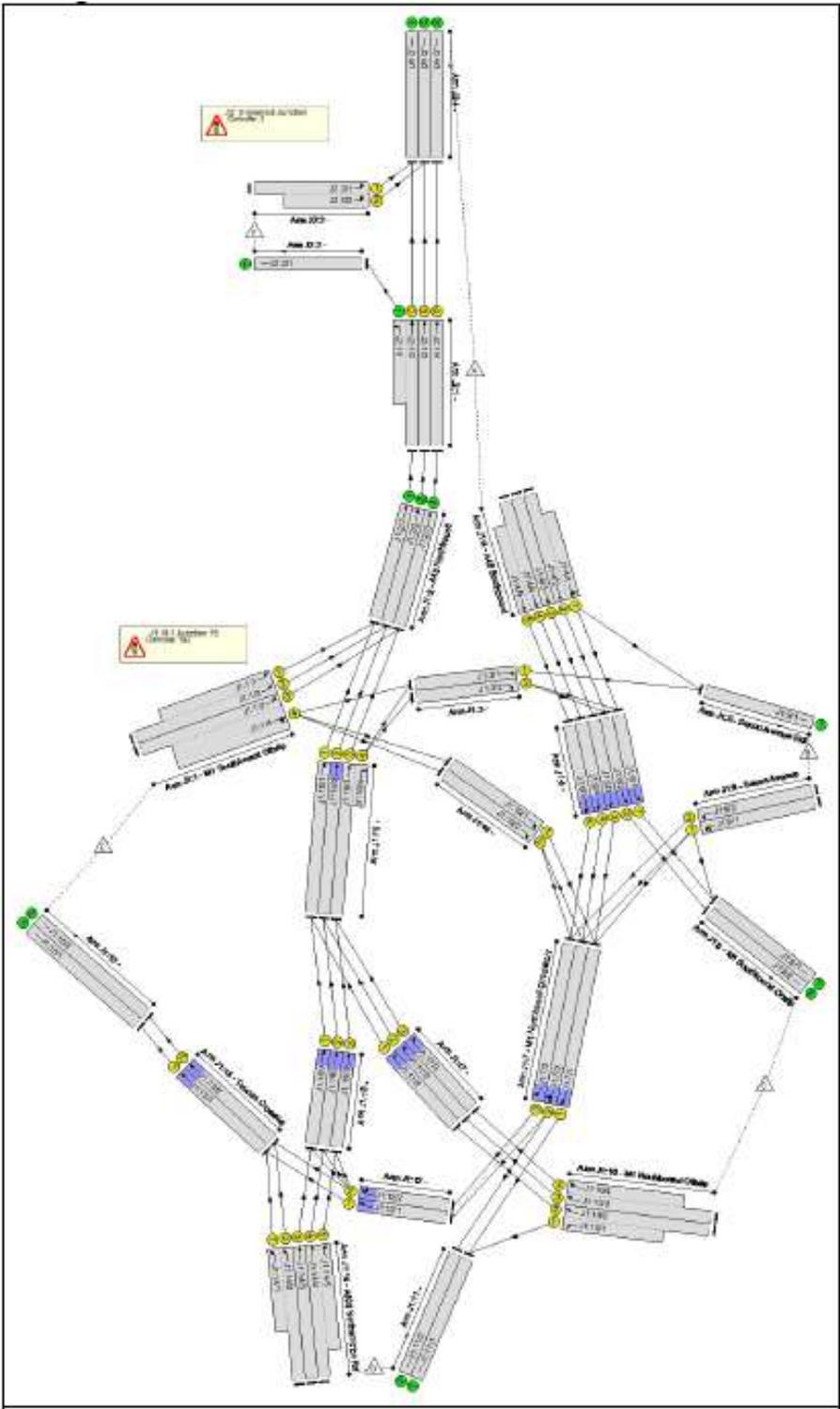
4.1 The complexity of the proposed redesign of J15 will result in increased pollution and accidents for the following reasons:

4.2 Northampton Gateway would be located at the point where 2 significant traffic flows cross each other (M1 and A45/A508) with the added complication of a feeder road onto J15 from the industrial and residential area of Grange Park. DIRFT does not suffer from this problem, having 3 access points (M1, A5 and A428). Roxhill's NG would have only one and even that is combined with the single emergency access at the first internal roundabout. If that roundabout became blocked by traffic back to the A508, a distance of only about 250m, this is likely to cause difficulty accessing the main site.

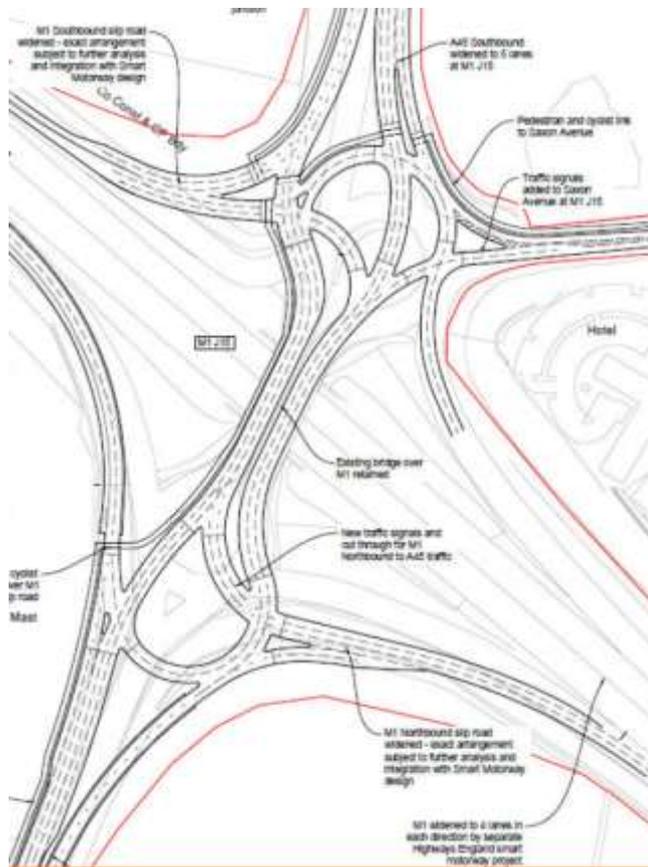
4.3 Junction 15 was *re-built in 1998 from a two-bridge roundabout to the current single bridge arrangement which passes over the M1 mainline. The final layout of the junction was a tear-drop arrangement incorporating a series of tight radii.* (Doc 5.2 – ES TR App 12.1 Transport Assessment, para 3.13). This resulted in a number of accidents involving HGVs over-turning on the tight radii. The current proposals increase the radii of the curves but add 8 islands into the design, which are likely to increase confusion

4.4 It is clear from the work produced in ES TR App 12.1 – TA App 10 – TN5 for different solutions for J15 that the main problem is the sheer volume of traffic. The Grange Park access is a significant contributing factor. This junction is complex now and is difficult and confusing to navigate, as confirmed in Doc 6.5B, para 4.56: *This junction suffers with a constrained physical design with tight radii on the roundabouts and a somewhat confusing layout,* and see also ES TR App 12.1 – TA App 10, para 2.8. The maps below illustrate that maintaining the 5 points where streams of traffic cross each other only increases confusion and tinkers with the Grange Park issues. An even more complex layout is proposed with an additional 8 islands, an additional 5 sets of traffic lights, and increased flows, especially from the increase from 3 to 5 lanes entering from the A45, all of which are likely to lead to slower progress and even more potential for accidents.

DIAGRAMS ILLUSTRATING CONFUSING LAYOUT AND MULTIPLE LANES MERGING WITH, AND CROSSING, OTHER MULTIPLE LANES OF DIFFERING SPEEDS:



Source: Doc 5.2-ES – Appendices – Chapter 12 - ES TR App 12.1 – TA App 10 TN5 Appendix E p364



Source: Doc 5.2-ES – Appendices – Chapter 12 - ES TR App 12.1 – TA App 10 TN5. Para 4.20 Fig 4 p13

4.5 Although Northampton Gateway would be connected to the strategic road network, the Department for Transport’s own National Transport Model, published on 17 December 2014 and prior to Northampton Gateway’s emergence, indicates the following roads are expected to experience severe congestion by 2040 (severe being the most serious level predicted):

<https://www.gov.uk/government/publications/national-policy-statement-for-national-networks>

(See Annex A, second map)

- M1 Junctions 15 to 17 (the longest section of the M1 expected to experience severe congestion north of the M25).
- A45 from M1 junction 15 to east of Northampton
- A5 at Milton Keynes
- A43 west of Towcester and also close to M40 junction 10

4.6 Roxhill indicated in Consultation 3 that an aggregates terminal will be included within Roxhill’s NG. It appears that an agreement had been made, prior to the Consultation 3 document being published, between Roxhill and GRS Roadstone to move their existing aggregates terminal from Northampton Castle Yard with 5 rail paths. However, no information has been made available on traffic, noise or employment, etc, nor any justification for moving it from its current central location. This will add further traffic to J15, provide no additional modal shift and is a glaring case of deliberate avoidance of consultation. There is still no traffic information available as the traffic movement figures in the Application are unchanged from earlier Consultations.

4.7 Since the A508 is a designated diversion route when there are problems on the M1, this would add further to congestion, pollution and delays. The M1 was closed southbound on 11 occasions in 2017 between J15 and J14 south bound for a total of over 65 hours which would have severely affected the A508 (email dated 30.04.18 from Highways England ref 18710249 - see Addendum 2 below)

5. A45 CORRIDOR

5.1 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:

5.2 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 at peak periods of the day, or the transporting of goods via HGVs instead of local delivery vans, and the huge increase in staff requiring to make long-distance commutes.

5.3 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.

5.4 Northamptonshire County Council has previously recognised the high levels of congestion currently experienced on the A45 on the east side of Northampton. To address that it has conceived and implemented the A45/M1 Northampton Growth Management Scheme. <https://www3.northamptonshire.gov.uk/councilservices/northamptonshire-highways/transport-plans-and-policies/Documents/Northampton%20Town%20Transport%20Strategy.pdf> - see page 54. Despite this, the A45 remains congested at peak times as it passes the eastern side of Northampton. Indeed, Map 1 in Annex A of the NPSNN indicates that the stretch of the A45 around the eastern edge of Northampton was considered severely congested (the top category) as long ago as 2010. In addition, HE has proposed adjustments to the A45 (Doc 5.2 – ES Chp 12 para 12.3.57 bullet 5) to turn it into a continuous Expressway from the A14 to the M1 - a magnet for HGVs to and from Felixstowe, the busiest container port in the UK. Para 6 of the Executive Summary in ES TR App 12.1 – TA App 15 – TN10 states: ... *the forecast growth in background traffic, including that associated with the committed and planned development in Northamptonshire, and is therefore an existing problem with or without the addition of the development traffic.* This suggests that any adjustments to accommodate Roxhill's NG would not be more than medium term at best. Roxhill's NG is no doubt expected to have a much longer life.

5.5 The DfT's own model clearly indicates the unsuitability of the proposed Northampton Gateway location with such severe congestion on the neighbouring strategic road network forecast for the future, even without the significant extra traffic generated by Northampton Gateway.

5.6 This is reinforced by NCC LHA NSTM2 AADF (24 hr two-way traffic flows) forecast for 2031 of 63,884 on the A45 between J15 and Watering Lane, without Roxhill Northampton Gateway. That

equates to an average of 2662 vehicles using J15 via the A45 every hour over 24 hours. There would be two lines of vehicles every 4.3 seconds each way every hour over the 19 hour period between 5am and midnight – a continual stream! This makes no allowance for peak periods. The traffic further north is projected to be worse (see chart below).

Projected AADF flows on A508 and A45 for 2031 without Northampton Gateway.

Link	AADT flow (24 hr two-way traffic flows)
A508 between Courteenhall Road and Road	18,359
A508 between Courteenhall Road and J15	21,832
A45 between J15 and Watering Lane	63,884
A45 between Wootton Interchange and Queen Eleanor Interchange	68,119

Source: NCC Highways Authority NSTM 2031 Reference Case: email 26.04.18 - see Addendum 1 below

5.7 ES TR App 12.1 - TA App 7 – TN3 HGV Trip Distribution states:

2.2 It should be noted that not all the HGV traffic associated with the proposed SRFI at Northampton Gateway would be new traffic to the road network, as container movements associated with existing end users would already be taking place on both the strategic and local road network.

There appears to be no evidence of interested end users to underpin this statement and it is unlikely an existing end user could justify double handling.

2.3 For example, instead of goods destined for Northampton arriving on HGV having travelled from Felixstowe on the A14 and then the A45, the containers may be transferred to the region by rail, arriving at Northampton Gateway SRFI to then be distributed from Northampton Gateway SRFI to the local area by HGV.

Rail freight from Felixstowe would have to travel via a circuitous route meeting the WCML at Hinckley (and then bypass DIRFT en route) or via London, a route that is already congested. Both are likely to be uncompetitive with the current A14/A45 HGV route, especially when the upgrades come into effect proposed by HE to turn the A45 into an Expressway (see para 5.4 above).

It goes on to state:

3.2 The proximity to large urban centres, which are likely to generate demand for containerised freight is also important in determining the likely regional demand.

The emphasis on 'large' confirms the location of Roxhill's NG is inappropriate; Northampton is not large by UK standards.

6. ROADE BYPASS

6.1 The proposed bypass would be a net disbenefit to the community, for the following reasons:

6.2. At an Exit Poll taken at the Roxhill Consultation Exhibition in October 2017 in Roade 87.4% of respondents were against the whole Northampton Gateway proposal with only 2.3% in favour. It is estimated that in excess of 90% of attendees took part in the exit poll. Even some living on the A508, who would welcome a reduction in the level of traffic through the village, did not want a bypass with the resultant impact of the Northampton Gateway proposal. (See Addendum 3 below)

6.3 A bypass would move existing and additional levels of pollution into the path of prevailing wind only to be blown back into a currently quiet rural part of the village. This is an area that has long been associated with horse breeding, stabling and riding. There is a well used bridle path that would be severed by the bypass, pushing the path under the road with its attendant noise exaggeration in the tunnel. The proposed route passes very close to an historic house with the possibility of causing vibration damage. Noise and NOx would increase from lorries and cars climbing the hill from the south. The size of the roundabouts, especially at Knock Lane, would require all vehicles to slow down and then speed up again, not just some, as now through the village, causing additional noise (gear changing and engine revving). Traffic bound for Blisworth and the A43 diverted from the left-only turn at the Courteenhall Rd junction would take priority over the M1-bound traffic potentially bringing it to a standstill with consequent additional exhaust pollution from constant stop-starting. Light pollution from headlights and street lights would be an additional disbenefit. The bypass corridor would inevitably attract additional development in the future thus increasing local pollution further.

6.4 Development in-fill is one of the biggest concerns in Roade village. One of the 4 landowners with property adjacent to the bypass route has already intimated that he will apply for planning permission on his land. This was assessed under the call for development land by the West Northamptonshire Joint Planning Unit (WNJPU) in 2009 as capable of accommodating 80 houses (see http://www.westnorthamptonshirejpu.org/connect.ti/website/view?objectId=2731216:SHLAA_c13_Roade.pdf ref SNC 093) but was not taken forward due to inadequate road access. The bypass would overcome this and encourage the other land owners to do the same, forming an arc around the village. Courteenhall Estates owns the remaining land through which the northern end of the bypass would run, together with all the land from the northern edge of Roade right up to the southern boundary of the proposed Northampton Gateway site. They have previously offered this for development (SHLAA 2009 S52 – Roade (North) - ref SNC578 – see http://www.westnorthamptonshirejpu.org/connect.ti/website/view?objectId=2731216:SHLAA_c12_Northampton_S.pdf) which was classified as 'with a potential for 1692 houses'. With no ready pool of labour to fill the 7,500 projected jobs, how likely is it that this will now be developed producing yet more unforecast traffic and pollution on the A508? And, if developed, the village would coalesce from its northern boundary to the Roxhill's NG southern boundary, totally destroying the rural character of this area and set a dangerous precedent for all areas in the District south of the M1, an area currently protected by SNC Saved Policy EV8 Important Local Gap (See <https://www.southnorthants.gov.uk/downloads/39/1997-local-plan>. Local Plan saved policies (revised 2014)). This would be a significant disbenefit

6.5 The proposed alterations to the Courteenhall Rd junction with the A508 will ease one problem by creating another: rat-running through Blisworth will get worse. Traffic from J15 to Blisworth would inevitably continue onto the bypass and turn right along Knock Lane and then Stoke Rd into Blisworth. Much of Knock Lane is approximately one metre narrower than Courteenhall Road, which many drivers currently use: Stop Rail Central Ltd recorded 166 cars entering Courteenhall Rd from the A508 between 8 and 9 am on Tues 12.07.16 and 270 between 5 and 6pm on Weds 13.07.16 (see Addendum 4 below). This one metre reduction in road width makes the difference between whether cars can pass easily when travelling in opposite directions,

as they can on Courteenhall Rd, or need to slow to pass safely. An additional hazard is the proposal to widen the dangerous blind bends which will encourage higher speeds. There is no proposal to rectify the half a metre or so of the road edge on each side which is disintegrating or repair the increasing numbers of potholes, other than providing a modest maintenance sum to a cash-strapped county council. The grass verges are high in places adding to the difficulties which reduce the usable road width and encourage driving close to the centre of the road. Passing is doubly difficult in the dark.

6.6 There will be further issues with parked cars on Stoke Road in Blisworth. Some of these car owners do not have access to garages and have nowhere else to park. There is a pinch point in Stoke Rd near the Doctors' surgery, a destination that attracts local traffic. This proposed alternative to Courteenhall Road is quite simply unsuitable for a significant increase in traffic movements. The Roxhill traffic Heat Map on the Consultation Exhibition Boards indicated a decrease in traffic on Stoke Rd in 2031, but many local residents have recognised the shortcomings of the traffic model put forward by the developer which makes the unlikely assumption that current rat-running from the A508 would prefer to divert up the M1 and A43 – a much longer route. When commuters discover the difficulties of negotiating their way across the Roxhill NG site access roundabout, highlighted at 2.6 above, they will soon return to Stoke Rd or find new rat-runs.

6.7 The traffic modelling shortfalls are supported by a local traffic count taken by Stop Roxhill Northampton Gateway Action Group (SRNG) on Knock Lane in October 2017 which recorded significantly higher figures during the peak periods than Roxhill's consultant, ADC Infrastructure Ltd, predicted for 15 years later (see table below). This includes natural growth to 2031 but excludes the total forecast development traffic and A508 works (ES TR App 12.1 – TA App 13 – TN8, para 4.2). The modelling indicates a considerable decrease in traffic using Knock Lane between now and 2031 without any development! Our figures are sufficient to illustrate that this demonstrates the NSTM2 output figures are very misleading.

Comparison of Knock Lane 2017 actual & 2031 D1 Reference case projections:

Source	Date	Time	Total 2-way	Time	Total 2-way
		AM		PM	
SRNG	2017	Peak	153	Peak	118
		AM		PM	
ADC	2031	Peak	58	Peak	30
	Reduction:	- 62%	95	- 75%	88
In the absence of current figures from ADC, these are taken from actual counts on the dates stated					
Sources:					
ADC: ADC Infrastructure Ltd App Ch_12-14, 4.2 31.08.17.					
Reference case D1 2031 with no development					
SRNG: Average of 2 days traffic counts 10 & 14.11.2017					

6.8 To countenance increasing the traffic on both Knock Lane and Stoke Road, the latter advised to be in the region of 800 vph currently at peak hours (Roxhill consultant at Milton Malsor Village Hall exhibition 13.10.17), would be adding significant risk to residents and other users along Stoke Road in Blisworth village, especially to the users of the Doctors' Surgery who are likely to include a preponderance of young and infirm.

6.9 In EN TR App 12.1 – TA App 13 – TN8, in the figure at the end of paragraph 3.16, the changes in traffic volumes don't appear to stack up. For example a reduction of 180 vehicles is shown for Blisworth-bound traffic (westwards) on the Courteenhall Road. This would be the effect of a no right turn from the A508 onto the Courteenhall Road. This former traffic would be expected to still need to reach Blisworth. The vehicles might instead go through Collingtree (+46) or via Knock Lane (+40) to reach Blisworth. However the additional traffic on the latter two roads does not amount to the reduction in traffic on Courteenhall Road; approximately 100 vehicles appear to be unaccounted for. To suggest that this would be diverted onto the A43 does not answer the question as how many of these 180 actually work or live in Blisworth or surrounding areas?

6.10 Another example is shown at para 4.2. The ADC projections of 2031 traffic along Knock Lane with and without the development would significantly increase but the Stoke Road traffic would reduce. No explanation is given as to where the extra traffic goes to as there are no other adjoining roads. Additionally, the 2031 forecast without the development are also suspect (see 6.7 above). This is another example that undermines the credibility of the outputs from the NSTM2 modelling.

6.11 South Northants Council concluded that a bypass would benefit local businesses without evidencing this statement (*SNC Public Reports Pack 30112017 1415 Planning Committee Item 11, sec 10.9* – see <http://modgov.southnorthants.gov.uk/documents/g2446/Public%20reports%20pack%20Thursday%2030-Nov-2017%2014.15%20Planning%20Committee.pdf?T=10>). The BP petrol station in the village, with the combined Nisa supermarket and integral Subway food outlet, is well patronised by the local community but takes a high proportion of its trade from passing traffic. The owner has expressed concern that a bypass would be catastrophic for this business. There is also a hi-tech service garage, offering servicing & MOTs together with used vehicle sales, on the main road. Economic damage to these significant village assets would undermine the sustainability of Roade with its growing population. Their demise would be a serious disbenefit to the residents of Roade and the surrounding villages that use these facilities.

6.12 One of the two western bypass options was dropped prior to the Statutory Consultation on the pretext that there was a majority in favour of the retained route. This turned out to be 4 in favour against 1 for the alternative – hardly a landslide! (ES TR App 12.1 – TA App 20 Roade Bypass Options, para 4.6). At an exit poll from the Consultation Exhibition in Roade on 14.10.17, of the 66 people who expressed a clear preference only 14 preferred the blue, retained, route whilst 52 (79%) preferred the green route (see Addendum 3 below).

6.13 The proposed western route offers no solutions to the increasing congestion problems on the eastern side of the village, especially on Hartwell Rd and High Street. Traffic generated by the recent doubling of Roade Primary School capacity to 420 pupils, the on-going construction of 297 houses in Ashton Rd which, when completed, will add to the existing traffic from Ashton and Hartwell, and the proposed re-siting of the Roade Doctors' Surgery from current London Rd location on the A508 onto this housing estate, is all channelled down Hartwell Rd past the Primary School into the High St or Northampton Rd to access the A508. The localised traffic impact from all these does not appear to have been taken into account, despite the statement in ES TA App 12.1 – TA App 23 – NSTM2 Reference case Forecast para 2.7.1. Although this will not be fully evident for a number of years when all the developments are completed, the local impact will be severe and an opportunity missed. Another disbenefit to our community.

6.14 The congestion at Primary school opening times is already a problem as there is no off-street parking or drop-off provision for parents bringing children to school by car on their way to work. There have regularly been up to 50 cars parked along Memorial Green, Hartwell Road and Northampton Road while parents take their children in to School. At closing time, parents are required to collect their children from the teacher-supervised playground. Both these necessitate parking. The reduction in parking due to the planned zebra crossing in front of the school and recent doubling of the School capacity can only exacerbate this situation.

6.15 An eastern route was considered but discarded, the reasons given being unsubstantiated and likely to have been purely cost rather than benefit (ES TR 12.1 – TA App 20 Roade Bypass Options, para 3.10). It was admitted, however, that it would produce less noise and vibration (para 4.2). The above issues appear not to have been properly considered despite the agreement to do so at the Transport Working Group meeting in July 2016 (see Meeting 1 Notes and Actions, item 4.4, in ES TR App 12.1 – TA App 22 – NSTM2 LNVR Pt 1 - Appendix A (p75)) and the impact of future traffic highlighted in 6.13 above. This is another example of a disbenefit to the local communities.

6.16 In response to the question at the Hilton Hotel Consultation Exhibition on 9th October 2017 a consultant indicated that Roade bypass would be constructed during the *initial stages of the development*, ie before first occupation. In Doc 5.2 ES Desc and Apps App 2.1 – CEMP, p27, Appendix 01, the chart indicates the bypass would not be started until half-way through the planned construction period and completion scheduled for the end of the 3rd construction year. It transpires this had already been planned prior to the time the question was raised and is an example of consultants giving misleading verbal information to pacify the public.

6.17 The government's leading independent adviser on transport, the Standing Advisory Committee on Trunk Road Assessment (SACTRA) showed that building new roads generates more traffic and found that, in a mature economy such as that which exists in the UK, there is no given connection between providing new transport infrastructure and economic benefit: [http://www.bettertransport.org.uk/sites/default/files/research-files/A Reasoned Objection NWTAR CFBT A6MARR 171213.pdf](http://www.bettertransport.org.uk/sites/default/files/research-files/A_Reasoned_Objection_NWTAR_CFBT_A6MARR_171213.pdf)

6.18 The Campaign to Protect Rural England (CPRE), Campaign for Better Transport (CfBT), and Friends of the Earth have all published research concluding bypasses do not solve the problems but have the opposite long term effect. The CPRE have evidence from 80 bypasses surveyed so far that have not achieved their objectives. The CfBT claim bypasses encourage more traffic and eventually defeat the objectives and money is better spent on improving existing roads.

6.19 To quote from a CfBT report: *"An average road improvement, for which traffic growth due to all other factors is forecast correctly, will see an additional [i.e. induced] 10% of base traffic in the short term and 20% in the long term."* The Department of Transport accepted this: <http://stopcityairportmasterplan.tumblr.com/post/19513243412/induced-traffic-again-and-again-and-again>

6.20 The above consequences have been ignored by Roxhill's consultants and suggests that the impact of the proposed Roade bypass has been seriously underestimated. This is another example of a disbenefit.

7. A508 CORRIDOR J15 - A5

7.1 It is clear that the A508 corridor between J15 and the A5 at Old Stratford is heavily used and has not been fully considered. The proposed bypass helps to increase the volumes of traffic using M1 J15 and the A5 roundabout and does nothing to reduce the traffic on the intervening section of the A508, in fact the opposite. This particularly affects Grafton Regis and the junctions with minor roads along the route.

7.2 As previously stated in 1.4 above the NPSNN provides a clear directive that road casualties and overall improvements to road safety are an imperative.

7.3 The A508 is classified as an Active Red Route by Northamptonshire County Council. This road is divided into three sections:

2014-16 accident data

Road number	RR Number	Description	KSI	Fatal
A508	15	M1 to Roade	4	1
A508	16	Roade to Stoke Bruerne	6	1
A508	74	Stoke Bruerne to Old Stratford	10	0

(KSI = Killed or seriously injured)

Active Motorcycle Red Route data for A508 and A45

2012-16 accident data

Road number	RR Number	Description	KSI	Fatal
A508	4	M1 to Old Stratford	5	1
A45	19	Wootton to Wellingborough	5	0

<http://www3.northamptonshire.gov.uk/councilservices/northamptonshire-highways/road-safety/Documents/Red%20Route%20Guide%20-%20Phase%2019.pdf>

7.4 The left-only turns at the Courteenhall Rd junction will not prevent rat-running from the A43 via Blisworth. It is likely to worsen if the development goes ahead. It is highly likely, especially with the Towcester SUE currently under construction, that employees commuting to Northampton Gateway will use the A43 from the south and then cut through Blisworth to reach their place of work. To do so, they will have to turn right off the A43 into Towcester Road. This is a difficult at-grade road junction where many serious accidents have occurred. The fact that Highways England (and previously the Highways Authority), in conjunction with SNC, has been monitoring junctions on the A43 for several years as a consequence of the serious accidents that have occurred supports the contention that Northampton Gateway will only add to the probability of further accidents at this junction. See Area 7 MAC A43(T) At-Grade Junctions (crossovers), SNC Scrutiny Committee Report, March 2015 at:

<http://modgov.southnorthants.gov.uk/documents/b4246/Additional%20Highways%20Agency%20Information%20-%20A43%20Review%20Wednesday%2004-Mar-2015%2017.00%20Scrutiny%20Committee.pdf?T=9>

7.5 Contained within the above report is the following in the section headed Conclusions, p8:

The A43 Tiffield to Blisworth scheme be monitored to determine if collision numbers at Towcester Road and Northampton Road junctions are reduced. If collision numbers are not reduced then consideration should be given to further measures or consideration of closing these gaps.

For the report to put forward the possibility of closing this junction indicates the concern that Highways England has about the seriousness and frequency of past accidents at this location. Northampton Gateway would simply add to the usage of this junction by employees commuting to work. With the A508 and part of the A45 remaining an Active Red Route and the A43 being under close scrutiny by Highways England and SNC regarding its serious accident record, it appears likely that the creation of Northampton Gateway would add to the serious road accidents on these roads, due to the greatly increased volumes of traffic. That would be in contravention of NPSNN 4.66

7.6 The recent temporary closure by Highways England of this right turn gap to facilitate the closure of the A5 through Towcester for essential repair work will have produced a different pattern of rat-running. All A5 traffic heading north from Milton Keynes (MK) was diverted along the A508 to M1 J15. This inevitably would have resulted in more traffic rat-running through Tiffield, Shutlanger/Stoke Bruerne and on Stoke Rd, Blisworth, and Knock Lane, Roade, to take the shortest route to their destination. A recent WSP study (<https://www.southnorthants.gov.uk/info/65/local-plan-part-2-and-evidence/42/evidence-base/11>) commissioned by SNC includes a recommendation (#40 on the Action Plan, p22) to close this gap in the short (the next 5 years) to medium (5 to 10 years) term. This will produce yet another pattern of rat-running, which will differ from that forecast by the NSTM2, and result in additional inconvenience for Blisworth and Roade residents and is another disbenefit for the community.

7.7 Since the A43 was rerouted to avoid Blisworth and Milton Malsor nearly 30 years ago, these villages have become much more peaceful places to live. However, if adequate measures are not taken to prevent all employee shift traffic from using these roads, then residents' sleep patterns (particularly children's) will be badly disturbed e.g. between 05:30 - 06:30 and 21:30 - 22:30. That would be incompatible with NPSNN which states: *3.2 The Government recognises that for development of the national road and rail networks to be sustainable these should be designed to minimise social and environmental impacts and improve quality of life.*

7.8 The Woodleys Farm Children's Day Nursery business is located on the A508 S-bends between the Courteenhall Rd turn and the proposed start of the Roade bypass. It caters for up to 40 babies and children aged from 0 to 8 years between 08:00 and 19:00 during weekdays. Peak traffic is likely to coincide with their peak times for drop-off and collection. The access to the property, owned by Courteenhall Estates, on this stretch makes right turns dangerous at peak periods. Increased speeds will be encouraged as a result of the Courteenhall Rd junction Left-only turns removing the halting/slowing of A508 traffic from J15 waiting to turn in. In view of this, and the fatality in these S-bends in December 2017 and a further accident in March 2018, it is surprising that the severe hazards have not been recognised and proposals made to eliminate them. This is yet another disbenefit to the community.

7.9 The straightening of S-bends south of the Rookery Lane/Ashton Rd junction is likely to encourage speeding through this section, a concern raised by NCC LHA: *NCC noted potential concern that a bypass might facilitate traffic reaching existing PIA 'hotspots' on the A508 to the south of Roade at faster speeds. The potential for this to occur and/or be addressed via minor highway realignment should be examined.* (ES TR App 12.1 – TA App 4 – TN1 Appendix A para 4.4). The proposed ghost island at this junction is more likely to increase speeding as a result of the road straightening. Additionally, it will cause difficulties for the local farmer needing to cross the

junction to and from Ashton Rd with large, slow-moving agricultural machinery, almost certainly necessitating a diversion south along the A508 – a potential accident hazard.

20

7.10 The overall proposed bypass and additional works on the A508 corridor does not resolve the problem of sheer volume of traffic using the section between J15 and the A5. The majority of commuter traffic is likely to be associated with MK. Commuting between MK and South Northamptonshire is significant. According to the ONS Travel to Work statistics for the 2011 Census 5,631 people travel daily into MK and 1,311 travel out to South Northamptonshire. That is a total of 13,884 movements every day (TR050006-000012-Scoping OPINION, Appendix 3, Milton Keynes Council, item C. Socio-economic Impacts, item 3). In addition, the ONS statistics record an additional 12,628 daily movements between Northampton Borough and MK (see Addendum 5 below: WF01BEW - Location of usual residence and place of work [OA level]). It is not known how many of these 26,512 daily travel movements use the J15 – A5 section of the A508 corridor but, together with commuter traffic along the A45 from further north of Northampton, it is likely to be a significant proportion. It would appear that the developer has not studied these traffic movements with a view to alternative solutions for this overburdened corridor.

7.11 The Scoping Opinion for Northampton Gateway includes the following comments:

3.1 This section contains the Secretary of State's specific comments on the approach to the ES and topic areas as set out in the Scoping Report.

3.77 The Applicant's attention is drawn to the comments in Appendix 3 on issues of particular concern that consultees wish to see included in the ES:

- *Traffic impacts on the M1 (junctions 13 to 15A), southbound traffic flows on the A5, A43 and A508 and the junction of the A508, A5 and A422 by Old Stratford (Milton Keynes Council).*
- *Impacts on the A43 (Cherwell District Council).*
- *Impacts on infrastructure within Buckinghamshire such as the A422 (Buckinghamshire County Council).*
- *Impacts on the A43/A5 Tove roundabout and the A43 McDonalds roundabout in Towcester and the proposed Towcester A5 bypass (South Northamptonshire Council).*

The above is not a full listing of the points made in paragraph 3.77. See

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050006/TR050006-000012-Scoping%20Opinion.pdf>

7.12 Concern is expressed by two councils about the junction of the A5, A508 and A422 or the roads feeding into it. This junction also falls within the Highways England A5 route study of problem road junctions for 2017/18.

<http://www3.northamptonshire.gov.uk/councilservices/northamptonshire-highways/road-safety/Documents/Red%20Route%20Guide%20-%20Phase%2019.pdf> - see chapter 17.

7.13 Anyone travelling into or out of MK at peak times will know how congested this junction becomes and the significant delays that occur. The 26,500 daily vehicle movements between MK and South Northamptonshire and Northampton Borough, identified above, suggests that a high proportion of these use this section of the A508. This is the primary road access to MK for traffic approaching from the north or northwest. Roxhill's NG would only add to this congestion as both site-bound employees and HGVs will use this roundabout. Yet Roxhill appear to have relied on the recent adjustments to this roundabout which have not proved totally effective. Therefore, what will be the impact of NG-generated traffic at this location by 2031?

8. CUMULATIVE IMPACTS

8.1 This section indicates that insufficient account has been taken of the impact of other developments

8.2 Other Committed Developments

8.2.1 ES TR App 12.1 – TA App 22 – NSTM2 LMVR Pt 1 lists 506 Committed Schemes in Northamptonshire, of which 142 are in the West Northamptonshire Joint Core Strategy area, and 70 Committed Infrastructure Schemes, of which 35 are due to be completed by 2021 and the balance by 2031.

8.2.2 Roxhill has suggested that regional distribution from Roxhill's NG is likely to take place within a 25 mile radius of this site. The developer provided a map of this area in ES-TR App 12.1– TA App 7 – TN3, para 3.14, figure 1. At least one third of this area falls outside Northamptonshire and encompasses areas of Milton Keynes, Buckinghamshire, Oxfordshire, Warwickshire, Leicestershire, Bedford and Central Bedfordshire.

8.2.3 The latest version of the NSTM has been used to forecast future traffic in Northamptonshire (and some surrounding areas) in 2031 as detailed in App 12.1 – TA App 22, p5, figure 3.1. To enable future forecasting to be carried out satisfactorily, the NSTM has to be provided with input in the form of planned new developments expected for that area, including homes, businesses and public infrastructure (hospitals, schools, etc).

8.2.4 However ES TR App 12.1 – TA App 36 NSTM Reference Case Assumptions indicates that the only developments considered for the NSTM are those within Northamptonshire (ie only detailed data within the county boundaries are included rather than surrounding conurbations within a close proximity which are less detailed):

COMMITTED DEVELOPMENTS IN NORTHAMPTONSHIRE. The table below lists all of the developments which have been included in the latest NSTM model for the year 2029/2031.

This is confirmed by inspection of the data within this appendix.

8.2.5 Milton Keynes, for example, lies outside Northamptonshire but is only 15 miles from the proposed Northampton Gateway and has a significant commuter traffic interchange with Northamptonshire (see para 7.13 above). The Proposed Submission Plan:MK contained the following: *4.27 The Borough is one of the fastest growing local authorities in the UK with a large, diverse and dynamic local economy with more jobs than resident workers, resulting in net in-commuting. It has one of the highest start-up rates for new businesses of any local authority..... At £10.9 billion in 2015, the local economy is bigger than that of Northampton and Luton and approaching that of some of England's major cities such as Leicester and Nottingham.* (<https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/plan-mk>)

8.2.6 To exclude the development plans for such a fast expanding area so close to Northampton Gateway significantly undermines the validity of the NSTM2. The omission of developments planned for the edges of the neighbouring districts listed in 8.2.2 above also undermines the validity of the traffic forecasts - the traffic forecasts will be understated.

8.2.7 There is highly likely to be a shortage of suitable employees living close to Roxhill's NG. Therefore a large proportion will almost certainly have to travel further to work than has been forecast by Roxhill. This further undermines the validity of the NSTM2.

8.3 Construction Traffic

8.3.1 The proposed construction period for Northampton Gateway is 6 years with road works completing after 3 years (Doc 5.2 ES Desc and Apps App 2.1 – CEMP, p27, Appendix 01). This assumes everything will go to plan. First occupation is projected as 7 - 8 months prior to completion of the bypass. The A508 road works are planned to complete in 18 months. Any delays with the bypass – a not unlikely scenario in repetition of the difficulties encountered with the unstable underlying geological structure during its original construction - suggests a period of 6 to 12 months when Roaders and the users of the A508 will have to endure the additional construction traffic with increasing site-generated traffic. In addition, there doesn't appear to be any restriction on construction traffic using the A508 south after completion of the bypass and A508 corridor works – a period of an additional 2½ - 3 years.

8.3.2 Additional traffic flows from the site will depend on which units are occupied first. There are 7 units ranging from 530,000 to 1.191 million sq ft. If demand for mega-sheds is as strong as predicted, the largest unit could go first, especially as there is potential for the previous applicant for development on this site to come forward again.

8.3.3 Note may be taken of the traffic situation at M1 J24 where Roxhill's East Midlands Gateway SRFI is currently under construction. There are 5 major traffic routes converging at this motorway junction. This is concurrent with the M1 upgrade to 4-lane running from J23A to J25. Local traffic conditions are said to be 'chaotic' and J24 currently experiences a high level of accidents. A similar pattern could be expected at J15.

8.4 High Speed Two

8.4.1 Also missing from the NSTM2 is the planned construction works traffic for High Speed Two (HS2). This development features a major construction compound adjacent to the A43 just north east of Brackley. In addition to workers travelling to and from it, there will be 1878 additional HS2 works-generated vehicle movements per day on the A43 around Brackley, including nearly 1300 HGVs. This represents a 26% increase on the forecast 2021 traffic. (See slide P3775 (5) at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/561781/Section_F_Traffic.pdf)

8.4.2 While the peak predicted by HS2 Ltd was forecast for 2021, this may occur later as Royal Assent was granted in 2017, two years later than scheduled. Additional traffic associated with the construction will find new rat runs to avoid the worst of the hold ups.

8.5 M1 Smart Motorway

8.5.1 Highways England has announced modifications to the M1 between J13 and J16 for 4 lane continuous running. Construction is planned to start in 2018 and complete by the end of 2021. The M1 between J15 and 16 is an existing AQMA. Slow running vehicles during the re-construction phase will inevitably add to journey times. Construction vehicles will add to the pollution. The site itself is up-wind of the prevailing wind and Collingtree is down-wind across the Motorway, thus spreading noise and air pollution further. This will take place at the same time as the reconfiguring of J15, adding construction traffic to the existing traffic thus supporting the contention that Northampton Gateway is the wrong thing in the wrong place at the wrong time.

8.6 Rail Central and Northampton Gateway

8.6.1 RC is an application for an even larger SRFI on the north-western side of the Northampton Loop line. Its appropriateness is also highly questionable in view of the early stages of development of DIRFT III, with similar capacity, just 18 miles away at the northern end of the Loop line and which is not expected to be complete until 2031 at the earliest. RC poses similar traffic issues to Northampton Gateway but with potentially even greater impact due to the projected larger site-generated traffic volumes. These would be concentrated mainly on the A43, J15A, M1 and the villages of Blisworth, Milton Malsor and Collingtree. Its impact on the wider community would also be far reaching, especially as there would be no control over RC site destined and originating traffic on the A508.

8.6.2 Roxhill's Consultation document Chapter 12, para 12.8.1 states: *The updated NSTM will include for all committed development and allocated sites within the Northamptonshire area. The model also includes the committed infrastructure schemes and those highly likely to come forward before the forecast assessment year.* However the NSTM2 includes neither Roxhill's NG nor RC. Roxhill took the view that it would not be commercially viable for both to be constructed (see ES TR App 12.1 – TA App 4 – TN1, Appendix A, paragraph 5.12). However that is simply Roxhill's opinion NCC LHA, in their Response to Stage 2 Statutory Public Consultation to Rail Central (Rail Central - Stage 2 consultation response LHA.docx – see Addendum 6 below), advise that it has offered both developers the opportunity to see the cumulative effect on traffic if both Roxhill's NG and RC developments were to go ahead but *'this has not been successful to date'*. They continue:

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.*

Although the above was in response to Rail Central's consultation, it applies equally to Northampton Gateway. The cumulative impacts of the two proposals on the Strategic Road Network and National Road Network have, therefore, not been adequately assessed.

9. CONCLUSIONS

9.1 In summary, the foregoing represents numerous examples of inaccurate and misleading information including:

- a. The location of Northampton Gateway on the intersection of two major traffic routes, together with the site access design, will inevitably cause significant congestion resulting in potential safety risks to the surrounding road infrastructure, especially when the M1 is closed. DIRFT at J18 does not suffer from this problem.
- b. The lack of requirement to stress-test the NSTM2 would inevitably result in unintended consequences, especially at the site entrance, and when the M1 or A45 are disrupted.
- c. The apparent lack of robust traffic forecasting puts doubt on either the consultants' work or the NSTM2 or both, suggesting that other areas may be just as unreliable as that discovered by the SRNG traffic count.
- d. The omission of adequate cumulative impact assessments, including detailed peripheral traffic impacts such as Milton Keynes and HS2 construction traffic, compounds the foregoing
- e. Individual and overall traffic issues on the A508 corridor, an existing Red Route, are not adequately addressed and potentially would worsen.
- f. The lack of effective consultation on the traffic impact of the aggregates facility is just one of a number of other areas of failure to consult and omission of data in the final Application documents.
- g. The lack of requirements to assess the impact of a mainly road-served industrial estate compounds the potential traffic impact.
- h. The proposed bypass would result in significant net disbenefits to Roade and surrounding communities, Blisworth in particular.
- i. The total impact, especially from the significant increase in traffic, would be a severe disbenefit to all the local communities and users of the A508, A45 and J15, in particular in terms of journey times, concentrated pollution in areas already suffering, and quality of life. The NSPNN warns that traffic congestion impacts negatively on both the economy and quality of life, '*a marked deterioration in the experience of road users*', and causes '*more environmental problems*' (para 2.16). The traffic congestion around J15 is likely to be severe by the time Northampton Gateway is completed. It also contravenes the NPPF para 32 which requires all development to be refused '*where the residual cumulative impacts of development are severe*'. (see also Part A Chapter 2 Planning Compliance)

Addendum 1 – Email: Re Northampton Gateway LHA 26.04.18

From: Sim-Jones, Rob [REDACTED]
Sent: 26 April 2018 14:51
To: Alastair Inglis
Cc: Punter, Jethro; Draper, Martin
Subject: RE: Northampton Gateway

Dear Alastair,

As requested, the below provides the Annual Average Daily flows (AADT) for the links requested. These are taken from the NSTM 2031 Reference Case.

Link	AADT flow (24 hr two-way traffic flows)
A508 between Courteenhall Road and Road	18,359
A508 between Courteenhall Road and J15	21,832
A45 between J15 and Watering Lane	63,884
A45 between Wootton Interchange and Queen Eleanor Interchange	68,119

I trust this assists,

Kind regards,

Rob

From: Alastair Inglis [REDACTED]
Sent: 25 April 2018 13:29
To: Sim-Jones, Rob
Subject: RE: Northampton Gateway

Many thanks!

From: Sim-Jones, Rob [REDACTED]
Sent: 25 April, 2018 9:34 AM
To: Alastair Inglis
Subject: RE: Northampton Gateway

Good morning Alastair,

I have requested the data direct from the Gateway transport consultants. I'll revert back once they have replied.

Kind regards,

Rob

Addendum 2 – Email: Highways England response to your data requests – Ref 18710249.msg

From: Highways England [mailto:info@highwaysengland.co.uk]

Sent: 30 April 2018 15:27

To: [REDACTED]

Subject: Highways England response to your data requests - Ref: 18710249

Dear Mr Inglis

Thank you for your emails of Wednesday 28 March and Friday 2 February 2018 where you ask for data concerning the M1 at Junction 15 the A45 towards Northampton and the A508.

The A508 is not a road that falls under the jurisdiction of Highways England so unfortunately we would not be able to assist with this element of your request.

For the other roads I am advised by our data Team that much of what you seek was included in the information previously supplied.

They have added some new detail and I have attached this for you.

If you have any further requests it will assist us to assist you if you can be very specific on what statistics you are asking for and on what parts of the Strategic Road network they are for.

The Strategic road network comprises the roads that Highways England have stewardship of and can be found at the link below.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/677493/s170085_Network_Management_Map.pdf

If you have any other questions about this or any other aspect of Highways England or the motorway network, please don't hesitate to get in touch. Our customer contact centre can be reached on 0300 123 5000 or email us at info@highwaysengland.co.uk or via twitter at @highwaysengland

Kind regards

Niall O'Grady

Executive Officer

Operational Planning Team

Highways England | National Traffic Operations Centre | 3 Ridgeway, Quinton Bus. Park | Birmingham | B32 1AF

Tel: 0300 123 5000

Web: <http://highwaysengland.co.uk>

If you're unhappy with any part of the service we provide, we want to hear about your experiences so we can learn from them and improve. Please follow this link to tell us more <https://www.gov.uk/government/organisations/highways-england/about/complaints-procedure>

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Attachment to Addendum 2:

Month	Date	Event ID	Full Closure Time (Hour:Min)	Full Closure Time (Minutes)	Location
Feb-17	21/02/2017 19:16	981089	00:06		6 M1 southbound between J15 and J14
Apr-17	28/04/2017 04:29	1079866	03:34		214 M1 southbound between J15 and J14
May-17	29/05/2017 05:27	1129358	03:09		189 M1 northbound at the Newport Pagnell services between J14 and J13
Jun-17	07/06/2017 03:44	1145080	01:24		84 M1 southbound within J15
Jul-17	05/07/2017 14:17	1194170	02:57		177 M1 southbound between J15 and J14
Aug-17	26/08/2017 02:18	1279556	06:58		418 M1 southbound at the Newport Pagnell services between J15 and J14
Sep-17	11/09/2017 14:01	1306609	12:29		749 M1 southbound at the Newport Pagnell services between J15 and J14
Sep-17	11/09/2017 14:03	1306613	11:01		661 M1 northbound at the Newport Pagnell services between J14 and J15
Sep-17	19/09/2017 07:15	1319892	14:08		848 M1 southbound at the Newport Pagnell services between J15 and J14
Sep-17	19/09/2017 07:19	1319911	08:38		518 M1 northbound at the Newport Pagnell services between J14 and J15
Oct-17	11/10/2017 23:20	1360348	00:38		38 M1 southbound at the Newport Pagnell services between J15 and J14
Nov-17	03/11/2017 03:37	1400446	03:04		184 M1 southbound at the Newport Pagnell services between J15 and J14
Nov-17	13/11/2017 08:42	1416116	00:25		25 M1 southbound within J15
Nov-17	18/11/2017 22:07	1426409	00:42		42 M1 northbound at the Newport Pagnell services between J14 and J15
Nov-17	22/11/2017 00:06	1431679	08:00		480 M1 northbound between J15A and J16
Dec-17	06/12/2017 16:43	1458155	02:12		132 M1 northbound between J15A and J16
Mar-17	#N/A	N/A	N/A		#N/A
17 incidents			79hrs 25 mins		
17 incidents over 12 months. 11 result of incidents between J15 and J15 which could have affected A508. 10 incidents were at NP services.					

Addendum 3 – Exit Poll Stats - Roade

EXIT POLL for ROXHILL CONSULTATION EXHIBITION at ROADE 14.10.17		
PROPOSED SRFI		
For	2	2.30%
Against	76	87.40%
undecided	9	10.30%
Total	87	
BYPASS ROUTE PREFERENCE <u>IF</u> SRFI APPROVED		
Blue route	14	21.20%
Green route	52	78.80%
Undecided	1	1.50%
	67	

Addendum 4 – July 2016 Blisworth Rat Runs

BLISWORTH "RAT RUNS" am Tuesday 12th July 2016											
	7.30	7.45	8.00	8.15	8.30	8.45		1st hour	2-way	8 -9 am	2-way
Northampton Road IN	126	125	126	125	157	111		502		393	
LEAVING	47	61	63	87	69	79		258	760	235	817
Towcester Road IN	36	51	63	76	52	59		226		187	
LEAVING	81	85	100	72	70	68		338	564	210	560
Stoke Road IN	10	23	25	33	24	18		91		75	
LEAVING	83	76	85	100	105	97		344	435	302	487
Courteenhall Road IN	26	38	27	43	62	61		134		166	
LEAVING	34	57	48	41	32	37		180	314	110	351
Gayton Road IN	18	28	26	18	22	20		90		60	
LEAVING	15	10	13	12	10	9		50	140	31	130
BLISWORTH "RAT RUNS" pm Wednesday 13th July 2016											
	4.30	4.45	5.00	5.15	5.30	5.45		1st hour	2-way	5 -6 pm	2-way
Northampton Road IN	73	81	72	66	66	67		292		271	
LEAVING	95	121	170	156	185	154		542	784	665	936
Towcester Road IN	54	73	66	64	77	65		257		272	
LEAVING	80	66	69	73	67	65		288	545	274	546
Stoke Road IN	57	70	102	109	141	97		338		449	
LEAVING	26	35	30	26	28	21		117	455	105	554
Courteenhall Road IN	46	56	50	78	72	70		230		270	
LEAVING	33	22	18	21	28	32		94	324	99	369
Gayton Road IN	18	21	12	17	8	13		68		50	
LEAVING	17	20	26	32	27	25		95	163	110	160
Taken by:	Stop Rail Central Action Group										

Addendum 5 – Census Customer Services email 26.02.18: FW 114006CB – 2011 ONS Travel to Work stats

From: Census Customer Services [mailto:Census.Customer.Services@ons.gov.uk]

Sent: 26 February 2018 16:20

Subject: FW: 114006/CB - 2011 ONS Travel to Work stats Northampton

Good afternoon Alastair,

Thank you for your email, which has been forwarded to us from the Customer Contact Centre.

I've attached table **WF01BEW – Location of Usual Residence and Place of Work** for Milton Keynes and Northampton local authority districts.

This table was downloaded from the [Nomis website](#), a service run on behalf of ONS by Durham University. I've also attached some navigation instructions for you should you wish to explore further.

If you have any further queries please feel free to contact us again.

Please take two minutes to answer our [survey](#) and help us improve our service.

Kind regards

Caroline Batchelor

Census Customer Services Manager

Census Customer Services

Office for National Statistics (ONS)

01329 444972 (Phone)

01633 652981 (Fax)

Census.CustomerServices@ons.gsi.gov.uk

Room 4300S, ONS, Segensworth Road, Titchfield, Hampshire, PO15 5RR

Attachment to Addendum 5:

WF01BEW - Location of usual residence and place of work (OA level)						
ONS Crown Copyright Reserved [from Nomis on 26 February 2018]						
population	All usual residents ages 16 and over in employment the week before the census					
units	Persons					
date	2011					
	place of work					
currently residing in : 2011 census	Milton Keynes	Northampton				
Northampton	4,221	63,048				
Milton Keynes	77,957	2,093				
In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.						

Addendum 6 – Rail Central – Stage 2 Consultation Response LHA

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.

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 Chevrolflex 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>

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

APPENDIX A - SRNG ACTION GROUP TEAM MEMBERS DETAILS

Name	Parish	Address	Email
Rod Sellers	Collingtree	██████████ ████████████████████	████████████████████

Alastair Inglis	Roade	[REDACTED] [REDACTED]	[REDACTED]
Stephen Blyth	Roade	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]
Vivian Blyth	Roade	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]
Lyn Bird	Roade	[REDACTED] [REDACTED]	[REDACTED]
Terry Armstrong	Roade	[REDACTED] [REDACTED]	[REDACTED]
Brian Sumpton	Milton Malsor	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]
Sharon Nola	Roade	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]

APPENDIX B – GLOSSARY OF ABBREVIATIONS

Applicable to Part B only

AADF	Annual Average Daily Flow
CfBT	Campaign for Better Transport
CPRE	Campaign to Protect Rural England
DfT	Dept for Transport
FoE	Friends of the Earth
FTE	Full Time Equivalent
HGV	Heavy Goods Vehicle
HS2	High Speed 2 railway
LEP	Local Enterprise Partnership
LHA	Local Highways Authority
LV	Light Vehicle
MK	Milton Keynes
NCC	Northamptonshire County Council
NSTM	Northamptonshire Strategic Traffic Model
RC	Rail Central
Roxhill's NG	Roxhill's Northampton Gateway
SACTRA	Standing Advisory Committee on Trunk Road Assessment
SNC	South Northamptonshire Council
SOV	Single Occupancy Vehicle
SRN	Strategic Road Network
SRNG	Stop Roxhill Northampton Gateway Action Group
TP	Travel Plan
vph	vehicles per hour
WCML	West Coast Main Line
WNJCS	West Northamptonshire Joint Core Strategy
WNJPU	West Northamptonshire Joint Planning Unit