

I have worked in Northampton and lived in Roade and for nearly 40 years. I have been involved in its development on a planned and managed basis, including the developing Neighbourhood Plan. This proposal will destroy much of the benefits that these carefully nurtured plans have endeavoured to produce. Consequently, I object very strongly to the Roxhill Northampton Gateway (NG) SRFI proposal on for the following reasons:

1. National Policy:

- a) The principle objective of the National Policy Statement for National Networks (NPS-NN) strategy is to achieve modal shift in freight from road to rail by means of an expanded network of SRFIs across the regions enabling participation by new users of rail freight. (2.50, 2.54 and 2.56). With Daventry Inland Rail Freight Terminal (DIRFT) less than 20 miles away Northampton Gateway (NG) falls at the first hurdle. No case has been made to support the viability of a SRFI of similar size and so close to DIRFT which is expected to have capacity until at least 2031.
- b) The Policy also states that *it is important that SRFIs are located near the business markets they will serve – major urban centres, or groups of centres – and are linked to key supply chain routes.* (2.56). NG does not meet these criteria. Northampton is relatively small where population and industry are concerned compared to the large conurbations in the West Midlands and areas further north or the south east. The Strategic Rail Network has limited capacity which, if NG were approved and rail paths reserved for it, would almost certainly utilise capacity that would be better utilised elsewhere
- c) *Given the locational requirements and the need for effective connections for both rail and road, the number of locations suitable for SRFIs will be limited, which will restrict the scope for developers to identify viable alternative sites* (2.56 and 4.26). Roxhill has not properly assessed the alternative sites (see section 2 below).
- d) *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.* (2.50). NG is well within the DIRFT catchment area with sufficient capacity to service both the Northampton and Milton Keynes areas for the foreseeable future. NG have failed to identify any particular industry or business with a need for rail freight in this area, other than an existing aggregates facility to be moved up-line from Northampton but resulting in no additional modal shift. With DIRFT being so close on the same loop line Northampton is not poorly served.
- e) The NPS-NN (4.26) requires Applicants *to include an outline of the main alternatives studied by the applicant and an indication of the main reasons for the applicant's choice.* No information on this was included in the Consultation documents. Alternative site appraisal should precede consultation, not follow it.
- f) Roxhill's proposals achieve none of these requirements.

2. Site selection:

- a) This site was the subject of an application in December 2014 for a non-rail connected 2.7m sq ft facility on behalf of Howden Joinery Group plc. It was withdrawn in June 2015. Despite protestations that refusal would result in the company having to move out of the county, they are still here.
- b) The ExA for West Northamptonshire Joint Core Strategy (WNJCS) directed the Applicant to J16 or DIRFT for such development.

- c) The first consultation exhibition for Northampton Gateway was held in December 2016.
- d) At the Blisworth Consultation exhibition on 17.10.18, a Roxhill consultant admitted that only the Rail Central (RC) and M1 J16 sites had been considered as alternatives. This does not constitute site selection on a national level as envisaged by NPS-NN, but paying lip service when the real intention is to develop the previously identified NG site for a road-served distribution park.
- e) It appears that Roxhill's intention is to bypass local planning laws to facilitate the previous proposals for this site and funding rail infrastructure through using cheap agricultural land to fulfil forecast demand for mega-warehouses for road-based distribution as evidenced by the Savill's and Burbage Realty reports, neither of which mention any demand for rail access (see Addendum 1 and 2 and also 10. Market Demand below).
- f) DIRFT uses the same rail and road infrastructure without the problems associated with two major trunk road systems crossing each other, ie the M1 motorway and the A45/A508 corridors that would affect NG.

3. **Traffic:**

Site entrance:

The impact of the site entrance design is particularly concerning:

- a) It is proposed that there will be only a single access into the NG site. DIRFT has three access routes. The roundabout on the A508 at the site entrance has been designed for two major streams of traffic to cross each other with the potential for serious conflict. Traffic accessing the site from M1 will automatically take priority over north-bound traffic on the A508. The AM peak hour traffic is forecast (ES TR App 12.1 –TA App 5, TN2, para 8.4) as 838 vehicles entering the site, including 138 HGVs. This does not include the aggregates terminal traffic, details of which are conspicuously missing from the submitted Application documents. A local traffic count in October 2017, referred to below under A508 corridor d), recorded an average of 861 northbound vehicles during the same hour, including 64 HGVs/buses. By 2031 there will be significantly more, but just using these figures equates to the vehicles in each stream having just over 4 seconds to cross paths. Although the roundabout would be dualled, it is highly doubtful the vehicles entering would be synchronised to allow sufficient space and time for northbound traffic to pass through. HGVs are up to 5 times the length of the average car and are slow to start off from a standstill.
- b) Access within the site adds further problems. All traffic will slow down as the two lanes merge into one after approximately 100 metres. Vehicle speeds will then be further affected by traffic slowing to enter the first, and largest, unit approximately 100 metres further on. The number of vehicles needing to access this unit can be judged by the number of parking spaces: over 900 cars and 250 motorcycles / bicycles. This car park is designed solely for office staff and warehouse operatives; in other words not for commercial vehicles.
- c) The inner site roundabout is reached after a further 300 metres or so. The next entrance to a unit is located immediately on the left on entering it. Again the volume of traffic entering can be judged by the car park capacity: well over 500 car spaces and 150 motorcycles/bicycle spaces. This will have an inevitable impact on the speed of vehicles still needing to enter the rest of the site.
- d) The entrance to the third unit is approximately 150 metres after leaving the roundabout. This time on the right-hand side. This car park holds over 500 cars and 150 motorcycles/bicycles. The vehicles needing to enter will need to cross another stream of 95 HGVs forecast to be exiting the site during the M peak hour (ES TR App 12.1 – TA App 7 – TN3, para 4.9). With an

HGV coming along roughly every 40 seconds, or possibly less if bunching, there are likely to be hold ups at this point. The ripple effect back to the A508 could be significant.

2

- e) There are other factors affecting the smooth entry and exit from the site. The bus stop located on the south side of the A508 by the site entrance, together with the pedestrian controlled traffic lights to enable employees to enter the site, will bring all traffic on the A508 to a halt when activated. It might give a breathing space to traffic already past this point, but the inevitable queuing could have an impact on Junction 15.
- f) There is a single emergency entrance off the A508 with access to the site by the inner roundabout. If traffic inside the site is at a standstill due to an incident this could prevent emergency vehicles reaching where they are needed.
- g) Doc 5.2 – ES Chp 12 – Transportation, para 12.6.60 assumes the most likely shift pattern would be around the hours 06:00-14:00-22:00. The peak hour traffic assessments are based on standard highway peak hours of 08:00-09:00 and 17:00-18:00. However there is a tendency for peak periods to extend beyond each end of the standard hours due to the increasing volumes of traffic. For instance, in the absence of available statistics, a local traffic count was conducted on the A508 through Roade over 2 days in October 2017. The data collected was averaged and showed the south-bound traffic between 07:00 and 08:00 was over 20% higher than from 08:00 – 09:00 and 7% higher between 16:00 – 17:00 than 17:00 and 18:00. If a 12 hour shift pattern were to be followed, typically 07:00 – 19:00 - 07:00, then shift traffic is liable to conflict with through commuter traffic giving higher than the forecast standard peak traffic volumes. This suggests that the site access (and other junctions) have not been assessed at the busiest times resulting in design capacities being significantly understated.
- h) The impact of traffic flows within the site has not been included in the traffic modelling and is likely to lead to unforecast congestion. The mixture of HGVs, vans, cars, motorcycles, cyclists and pedestrians at busy times is likely to lead to accidents. That no stress testing of the road network is required (or has been undertaken) is a surprising omission as the impact on J15 and the A508/A45 corridors when incidents occur on the M1 can be severe. There were 17 incidents on the M1 between J16 and J14 in 2017 resulting in closure for a total of nearly 80 hours affecting the A508/A45. Diversions would have been via the designated A508/A45 corridor for all south-bound traffic.

A508 corridor

- a) The proposed 'improvements' on the A508 do not resolve the overall issues with the section from J15 to the A5 at Stony Stratford and would add traffic to unsuitable local roads.
- b) Left-only turns at Courteenhall Rd to Blisworth will divert traffic along the bypass and down Knock Lane. This will increase pollution on the edge of the village which is not currently experienced through the village. It will bring added inconvenience for residents of Blisworth.
- c) Knock Lane (a prophetic name?) is an unsuitable country lane for increased traffic. It is narrower than Courteenhall Rd and in poor condition. Although there are plans to adjust the two worst corners there are no plans to repair the general condition but instead to give an amount to NCC HA for maintenance. This is just 'passing the buck'. It would be cheaper to do it while adjusting the corners. The high verges and deteriorating edges tend to move traffic to the centre of the road, even when passing. This is more dangerous in the dark.
- d) A local count last year showed traffic on Knock Lane to carry between 62% and 75% LESS traffic than Roxhill's predicted traffic for 2031 without the NG development and associated

A508 road works (App 12.1 TA App 13, para 4,2). This casts doubt on the reliability of the NSTM outputs.

3

- e) Traffic on Stoke Rd will inevitably increase as a result of the Courteenhall Rd left-only turn junction changes by forcing it along the bypass and down Knock Lane (a prophetic name?). This will cause increased congestion in Blisworth, especially at the PM peak as Northampton-bound A508 traffic will tend to bypass a congested NG site access, as discussed above, and divert left into Stoke Rd. This will combine with the existing traffic from the A5 at Stony Stratford that uses Stoke Rd to reach Blisworth, Milton Malsor, and areas beyond.
- f) The A508 south of the Courteenhall Rd junction includes a dangerous S-bend with Woodleys Farm Day Nursery, catering for very young children, located in the middle of it. There is a difficult right turn into it now and, with the right turn closure into Courteenhall Rd, the likelihood is that traffic will travel even faster. This is a particular problem at peak hours which coincide with drop-off and collection times. There was an accident on this bend here in Sept 2017, a fatality in Dec 2017 and a further accident in March 2018. Roxhill appear not to have considered these safety issues.
- g) Straightening the bends south of Roade will encourage higher speeds as highlighted by NCC HA in the Traffic Working Group notes of 7 July 2016, item 4.4 in TA App 4, Appdx A. The A508 is already an active Red Route with 20 accidents over the 3 years to 2016. The likelihood is the proposed road works will encourage higher speeds and, therefore, more accidents rather than less.
- h) The NSP-NN (4.66) requires minimising the risk of road casualties resulting from the scheme. The potential risks associated with the site access, Woodley's Farm, Knock Lane and straightening the A508 bends south of Roade are likely to increase accidents due to congestion and/or facilitating increased speeds.

Road bypass:

- a) Roxhill appear to be pinning their hopes for approval by offering the Roade Bypass. However, there is a potential alternative which has not been considered. Further information is available if required.
- b) At an Exit Poll carried out at the Roade Consultation Exhibition in October 2017, 87% were against the NG proposal and only 2.3% in favour. A number of residents living on the A508 in Roade were against NG simply because of its greater impact.
- c) The bypass would
 - i. reduce pollution from one part of the village only to increase it in another: a currently quiet rural edge of the village.
 - ii. encourage development in-fill on the bypass with no additional infrastructure in the village to handle the resulting increase in traffic
 - iii. be likely that the village would coalesce with NG. The land is in single ownership and previously been offered for development (see SHLAA 2009 in 7b below).
 - iv. be likely to destroy a major village asset – our petrol station and supermarket, the bulk of whose business comes from passing trade which enables the local communities to piggy-back on their extensive offerings.
 - v. provide no relief to growing traffic issues on the village eastern side as a result of 297 houses being constructed in Ashton Rd, the recent doubling of the Primary School to 420 places with no off-street parking/drop-off facility, and increasing traffic from Hartwell

and Ashton. All traffic from these areas have to pass the Primary School, already a difficult area at school opening times, and funnel down the constricted High St or Northampton Rd, depending on the direction of final destination, to reach the A508.

4

- vi. result in Roade having to endure 3 ½ years of construction traffic during the NG site & J15 construction, and the M1 Smart Motorway construction
- d) Four bypass routes were considered (TA App 20, para 3.12 & 4.2) but the more beneficial eastern routes discarded without proper assessment (para 3.10). Of the 2 western routes, one was dropped following a single exhibition held in Dec 2016 outside the village, which has most to gain or lose by it, on very flimsy evidence (para 4.6)
- e) The Campaign to Protect Rural England & the Campaign for Better Transport both have significant evidence that bypasses do not achieve their objectives, but encourage even more traffic. Roade bypass does not solve the overall issues on the A508 between J15 and A5. MK – SNC and NBC commuting

Other Traffic Impacts:

- a) In Roxhill's ES-TR App 12.1–TA App 7 – TN3 is trying to make a justification for NG by such remarks as: *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* (para 2.3). No evidence is produced to support this claim. HGV traffic from Felixstowe to Northampton would have to be replaced by rail via London, a much longer route along some of the most congested rail lines. This is unlikely in view of current plans to upgrade the A45 to a continuous Expressway from the A14 to the M1 (Doc 5.2 – ES Chp 12 para 12.3.57 bullet 5). Why would a local company currently freighting goods by HGV be willing to pay the cost of double handling using rail, a more costly circuitous route over this distance? This appears to be making a case when none exists.
- b) Detailed traffic modelling is suspect. Roxhill has stated its regional distribution is likely to be within a 25 mile radius of the site (ES-TR App 12.1–TA App 7 – TN3, para 3.14, figure 1) At least one third of this area is outside Northamptonshire and includes areas of Milton Keynes, Buckinghamshire, Oxfordshire, Warwickshire, Leicestershire, Bedford and Central Bedfordshire. NSTM2 has been used to forecast future traffic in only 6 areas of Northamptonshire in detail (around Daventry, Northampton, Wellingborough, Kettering, Corby, and Rushden) with the remainder of the county and some surrounding areas in less detail and other areas (Buckinghamshire, Central Bedford, Bedfordshire, Oxfordshire, Warwickshire and Leicestershire appear to have been omitted, even though some parts are included in the distribution area. (App 12.1 – TA App 22, p5, figure 3.1). To achieve reliable forecasting the NSTM input should include detailed planned new developments expected for that area, including homes, businesses and public infrastructure (hospitals, schools, etc). However ES TR App 12.1 – TA App 36 NSTM Reference Case Assumptions only includes committed developments in Northamptonshire.
- c) 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, It 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..... and 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> para 4.27)

5

- d) 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 b) above also undermines the validity of the traffic forecasts - these will be understated.
- e) There is highly likely to be a shortage of suitable employees living close to 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 outputs.
- f) Information on the traffic and noise impact of the aggregates terminal was not made available during the Applicant's consultations nor is it in the Application documents. Their five trains a day suggests there will be a lot of HGV traffic and considerable noise.
- g) The site-generated traffic is understated on two counts. First the aggregates traffic projections have been omitted, as mentioned above. Secondly, TA App 5, para 8.4 shows site-generated non-HGV traffic as 12,286. Para 9.4 shows 9871- a difference of 2415 or 20%. The intervening paragraphs are intended to justify the validity of this mainly by using Swan Valley estate statistics and reducing the single occupancy vehicles rates. However Swan Valley is on the north side of the M1, closer to urban areas, and only achieves an 8% reduction - a difference of 1432. No evidence has been produced to support the claim that NG can achieve a significantly better Travel Plan outcome than Swan Valley.

4. Rail:

- a) Network Rail appears reluctant to confirm sufficient capacity exists on the Northampton Loop line – an essential requirement for a SRFI. This suggests that a juggling act would be required to provide even minimal future capacity for more than one proposal. Adequate capacity should be a pre-requisite
- b) The NPS-NN advises (5.117) that land instability is an important consideration. The bypass is planned to cross the WCML in Roade Cutting. This is an unstable geological area, as discovered when the Cutting was originally constructed and by subsequent land slips onto the line. Have sufficient investigations been undertaken to establish the requirements of works needed to prevent another disaster?
- c) Northamptonshire County Council (NCC) Highways Authority (HA) predicts a potential reduction in passenger rail services from Northampton Station if an additional SRFI is approved in this locality (see the Penultimate paragraph in Addendum 3). The NSP-NN (2.29) lists 4 important requirements of the Government's vision for the transport system as a driver of economic growth and social development. Rail freight comes last.
- d) The West Coast Mainline consists of 2 fast lines to accommodate 125 mph Virgin trains and two slow lines to accommodate 100 mph commuter trains together with 60 -70 mph freight trains. The lines diverge north of Rugby with the slow lanes going to Crewe and the fast lanes going to Glasgow. All trains destined for areas on the WCML north of this point need to use the same 2 tracks. That means trains running at 70, 100 and 125mph have to be

timetabled together. Using up scarce capacity on the WCML with insignificant SRFIs should not be an option.

6

- e) NPS-NN (4.89) calls for a capacity to handle a minimum of 4 trains per day of 775 metres length, if possible. NG plans to include a Rapid Rail Freight (RRF) capacity to handle up to 12 trains per day. RRF trains are typically converted 9 or 12 carriage passenger trains carrying cages for manual roll-on, roll-off usage. They do not carry containers and are used solely for 'last mile delivery' into city centres. DIRFT is already operating this system into London (DfT Rail Freight Strategy – Moving Britain forward 2016, p28). There is a concern that NG will utilise these trains as part of their target 16 trains per day combined with the 5 existing train aggregates facility which produces no new modal shift. This would be contrary to the objectives of the NPS-NN and not constitute a genuine SRFI.

5. Pollution:

- a) 24 hour working would produce unacceptable noise and light pollution for neighbouring villages. The location of the proposed aggregates facility so close to Milton Malsor and Collingtree is a particular problem for noise pollution.
- b) 62% of NG HGVs (over 2,500 daily) are predicted to pass through one or other the 2 existing AQMAs in the locality (J15 – 16 and A45 Wootton turn to Queen Eleanor junction). This will contribute to preventing these non-compliant areas from becoming compliant and is contrary to NPS-NN (5.13)
- c) ES TR App 12.1 - TA App 7 – TN3, Para 3.11 states: *In this way, a picture of the likely use of the strategic road network can be formed. For example, the data identifies a bias towards the south due to the location of Dover, London and Southampton in relation to the site.* Para 3.9 states that the split is based on current rail distribution from Southampton port, although this is not clear from the Table referred to. This suggests that HGVs will return the freight imported at Southampton port back down near to that area which smacks somewhat of Coals to Newcastle, and adding pollution not reducing it. The main purpose of SRFIs is to minimise long distance HGV final deliveries.
- d) Para 4.7 advises that HGV traffic will be split 70% national and 30% regional. However, this just perpetuates the status quo when policy objectives are to build a network of SRFI's across the regions to reduce long-distance road haulage.

6. Labour:

- a) Appropriate warehouse staff and HGV drivers are currently in short supply in the area.
- b) Local unemployment is extremely low. There are just over 4,000 claimants actively seeking work in South Northamptonshire, Daventry and Northampton Borough combine. Not many of these claimants are likely to be suitable or able to fill many of the projected 7,500 jobs, of which 55% are for warehouse operatives and drivers.
- c) This will necessitate long-distance commuting and increased pollution through existing AQMA areas.

7. Housing:

- a) The lack of planned local housing will bring pressure to develop in the vicinity adding to local fears that coalescence with Northampton will result.
- b) The land between the northern boundary of Roade up to the southern edge of NG is in the same ownership as the NG site. It was offered for development under SHLAA in 2009 and identified as capable of accommodating 1692 houses.

(<http://www.westnorthamptonshirejpu.org/connect.ti/website/searchGroup?pageaction=F&searchtermAND=S52>)

7

- c) Housing for over 6,000 are under construction at Houlton, a new town next to DIRFT, thus reducing the need to bring in new labour. No housing has been proposed to accommodate any NG employees. To rely on housing planned under the WNJCS and Local Plans is unrealistic as it will unbalance the carefully planned Strategy.

8. Open countryside:

- a) 210 hectares of country side, of which approximately 33 ha are Best and Most versatile agricultural land, will be permanently lost with no appropriate mitigation proposed.
- b) Although not officially designated Green Belt, this area south of the M1 is Greenfield and acknowledged to serve a similar function of protecting it as a 'green lung' from the urban area on the north side. It is designated an Important Local Gap in SNC saved Policy EV8 and hence NPS-NN policy 5.170 and 5.178 should apply.
- c) Existing recreational benefits of walking and riding paths will be damaged or destroyed. Is a walk around the outside of a noisy Industrial estate good mitigation for destroying a quiet walk through open agricultural land?
- d) Wildlife habitats and corridors will be destroyed with limited mitigation proposed.

9. Environmental and social impacts:

Applicants should also provide evidence that they have considered reasonable opportunities to deliver environmental and social benefits as part of schemes. (NPS-NN 3.3). It would appear that Roxhill can only claim the Roade bypass and minor works on the A508 corridor under this heading. This does nothing for the surrounding villages, such as Milton Malsor and Collingtree. The impact of the traffic and pollution, as outlined above, outweigh any perceived benefits.

10. Market demand:

- a) The NG site was the subject of an Application to South Northants Council (SNC) in December 2014 for a 2.7m sq ft National Distribution Centre (NDC) for Howdens Joinery. This company apparently has little or no requirement for rail access and distributes to their circa 600 stores daily by HGV. Their Supporting Statement to SNC makes this statement on page 8, Why Northampton, last paragraph: *If the company does not have confidence that this will be delivered in Northampton within an appropriate timescale then a relocation away from the town is accepted as being necessary, even if it would be deeply regrettable.* It is interesting to note that, 3 years later, the company is still in Northampton although with additional storage in a Roxhill property in Raunds.

- b) This followed hard on the heels of a similar request to the ExA for the West Northamptonshire Joint Core Strategy being turned down as it was considered inappropriate in open countryside and the company was directed to J16 and DIRFT. This was also in December 2014.
- c) In June 2015, Howdens withdrew their application as it was unlikely to be approved.
- d) In January 2016 Roxhill received approval for their East Midland Gateway SRFI.
- e) In November 2016, Roxhill commenced pre-application community consultations for Northampton Gateway.
- f) Roxhill are developing industrial estates in Raunds, Kettering and Northampton, so are familiar with the demand for industrial accommodation in the area. Despite this, they have provided no evidence of any new demand for the rail element in this location, an essential ingredient for the justification of a SRFI.
- g) Is Howdens waiting in the wings? A requirement for 2.7m sq.ft of industrial property would represent in excess of 50% of the NG site – a useful contribution.

8

11. Cumulative Impact:

- a) The omission of detailed planned developments in a significant portion of the proposed 25 mile catchment area understates the traffic impact
- b) The cumulative impact of NG and RC would effectively double the impact caused by NG, albeit affecting a slightly different sector of the region's road infrastructure.
- c) NCC HA have offered to run the traffic projections of both proposals through the NSTM2 simultaneously but neither have yet agreed. Failure to do this would result in inappropriate proposals for upgrading the M1 J15 and J15A junctions should both SRFIs be approved.

12. Conclusions:

- a) Roxhill's proposals fail to make a credible or compelling case for a SRFI in this location.
- b) The site access design would bring significant disruption and congestion on the region's road system.
- c) The 508 road works are likely to result in unintended consequences, affecting safety and local rat-running.
- d) The traffic forecasting is unsatisfactory.
- e) The whole tenor of Roxhill's case appears to suggest the real purpose of this Application is to bypass the Local Planning Authority in order to capitalise on the work previously carried out in conjunction with a willing land owner and a customer potentially still waiting in the wings.
- f) There are no overall benefits to the local communities
- g) In conclusion, this all amounts to the wrong thing in the wrong place at the wrong time. The proposal would not fulfil the objectives of the NSP-NN to facilitate modal shift from road to rail in far more important areas of the country

15 December 2015



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Dear Graham,

**NORTHAMPTON – MIDWAY PARK – M1, JUNCTION 16
TOWN & COUNTY PLANNING ACT 1990
WEST NORTHAMPTONSHIRE CORE STRATEGY
INDUSTRIAL/ LOGISTICS OCCUPIER DEMAND- UPDATED OPINION DECEMBER 2015**

In response to your request for advice regarding trends in occupier demand and preferred unit sizes for your scheme as set out above, I write to update you on the current market demands and trends along the M1 corridor, with specific reference to Northamptonshire and the proposals to develop land at Midway Park.

1.0 NORTHAMPTON OVERVIEW

Northampton is an historic established town, strategically located adjacent to the M1 Motorway and has flourished to serve the logistics, manufacturing and warehouse requirements of the Midlands and Greater London conurbations to the North and South respectively.

The M1 is the principal arterial road from London connecting the major Towns and Cities in a North South Axis, and is popular for many occupiers seeking and needing good speedy access to their markets.

The land at Midway Park, J16 which extends to approximately 40 hectares offers a good quality strategically located business and employment environment, with size range flexibility, deliverability and the benefit of the nearby amenities and facilities of Northampton Town centre and its environs.

The availability of this land would overcome the chronic shortage that has emerged for well located development sites in this area as indicated below.

2.0 EAST MIDLANDS MARKET SUMMARY – GENERAL

Savills 'big shed' research, which focuses on building and deals over 100,000 sq ft, indicates that there is currently 4.1m sq ft of industrial and logistics property on the market in the East Midlands, spread over 26 units. The current vacancy rate in the East Midlands is 5.25% compared to the national average of 7.62%. However 86% of this is classified as Grade B or C. Analysing supply by size shows that only 28% of the stock on the market is over 200,000 sq ft.

Long term average take up in the East Midlands is 3.93m sq ft per year across 14 deals. However for the last two years take up has exceeded this by almost 2m sq ft to reach approximately 6m sq ft, with 6.1 m sq ft transacted in 2015 across 22 deals.

Traditionally the Midlands has been the home of larger units as operators adopt a hub and spoke supply chain model however, the average deal size in the Midlands for 2015 was 218,000 sq ft against a national average of 255,000 sq ft. We see this as a direct impact of the lack of supply for larger units and therefore cost conscious occupiers have looked at cheaper locations, in the North for Build to Suit units.

Despite the commencement of speculative development by some developers, due to the continued improvement in economic conditions our research indicates that demand still substantially outweighs supply in Midlands as well as nationally and the supply of good quality distribution units over 200,000 sq ft remains very constrained.

3.0 NORTHAMPTONSHIRE SUPPLY & COMPETITION

There is currently one Grade A, existing building on the market in Northampton over 100,000 sq ft for B2 and B8 use classes. At Northampton Commercial Park, Goodman are rumoured to have let prior to completion the larger unit of circa 300,000 sq ft to Clipper (for a John Lewis contract), resulting in one available unit remaining of 161,000 sq ft, which there is understood to be strong interest in.

There is a second hand unit of 189,000 sq ft, currently being marketed at Brackmills, Northampton, however we do not believe that occupiers would consider this as alternatives to Midway Park. Further afield in the East Midlands a number of developers have speculatively developed buildings with others announced to commence shortly. However the majority of these units are under 200,000 sq ft. G. Park Daventry is the only Grade A building currently available over 200,000 sq ft in the East Midlands.

Similarly there are limited large strategic sites currently available in Northamptonshire offering occupiers a range of buildings sizes between 100,000 sq ft and 1,000,000 sq ft. As can be seen by the number of requirements for the area in section four of this report, there is a need for additional land in order to meet the increasing demand from occupiers for a significant Industrial/ Commercial Park environment. Magna Park, Milton Keynes is a prime example of this. This scheme is now fully developed, with John Lewis committing to two additional units of 650,000 sq ft in the past two years and Waitrose committing to a further facility of 950,000 sq ft. Indeed it is believed that John Lewis still have a further requirement in excess of 400,000 sq ft, where they would consider Northampton as an option.

In Northamptonshire there are few small infill sites where a single requirement could be accommodated. Matched by limited bespoke occupier requirements that could be accommodated on the smaller sites in Northamptonshire, however as per the demand schedule in addition to these requirements there remains a huge pent up demand for warehousing and logistics between 200,000 sq ft and 400,000 sq ft, where current supply is very limited.

However there are a distinct lack of sites where a number of occupiers can be located in an Industrial/ Commercial Park environment. Furthermore, critically, occupiers require an operationally effective building, namely a rectangular site with loading along the longest elevation and a continuously deep service yard with a minimum of 50 metres, which does not taper at any point.

We list below the limited options available to accommodate an Industrial/ Commercial park environment

- Phase II Pineham, Prologis have 85 acres where they can develop 1.1m sq ft
- DIRFT, Phase III, Prologis have outline consent for 7.8m sq ft at their rail connected scheme.

As can be seen by the list of current enquiries in the market demand currently massively outweighs supply in the market. The increase in speculative development in the wider market place reiterates the confidence in the demand for industrial space.

4.0 DEMAND

In contrast to the limited supply there continues to be an ever increasing level of demand, as can be evidenced by the schedule of current enquiries below. We have focused on enquiries from 200,000 sq ft upwards as we believe this is where the current level of demand is for a strategic site. (We have highlighted in bold occupiers who have a particular focus on Northampton).

c/o Bidwells	Up to 200,000 sq ft	Requirement for a frozen facility with high eaves, possibly on behalf of XPO.
c/o Brown and Lee	c. 200,000 sq ft	Manufacturer wishing to relocate from their existing facilities to one on the M1 corridor.
DFS c/o Savills	150,000 sq ft	Requirement focused on southern M1 corridor.
c/o CBRE	c.200,000 sq ft	Requirement believed to be on behalf of CAT Logistics, focused on the M1 corridor.
Chain Reaction Cycles	c.250,000 sq ft	Bicycle business wishing to locate in the East Midlands.
Amazon	200,000 sq ft+	M1 corridor/ Midlands
Abel & Cole	c.250,000 sq ft	Fruit and vegetable supplier, currently based in Andover but looking to relocate to the Midlands.
DS Smith	c.350,000 sq ft	Packaging business focused on M1 corridor
Culina Logistics	200,000 sq ft	Local occupier reconsidering their national portfolio. M1 focused requirement.
DHL	200,000 sq ft and 300,000 sq ft	DHL have two different requirements focused on the Midlands.
Cronin and Co	200-300,000 sq ft	Requirement believed to be on behalf of Canute, search area from the M25 – M1/ M6
Electrolux	300,000 sq ft	Milton Keynes occupier considering relocation options.
c/o Louch Shacklock	300-400,000 sq ft or 600- 700,000 sq ft	Size requirement dependent on eaves height. Midlands focused requirement.

Dalepak	300-500,000 sq ft	Considering the consolidation of facilities.
c/o Louch Shacklock	300,000 sq ft	Northamptonshire focused requirement on behalf of a confidential client.
c/o GVA	300-400,000 sq ft	Midlands based requirement thought to be on behalf of the MOD.
Wolseley c/o LSH	300-500,000 sq ft	Currently based at Milton Keynes but wish to expand to a larger facility along the M1
Decathlon	300-500,000 sq ft	Northampton occupier wishing to expand
Carlsberg	300-600,000 sq ft	Northampton focused requirement
John Lewis	400,000 sq ft +	Rumoured to have a further requirement in addition to their latest facility at Magna Park, Milton Keynes.
Arcadia	400,000 sq ft	M1 focused requirement.
Amazon	300-1m sq ft	Various requirements across the Midlands.
Wincanton	400,000 sq ft	Early stages of a feasibility study in the Midlands.
Travis Perkins	500- 1m sq ft	Focused west of London, however considering their options due to lack of opportunities.
Howdens c/o Burbage	650,000 sq ft	Understood to have a further requirement in addition to their facility at Raunds.
House of Fraser c/o Knight Frank	750,000 sq ft	Milton Keynes occupier looking for a second facility in the East Midlands.
B&M Stores	750-1m sq ft	Wide ranging requirement.

As can be highlighted by the list of key enquiries above there is a demand from a large range of Northampton centric occupiers as well as those that are more footloose, who will dismiss Northampton as a location if they believe there is no viable deliverable option. In addition to this there are a number of

strategic sites being brought through the planning system in adjoining and competing towns, notably Milton Keynes and Bedford.

5.0 SUMMARY

The major players that have emerged in the logistics market at present are theetailers, grocers, manufacturers and parcel operators, all of whom are actively acquiring large distribution units across the south east at present. As can be seen from Savills research the average size deal in the Midlands is over 200,000 sq ft, which mirrored by the majority of current occupier requirements in the region. A large majority of the requirements are between 200,000 sq ft and 400,000 sq ft, albeit there are requirements in excess as well up to 1 m sq ft.

At present there is only one existing building within the wider East Midlands over 200,000 sq ft, which can accommodate any of these requirements. The continued pent up demand is highlighted by the fact the many of the speculative buildings developed over the past two years have been let prior to completion. Indeed we understand that the latest scheme to be speculatively developed in Northampton has seen the developer successfully let the larger unit prior to completion and are understood to have serious interest in the remaining unit.

We believe that in the logistics market there are a number of key drivers for companies looking to locate into a new facility, namely an efficient workable site with a continuously deep service yard of 50 metres which doesn't taper. As indicated by Savills research and the current demand trends the optimum size for a building should be in excess of 200,000 sq ft. This building needs to be within easy reach of a well educated labour pool, fast access to major roads and conurbations and the ability to service the chosen market, as well as a safe and secure site. In our experience all of these key criteria are provided at Midway Park.

A constrained site that limits building size to below 200,000 sq ft and critically compromises the building and yard shape on a triangular site will not appeal to occupiers who will chose to locate to other sites outside Northamptonshire to meet their operational demands.

The Midway Park scheme design reflects the requirements of the strategic employment site identified within the Core Strategy. Furthermore the scheme design compliments the economic objectives of the plan and the proposed building scale and occupier's requirements have led us to deliver Midway Park masterplan.

Once an internal decision has been made by an occupier to acquire a significant amount of space, they then require an 'oven ready' site. One where infrastructure and planning are in place and as such a property solution can be delivered for them in a short time frame. Gazeley have benefited from this at Magna Park, Milton Keynes, where they were able to deliver John Lewis' third facility and Waitrose's facility in under 30 weeks.

To summarise, we believe that the land at Junction 16 would provide a site for much needed further B2 and B8 development in Northampton, alongside Phase II at Pineham. Without this land there is limited opportunity for existing Northampton occupiers to expand and remain in the town or for new occupiers to relocate to the area. As such there is a real risk that Northampton will lose long standing businesses who cannot expand, as well as prevent many substantial occupiers from locating in the area, who will chose accessible and available opportunities elsewhere. The demand is such that both these sites need to be available to meet occupier demand.

If a long standing occupier such as Travis Perkins, who have acquired 970,000 sq ft of space in recent years wished to expand within Northampton now, they would take out a large proportion of any existing site and as such occupiers need to be provided with both options. As per the demand schedule, Amazon, Carlsberg, B&M and House of Fraser to name a few are all looking for significant facilities in the region and currently there is not enough capacity for all these requirements.

Without Midway Park, there will be no capacity for any other existing Northamptonshire occupiers to inwardly invest or new occupiers to locate to the area and they will instead choose other feasible and quickly deliverable options available to them on the M1 corridor.

6.0 CONCLUSION

Recent market activity has resulted in a dearth of sizeable quality, well located sites in the Northampton sector of the M1 Corridor, with the result that locally established occupiers and inward investors seeking large bespoke, high quality buildings will have to look outside the area to satisfy their demand.

Our 'big shed' research indicates that the average deal size in the Midlands is over 200,000 sq ft, which is in turn mirrored by current occupier requirements in the region. A large majority of current requirements are between 200,000 sq ft and 400,000 sq ft, albeit there are a limited number of requirements in excess of this up to 1 million sq ft. As such the masterplan for Midway Park has been designed accordingly to match occupier trends and current requirements.

The scheme at Midway Park should be designed and laid out to provide a top quality solution for existing and future occupier demand and retain and enhance quality employment in Northampton rather than other localities.

We trust that the above is helpful and sufficient for your purposes at this stage. We would be pleased to clarify any aspect as appropriate.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Graham Brown", with a large, sweeping flourish extending from the bottom left.

Graham Brown
Director
National Industrial Logistics

REPORT IN RESPECT OF

SITE SELECTION PROCESS

FOR HOWDENS NEW

NATIONAL DISTRIBUTION CENTRE

1.0 Introduction

- 1.1 I act on behalf of Howden Joinery Group Plc (Howdens) which is a successful UK business and a major local employer. Burbage Realty is based in Northampton and has direct first hand knowledge of all the locations and sites referred to in this report.
- 1.2 Howdens has operated from a 1 million sq ft national distribution centre (NDC) on the Brackmills estate for a number of years. The company has recognised for some time that the dated Brackmills facility would become increasingly inadequate for the future requirements of the business.
- 1.3 The existing Howdens NDC is no longer fit for purpose and cannot accommodate Howdens anticipated growth. During recent years the business has found it necessary to take a number of external warehouse units in order to meet demand during peak periods. This is extremely inefficient and within the logistics sector there is a growing trend towards consolidation.
- 1.4 Howdens require a new purpose-built single site NDC in order to grow and operate most efficiently and cost effectively by minimising truck movements and miles travelled. The company also wishes to integrate the existing Brackmills office operations on the same site.

2.0 Requirement

- 2.1 The planning application for Howdens at Junction 15 is for a total of 2.67 million sq ft:
- 2.2 Office building - 81,000 sq ft
- 2.3 Principal distribution unit - 1 million sq ft
- 2.4 Mezzanine floor - 400,000 sq ft
- 2.5 Support distribution unit - 400,000 sq ft
- 2.6 Connection/expansion space - 279,000 sq ft
- 2.7 Further distribution unit - 500,000 sq ft
- 2.8 Gatehouses and vmu - 10,000 sq ft
- 2.9 The site area required is in excess of 150 acres.
- 2.10 Howdens regard Junction 15 as a long term strategic solution.

3.0 Site Selection Criteria

- 3.1 Howdens has always expressed the desire to remain in Northampton in order to retain the existing Brackmills workforce. Proximity to Brackmills and rapid motorway access are important determinants.
- 3.2 The site area necessary in order to accommodate the scale and format of the NDC building and other facilities required by Howdens is 150 acres.
- 3.3 Essentially the Howdens requirement is for a site of sufficient scale (150 acres) convenient for the existing workforce (ie close to Brackmills) and with excellent motorway connectivity.
- 3.4 With reference to timescale Howdens require a site where an implementable planning permission can be secured in good order to facilitate the completion of building construction and development works preferably by September 2016 and certainly not later than June 2017.
- 3.5 Howdens wish to achieve planning permission no later than May 2015. The company has confirmed a need to occupy a new larger NDC and office facility as a matter of strategic priority.

4.0 Site Selection Process

- 4.1 Howdens instigated a rigorous site search which commenced in 2010 and although the company wishes to remain in Northampton a number of locations in the region and beyond have been considered as possible alternatives.
- 4.2 Throughout the site selection process availability has been monitored at all relevant developments from Milton Keynes to the south up the motorway to Rugby and across to Peterborough on the A1(M).
- 4.3 The current position with regard to the locations concerned is as follows:
- 4.4 Milton Keynes – the Magna Park scheme is now almost full with John Lewis and sister company Waitrose having taken 3 million sq ft. The largest remaining plot can accommodate a unit of 180,000 sq ft. The adjacent Eagle Farm will provide a further 50 acres for development but with a maximum unit size of 500,000 sq ft.
- 4.5 Bedford – the largest B8 site available is the 44 acre Bell Farm. The final plot available on the Marston Gate development adjacent to Junction 13 is only 19.5 acres.
- 4.6 Northampton – the largest consented plot was at Grange Park and which has been purchased by Prologis who have a unit of 341,000 sq ft under construction. There is a planning application submitted for two units on the Pineham Extension land and with the largest potential unit providing 580,000 sq ft. I refer below to Junction 16 in Section 5.0 below.
- 4.7 Daventry – Phase 4 of the Apex Park scheme is consented but will only provide 714,000 sq ft in total.
- 4.8 Crick – the G Park scheme had planning consent for 1.1 million sq ft and has been purchased by Costco whose new national distribution centre is under construction.

- 4.9 DIRFT II – now fully committed with 2.25 million sq ft of rail linked distribution space taken by Tesco, Sainsburys and Stobart. The companies concerned chose this development primarily because of their requirement for rail. Tesco and Stobart are expanding existing operations at DIRFT.
- 4.10 DIRFT III – in July 2014 the Secretary of State for Transport granted a Development Consent Order for up to 7.92 million sq ft of rail linked distribution space at this strategic rail freight interchange. No more than 1.65 million sq ft can be occupied until the associated rail works have been constructed and are available for use. It is understood that the 1.65 million sq ft provision is intended to be on a total of 90 acres formed by non contiguous plots of approximately 10 acres, 28 acres and 52 acres. Units within the further phases can be occupied once the new rail freight terminal is constructed and operational.
- 4.11 Rugby – the largest plot remaining on the Rugby Gateway scheme can accommodate a unit of up to 850,000 sq ft.
- 4.12 Wellingborough – the Prologis Park Wellingborough West scheme at Park Farm is consented but the largest unit that can be provided is 620,000 sq ft.
- 4.13 Kettering – the largest plot remaining on Prologis Park is 21 acres. This has consent for a unit of up to 352,000 sq ft. Other schemes in the town have a maximum unit size of 150,000 sq ft.
- 4.14 Corby – the Stanion scheme is consented but substantial infrastructure is required. The site is dissected by overhead electricity lines that can only be removed at substantial cost and the largest plot available comprises a triangular 67 acres. The separate CIRFT scheme can accommodate a unit of up to 880,000 sq ft.
- 4.15 Peterborough – the 5 million sq ft Peterborough Gateway scheme is consented and the infrastructure is complete. Individual units of up to 1.23 million sq ft can readily be provided.
- 4.16 Each of the alternative locations listed above has been considered. Howdens do not regard any of them to be a viable and attractive alternative to Junction 15. The fundamental reasons for rejecting the alternatives are (a) distance from Northampton; (b) distance from the motorway; and/or (c) non availability of a site of sufficient scale and immediacy.
- 4.17 Howdens selected Junction 15 in preference to the alternative locations listed because it is the only site that offers the necessary combination of being (a) convenient to the existing Brackmills workforce; (b) immediately accessible to the motorway; (c) of sufficient scale to accommodate the Howdens requirement; (d) available; and (e) deliverable.
- 4.18 Howdens is proposing a major investment at Junction 15 in order to meet strategic business needs. The company is seeking certainty with regard to availability and deliverability. This precludes consideration of longer term and uncertain development proposals.

5.0 Junction 16

- 5.1 Prior to the Examination in Public it was suggested (by others) to Howdens that Junction 16 would be a more appropriate location for the project. The location of Junction 16 is not as attractive to Howdens as is Junction 15 but given the desire to remain in Northampton a detailed investigation of Junction 16 was undertaken.
- 5.2 Howdens had been given to understand that all of the land at Junction 16 was developer controlled but due diligence revealed that there are actually eight separate ownerships. The two developers involved have secured options from just two of the eight landowners over the course of the last decade. The situation has not changed since the Examination in Public when it was claimed on behalf of the developers and promoters of the site that the majority of the land was under control. This is not the case.
- 5.3 Problems with regard to deliverability at Junction 16 have been made clear by continuing references to compulsory purchase possibly being necessary in order to achieve land assembly. This process would have only added further to the uncertainty with regard to deliverability at Junction 16. Any suggestions that the Howdens timescale could be met at Junction 16 were and remain wholly unrealistic.
- 5.4 Proper site investigation in respect of Junction 16 also revealed significant development constraints. These include the north to south structural landscaping requirement, the traversing of the site by the Rugby to Dunstable cement slurry line which is an immovable piece of infrastructure, and the existence of two high pressure gas mains which could only be moved at substantial cost. Furthermore, the topography of the land is not suited to development of the scale and configuration required by Howdens.
- 5.5 Even if it were physically suitable and deliverable the site at Junction 16 would not have been ideal for Howdens in view of the greater distance from the existing Brackmills operations – it is only a very short and rapid journey from Brackmills to Junction 15 but a much longer and less predictable journey to Junction 16 either through Northampton (town centre or the ring road) or via the motorway.
- 5.6 From the above it will be clear that Howdens analysed the Junction 16 proposition in considerable detail before concluding that the site was neither available nor deliverable to meet the timescale and criteria set.
- 5.7 Following the Examination in Public the Inspector has issued his proposed modifications to the Joint Core Strategy proposing a substantial reduction in the scale of the proposed employment site at Junction 16 and reinforcing the total unsuitability for the Howdens project.
- 5.8 Howdens has confirmed that Junction 16 is not a viable alternative.

6.0 DIRFT III

- 6.1 Subsequent to the Examination in Public it has been suggested (by others) to Howdens that DIRFT III would be a more appropriate location for the project. DIRFT III is not an attractive alternative for Howdens. The site is 22 miles distant (a 44 mile round trip) from Brackmills and inevitably the majority of the existing and valued workforce would be lost. The company wishes to remain and grow in the locality of its existing operations at Brackmills and Junction 15 is ideally positioned.
- 6.2 DIRFT is a strategic rail freight interchange with DIRFT I and DIRFT II being fully occupied and committed. The developers of DIRFT III state that their intention is to offer their customers “the best opportunities in the market for rail served distribution facilities”. Howdens have no need for a rail served distribution facility. Clearly it would be rather incongruous for Howdens to take out almost one-third of the whole of DIRFT III and deny that opportunity to companies (for example Tesco, Sainsburys and Stobart in DIRFT II) that actually require rail served distribution facilities.
- 6.3 Howdens is not a significant user of rail freight. The NDC handles more than 5,000 individual bought-in products sourced from 200 external suppliers. These products are delivered nationwide on a weekly basis from the NDC to each of the more than 580 Howden trade only depots who order frequent and relatively small quantities of stock in a range of shapes and sizes. Each depot provides an “always in stock” service and given the inbound and outbound dynamics involved rail is completely impractical.
- 6.4 Howdens has confirmed that DIRFT III is not a viable alternative.

7.0 Milton Keynes

- 7.1 From paragraph 4.4 above it will be noted that Milton Keynes was considered as an alternative location during the site selection process. The Magna Park scheme has filled rapidly with John Lewis and Waitrose taking 3 million sq ft. The other major occupier is River Island.
- 7.2 What is interesting to note is that John Lewis, Waitrose and River Island relocated to the Magna Park development from smaller and outdated premises in Milton Keynes. They did so in order to retain and expand their workforces locally and continue to operate with their established distribution patterns and supply chains. This is precisely what Howdens is seeking to achieve in Northampton at Junction 15.

8.0 Junction 15

- 8.1 Junction 15 has been selected by Howdens because it meets all of the criteria set with the summary being:
- 8.2 the site can be developed within the timeframe to which Howdens is working;
- 8.3 all of the land required is actually under the control of the developer;
- 8.4 the site can readily accommodate the scale of facility required by Howdens;
- 8.5 there are no issues with regard to development constraints or ownership;
- 8.6 the site is accessible to Brackmills and convenient for the existing workforce; and
- 8.7 the position adjacent to Northampton offers a number of local facilities.
- 8.8 The land at Junction 16 offered none of the above attributes and Howdens has confirmed that neither that location nor DIRFT III are viable alternatives to Junction 15.

9.0 General Comments

- 9.1 The benefits of the Howdens project at Junction 15 involve:
- 9.2 650 existing 'Northampton' jobs are preserved;
 - 9.3 Business growth will provide future job opportunities for residents of South Northamptonshire;
 - 9.4 The motorway junction will be rebuilt and peak time congestion eliminated;
 - 9.5 The A508 will be dualled from the motorway junction to the site entrance;
 - 9.6 Further road improvements will be undertaken on the A45;
 - 9.7 There will be substantial business rates payable.
 - 9.8 The existing Howdens site at Brackmills will be released for redevelopment.
- 9.9 Without the Howdens project proceeding these considerable benefits will not be enjoyed.

10.0 Conclusion

- 10.1 Prior to committing to Junction 15, Howdens completed a very thorough site selection process and fully considered all potential opportunities in Northampton and the surrounding region.
- 10.2 The company has carried out a very thorough analysis and has concluded that the only site in the Northampton area suitable for the scale and format of NDC building and other facilities required is at Junction 15.
- 10.3 Securing and occupying a new NDC and office facility is a strategic priority of Howdens. The company has confirmed that the site at Junction 15 is ideal and that if planning consent is not granted a relocation away from Northamptonshire will be necessary in order to achieve the strategic objective. Howdens has confirmed that this would be deeply regrettable as the strong preference is to remain and continue to grow in Northampton.
- 10.4 The relocation from Brackmills to Junction 15 is fully approved by the Board of Howden Joinery Group Plc and a formal and binding legal Agreement has been completed with the developers Roxhill Developments Ltd.



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JEB/co/23118
12th December 2014

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

Dear Sir/Madam,

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

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

Transport Assessment

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

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

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

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

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

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

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

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Initial highway mitigation proposed

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

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

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

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

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

Road By-Pass

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

Internal Layout

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

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

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

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

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

Walking and cycling connectivity and Public Rights of Way

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

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

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

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

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

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

Public Transport

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

Rail Freight Proposals

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

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

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

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

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

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

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

In particular:

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

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

Summary

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

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Principal Engineer – (Principal Lead) Development Management

Page 5 of 5

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Summary

Northampton Gateway does not conform to a number of objectives of the National Policy Statement for National Networks. The objectives are in the name – a network of SRFIs across the regions, close to large urban areas that they serve, to facilitate modal shift from road to rail, especially in areas poorly served at present.

The site selection, as intended by the policy, was not carried out in advance, but was selected to facilitate the land options carried over from a previous application on this same site. No evidence of market demand in the area has been produced.

Traffic modelling is suspect due to erroneous and missing information and the ability of the site entrance to handle traffic effectively at peak hours and times of stress appears to be woefully inadequate.

The proposals for the A508 corridor do not address the overall issues between M1 J15 and the A5 and will lead to unintended consequences.

The Roade bypass appears to be the cheapest and least beneficial option and would result in more disbenefits than benefits and is even not wanted by many residents living on the A508 in the village due to the unacceptable impact of the SRFI and its future implications for the area

Any reduction or curtailment of expansion of passenger rail traffic from Northampton would have an adverse effect on existing commuters and future development of the area.

Pollution would be considerably aggravated in the area from too great a concentration of polluters and the stresses brought about by the lack of a suitable labour force and housing.

The environmental damage would be considerable, and doubly so if Rail Central were to be approved as well.

Quite simply it is not justified and would upset the planned balance of the region with little or no fulfilment of modal shift.