

Written Representation from South Northamptonshire Council
(to be submitted by email to NorthamptonGateway@pins.gsi.gov.uk)

November 2018

PINS Reference TR050006

IP REF. SP074

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

1. The proposed Northampton Gateway development in terms of the scale of development and the location has the potential to undermine local economy and local planning policy. The proposal represents a significant increase in employment provision which would lead to increased pressure on housing over and above provision identified in the Development Plan. The harm that will arise from the contradiction with the Development Plan in terms of the distribution of development and the balance of land uses will not be mitigated through the development proposal.. The Council as the Local Planning Authority is opposed to this proposal.
2. The following paragraphs identify issues that the Council wishes to bring to the attention of the Examining Authority.
3. These are set out under the headings of Landscape & Visual Impact, Transport, Local Economy and Employment, Noise, Cumulative Impact, and Planning Policy.

Landscape & Visual Impact

4. The existing landscape within the SRFI site will be almost entirely replaced with the urban form of the buildings, roads and rail infrastructure. The loss of this pleasant landscape together with the diversion of public footpaths would result in a significant adverse effect on the amenity afforded to users of the public footpaths. This is a significant negative impact on both the landscape character and for views into the site and within the site.
5. The M1 Is a strong barrier dividing the urban fringe of Northampton from the rural landscape and the proposed development through its green screening that runs along either side; the proposed development will transcend this to create a development presence within the hitherto predominantly agricultural landscape to the west of the M1.

6. A development of the scale proposed will have a significant adverse impact on the existing landscape character by virtue of the fact that the land in question is currently mostly undeveloped. The impact of the resulting urban form has to be assessed in the context of the relationship of the proposal with other urban forms of development which here would include the M1 motorway, the West Coast Mainline Northampton Loop railway and the urban areas to the east of the M1, (soon to be extended through Northampton South Sustainable Urban Extension), which form the edge of the Northampton conurbation. The site of the proposed Roade bypass site is also currently mostly undeveloped land to the west of Roade village.
7. The Rail Freight Interchange site is a shallow enclosed landform setting with the general aspect towards the existing urban edge of Northampton and the motorway junction. The relatively higher land along its western side and to the south (the Courteenhall – Blisworth ridge of higher ground), separate it in localised terms from the landscapes further to the west and south.
8. The principle local views into the site are thus from the edge of Blisworth, the A508 travelling northwards, Junction 15 of the M1. More distant views of the development will be possible, e.g. from the St. Crispin area of Northampton
9. The proposed visual impact mitigation relies significantly on the use of extensive earthworks with associated planting to enclose the development area. The scale of the roof scape with the rectilinear form of the buildings layout and taller elements such as the gantry crane will create a strong visual presence until the mitigation elements have matured to achieve their full effect
10. Despite the external lighting strategy there will be residual lighting glow effects due to the 24 hour operational needs of the development which will extend into the relatively undeveloped landscape west of the M1 which reducing the extent of local dark skies.
11. The areas surrounding the site are classed as lighting zone E2 defined as Rural, Low District Brightness there will be residual effects from external lighting of the development. The external lighting strategy proposed would minimise the impact and avoid significant adverse effects for the SRFI site. Street lighting around the Roade Bypass roundabouts will be clearly visible to the surrounding properties. Lowered lamp mounting heights as well as baffles fitted to the lights are proposed, however some properties surrounding the roundabouts will still be likely to experience significant adverse impact.

Transport

12. The proposal relies fundamentally upon the successful delivery of the highway improvements proposed to the strategic road network at Junctions 15 and 15A of the M1, to parts of the A45 and the A508 corridor, the latter includes the provision of the Roade bypass, to add capacity at junction 15 of the M1 and to remove existing constraints on the A45 and A508 to the south of the site.

13. The Roade Bypass and A508 junction improvements will not be in place for the first two years that the development is operational. The Roade bypass will be provided within two years of the first warehouse being occupied or within 4 years of the commencement of the junction improvements to J15 M1. During this period additional traffic travelling to/from the A508 (south) will therefore travel through Roade. Until the bypass is open, it is predicted there will be an increase of 131 two way peak hour traffic movements for the A508 south of the site access in the assumed opening year of 2021, with a small annual increase until the bypass opens.
14. Although a relatively low proportion of development traffic is expected to use the A508 to the south of the site, this section of the A508 does currently experience congestion and it is likely there will therefore be some increase in this prior to completion of the bypass; this would be a potentially negative impact both in terms of congestion and air quality.
15. Roade is has been identified as an area of sensitivity with respect to air quality. The impact on Air Quality within Roade is assessed with the Environmental Statement and this is to be considered Negligible Adverse without the bypass. It is not until the Roade bypass is opened that the beneficial effect on air quality be achieved, this is assessed as Moderate Beneficial. The bypass is thus critical to the local impact in this part of South Northamptonshire.
16. The delivery of the A508 Roade Bypass is a critical component of this proposal. Which in combination with the added capacity at J15 of the M1 and the removal of constraints on the A508 to the south of the site, will facilitate the re-assignment of traffic both associated with the proposed development and general background traffic (which is forecast to increase even without the development), onto the A508 rather than to minor roads. Without the delivery of the proposed highway works, including A508 Roade bypass there is likely to be an adverse traffic impact on the village communities within South Northamptonshire.
17. The Council would highlight the following with respect to the trip generation assumptions used in the Transport Assessment (TA) as variation in these parameters could result in adverse impacts.
18. Table 1 of Technical Note 2 in the Environmental Statement includes a summary of trip rates from 12 sites and presents an average trip rate using data from all 12 sites. The TA applies trip rates associated with the Swan Valley development which are higher than the average trip rates from all 12 sites. The Swan Valley trip rates are however lower than those obtained from the Grange Park, Marston Gate, EuroHub and DIRFT sites which in terms of location and development are more representative of the proposed SRFI site than the other sites listed in Table 1 of Technical Note 2.
19. The TA adopts indicative shift patterns of 06:00-14:00, 14:00-22:00 and 22:00-06:00. The time periods assessed in the TA are the 'typical' highway peak hours of 08:00-09:00 and 17:00-18:00. Background plus development flows may be higher at shift changeover times than during 'typical' highway peak hours. This leads to a query over whether junctions have been assessed at the

busiest times, particularly the site access (which is shown to operate close to capacity). If shift patterns were to coincide with highway peak hours, trip generation could increase significantly.

20. The TA indicates the number of daily arrival and departure light vehicle trips (circa 6,100 arrivals and 6,100 departures) and indicates that single occupancy vehicle trips represent a 92% share of total development trips. Based on the development providing in the region of 7,500 jobs, the daily number of vehicle trips seems lower than would be expected for a development where 92% of trips are made by single occupancy vehicle ($7,500 * 92\% = 6,900$). In addition to trips by employees, there would also be expected to be trips from visitors and other site users.
21. The above is significant for the capacity of the junction at the site entrance. The TA indicates a Ratio of Flow to Capacity (RFC) value of 0.82 on the A508 (north) and 0.85 on the site access arms of the junction in the AM peak hour. RFC values above 0.85 can indicate that there will be periods when congestion will occur, and overall performance of the junction becomes unstable. The site access is therefore shown to be operating at capacity at the 2031 assessment year. Given this is the only vehicle access point the site access design must safely accommodate all future traffic flows.
22. Comments received by the Council from parish councils and others highlight existing frustrations with a perceived increase in the frequency that congestion is experienced on the local road network within South Northamptonshire arising from incidents that either close or interrupt traffic flows on the strategic road network. This highlights the importance of ensuring the site access has the resilience to meet the resulting site traffic flows.
23. The highway improvement scheme at the A508/Pury Road junction does not appear to provide expected nil-detriment,
24. The SRFI site is currently poorly served by public transport provision. A limited number of bus services utilise the A508, and there are no stops within the vicinity of the development. Bus travel provides the best opportunity to ensure the sustainability of the development and presents the most realistic alternative to the car for employees.
25. The proposed public transport mitigations are therefore welcome and the extensions to existing services and provision of a commercially sustainable bus service to the site will be a positive impact providing these are effective. In this context these will need to be a 'realistic and attractive' and affordable alternative to the car, and not merely a 'reasonable' alternative, or 'relatively affordable, which are the less ambitious objectives in the Public Transport Strategy.
26. The proposed pedestrian access from Collingtree Road via public footpaths and the cycle access into the site via the M1 overbridge from Collingtree would be enhanced with the provision of a pedestrian footway to link the existing

footways at Milton Malsor recreation ground to the west and the Collingtree Road / M1 overbridge to the east) and a cycle route along Collingtree Road between Milton Malsor and Collingtree to improve walking and cycle access from this westerly direction.

Local Economy and Employment

27. The economic impact of the proposal would extend to urban areas across the sub-region. These are already subject to demands arising from existing strategic logistic facilities near Daventry, (Daventry International Rail Freight Terminal - DIRFT) and Milton Keynes.
28. The sub region is however well represented with National and Regional Distribution Centres and the logistics sector accounts for a much higher proportion of employment than that seen at the national level.
29. DIRFT is an established rail served distribution hub of national significance, the largest SRFI in the UK, with Phases 1 and 2 now successfully complete and with capacity to accommodate further growth through the permitted Phase 3, which will provided a further 7.86 million sqft of rail served warehousing and a new enhanced rail freight interchange terminal to replace the existing terminal. Located at J18 M1 this is only 18 miles distant, (20 minute travel time from the proposed Northampton Gateway RFI). The market area served and the labour force catchment will overlap that for DIRFT.
30. South Northamptonshire has a relatively highly skilled labour force and experiences low unemployment and high-levels of out-commuting by residents from South Northamptonshire to workplaces in other areas, including Northampton. This varies across the wider area with higher unemployment in other areas, such as Northampton and Milton Keynes, parts of which exhibit relatively high levels of deprivation. There are generally high levels of commuting (net in-commuting) into Northampton from surrounding local areas, including South Northamptonshire, There is also a net commuting flow out of South Northamptonshire (and Northampton) in the direction of Milton Keynes. Additional local job creation could help to reverse this outward trend, creating benefits as a result of more sustainable patterns of travel to work from South Northamptonshire and elsewhere.
31. South Northamptonshire has been able to develop the economic opportunities from growth in the logistics sector in line with other economic and social priorities. This has allowed growth in any one sector to be balanced against a range of other factors, including the distribution of development, capacity within the transport network and vehicle trips (especially HGV) to manage impacts for resident, visitors and business with respect to the quality of life, protected environments and habitats. The proposed logistics development would significantly alter this balance within South Northamptonshire
32. The Socio-Economic assessment within the Environmental Statement (ES) estimates that the proposal would create around 7400 new jobs.

33. The Study Area for the socio-economic assessment within the ES includes South Northamptonshire Council, Northampton Borough Council, Daventry District Council, the Borough Council of Wellingborough, Kettering Borough Council and Milton Keynes Council.
34. Employment activity, an important indicator of the general economic characteristics of an area, within the Study Area in 2017 was 82.8%', higher than the national average of 79.2%. In February 2018 there some 8800 people claiming benefits, in the Study Area, (2750 in Northampton and 2755 in Milton Keynes), within the Local Study Area which covers the four Parishes of Courteenhall, Roade, Blisworth and Milton Malsor less than 1% were claiming benefits.
35. The ES concludes that a significant majority of future employees at the RFI will derive from within the Study Area. It anticipates the future workforce for the RFI may be found within the more deprived areas of Northampton, the central and south side of Milton Keynes, and local areas within Daventry, Wellingborough and Kettering. An effective and affordable system of public transport is thus likely to be essential to transport potential workers across the Study Area to the workplace.
36. The Council is not convinced the assessment demonstrates the existence of the 'available and economic local workforce' which is identified as being an important consideration in paragraph 4.87 of the National Policy Statement for National Networks 2014.
37. The Council commissioned the South Northamptonshire Logistics Study in 2017. This examined the existing logistics sector and the opportunities and risks associated with growth within sector for South Northamptonshire. The report may be viewed at [South Northamptonshire Logistics Study 2017](https://www.southnorthants.gov.uk/downloads/file/3037/logistics-study-2017) (<https://www.southnorthants.gov.uk/downloads/file/3037/logistics-study-2017>)
38. This identified an established 'hierarchy' of logistics activity within the sub-region and the M1 corridor. DIRFT is an established national distribution hub, with significant capacity for further growth and the focus for the future logistics activity within the Northamptonshire. Milton Keynes also provides a major focus for logistics activity in the wider Local Economic Partnership area.
39. Logistics activity within South Northamptonshire is currently mainly within the second tier, attracting a mix of third party and direct distribution activities that have a mixed focus between regional and national distribution. The nature of this logistics activity has enabled a balance to be struck locally between the economic opportunity and other priorities.
40. The Study recognises that South Northamptonshire is strategically well positioned, in terms of existing transport infrastructure, to take advantage of growth in logistics, however to do so will require proactive interventions to develop an appropriate skilled and trained labour force and the local supply chain.

41. Future growth in South Northamptonshire should also be balanced with a range of factors, including the impact on the quality of life, open space and protected habitats, junction capacities and the impact on local employment in the area. These are critical considerations as there are significant risks to the wider economy of the District of not managing growth of the logistics sector,
Noise.
42. The M1 motorway, a significant noise generator, separates the site from receptors within Northampton. There are sensitive receptors (dwellings) close to the SRFI site within South Northamptonshire that are likely to experience adverse effects from noise or vibration during construction or when the site is operational.
43. The Council acknowledges there will be beneficial effects with regard to noise within the centre of Roade it is however concerned that there may be a significant adverse effect for three receptors from rail operations in the longer term and a number of receptors close to the Roade bypass will experience adverse noise effects.
44. Adverse impacts are expected at the receptors close to the Roade Bypass site on the western side of the village where existing levels of road traffic noise are relatively low. In particular, major adverse impacts are predicted for receptors R38a, R39 and R39a for the night-time DS 2031 scenario (para 8.6.26 and 8.6.27).
45. A number of properties will experience a moderate to major change in the magnitude of the noise change from the proposed development even with mitigation and which will exceed the night-time noise criteria recommended by the World Health Organisation (WHO) Night Noise Guidelines for Europe.
46. With regard to rail operations, a potential significant adverse effect has been identified for locations R1, R18 and R54 in 2021 and 2033. It is estimated that the number of noise induced awakenings from maximum noise levels could increase by just over one per night (para 8.5.45 and 8.5.48).
47. The Council believes protection should be offered in the form of the provision of suitable glazing and alternative means of ventilation to these affected properties close to the SRFI site and the Roade bypass site.
48. The Council is also concerned the approach adopted with respect to potential impulsivity characteristics of sound sources underestimates the assessment of L_{Amax} values for operational noise(s) from the SRFI site with respect to guidance within BS4142.. Whilst a +3dB penalty has been applied to the industrial noise sources to “account for features that may be readily distinctive; the correction that needs to be applied to the “specific sound source(s) being assessed depends on the perceptibility of the sound(s), this could be as much as +18 dB if it includes any tones, impulsivity, or has any other distinguishable acoustic features that may be recognisable in the context of the receiving environment (Section 9 of BS4142:2014 Method for Assessing and Rating Industrial and Commercial Sound).

Cumulative Impact

49. The cumulative impact of the proposal, together with other developments either existing, permitted or that can reasonably be foreseen, is also matter of concern. A significant consideration in the assessment of the cumulative impact is the existence of the similar Rail Central SRFI proposal on adjacent land and the commencement of construction of the high speed railway from London to Birmingham (HS2) which passes through South Northamptonshire which will result in increases in traffic on the strategic and local road network within South Northamptonshire during the construction phase until 2026. These are fully not assessed within the ES.
50. The Environmental Statement submitted for the Northampton Gateway DCO assesses the cumulative impacts if both RFI proposals were to be implemented. With respect to landscape character and visual impact this concludes there would be significant adverse effects, identified as being Moderate to Major Adverse. The overall impact in terms of the adverse effect on the landscape character, visual impact and for the separate identity of settlements of Milton Malsor & Blisworth of the simultaneous development of two RFIs on adjoining sites would be devastating and unacceptable. The development of both RFIs would also comprise the measures proposed to mitigate the landscape and visual impacts within each scheme.
51. With respect to cumulative highway impact, the assessment does not give a sufficient level, depth or likely accuracy to provide a robust understanding of the full highway and transport impacts resulting from both sites being delivered. This is not perhaps unsurprising given the level of information available for the Rail Central proposal at the time this was prepared. A full review of the cumulative impact of the two proposed SRFI sites is essential to a robust assessment of either proposal this must be a priority for the Examining Authority.
52. The absence of a robust assessment of the cumulative highway impacts and of a proposed mitigation scheme developed specifically to accommodate both developments has resulted in assumptions having to be made within the cumulative assessments undertaken as to the package of highway improvements that might be implemented from within both schemes, in order to undertake assessments of cumulative impacts in related matters, such as Air Quality. This is unrealistic, as the package of highway mitigation measures required, should both schemes be implemented will in all probability differ from that of any one scheme. The package of transport and other mitigation measures mitigation

Planning Policy

53. The National Policy Statement for National Networks 2014 (NSPNN) is the primary national policy guidance relevant to nationally significant (transport

related) infrastructure projects. This includes specific reference to strategic rail freight interchanges, it must however be considered as a whole to ensure proposals are assessed in accordance with all relevant regulatory regimes.

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

The Development Plan

58. This comprises the West Northamptonshire Joint Core Strategy (WNJCS), the Saved Policies of the South Northamptonshire Local Plan 1997 and the emerging South Northamptonshire Local Part 2.

59. The West Northamptonshire Joint Core Strategy includes objectives to retain and diversify the local economic base, whilst maintaining a broad balance between new homes and jobs.
60. The JCS contains justified proposals for employment to meet local needs making provision for employment development in several strategic locations including at Junction 16 M1 and to meet associated housing growth
61. It also recognises the specific wider national and regional requirements of the logistics sector through the expansion of the Daventry International Rail Freight Terminal (DIRFT). The impact of this nationally significant infrastructure extends across the sub-region e.g. the labour force catchment extends into the local authority areas of Daventry, Rugby, Northampton and beyond into Harborough and Coventry. DIRFT is some 18 miles distant from the proposed Northampton Gateway RFI and the labour force catchment will overlap that for DIRFT. The NSPNN makes clear that the “existence of an available and economic local workforce is an important consideration” and should be a priority for the examination.
62. This proposed development has the potential to undermine the adopted WNJCS in terms of both the scale and the distribution of development. The proposal represents a significant increase in employment provision which would lead to increased pressure on housing over and above provision identified in the JCS .The harm that will arise from the contradiction with the Development Plan in terms of the distribution of development and the balance of land uses will not be mitigated through the development proposal. For this reason the Council as the Local Planning Authority is opposed to this proposal.