

**NORTHAMPTON GATEWAY RAIL FREIGHT INTERCHANGE
ROXHILL DEVELOPMENTS LIMITED**

Planning Inspectorate Reference: TR050006

NORTHAMPTON BOROUGH COUNCIL

WRITTEN STATEMENT

November 2018

1. INTRODUCTION

- 1.1 This statement is submitted by Northampton Borough Council in respect of the Northampton Gateway Rail Freight Interchange Development Consent Order application, accepted for examination by The Planning Inspectorate on 15th June 2018.
- 1.2 The statement is submitted in addition to the Statement of Common Ground prepared between Oxalis Planning for Roxhill (Junction 15) Ltd and Northampton Borough Council (NBC), and the Local Impact Report submitted by NBC, and re-iterates points made therein.

2. PROPOSED DEVELOPMENT

2.1 In summary, the proposed development comprises:

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

3. SITE HISTORY

- 3.1 The site was put forward for consideration as a strategic employment site as part of the consultation process for the West Northamptonshire Joint Core Strategy. The site was considered unsuitable for allocation at the time by reason of being located in the open countryside away from the existing urban area, which would conflict with the desire to provide good linkages between existing and new communities; it was considered contrary to the aims of promoting sustainable transport modes; concern regarding impacts on access to the M1 at Junction 15 and the strategic highway network; and the site was detached from the urban area and would represent a substantial extension of urban development into open countryside with potential impacts on landscape character.

4. POLICY

National Planning Policy Statement for National Networks 2014 (NPSNN)

- 4.1 The NPS sets out the need and government policies for nationally significant infrastructure rail and road projects for England.
- 4.2 The policy sets out a vision for the delivery of national networks that meet the country's long-term needs; supporting a prosperous and competitive economy and improving overall quality of life, as part of a wider transport system.
- 4.3 Paragraph 2.37 advises, in the short to medium term, the Government's policy is to improve the capacity, capability, reliability and resilience of the rail network at key locations for both passengers and freight movements to reflect growth and demand, and maintain or improve operational performance and facilitate modal shift from road to rail.
- 4.4 Paragraph 2.40 recognises that modal shift from road and aviation to rail can help reduce transport's carbon emissions, as well as providing wider transport and economic benefits.
- 4.5 Paragraph 2.53 advises that the Government's vision for transport is for a low carbon sustainable transport system that is an engine for economic growth, but is also safer and improves the quality of life in our communities. It is important to facilitate the development of the intermodal rail freight industry. The transfer of freight from road to rail has an important part to play in a low carbon economy and in helping address climate change.

National Planning Policy Framework 2018 (NPPF)

- 4.6 The NPPF has a presumption in favour of sustainable development and seeks to support economic growth and productivity, promote sustainable transport and support the transition to a low carbon future.

West Northamptonshire Joint Core Strategy (2014)

- 4.7 The West Northamptonshire Joint Core Strategy (JCS) provides an up to date evidence base and considers the current Government requirements for plan making as it has been prepared in full conformity with the NPPF. Policies of particular relevance are:

The JCS sets out a number of Spatial Objectives which include:

- Ensuring new development promotes the use of sustainable travel modes.
- To strengthen and diversify West Northamptonshire's economy by taking advantage of our internationally well-placed location, strategic transport network and proximity to London and Birmingham.

Policy S1: The Distribution of Development – development will be concentrated primarily in and adjoining the principal urban area of Northampton.

Policy S7: Provision of Jobs – provision will be made for a minimum net increase of 28,500 jobs in the period 2008-2029.

Policy S8: Distribution of Jobs – the majority of new job growth will be concentrated within the principal urban area of Northampton.

Policy S10: Sustainable Development Principles – seeks to ensure development achieves, amongst other things, the highest standards of sustainable design; protects,

conserves and enhances the natural and built environment and heritage assets and their settings; minimises pollution from noise, air and run-off.

Policy S11: Low Carbon and Renewable Energy – major development should contribute to reductions in carbon emissions and adapt to the effects of climate change. All new non-residential developments over 500m² gross internal floorspace should achieve a minimum rating of at least BREEAM very good standard or equivalent, subject to viability.

Policy C2: New Developments – new development will be expected to achieve the modal shift targets by maximising travel choice from non-car modes.

Policy C3: Strategic Connections – the priorities to retain and enhance West Northamptonshire's Strategic connections for economic advantage are to work in partnership with, and support the relevant transport providers in order to secure the introduction of additional rail services to the wider north west for passenger and freight movements along the M6 corridor to relieve congestion on the road network.

Policy BN5: The Historic Environment and Landscape – heritage assets and their settings will be conserved and enhanced.

Policy BN7: Flood Risk – new development proposals will need to demonstrate that there is no increased risk of flooding to existing properties and is (or can be) safe and shall seek to improve existing flood risk management.

Policy BN9: Planning for Pollution Control – development proposals likely to cause pollution or result in exposure to pollution or risks to safety will need to demonstrate that they provide opportunities to minimise and where possible reduce pollution.

Policy INF2: Contributions to Infrastructure Requirements – new development should provide the necessary on and off-site infrastructure that is required to support it and mitigate its impact.

5. MATTERS FOR CONSIDERATION

Socio and Economic Impacts

- 5.1 The development of the site as a Strategic Rail Freight Interchange is broadly consistent with the strategic objectives of the NPSNN to increase the modal shift from road to rail in order to assist in the reduction of carbon emissions, as well as providing wider transport and economic benefits.
- 5.2 The proposed development would also help to deliver the Council's Corporate Plan objective to facilitate economic growth, by providing jobs that could be easily accessed from Northampton.
- 5.3 On a wider scale, the provision of the proposed development would facilitate use of the rail network for freight shipment to reduce road-based haulage movements across the country. However, this relies on the effective use of the proposed development as an inter-modal freight terminal. A failure to attract rail-related businesses could lead to warehousing occupied by businesses that are dependent only on road transport, negating the environmental benefits of the proposal.
- 5.4 The scale of the proposed development could be such that, whilst it may, to some extent reduce the distance of out-commuting from Northampton, it could also generate

more employment than the local labour market can supply, precipitating local shortages and an increase in net in-commuting to the immediate vicinity of Northampton. This has the potential to lead to recruitment difficulties for local businesses, congestion on local road networks because of long distance in-commuting and increased demand for housing in the local area that has yet to be planned for.

- 5.5 A review and update of the West Northamptonshire Joint Core Strategy is expected to start later this year, and if the development proposals are permitted, the review would likely have to make appropriate references to it and consider it as part of the sub-regional and local economy.

Landscape and Visual Impact

- 5.6 The Council acknowledge that it will not be possible to entirely eliminate views of the proposed development from visual receptors in Northampton, however, subject to the early implementation in the development process of the proposed earthworks and landscaping mitigation measures proposed, it considered that visual impacts would be limited to a small proportion of residential properties in Collingtree, and that the development would be seen in the context of the M1 corridor, such that the overall visual impact within the Borough would not be significantly adverse.

Heritage Assets

- 5.7 The Council is satisfied that the proposed development, subject to the bunding and landscaping mitigation measures proposed, the development would not lead to any significant adverse impact on the setting of Collingtree Conservation Area and any listed buildings therein.

Air Quality

- 5.8 The assessment of the likely impacts on air quality includes consideration of Air Quality Management Areas (AQMAs) within Northampton Borough. The development is predicted to have some marginal adverse impacts in some AQMA and is predicted to provide some marginal benefits in other AQMA.
- 5.9 The proposed SRFI development could enhance national efforts to reduce air pollution and other emissions from transport by increasing the use of rail for the long distance transport of freight, resulting in reduced emission miles from HGVs across the road network. However, there will be some emission increases on the local Northampton road network and some improvements to air quality where traffic flows are improved.
- 5.10 The Council are in discussions with the Applicant with regards to appropriate air quality mitigation measures as detailed in the submitted Local Impact Report to ensure the development proposals are in accordance with the objectives set out in national policy and local policy for a low carbon sustainable transport system and to help reduce carbon emissions.

Noise, Vibration and External Lighting

- 5.11 The Council is satisfied that, whilst there will be residual effects from external lighting due to the current rural character of the site, subject to agreement of an appropriate Construction and Environmental Management Plan to appropriately mitigate impacts during construction, and agreeing external lighting details for the operational phase, and the early implementation of the proposed bunding and planting during the development stage to assist in mitigating noise impacts, the impact within Northampton

Borough can be appropriately mitigated such that the impact would not be significantly adverse.

Contamination

- 5.12 No significant impacts with regards to contamination have been identified.

Transport and Highway Impacts

- 5.13 The Council are aware that Northampton County Council Highway Authority in their Statement of Common Ground (SoCG) are broadly in agreement with the proposed highway mitigation measures as set out in their SoCG, and that subject to the satisfactory securing of the highway mitigation strategy and the associated mitigation to be delivered by the Travel Plan and Public Transport Strategy, the Highway Authority are satisfied that there would be no significant adverse residual highway impacts associated with the development.
- 5.14 Notwithstanding this, the Borough Council is concerned that the potential impacts of additional vehicle movements on the local road network have not been fully taken into account, particularly in the context of planned and committed housing growth in the area at Collingtree and Hardingstone. It is our view that, measures need to be incorporated to ensure that heavy goods vehicles do not rat-run through residential areas. West Hunsbury Parish Council has also indicated their concerns to the Council in respect of traffic congestion and issues of rat-running.
- 5.15 Notwithstanding the conclusions of the submitted Rail Reports, in particular the 'West Coast Main Line south of Rugby: capacity for additional freight', by Victra Railfreight, this Council is concerned to ensure that the additional freight traffic on the Northampton loop railway does not impact adversely on the availability of paths for passenger trains.
- 5.16 In its submissions on East–West Rail, Northampton Borough Council has expressed support for proposals for the Marylebone / Old Oak Common – Bletchley – Milton Keynes element of East – West Rail to be extended to Northampton to facilitate further economic growth in the borough to increase its contribution to Government's ambitious targets for housing and employment growth in the Oxford – Cambridge Corridor. Additionally, this Council supports the submission of a Growth Deal for West Northamptonshire which would include a significant uplift in housing provision over the period 2019 to 2050, which has the potential to involve a small number of new settlements including some on a proposed North – South line running north of Northampton.
- 5.17 Victra's report does not include assumptions for either of these potential additions to passenger services.
- 5.18 It is also noted that Victra's conclusion on the availability of freight paths following the introduction of services on HS2 is, in part, predicated on the assumption that fast commuter trains running from London to Milton Keynes and beyond will have more paths available on the fast lines of the WCML. However, it should be noted that, because the fast lines do not run through Northampton, this Council would not support any diversion of trains from the slow lines that would result in a reduction of the existing level of passenger services calling at Northampton, so it is not safe to assume that this consideration would result in a significant increase in the number of paths available for freight trains on the Northampton loop.

Cumulative Impacts

5.19 The Council are mindful that there is an existing consent for the expansion of DIRFT Phase 3 at Daventry, and that, in addition to the SFRI proposed under the Northampton Gateway scheme, an application has been submitted for the Rail Central project on the adjacent site, albeit this has not yet been accepted for examination. The Council would request that the Inspector gives appropriate consideration to the cumulative impacts arising from these developments and as to whether this raises any issues in respect of over-provision of such facilities within area.