

**Stop Roxhill Northampton Gateway (SRNG) responses to Roxhill's Doc 8.9 Applicant's responses to Other Parties' Deadline 2 submissions (PINS doc TR50006-000983) and matters raised at ISH2 and others.
(PINS Ref TR050006. SRNG ID 20011012)**

ExQ1.0.6:

It appears the traffic, noise and vibration information relating to the aggregates terminal was available prior to the end of Consultation 2 after all. However, our major concerns are that these issues should be studied carefully by the ExA in relation to their impact on neighbouring settlements and the 5 daily aggregates trains, which are heavier and noisier than standard intermodal trains, should be excluded from meeting the 4+ trains per day required by NPSNN. They will not achieve the modal shift that policy requires, just a transfer of an existing operation a few miles up the track.

1. ExQ1.0.9:

The Applicant's response is incorrect. The principles of EV8 *are* reflected in the proposed SS2. The revision merely specifies the principles more clearly. Essentially that means maintaining the individual identity of towns and villages without any significant loss of open countryside between them. Clearly Northampton Gateway does not meet this requirement. EV8 is still valid, as the Local Plan Pt 2 has not yet been adopted and is still subject to change. The significant point is why would SNC remove the protection of an important local gap for no apparent reason if its revised policy did not cover it and add to its definition at the same time.

2. ExQ1.0.11:

It makes sense to put offices on a mezzanine to give more working floor space at ground level. This is a not an uncommon feature in industrial estates. It also seems obvious that Gazeley have stated 'up to five' mezzanines to demonstrate the versatility of the building and are able to promote the advantages of more than one mezzanine, thus stressing the height of the building which is similar to those in the Applicant's proposals. This could increase the traffic, both HGV and employee, generated by additional mezzanines.

3. ExQ1.0.17:

Roxhill's Doc 8.8A Appendix 1 describes alternatives considered to alleviate traffic through Roade. It omits another potential option. There are currently 16,500 2-way daily vehicle movements on the A508 through Roade. The ONS 2011 census Location of Usual Residence and Place of Work statistics recorded 20,198 daily vehicle movements between Milton Keynes and the combined areas of South Northants and Northampton Borough Councils. How many of these use the A508 may well have been recorded in Roxhill's traffic monitoring, but are not published.

M1 J14 is a known bottleneck and avoided by many commuters who would otherwise travel via M1 J15 if it the bottleneck were remedied. A high proportion of accidents between J15 and J14 that close the motorway occur at Newport Pagnell (NP) services. This suggests an upgrade is required to resolve. The service area is immediately adjacent to the north-east corner of the Milton Keynes road infrastructure and has the potential to be upgraded to a J14A. M1 J13 – 16 is currently being upgraded to 4-lane permanent running, resulting in a 33% capacity increase. The combination of all these factors indicate a strong case for further work to assess the impact that upgrading the NP service area to a motorway junction would have on the A508 corridor between J15 and the A5.

We have not argued that a J14A would avoid the necessity to upgrade J15. The SRFI development should be judged on its merits alone, not on the provision, or not, of a bypass around Roade. The bypass is intended as mitigation and is a consequence, but not part, of the proposed SRFI.

A further issue with the bypass, raised in our WR Pt B, para 6.12 – 6.15, is the proposed route would be the least beneficial for the village. A robust justification does not appear to have been, nor any consultation, undertaken with regard to the more beneficial eastern route.

4. ExQ1.7.3:

The last sentence in the Applicant's response confirms the issue. The visual impact cannot be assessed if the final bund height is not known.

5. ExQ1.8.1:

In Doc 5.2, Appdx 8.5 the figures shown under *HGV manoeuvres and loading/unloading* include the aggregates terminal figures with those for the Intermodal Freight Terminal. This is unsatisfactory, as it gives no indication of the number of HGVs associated with the aggregates terminal compared with the intermodal terminal. The number, size and frequency of the aggregates trains is not stated. This is important for understanding the relative scale of the traffic, and hence noise, it generates compared with other activities. It would appear that Roxhill are aware that both are greater than the other activities and wish to hide this amongst the general statistics.

6. EXQ1.8.20:

There is no certainty the new noise reduction proposals will be introduced in 2043 or how significant the required reduction will be. There would be 22 years between the date the development is forecast to open (2021) and the new rolling stock being introduced after the regulations come into force and probably a further 10 years to become effective as old stock is scrapped or refurbished. This could take us well into the 2050s. This is an unacceptably long time to expect unmitigated noise to be tolerated.

7. ExQ1.10.6:

The paragraphs in Chapter 3 referred to in the Applicant's response only cover the Methodology of Temporal scope and Magnitude of effects.

Referring to the Applicant's response to this question in Doc 8.2, p138, items iii), iv) and v), the Applicant states 11,000 people commute out of South Northants and over 5,500 are claiming benefit in Northampton and Milton Keynes. That there are nearly 1000 current job vacancies for warehouse operatives in this area indicates that sufficient people with appropriate skills are not available for existing businesses, let alone for a further c.4,000 predicted for Northampton Gateway. This type of job is obviously not attractive to local job seekers. With Brexit looming, this situation could worsen if EU nationals currently employed in the industry return home. DIRFT could be expected to experience a similar problem. It would be counterproductive to allow two, possibly three, SRFIs competing for similar numbers of currently non-existent employees. This would doubtless increase competition with existing local businesses with the attendant impact on their ability to thrive.

8. ExQ1.11.6:

The ANPR system may well work well in London, but HGVs have restricted access there and the liability lies with the registered owner not a third party.

Our concerns are two-fold:

- i) No information has been made available as to the mechanism for identifying a foreign lorry turning south along the A508 via J15 and relating it to a particular tenant. To rely on GPS would require appropriate tracking devices fitted to all HGVs. This is unlikely to be controllable for foreign vehicles or short-term rental vehicles.
- ii) No information has been made available covering cases of closure of the M1 impacting on the A508 and J15 to the extent that the right-turn barrier is raised. There is no information on how, and by whom, this would be controlled. With 11 such closures of the M1 in 2017, this is not an uncommon occurrence. This is likely to lead to unintended consequences and leaving it up when not required.

9. ExQ1.11.19:

- i) The Applicants statement 12.3.10, under heading NPSNN in Appendix 17, quotes NPSNN paras 2.19, 2.43 and 2.44 all of which are intended to reduce road haulage. Northampton Gateway may facilitate some modal shift, but only about 20% of freight movements is forecast to be carried by rail. Indeed, Rail Central has forecast less than 10% (see item 18 below). It is considered that the primary attractions of this location are that it is the centre of the country's Strategic Road Network for National Distribution Centres (NDC), ie road haulage, and, as a result, there is strong demand for NDC warehousing. This is evidenced by the sheer size of the warehouses proposed as well as the references to 4½ hour drive-times for HGVs.

It is interesting to note the Editor's independent assessment of the clustering of SRFIs in the Midlands in the January 2019 edition of Railway Magazine, included with Mrs Lyn Bird's Deadline 4 submission *Research into Northampton's Air Quality Management Area's (AQMA's) and the location of Hospitals and GP Surgeries*, Appendix ii

- ii) 12.3.11: there is obvious misinterpretation of the definition of 'across the regions'. 'Regions' is plural. If it was singular, then Roxhill might have a case. DIRFT is also in this region and, being larger than the proposed Northampton Gateway and with capacity to at least 2031, by definition must satisfy the requirement for this region. '
- iii) 12.3.12 also refers to NPSNN para 2.56 which states there is "...a compelling need for an expanded network of SRFIs", ie not just a network but an **expanded** network. Northampton Gateway does not meet this requirement.
- iv) 12.3.13: It is notable that the TA goes on to state in para 8.8 that the agreed times for assessing the development highway impact were the standard peak hours of 08:00-09:00 and 17:00 to 18:00. ES TR App 12.1 – TA App 2 states at para 8.4 that shift patterns create different peaks and these occur over a 15 minute period either side of the shift change hours of 06:00 – 14:00 – 22:00. 50% of employees are predicted to be warehouse employees. That is 1250 for each shift entering and leaving over a half hour period. This equates to 42 per minute – one every 3 seconds each way. These would have to contend with the A508 traffic being stopped for pedestrians crossing from the bus stop. This is a problem resulting from a single site access and reinforces our position stated in our WR Pt B, Chapter 3.

10. ExQ1.11.31:

As the 5 aggregate trains-per-day are currently in existence, the corrected aspiration is for 11 standard intermodal trains. Aggregate trains are roughly half the length of standard intermodal trains and should not be included in the minimum 4 trains per day required by the NPSNN as they do not bring any new intermodal activity.

PINS ISH2 19.12.18

11. Knock Lane traffic:

Alexander Booth, QC for Northampton Gateway, was incorrect when he claimed at the ExA ISH2 hearing that the SRNG traffic count on Knock Lane (SRNG WR Pt B para 6.7) were higher than normal due to rat running caused by road works at the A5 Stony Stratford roundabout. The SRNG counts were taken in November 2017. The works to the A5 roundabout did not commence until January 2018, confirmed by Highways England email ref CCC Log 18955516 in Appdx 1 below.

This means that our Knock Lane figures are more likely to be representative of the current situation. The increase in traffic in Knock Lane would be over 40% higher during the two peak hours. The impact on Stoke Rd into Blisworth would be correspondingly higher and, contrary to the figures quoted in ES TR App 12.1 – TA App 13 para 4.2, would not result in any reduction in traffic flows, but rather an increase for all peak hour periods over the 2031 D1 Reference case. The impact on the road into Blisworth and the junction with the High Street would be considerable. Current experience at peak hours illustrates this. The works proposed in Knock Lane and Stoke Road do not eliminate the basic problem of this narrow, dilapidated country lane which is not a suitable alternative to Courteenhall Road.

This confirms our contention, as highlighted in our WR Pt B Chapter 2, that there are a number of instances of flawed traffic modelling in the Northampton Gateway Application.

12. Highways SoCG:

It was mentioned at the ISH2 hearing regarding Knock Lane traffic that an addendum to ES TR App 12.1 - TA App 13 TN8 A508 Corridor had been issued. The only copy found on the PINS website is dated 18.01.17. If subsequent figures have been produced these need to be available for public scrutiny as they may invalidate the Highways SoCG signed with NCC Highways Authority on 30.07.18.

13. VISSIM modelling:

It was stated at the ISH2 hearing that VISSIM only recognises front axles and explains why two vehicles can appear to be in the same space at the same time. This must mean that technically some are in the same space at the same time as the software is unable to identify the length of each individual vehicle. This is important as an HGV cab as much as 6 times the length of a car. This confirms our contentions stated in our Deadline 2 Response to Applicant's Doc 8.7 SRNG Pt B, para 3 that it would be unsafe to rely solely upon this software for assessing the safe performance of such a critical junction.

Dr John Davies, an experienced expert in visual simulations, has expressed the same views. See his Reply to RR-742 – Roxhill Doc 8.3 (PINS Doc 989)

Is this a case of the client having to accept the perceived superior technical advice of a supplier of complex software algorithms?

14. GRIP levels

It was stated at the ISH2 hearing that Northampton Gateway has only reached GRIP 2 and claimed that this is sufficient at this stage.

A S51 advice letter published on 21 Feb 2017 on the PINS website for Rail Central states *With the above in mind, the critical consideration for a developer is to seek to provide an Examining Authority (ExA) with sufficient information and detail for them to be able to understand and assess the impacts of a scheme; if an ExA was unable to do this there would be a high risk that they could not recommend that consent be granted for that scheme. GRIP stage 3 relates to option selection, and GRIP stage 4 relates to single option development. If a developer had not reached a conclusion with Network Rail on a single option development (GRIP stage 4) this could present a greater high risk approach, as it could complicate the ExA's ability to assess the potential impacts of the scheme.*

(<https://infrastructure.planninginspectorate.gov.uk/projects/east-midlands/rail-central-strategic-rail-freight-interchange/?ipcsection=advice&ipcadvise=fa85cd29e0>). It would

appear that PINS have already considered this in the light of two simultaneous SRFI proposals coming forward adjacent to each other and concluded that the achievement of any stage below GRIP 4 would be unsafe in these circumstances. The fact that two adjacent SRFIs are being proposed simultaneously is a unique situation and must mean that the risks of them failing to achieve Government objectives are considerably increased. That the ExA requested an explanation of the GRIP process suggests that they may not have been fully aware of the implications of not achieving GRIP 4.

We are surprised that Network Rail was not required to attend ExA hearings when they are an essential component of the final decision. This allows statements, such as the above example, to go unchallenged.

Others:

15. Woodleys:

We reported a number of accidents on the A508 outside the Woodley's Day Nursery in our WR Pt B, para 7.8. Further accidents have occurred since then on these bends, including a fatality, and resulted in new electronic signage warning of 'tight bends' and additional temporary roadside warning triangles being placed before the bends on either side of Woodley's. On 3/12/18 a car crossed the carriageway and landed on its roof in the ditch demolishing hedge and bushes. On 4/12/18 a multi-car accident on these bends resulted in a fatality. This reinforces the need to improve safety on these bends, especially for parents and youngsters entering and leaving Woodley's Day Nursery at peak hours. It is only a question of time before a child is involved in an accident here. Please see our WR Pt B, para 7.8

16. Footpath RZ3:

We are concerned to see in DCO Application Doc 2.3D of 24.04.18 the lack of a safe crossing via a bridge or underpass across the proposed Bypass for footpath RZ3 which will have an unmitigated impact. It is forecast that in excess of 20,000 vehicles would use the A508 bypass daily by 2031. The potential danger resulting from this significant increase is likely to deter walkers, especially with dogs, the young and/or the less mobile. This effectively would result in the circular walk KZ10, RZ1, RZ2, RZ3, KZ9 to KZ18 with options to return to KZ10 or other parts of the village being, at best, disrupted or, at worst, no longer possible for many.

17. Intermodal traffic

Mr Nick Gallup of Intermodality, rail adviser to Rail Central, remarked at an open meeting that about 10% of traffic generated by Rail Central would be carried by rail and that this is the norm for SRFIs. This is supported by a letter dated 14.07.17 from Rail Central (see Appendix 2 below) which indicates that of 9,365 daily HGV movements generated by the site only 730 would be moved by rail (7.8%). This includes a forecast of 400 HGV movements that remain within the site and would result in the remaining 8,606 HGV movements having no connection with rail freight. This is a colossal impact for the local road network to bear and hardly represents modal shift on the scale one should expect from a *Strategic RFI*.

18. Cumulative impact:

The Highways SoCG Doc 8.5, para 3.8 states *The NSTM2 provides an appropriate basis for the cumulative impacts of the proposed Development in combination with other defined committed and allocated land uses and infrastructure schemes to be assessed. Both the baseline and forecast NSTM2 models are approved as fit for assessing proposed development traffic impacts.* Roxhill's Scoping Report included a commitment to assess the cumulative impact of Rail Central (5.1.13 – 15) but has not availed themselves of the offer from Northamptonshire Highways Authority (NCC LHA) to run the traffic modelling through the NSTM2 in conjunction with the Rail Central data. This is obviously a concern for the Highways Authority who considers that *It would be unacceptable in highways terms therefore to permit both sites without such an assessment having been undertaken, and the appropriate mitigation being secured to mitigate the cumulative impacts.* (See our WR Pt B, para 8.6.2).

Doc 5.2 ES TR App 12.2 TN12, para 2.3 notes that as the DfT Circular 02/2013 only requires committed and allocated schemes to be considered this was not included for Rail Central in Northampton Gateway's cumulative traffic assessment. This suggests that the cumulative traffic assessment proposed by NCC LHA would produce a different outcome. The fact that Northampton Gateway is ahead of Rail Central by several months in the examination process indicates that this needs to be resolved prior to the ExA making its recommendations to the Secretary of State.

APPENDIX 1

From: Howland, David [mailto:David.Howland@highwaysengland.co.uk]

Sent: 31 December 2018 10:37

To: 'Alastair Inglis'

Cc: Area 7 Enquiries; Sharp, Rhian; Wagstaff, Simon; Bourke, Jason; 'Paul Devine'

Subject: CCC Log 18955516. Information request A5 Old Stratford Roundabout.

Alastair

In response to your query of 20th December regarding the aforementioned scheme I can advise on the following:

The works effectively commenced on 8th January 2018 and were ongoing until 19th October 2018.

Main works were undertaken using lane closures on the roundabout and occasional road closures of roads approaching the interchange. All these works took place during off peak hours (20:00hrs-06:00hrs) on week days. There were a number of phased closures on the roundabout itself for resurfacing work which took place between May and July. All these works were undertaken at weekends only, from 20:00hrs on Friday until 06:00 on Monday. There were no weekday closures during daytime hours for any part of this scheme.

Please be advised that further works have to be undertaken to complete this project which are being planned for early in 2019 at dates to be agreed. These works will be notified in advance and will be carried out under similar constraints to those previously advised for the main scheme operations.

I trust this answers your queries. If you require further information please do not hesitate to contact me on this email address.

Regards

David Howland IEng FIHE

Construction Project Manager.

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14/07/2017

[REDACTED]

Dear [REDACTED]

Re. Rail Central – freight and highways modelling

Thank you for your e-mail of 1 July. I have raised the points you mentioned with the project team and wanted to come back to you.

It remains the case that I would recommend you review the information that will be presented for the formal Phase Two consultation this autumn and upon which Rail Central will be formally consulting. Within the NSIP process, this is the prescribed way for information to be presented and feedback sought. For Phase Two, we will be presenting updated Preliminary Environmental Information in the form of a draft Environmental Statement (ES). There will be chapters and content that relates to rail use, freight distribution and forecasts, highways, and associated access and network information. You will be able to review that body of information and comment upon it, as you wish. Comments received as part of the formal consultation will be logged within a Consultation Report and, as applicant, Rail Central will need to demonstrate that it has reviewed and had regard to comments in line with the NSIP process.

I appreciate your interest in understanding more of the detail of the scheme and, as I say, I would recommend that you review the information presented at Phase Two consultation. This is scheduled to take place in the autumn and dates will be confirmed to the LLG as well as advertised when fixed.

With regard to your questions and to assist with information that will help you to understand the approach we are taking in advance of the Phase Two consultation, it might be useful for you to note:

- Forecasts for freight movements at Rail Central (both road and rail) have been estimated using the Great Britain Freight Model (GBFM), a comprehensive freight forecasting tool developed by industry-leading consultants MDS Transmodal. For your information, the GBFM also forms part of the Department for Transport's National Transport Model (NTM), and it was also utilised to produce rail freight demand forecasts for Network Rail. These forecasts are continuing to inform Network Rail's long-term planning process.
- The road freight forecast figures produced by MDS Transmodal are being used by TPA (highways consultant for Rail Central) to inform an overall understanding of potential vehicle movements on both the strategic and local road network, and therefore to inform scheme design and mitigation design.
- TPA is working closely with Northamptonshire County Council (NCC) and Highways England to ensure that the proposals for Rail Central are developed in line with standards and guidance – it is using a robust and recognised methodology.

Cont....

As an outcome of this way of working, comprehensive information will be presented at Phase Two to address the questions and points you would like to know more about.

In advance of that, you may find the following helpful to assist with your understanding of how we are modelling the scheme.

i) We are forecasting that 165 loaded intermodal units (containers) per day will arrive at the Rail Central intermodal terminal by rail, but will then be delivered by road to off-site warehouses/factories in the wider Northampton area. Likewise, 165 loaded intermodal units per day will arrive at the Rail Central intermodal terminal by road from off-site warehouses/factories, but will leave Rail Central by rail. Including empty re-positionings (for operational reasons, some HGVs will leave the site with loaded containers but then return empty and vice versa), we are forecasting 289 inbound and 289 outbound movements by road associated with servicing off-site warehouses/factories. Demand for this activity is ultimately driven by the quantum of industrial floor space and related activity in the wider hinterland of the SRFI rather than its 'maturity', albeit that traffic will initially be lower in the early years as the SRFI and rail services to it establish themselves in the market.

ii) We are forecasting that 295 loaded intermodal units per day will arrive at the Rail Central intermodal terminal by rail, which will then be shunted internally to the on-site warehousing. Likewise, 105 loaded intermodal units per day will depart from the Rail Central intermodal terminal by rail, having been shunted internally from the on-site warehousing. Note that these intermodal units never leave the site (i.e. enter the public road network). Demand for this traffic will be primarily driven by the quantum of on-site warehouse floor space developed and the nature of the business undertaken by the occupiers, rather than the SRFI's 'maturity'. A warehouse sourcing entirely from international markets and then re-distributing nationally would probably see a higher use of rail when compared with a warehouse unit which sourced domestically and only re-distributed to the southern East Midlands region. Our forecasts have assumed a representative mix of occupiers.

iii) We are forecasting 1,633 loaded inbound HGV units per day arriving from the national road network and destined for the on-site warehousing. Including empty re-positionings (for operational reasons some HGVs will arrive loaded but depart the site empty, while some outbound loads will be undertaken by HGVs arriving at the site empty), we are forecasting 3,047 inbound and 3,047 outbound HGV units per day. As per above, demand for this traffic will be primarily driven by the quantum of warehouse floor space developed and the nature of the business undertaken by on-site occupiers rather than its 'maturity'. Again, our forecasts have assumed an appropriate mix.

The meeting of the LLG on 18 July will provide more detail on the overall approach we are taking to rail (the main topic of the meeting is rail and a presentation by Nick Gallop of Intermodality) in advance of the Phase Two consultation.

Representatives of Stop Rail Central have been invited in line with the established attendance of the LLG meetings and so that we can continue to keep people informed on the direction of our work ahead of the formal Phase Two consultation.

Kind regards,



Ben Copithorne
On behalf of Rail Central
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