

Stop Roxhill Northampton Gateway (SRNG) response to Applicant's Doc 8.11 Responses to Other Parties Deadline 3 submissions
PINS doc TR050006-001043 - Issued on 5 February 2019 SRNG ID 20011012

PINS REP3-014.

1. **SNC - Monitoring of rail noise:** We still have a concern over the potential implementation date of any mitigation that may be required. It would be helpful to know the agreed trigger details, decision and implementation dates.

PINS REP3-019

2. **Andrew Bodman- Site access, modelling and driver behaviour:** The Applicant's response skates over the issues raised. These are elaborated in greater detail in SRNG WR Pt B, Chapter 3. The reliance on VISSIM, with insufficient accuracy to replicate real life behaviour, is very concerning in this particular situation. Two major streams of traffic are expected to cross each other at peak periods with mathematical precision determined by a computer. The stream with priority would inevitably be slowed as it enters the site producing a ripple effect backwards towards J15. People are not computers. Commuters in a hurry can be impatient, leading to accidents. The site single entry point is a **major design flaw** for an operation of this size.

Northampton Gateway's (NG) response in Doc 8.7 page 22 ref SRNG paras 3.6 -3.9 that the site layout is only indicative appears to be an excuse for a major error of judgement and reliance on technology that, being reliant on inputs that can only be a best guess, is not foolproof. If the layout changes this may well have an impact on traffic entering the site.

These points are responded to in greater detail in the following sections.

With regard to the GEH measurements, we would draw attention to the SRNG response to the Applicant's Doc 8.7, para 10.

PINS REP3-015

3. **SRNG Response to Applicants Document 8.7 Part B, paragraphs 2 – 3 concerning capacity of the A508 SRFI access roundabout and VISSIM modelling**

3.1 We will not attempt to respond to each individual point made by the Applicant, but make the following response in relation to the above as they are interconnected. A more detailed analysis is contained in the SRNG WR Pt B Chapter 3.

3.2 The main points are:

- The site road infrastructure has not been included in the VISSIM or NSTM2 modelling
- This has resulted in the modelling programme assuming that traffic entering the site can continue indefinitely without interruption. It clearly cannot.
- The site-wide speed limit is stated to be 20kph (TR050006-000374-Doc 5.2 - ES Noise Vib App 8.5 – Summary of Assumptions SRFI Operation, page 1 para 2).
- It is assumed traffic will traverse the site access roundabout on the A508 at 40kph.
- Three lanes of traffic off the access roundabout have to merge into a single lane and slow to 20 kph, all within approx 100 metres.
- This is followed in quick succession by several likely points of interruption to the traffic flow.
- At the AM peak hour these 3 lanes of traffic will be attempting to enter the single lane at the rate of about one every 4 seconds

- The mixture of traffic includes lorries, vans, cars and motorbikes, all with different capabilities to safely negotiate such a constrained environment.
- The site access situation is not the same as merging via slip roads where traffic merges into one or more lanes which are running at similar speeds. NG traffic would have to merge three lanes into just one and slow down at same time – a much more difficult and, therefore, riskier manoeuvre, especially with the mixture of vehicles involved. This leaves little or no margin for error.
- This will inevitably cause a tailback sufficient to block the A508 at peak times and risks potential accidents at a crucial location. The proximity to J15 and the pressure of peak northbound traffic on the A 508 at peak times makes uninterrupted site access critical.

3.3 The fact that Highways England, Northampton County Council and Aecom have all signed off VISSIM is not in doubt. If this software is the best available then doubtless it will be approved. We accept that we do not live in a perfect world and all predictions are prone to error. However, the fact that the site internal road infrastructure has not been included in the modelling has led to a false, over generous output.

3.4 The Applicant's second bullet point under the response to our para 3 states that the visualisation was developed for the Public Consultation. However, the errors displayed at the Consultation are identical to the error displayed on the PTV VISSIM website demonstration film (<https://www.youtube.com/watch?v=W7ZUqDNWoYs>) referred to in SRNG WR Pt B, para 4. The PTV website shows identical style outputs from the VISSIM software as the Consultation videos. Their website information makes no distinction between the programme and the display. If VISSIM is not a reflection of the base programme, why is it different and what is it reflecting? The fact that VISSIM can only 'see' front axles is an indication of its limitations.

3.5 Reference the Applicant's bullets 3 onwards, VISSIM stands for Visual Simulation which indicates that the outputs from the programme are designed to display visually what the programme has calculated. There is no other way the outputs can be 'seen' and checked. The fact that the programme is run 20 times is presumably to enable the software to run different random sequences of vehicles. VISSIM may show that the traffic would flow acceptably for much of the time, but it should be mandatory to show it will flow acceptably under all circumstances. The Applicant admits to 'quirks' and dismisses them as being 'of no consequence'. This appears to be saying that the occasional accident or death doesn't matter! This is not scientifically sound. We stand by our response to the Applicant's Doc 8.7 SRNG Pt B, para 3, in which we concluded that *if the visuals are an accurate reflection of the software then it is demonstrating a problem. If the visuals are not accurately reflecting the software, then it cannot be relied upon.* This is supported by Dr John Davis, an experienced expert in visual simulations, who has expressed the same views in his Reply to RR-742 – Roxhill Doc 8.3 (PINS Doc 989). We understand Dr Davis has also responded to this section in Doc 8.11.

3.6 If the ExA are minded to recommend the DCO Application in principle, then a condition for the site to be accessed from J15 via an underpass under the site access roundabout would be an improvement. This would avoid blocking the northbound A508 traffic, although it would be unlikely to resolve the overall issues highlighted above. .

4. SRNG Response to Applicants Document 8.7 Part B, paragraph 4 capacity of site road network and paragraph 6, concerning aggregates traffic.

4.1 The reasoning behind making no changes to the traffic forecasts is flawed. We reiterate our assertions in para 6 of our response to the Applicant's Doc 8.7. In summary: *The number and capacity of warehouse units has not changed and the traffic generated by them are not necessarily reliant on the number of trains.* This is especially true if the majority of warehouses have little use for rail freight and are predominantly road-based distribution centres. The aggregates terminal is, therefore, an addition to the Northampton Gateway facility, not a substitution.

4.2 The same applies to levels of labour. These will increase by the number employed by GRS Roadstone and contribute to an increase in non-HGV traffic.

4.3 The overall traffic projections have not changed by even 1 vehicle from the forecasts produced for Consultation 2. Similarly, the employee projections have not changed even by 1 person. It is therefore disingenuous to claim there will be no increase in either traffic or labour as a result of the addition of the aggregates terminal. This undermines the traffic forecasts and could have an unacceptable impact on the flow of traffic in and out of the site, especially at peak times.

5. SRNG Response to Applicants Document 8.7 Part B, paragraph 5, concerning layout of J15.

5.1 A study of NG TR050006-000229-Doc 2.4U clearly shows the number of opportunities for drivers to get in the wrong lane. It is currently not uncommon for drivers to get confused at the M1 south slip road and then reverse up against the following traffic, and this is a far less complex layout. This phenomenon is likely to increase with less room for error leading to a greater likelihood of accidents.

5.2 Even if the junction is able to handle a doubling of traffic, the more distant sections of the A45 and A508 will have no increased capacity.

6. SRNG Response to Applicants Document 8.7 Part B, paragraph 7, concerning Watering Lane.

6.1 We reiterate our concerns that stopping the A45 main stream of traffic at busy times is not good practice as it will increase pollution unnecessarily. The distance from the J15 interchange to Watering Lane is c.300m. There is sufficient space after Watering Lane to retain, and possibly expand, the existing slip road and use ramp-metering traffic lights with appropriate signage on the A45 leading up to this point. They would only need to operate at busy periods. The result would be a reduction of pollution impact and lower operating costs. If the ExA are minded to recommend approval of this DCO Application, we would recommend this junction design being revisited to achieve the above points.

7. SRNG Response to Applicants Document 8.7 Part B, paragraph 8, concerning A45 speed limit.

7.1 Our concern is that if the speed limit is set too low (50mph), it will be largely ignored outside busy periods. If traffic is currently self regulating to 50 mph in a 70 mph limit area at busy periods then there is no reason for it not to continue to do so. 60 mph would appear to be more appropriate and in line with the A45 section from Queen Eleanor interchange to the Bedford Rd flyover.

8. SRNG Response to Applicants Document 8.7 Part B, paragraph 9, concerning Knock Lane – Stoke road.

8.1 Overall traffic volumes may well be low, but this is not the case at peak periods for a narrow country lane in poor condition.

8.2 The roadway at the edges is currently in need of maintenance and will continue to deteriorate, increasing the associated safety risks. It would be far more beneficial to users, and cost effective, to undertake this at the same time as the other proposed road works. To leave it until it deteriorates even further would be a disbenefit to local users.

9. SRNG Response to Applicants Document 8.7 Part B, paragraph 10, concerning Knock Lane/Blisworth Rd.

9.1 We will just reiterate that we have serious doubts about some of the traffic forecasting, heightened by the references to a number of corrections to NSTM2, differences in run outputs and culminating with the large differences in the Knock Lane 2017-current-actual-to-2031-forecast traffic figures without the development.

9.2 If the current figures for that count are extended by just 1% per year for the 17 year time lapse, the difference would increase to between 220% and 360%. This equates to between 100 and 125 vehicles just at peak periods; that is an increase of one every 30 seconds 2-way. This is not insignificant for a narrow, rural lane and undermines the accuracy of the forecasting.

10. Conclusions:

10.1 It is interesting to note that the Applicant has chosen not to respond to our concerns regarding the failure to include the on-site road infrastructure in the any of the traffic modelling undertaken (para 3.2 above and SRNG response to Applicant's Doc 8.7, paras 2 and 15). **This is a serious flaw** as it fails to foresee the inevitable congestion that would be caused at busy periods with potentially serious consequences for both the A508 and J15. This has obviously been 'missed' during the approval stages and we urge the ExA to examine this closely.

The complexity of this proposal may well be unique and, we believe, is unsafe. Two major traffic streams crossing at a complicated motorway junction, in close proximity to a single-access site designed to funnel 3 lanes into one over a very short distance using a modelling system that has been acknowledged to have limitations and with no apparent traffic modelling carried out inside the site, leaves little or no margins for error.

10.2 The Applicant is proposing to substitute additional traffic and labour generated by the aggregates terminal for the exact same numbers generated by an unchanged warehouse capacity and provides no credible reasons. This undermines the reliability of the traffic forecast and modelling.

10.3 We still have major concerns over the reliability of traffic monitoring, as elaborated in sections 3, 4, and 9 above.

10.4 The overall impact of this proposal is that of too much being squeezed into too small and congested an area with little of no margin for error. This makes it unsafe and contrary to a number of NPSNN policies.