Stop Roxhill Northampton Gateway (SRNG) responses to NG Documents 8.20 & 8.21 and OFH2 Published on 19th March at Deadline 6 TR050006 SRNG ID 20011012

PINS Doc 1195 – NG Doc 8.20 Applicant's Post Hearing Submissions:

P21, para 4.3 Impact of passenger rail services: The Applicant is very selective in its reference to the Network Rail (NR) response to ExQ 1.11.15 which goes on to state that *the addition of 4 paths/day would not .. be a considerable restriction.* This was clarified at ISH4 to mean that the addition of 4 paths/day **would** result in restrictions on passenger rail services to Northampton. Please see SRNG ISH4 submission (PINS Doc 1166)

PINS Doc 1208 – NG Doc 8.21 Applicant's Responses to Other Parties' Deadline 5 Submissions:

P18, SRNG REP 5-044 Response to ExQ2 – 2.9.3: The Applicant again seems to be claiming that there is sufficient capacity on the WCML to enable their stated long-term aspirations. If this were the case, then we question why NR has been so reticent to confirm it. Failure to do so seriously undermines the ability of Northampton Gateway (NG) to function as proposed, thus failing to fulfil the *raison d'être* for a SRFI and national policy.

Response to ExQ2 – 2.9.5 Number of trains handled: The Applicant's response brings some clarity but still fails to confirm the number of paths required. The terminology confusion over the number of trains and paths is highlighted by the 5 paths (2½ trains) currently held by GRS Roadstone. To achieve 4, 16 or 28 trains per day would require more than double that number of paths, to take account of late timings of availability of, or requirement for, the goods at times that match the allocated paths.

Responses to Deadline 3 Submissions – 2, 3.2, 3.3 and 10.1 VISSIM Modelling

1. Although 3 physical lanes do not enter the site together, there would still be traffic entering from 3 lanes merging. Two originate from J15 and one from the A508 south. So, two lanes would have to merge into one lane twice within approximately 100 metres with the consequent potential for accidents. At peak hours there are predicted to be 838 vehicles, including 138 HGVs entering the site, or 1 every 4.3 seconds. The mixture of vehicle types and so many HGVs is a potentially dangerous mix. Please refer to our WR Pt B, Ch 3 for further details.

2. Fig 2 of ES TR App 12.1 – TA 27 (PINS doc 446) referred to, showing the first 260m of the site entrance road, **omits the first warehouse entrance on the left and stops short of the internal roundabout with a second warehouse entrance leading off it, also to the left**, all of which is prior to traffic entering the main site. The conclusion can only be that the impact of vehicles disrupting the smooth flow of traffic to negotiate these three impediments have not been included in the traffic modelling. This is a **serious flaw** as traffic will have been assumed to flow *ad infinitum* with no hold ups. In practice there will be, and this will slow traffic sufficiently to cause a ripple effect back to the A508 and potentially to J15. The Applicant has produced no evidence to the contrary.

3. As stated previously, in view of the above it would be unsafe to change the internal layout so close to the site entrance without re-modelling ALL the revised layouts and roadways **in conjunction with** re-modelling of the A508 and J15 traffic. To depend on approval of the detailed layout of the internal road network following granting a DCO, as suggested, would be too late, especially if it is carried out in a 'bubble' as the site access has been.

4. **This is the most serious flaw in the Applicant's traffic modelling and potentially invalidates most of the so-called mitigation proposals.**

Responses to Deadline 3 Submissions – 4.1, 4.2 and 4.3 Impact of Aggregates terminal: We cannot agree with the Applicant's refusal to admit the obvious and so stand by our previous statement. There is no logic to the Applicant's claim that the Aggregates terminal will miraculously cause an identical reduction in warehouse activity without even a hint of justification. We can only assume that Highways England and Northants County Council Highways Authority have taken the Applicant's assertions on trust.
It would appear that, although the proposed transfer of GRS Roadstone's activities to NG may seem a bonus, the Applicant does not wish to risk having to revise a significant section of the Consultation/Application documents.

Response to Deadline 3 Submissions – 5.2 Lack of increased capacity: The Applicant appears to be saying that straightening bends and provision of a bypass will allow traffic to flow faster and thus encourage more traffic. The problems arise where the A508 meets the A5, where no increased capacity has been provided. The A45 widening close to J15 would have the same effect, also without the benefit of widening beyond the Wooton interchange. In contrast, the current widening of the M1 does provide more capacity.

Response to Deadline 3 Submissions – 9.1 and 10.3 Reliability of traffic modelling: We have seen nothing additional that would enable us to retract our previous statements.

PINS Doc 1173 – John Exley presentation at OFH2 on 14th March
The presentation by John Exley has prompted a local environmentalist to raise further concerns about Roxhill's current submission and the possibility that embodied carbon within the construction and operational phase might not offset the climate change benefits of the perceived modal shift from road to rail freight during the projected lifetime activity of the proposed site. **A nett gain in the carbon footprint of Northampton Gateway over its lifespan would do nothing to promote a SRFI on this site.**

Roxhill's 2019 Climate Change Summary (Document 8.22) provides a superficial over-view and supposed re-justification for the current version of the Northampton Gateway planning application. While pertinent points, previously raised, have been reiterated there is no additional content to give insight or confidence to the reader of the total impact, in lifecycle terms, of converting a carbon sink – i.e agricultural land with photosynthesising flora – into a concrete landscape.
David Thorpe, of The Sustainable Cities Collective, stated in a 2015 article[1] that,
'No building or development project can be deemed to be environmentally sustainable without an assessment of its life cycle environmental performance. This so often fails to be done, or even thought about.'
Mr Thorpe states,
'A crucial aspect of life cycle performance is energy use, i.e. the embodied energy. Embodied energy refers to the energy used in the manufacturing of the materials used in the project, in transportation to the site, construction, maintenance and the removal and disposal or recycling of materials and restoration of the site at the end of its life.'
Operational energy requirements must also be considered in carbon lifecycle calculations.

[1] Thorpe, D (2015) *Why we need to focus on embedded energy in buildings*. https://www.weforum.org/agenda/2015/05/why-we-need-to-focus-on-embedded-energy-in-buildings/

Clean Air Strategy 2019: in January the Government published its long promised but disappointing 'Clean Air Strategy'. It puts most of the burden on Local Authorities BUT nowhere does it mention the benefits of getting freight off the road and onto rail. As Roxhill promote this as a major plus point it seems odd that, other than the NPS-NN, there seems little 'strategic' endorsement from Government.