

Applicant's Responses to ExQ1 – Document 8.2 TR050006
Comments on Roxhill Written Responses
by Stop Roxhill Northampton Gateway Action Group . I.P.No. 20011012

1.0 General Cross-topic questions:

- 1.0.6 The Applicant discusses the benefits to Northampton but makes no mention of the impact of the relocation to the Northampton Gateway site. For instance, the site-generated traffic figures produced for Consultation 2 are unchanged in the Application documents. This is despite the number of existing traffic movements and noise levels being known by the aggregates company, GRS Roadstone. These were not available in Consultation 3. Noise levels during loading and unloading in particular are likely to be significant compared with other activities on site.
- 1.0.8 This response does not reflect their previous statement when these concerns were raised at a Village Meeting. The response was that Roxhill would be prepared to purchase the land between the bypass and the village boundary and gift to the village. If the Application were to be approved, this would be a benefit.
- The land between the bypass and the built up areas of the village are an obvious target for development. The fact that SNC has a 10 year land bank may be of little relevance when the Council is amalgamated with Daventry District Council and Northampton Borough Council (NBC) to form a unitary authority in 2020. Currently NBC does not have the required 5 year land bank.
- One owner of land adjacent to the inner edge of the bypass route has already intimated he will apply for Planning permission for housing.
- Roxhill also discusses the relative merits of the bypass route which is more fully covered in our Written Response, Pt B, 6.12 – 6.15
- 1.0.9 Saved Policy EV8 is still valid. It is intended to be given the same effect by Policy SS2 (General Development Principles) 1. a) and b), in the emerging Local Plan Pt 2, Policy NE2.
- 1.0.11 This response does not reflect the promotion of the Gazeley Altitude building alongside the M1 at Milton Keynes which will accommodate up to 5 mezzanine floors in a similar height building (see our Written Response Pt B, 2.9 a). One can only assume that Gazeley promote this as being an attractive proposition in the light of current warehousing trends. If any of Roxhill's units are similarly equipped the impact on traffic could be considerable but this has not been taken into account.
- 1.0.14 Expansion of the rail terminal should refer to the enlargement of the area included in the application, as demonstrated by DIRFT II and III. This site is severely constricted to anything meaningful by the land available.
- 1.0.17 The proposed Roade bypass is not necessarily the only solution for reducing traffic through Roade. A potential alternative, not investigated by the Applicant, is a J14A. There is much concern in the village regarding the overall impact of the proposed development, despite the apparent benefit of a bypass. Should PINS be minded to support the Application, we would welcome a requirement to assess this alternative which is likely to be cheaper.
- 1.0.19 Roxhill's view appears to be that the so-called Golden Triangle is the ideal area for a cluster of SRFI's. This area came about because it is strategically located for road-based distribution. The objective of the NPSNN is clear in requiring an expanded network of SRFIs across the regions, etc. In effect, it sees the future moving away from this locality, as it will otherwise lead to more HGVs on the roads with the resultant impact of increased congestion and air quality issues. DIRFT III, together with DIRFT I and II, will have sufficient capacity for this area when the planned further rail connected warehouses are constructed.
- 1.0.21 The Applicant refers to *the area around Northampton Gateway and particularly to its south towards London, are not well served by existing SRFI's*. This statement raises two points:

1. It would be surprising if DIRFT do not have plans to cover this area more extensively as developments of Phase 3 progress.
 2. Roxhill now state that they have investigated a site further south near M1 J13. This appears to have been after the decision was made to apply for the Northampton Gateway (NG)site; was somewhat half hearted as the landowner has other plans for one possible area (Roxhill appear to have conveniently forgotten about the powers of compulsory purchase in this instance) and another area is already occupied. It would appear to be a better area as highlighted by the statement in the Applicant's response in 1.0.22: *The majority of trains to and from the SRFI are expected to run between London and Northampton Gateway via Milton Keynes.* No information has been produced of research in areas further north, west or south west of the country to fulfil the NPSNN requirement for an expanded network.
- 1.0.22 The Applicant seems certain that sufficient capacity exists up to Network Rail's Control Period 8 (2029 to 2034). This was not confirmed by the Network Rail representative at the Preliminary Meeting on 6th November at the Hilton Hotel.
- 1.0.25 In the UK the majority of goods are moved by road; the majority of distribution warehouses in the Midlands are not connected to rail. The example given is simply trying to justify the status quo, ie shipping goods out to all parts of the UK by road from the centre of the country. The NPSNN objective is to move goods by rail closer to their final destinations thus shortening the last leg deliveries by road. NG does not achieve this.
- 1.0.28 The Applicant states the case against this proposal very succinctly by quoting the NPSNN (our emphasis in bold type): "It states that **forecasts** '*confirm the need for an **expanded network** of large SRFI's **across the regions** to accommodate the long-term growth in rail freight*' and that they also '*indicate that new rail freight interchanges, **especially in areas poorly served** by such facilities at present, are likely to attract substantial business, generally new to rail*' (Our emphasis)." The existence of a high proportion of existing, planned and proposed RFI and SRFIs are in the East Midlands and with DIRFT so close effectively excludes NG.
- 1.0.30 This follows on from our response to 1.0.28 above. The Applicant confirms our point that the concentration of logistics in this area is historically based on road distribution and is *an explanation of why demand for logistic warehouse space is expected to be strong at Northampton Gateway*. Note, rail demand is not mentioned.
- 1.0.32 The Applicant claims that nearly 1 million sqm is likely to be developed in this area even if NG does not proceed. This does not take account of DIRFT or Planning restrictions or the non-availability of SRFI's in more distant areas. With such apparent demand, this is the ideal moment to encourage the development of logistics facilities across the regions and not clustered in an ever more congested area with every likelihood of them not achieving national policy.
- 1.0.33 The Applicant does not answer the question. It is surprising that the research by the Applicant of demand for warehousing in this area does not include the demand for rail freight.

1.1 Air Quality and emissions: This has been covered separately by Mr Rod Sellers

1.6 Historic Environment

- 1.6.1 By being closer to highway traffic, the Courteenhall War memorial would be exposed to greater risk of accidental damage, especially from the proximity of larger vehicles turning left. It is insensitive of the Applicant not to consider relocating the memorial, preferably nearer to the homes of the fallen in the village of Courteenhall where it could be accessed safely and viewed in quiet contemplation.

1.7 Landscape and Visual

- 1.7.3 The building heights are still not clear. The Above Ordinance Datum (AOD) for the main building heights was used for the two Consultations and was impossible to assess in relation to the smaller buildings for which the actual heights **were** stated. The continued use of AOD suggests some latitude may be taken in relation to any approved height. If this is not the case then it would be clearer to state the maximum and minimum height of the bunding in relation to the specified building heights, cranes and gantries.
- 1.7.4 The Applicant has not responded to this question.

1.8 Noise and Vibration

- 1.8.1 It is not clear whether the noise from the aggregates terminal has been included. Information on noise was conspicuous by its absence during the Consultation period therefore there is nothing to compare it with. The fact that the related traffic projections have not been included suggests that the noise predictions may have also been omitted.
- 1.8.8 The Applicant concedes that mitigation is required without making, or referring to, any proposals.
- 1.8.14 The Applicant has not answered the question, just changed the wording from 'relatively close proximity' to 'near'.
- 1.8.16 It is surprising the Applicant has not conferred with Network Rail to give some reasonable assessment. Milton Malsor in particular will be affected, especially as night-time working is envisaged when background noise levels are low.
- 1.8.17 300m from a receptor seems low, especially if background noise levels are low. No evidence has been produced to support the statement '*these conclusions are based on experience of similar works elsewhere*'.
- 1.8.20 The Applicant should state whether freight trains complying with the 2011 standards will produce a sufficiently reduced level of noise to make mitigation unnecessary in these particular circumstances. There is also no indication of the life of a rail freight wagon or the current population of wagons complying with the new standard.
- 1.8.21 The Applicant states that the government sets no *classification of degrees of significance*. This is at odds with the statement in the preceding paragraph that there is a *threshold set for it being classified as significantly adverse*.
- 1.8.24 The Applicant does not answer the second part of the question.
- 1.8.25 The Applicant's references to parts of a British Standard are merely aspiration and depend on the opinion of the Construction company operatives (whose hearing may well be impaired by continual exposure to the noise they generate)

1.9 Cumulative impacts and interactions:

- 1.9.1 It is not clear whether the cumulative transport impact assessment will cover both road and rail. Rail developments related to HS2 on the WCML capacity should include the construction interruptions at Euston as well as any potential capacity released.
- There should not be any delay in the road traffic element if both Rail Central and NG agree to NCC Highways Authority's offer to run their traffic inputs through NSTM2 together. The concerns over confidentiality should no longer exist now that both Applications have been accepted for Examination.
- 1.9.5 The response is woolly. It just restates national policy but does not put the claimed HGV mileage savings into any context other than 4 trains per day. It is not clear if it includes more than that – the aspirational 16 trains, the 12 Rapid Rail Freight trains, or the Aggregates trains which together would need 66 paths a day (1 every 22 minutes day and night!!)

- 1.9.6 Please see our point about the omission of significant detailed developments, eg in Milton Keynes, in our Written Representation Pt B, 8.2.

1.10 Socio-economic Effects:

3.2.11 A report by SEMLEP on the Logistics Sector estimated that around 11% of all workers are employed in the logistics sector in the South-East Midlands areas. With employment of over 16,000 people in the sector (in 2012), Northampton is second only to Milton Keynes, and considerably higher than other locations such as Daventry with 7,700 employed and South Northamptonshire which has 2,800 people employed in the logistics sector. (ES Chp 3 - 3.2.11)

Adding over 4000 warehouse and driver jobs to this figure just perpetuates what could be termed the 'golden triangle effect' – long-distance road-based distribution. The growth in working age population up to 2029 in South Northants Council district is forecast to be less than half this number in total, let alone any suitable for logistics employment. It would result in an imbalance in the local economy

- 1.10.6 Response (i) refers to £348 billion contribution to the local economy, but response (iv) estimates 25% will be already employed in the local area = c.1900 people. This industry has a high job vacancy rate for warehouse operatives in the Applicant's 25-mile catchment area. (There were 944 on 20.11.18 at <https://www.indeed.co.uk/jobs?q=warehouse+operative&l=Northampton>). The 7500 projected jobs would bring few new opportunities for local residents but more likely disrupt other local employers and draw commuters from outside the locality. No housing has been planned for a development of this size.

Response (iii) refers to the new housing developments but this is planned for the needs of new residents predicted in the approved WNJCS Local Plan which balances housing needs against type of employment. The increase in residents of employment age predicted for the Local Plan period for South Northants is extremely small, accounting for about 20% of the NG projected total employment opportunities and there is no guarantee that many of these will be attracted to NG. This response also makes this claim: *Most significantly, NOMIS official labour market statistics show c.2,750 claiming in Northampton and c.2,755 in Milton Keynes.* But no reference is made to the bulk (55%) of the job types (warehouse operatives and drivers) for which there is a large deficiency at present. No evidence has been produced of any increase in available suitable employees.

Response (v) suggests the labour market will correct itself, but the current level of vacancies in the industry referred to above suggests this is unlikely.

- 1.10.11 The Applicant is ignoring the employment expected from the committed and allocated development and infrastructure. The references to Milton Keynes suggest they intend to piggy-back on out-of-county as well as local developments, to the detriment of those areas as well. The WNJCS does not envisage such a large increase in logistics employment. This strategy will cause an imbalance in the local economy.
- 1.10.14 The crime statistics were obtained under a freedom of Information request by Stop Rail Central. In view of the potential for crime and Roxhill's business in this area, they should have been aware of this. See also their response in 1.11.10 and 1.11.29

1.11 Transportation, Traffic and Rail:

- 1.11.6 There are no details in the S106 document as to how either tenant-owned/contracted or, more importantly, non-tenant HGV operators will be monitored. The S106 agreements need to be worded to include the successors to the County and District Councils as they may not exist when some of the S106 provisions are due to be activated. Roxhill should be required to reference an existing system that works.
- 1.11.11 To avoid duplication, we would refer the ExA also to Mr Andrew Bodman's responses to all rail-related questions, including 1.11.12, 1.11.16 amongst others.

- 1.11.13 The references to EMG are not relevant. It is on a different line, close to the size of urban areas envisaged by the NPSNN (which NG is not) with no competition for freight services (which NG has in DIRFT and others further north on the more congested 2-line section of the WCML). The land costs, compared with industrial land, are extremely low which enables the rail investment, even if not used. Response (iii) is not surprising as it is in the interests of the operator to have the rail option as approval would bring into existence yet another industrial park in the so-called Golden Triangle which is the ideal location for road-based distribution. This is referred to in a number of areas in the Roxhill reports by reference to being 4 ½ hours from the most densely populated areas in the country – a distance relevant to road transport, but not for rail.
- 1.11.19 We were unable to locate Appendix 17 referred to attached to this document, or in Chapter 12 or the ES 5.2 Appendices
- 1.11.23 The Rail Central traffic projections have not been run in conjunction with the NG traffic projections (NCC Highways Authority Written Response, para 3.7). Additionally, the NSTM2 does not include detailed traffic modelling outside Northamptonshire, despite the close proximity of, for instance, Milton Keynes. This is likely to influence the A508 corridor traffic to the A5 which could include additional Rail Central-generated traffic.
- 1.11.27 Please note that the X4 bus service has been discontinued and the 33/33A is under threat.
- 1.11.31 No allowance appears to have been made for the proposed 12 daily Rapid Rail Freight trains or the 5 daily Aggregate trains.
- 1.11.33 The paragraphs following 12.7.107 offer no solution to high levels of driver stress along the Roade bypass. This does not bode well for driver behaviour along the whole corridor between J15 and the A5 when combined with the additional A508 corridor works enabling faster speeds. The proposed 30% speed reduction along the A45 is likely to add to driver frustration and stress particularly at peak hours resulting in longer journey times.
- It seems extraordinary that a development of this size, which has a dubious claim to being required, could allow a **continuation** of driver stress on the SRN and A508.

Appendix 1, p2, item 1 e). It is noticeable that the Applicant has not responded to this, no doubt because this requirement is impossible to achieve.

Appendix 2, Transportation, p30, last item. If the Applicant lives in a village, he obviously doesn't use the surrounding countryside for recreational walking or riding. If he did he'd know that the residual impact of severing access by a busy bypass would be significantly more than negligible. The bypass would also cut off wildlife movements.

Appendix 6. The letter from the Owner of Maritime Transport Ltd, p2 last para, states:

*'the future success of rail freight is predicated on the development of an **expanded network** of modern rail interchanges* He repeats this in the next sentence. This supports the objective of the NPSNN. However, on p4, penultimate paragraph, he states: *The proposed location for Northampton Gateway and the hinterland it would serve represents a major collection and delivery point for Maritime. We currently have many grocery, FMCG and industrial goods traffic flows that we would look to move by rail once operational.* This begs the question: if that business is significant enough to be economically transported by rail, possibly as a second rail leg, then why is it not handled by DIRFT? The answer is probably that road is cheaper.

He also refers to BIFT at Birch Coppice which is a RFI and, at only 35 acres, is too small to be a SRFI and outside the scope of a NSIP.

Additional comments:

We note that no questions have been raised on the following, all included in our Written Representation, part B :

1. The conflict of traffic destined for the NG site from J15 with priority over A508 traffic destined for J15, especially at peak hours. (Chapter 3). Please refer to NPPF 2018, para 108 h) in this regard.
2. The apparent inability of the single NG site access to cope with peak hour traffic and at times of stress.(Chapter 3) Please refer to NPPF 2018, para 108 h) in this regard.
3. The route of the proposed Roade bypass delivering the least benefit (6.12 – 6.15)
4. The concerns regarding access to the Woodley's Day Nursery on the A508 corridor (7.8)

Conclusions:

The questions raised by the ExA, and the answers given, reinforce our position that

- Northampton Gateway does not fulfil the objectives of national policy
- it would perpetuate the continued development of road-based distribution centres in this area to the detriment of more appropriate regions of the country.
- the high aspirations of handling 33 trains a day would seriously damage both current and future passenger rail services out of Long Buckby and Northampton.
- the traffic and pollution impacts have been understated, and
- this is in reality an attempt to bypass the local planning regime.