

## Town and Country Planning Act 1990 (As Amended) Local Highway Authority (LHA) Response

<b>Application Reference</b>	2025/1867/DCO		
<b>Proposal</b>	Consultation on Notice of Application to make a Non Material Change to the Development Consent Order: The Northampton Gateway Rail Freight Interchange Order 2019 S.I 2019 No. 1358 Proposed Amendments – increase in mezzanine floorspace and associated minor amendments to site access roundabout and DCO Requirements.		
<b>Location</b>	Northampton Gateway Rail Freight Interchange Collingtree Road Milton Malsor		
<b>Case Officer</b>	[REDACTED]		
<b>Date Consulted</b>	09/05/2025	<b>Date Sent</b>	06/06/2025

In respect of the above application, the Local Highway Authority (LHA) has the following observations, comments and recommendations: -

- It is queried why the application is classified as a 'non-material' change to the DCO when considering the scale of the proposed increase in floor space (114,480sqm of mezzanine), the resulting potential increase in vehicle trip generation (up to 128 two-way peak hour vehicle trips after the application of a 50% reduction factor which has not been suitably justified) and the proposed highway mitigation that has been put forward (partial signalisation of the A508 / site access roundabout).
- The submitted 'Summary Statement of Traffic and Transport' concludes *'that the proposed amendment will have no severe traffic impacts, and no additional significant environmental effects as compared to the scheme as consented.'*
- The LHA have raised a number of issues / concerns in relation to the proposals which have not yet been addressed, particularly in relation to highway impact assessment. Therefore, we are not able to agree with the above statement at this stage.
- The submission states that the applicant has *'agreed to submit additional information to allow WNC to confirm agreement to the findings of the TA Addendum'* and that following submission *'dialogue with WNC will continue and an update will be provided in due course.'*
- We have not yet received a full response to our previous comments which were issued prior to the formal submission of this application. For completeness, the issues that we have previously raised and are awaiting a response are summarised below (with any relevant updates provided).

### General

- The proposals seek to increase the mezzanine floor space by 111,480 sqm at the already approved Northampton Gateway Strategic Rail Freight Interchange (SRFI) development site.
- The current proposals include an improvement scheme at the site access roundabout on the A508 (partial signalisation).
- It is noted that the Northampton Gateway SRFI development was granted permission in October 2019 (Development Consent Order 2019) and that the supporting Transport Assessment (TA) was dated May 2018. The NSTM model would likely have been based on 2015 baseline data. This data and assessment from the previous TA are now several years old and therefore any reliance on its data / assumptions would be questioned as part of the review process for a new planning application.
- The approved Northampton Gateway SRFI scheme includes 468,000 sqm of warehousing and ancillary building with 155,000 sqm of mezzanine floor space (includes HGV parking of approximately 120 spaces).
- As part of the approved scheme a package of highway mitigation measures was secured. The highway improvement measures included an upgrade to M1 Junction 15 and the A45, improvements to M1 Junction 15A, a bypass for the village of Roade, the implementation of environmental weight restrictions, improvements along the A508 as part of the A508 route upgrade, and financial contributions towards improvements to the A45 Queen Eleanor Interchange, and junctions along the A5076, and a Knock Lane and Blisworth Road maintenance and minor works fund.
- The phased construction of the offsite highway works described above commenced in 2021 and are now reported to be largely complete.
- Walking and cycling measures / strategies were also secured both on-site and off-site in order to help improve connectivity to residential areas within the walking and cycling catchments.

- As part of the approved development, a public transport strategy was developed which includes the introduction of a new bus service specifically serving the SRFI site, as well as building on the existing local bus network and providing additional bus stops on the A508 to the north and south of the A508/site access roundabout.
- The approved Northampton Gateway SRFI was forecast to generate 1,044 two-way vehicle trips in the morning peak hour, 1,303 two-way vehicle trips in the evening peak hour, and 16,531 vehicle trips over a 24-hour period.
- The proposed increase in mezzanine floor space is reported to increase the off-site vehicle trips by 105 two-way trips in the morning peak hour, 128 two-way vehicle trips in the evening peak hour and 1,601 vehicle trips over a 24-hour period. This equates to a 10% increase in off-site traffic as a result of the proposals. However, these numbers are based on the application of a 50% reduction factor which has not been suitably justified (as discussed further below).
- The proposed extensions and resulting trip generation should be accounted for within not just a revised TA but also the supporting documents such as the Travel Plan (TP), Service and Delivery Management Plan (SDMP), Car Parking Design and Management Plan (CPDMP) and Construction Traffic Management Plan (CTMP).
- The impact of the proposals on the site car and cycle parking strategy, forecast accumulation / demand and parking supply have not been discussed in this submission.
- It is noted that there was a variation to the DCO in 2023. Any implications as a result of the variation should be considered as part of this assessment.

#### Mezzanine Floor Space / Trip Generation

- Reference is made to the acceptance of the 50% reduction factor for HGV trips as part of the approved scheme. However, this scheme was approved as part of a separate application and assessment that was undertaken in 2018 (approximately 6 years ago). Therefore, as mentioned above, the application of any trip reduction factors should be based on current available data and justification.

#### Vehicle Trip Generation

- Vehicle trip rates for the proposed B8 warehousing extension has been extracted from the previously consented scheme with a 50% reduction factor being applied to take account of the mezzanine floorspace.
- The Transport Assessment for the previously consented scheme was undertaken in 2018 (approximately 6 year ago). It is therefore not considered appropriate to simply apply the same trip generation rates and reduction factors for the proposed extension without any current evidence based justification.
- Paragraph 3.6 states that '*HGV generations are typically related to the number of loading bays, which are located on the ground floor and hence do not increase when mezzanine levels are introduced.*' However, this statement does not seem to acknowledge that increased turnover of the loading bays, afforded by increased storage space, would also be a contributing factor towards potential HGV trip generation numbers.
- In relation to trip generation forecasts, it is acknowledged that mezzanine floorspace would not generate trips on a pro-rata basis with conventional floor space. However, the application of any reduction factors would need to be evidenced based and fully justified. In this instance, a 50% factor was applied but the robustness / suitability of this significant level of reduction is queried.
- An assessment of the forecast trip generation rates and associated reduction factors for the proposed extension should be based on current available data (e.g. survey data of comparable sites / comparable TRICS sites).
- Once the above has been undertaken a comparison could be made with the previously used rates to provide assurance that a reliable and robust assessment has been undertaken.

#### Update:

- It is noted that following a meeting with the applicant on 1<sup>st</sup> May 2025, the applicant referred to new survey data of other comparable sites which they intend to use in their justification of vehicle trip rates related to the proposed additional mezzanine floor space. The applicant was to provide further details of this analysis in order to justify the rates / reduction factors used in their assessment. We await this further information.

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#### Person Trip Generation

- Similar to the comments made above, an all-mode trip generation exercise should be undertaken for the proposed expansion, based on current available data.

#### Trip Distribution and Assignment

- Vehicle trip distribution for the proposed extension has been based on the 2018 TA. The NSTM model would likely have been based on 2015 baseline data. This is not accepted due to the age of the previous data / assessment.
- The current proposals should be based on more recent traffic background data, growth rate, trip generation, committed / allocated land use and infrastructure assumptions.
- A comparison of new versus old data could be used in order to justify the assumptions used for this assessment and its reliance on the previous TA.
- The assessment should utilise the Northamptonshire Strategic Transport Model (NSTM) which is a tool that is currently used in the assessment of large-scale development proposals which would potentially have wider scale / strategic impacts. The NSTM utilises 2026 and 2031 design year land use and infrastructure assumptions contained within the 'Uncertainty Log.' This would need to be verified and updated as necessary for the specified study area.
- It is noted due to other schemes within the surrounding area the NSTM has been recently updated (validated/calibrated). Hence, this would help streamline and minimise the length of time taken for the utilising the NSTM to test the proposed development scenarios.
- To initiate the use of NSTM please contact WNC's Highways Development Management team directly.
- The relevant PCU conversion factors used in the development of the traffic flow diagrams should be clarified.

#### Update:

- It is noted that following a meeting with the applicant on 1<sup>st</sup> May 2025, the applicant had initiated the use of the NSTM in order to obtain flow difference plots and junction turning movements for the 2031 reference case model (for site access and M1 Junction 15 only) such that a direct comparison can be made of the forecast baseline network flows between the superseded and current versions of the NSTM. Noting that the applicant's assessment was based on the older / superseded model version.
- The model plots indicate that the current version of the NSTM has materially lower network flows near the application site during both the AM (up to 760 two-way vehicles lower on the A508) and PM (up to 616 two-way vehicles lower on the A508) weekday peak periods.
- Based on the above, the LHA have concerns regarding the accuracy and suitability of the impact analysis conducted by the applicant due to the use of the outdated model and its significantly higher network baseline flows.
- The incorrect use of higher baseline network flow could be seen as a robust assessment. However, the LHA question the forecast performance of the highway network as well as the justification and proportionality of the proposed highway mitigation (noting that an agreement on forecast trip rates and traffic generation has not yet been achieved).
- We cannot properly determine the impact of the proposals nor the requirement / suitability of the highway mitigation measures until an updated modelling / traffic impact assessment is undertaken.
- The above, relates to the site access and M1 Junction 15 only. Further NSTM 'select link' analysis outputs are currently being produced to help better understand the potential wider network implications of the proposals.
- The LHA have expressed the above concerns to the applicant and await their response.

#### Assessment of Impacts

- The impact assessment of the submission cannot be agreed until the fundamental issues raised above have been addressed (e.g. trip generation and distribution).
- The TA addendum has limited its assessment to the A508 access roundabout and M1 Junction 15. The study extent cannot be agreed until the issues raised above have been addressed.

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- The 2031 baseline flows have been derived from the 2018 TA which is not considered appropriate. Reference should be made to the current version of the NSTM (which has a material difference in network flows).
- The suitability of using isolated LinSig model is queried considering the potential interaction of adjoining junctions. The suitability of this approach would be informed by current data / surveys / NSTM and junction model outputs. Though it is noted that the current submission suggests that this would not be an issue.
- Clarification is sought as to what is the anticipated opening year of the proposed development with extensions. The modelled design years should also account for the realistic year of opening.
- Due to capacity issues identified an improvement scheme has been put forward at the A508 site access roundabout which involves partial signalisation of the A508 southbound approach arm and circulating carriageway.
- Increases in delay and queuing were also identified at the M1 Junction 15 using an isolated LinSig model. However, no mitigation has been put forward as the impact was not categorised as severe although there are reported negative values of Practical Reserve Capacity (PRC).
- We do not necessarily agree with the above, but will await a full response/ revised assessment addressing the issues raised in this note.
- Full model summary results covering all scenarios have not been provided within the TA addendum.
- The LinSig model output file for the Site Access / A508 roundabout only covers the '2031 with mitigation' weekday AM and PM scenarios. The 'without extension,' 'with extension without mitigation' and 'with extension with mitigation' scenarios should be provided for the AM and PM peak hour periods for all design years. Similar comments apply for the M1 Junction 15 model where only the 'with extension' scenario was presented.
- The above would help inform of the suitability / proportionality of any forms of mitigation proposed. The acceptability of net additional impact is fundamentally based on a comparison of different scenarios and hence this should be included as part of the submission.
- Fully scaled, annotated and dimensioned layout plans of the modelled junctions and the geometric parameters used should be provided to help in the review / audit process of the traffic models.
- A Stage 1 Road Safety Audit should be provided in relation to proposed works on the public highway. The RSA would need to be undertaken by pre-approved independent auditors with the RSA brief agreed by the relevant authorities (LHA/NH). The RSA should be compliant with DMRB GG119: Road Safety Audit.

Update:

- A Draft Stage 1 RSA was submitted on 30<sup>th</sup> May 2025 with the final version yet to be issued. The Draft RSA document raises issues and provides recommendations to address the concerns.
- We await the final version of the Stage 1 RSA to be issued alongside the Designer's Response to the issues raised and any subsequent design revision.

Other Consultees:

- Active Travel England (ATE) should be consulted in terms of the implication on active travel / connectivity to and from the development.

Stage 1 Road Safety Audit:

The LHA have provided comments in relation to the Stage 1 Road Safety Audit (RSA) brief. We await submission of the completed RSA and the accompanying designer's response. Some of the factors raised by the LHA for consideration within the RSA include the following:

- Lack of a controlled pedestrian crossing facilities across the site access arm. (2 lane entry and 2 lane exit). Potential conflict issues that are increased with proposed site intensification.
- Short flare lane feeding into stop line within circulating lane requires sharp and sudden vehicle movement (query design standard). Potential conflict issues.
- The pedestrian crossing on A508 northbound exit arm does not appear to be fully accounted for in the modelling. Hence there are concerns that potential queuing from this stop line may not be fully reported and may block flows. Northbound traffic flows exiting the roundabout may be blocked by traffic queuing at the internal stop line. Similarly northbound traffic stopped at northern exit due to pedestrian crossing may block

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site exit arm / circulating traffic. No measures appear to have been put forward to address this circumstance / keeping circulatory lane clear resulting in potential conflict issues.

- Vehicle swept path analysis suggest some tight movements (e.g. A508 southbound vehicles overlap adjoining circulating lanes). Swept path analysis for 2 lane site arm exit is missing side by side vehicle movement analysis. This appears tight. Potential conflict issues.
- Suitability of re-located position of maintenance lay-by
- National Highways have noted that 'the intergreen value of 8 seconds on the A508 Southbound entry pedestrian crossing (Phase C) may be too low, as pedestrians have to walk across three lanes of traffic.'
- The applicant has stated that 'a reduced intergreen is used to account for the effect of on-crossing detection on the extendable period of the intergreen. Further, in this instance the crossing would be called infrequently during a peak hour and therefore the reduced intergreen reflects the aggregate effect across the hour.'
- It is noted that during network peak hour periods for vehicles the pedestrian flows would also likely be in their peaks taking account of the location of the bus stop facilities.
- As noted previously, the LinSig model do not appear to include the pedestrian crossings located on the A508 Northbound exit (as well as on the left turn slip on the site access arm). The peak usage of these crossings is anticipated to coincide with the network peak hour periods (taking account of the bus stop facilities). This would likely impact operation of roundabout and queue lengths resulting in potential conflicts.

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- We await the final version of the Stage 1 RSA to be issued alongside the Designer's Response to the issues raised and any subsequent design revision.

#### Conclusions:

- As the Addendum Transport Assessment currently stands, we are not in a position to agree with its conclusions nor do we have sufficient information to determine *'if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'*
- We shall await a full response / revised assessment addressing the issues raised above before providing further substantive comments on this application.
- Based on the above, we are not able to provide a positive recommendation in relation to this application as it currently stands.

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*The views, observations, comments and recommendations contained in this response represent those of West Northamptonshire Council as Local Highway Authority and in no other function or authority.*