

Northampton Gateway SRFI

Questions raised at the Milton Malsor PC meeting 8th Nov:

Q. *The proposals are contrary to 2014 Joint Core Strategy where the Inspector (from PINS) concluded no new employment sites are needed, and DIRFT was allocated as the SRFI needed in this area. Why would PINS now be expected to approve something contrary to the local planning policies?*

A. There are a range of policy considerations of direct relevance to these proposals. This includes the policy context provided by the National Policy Statement for National Networks ('the NPS') published by Government in December 2014. The NPS is clear about the need for a network of SRFIs across the country to help enable and encourage the shift of freight from road to rail.

Local planning policies will be one of the considerations by PINS alongside the NPS and associated evidence base regarding the growth in rail freight volumes over the next 20 - 30 years. The local planning authorities will be important consultees in the process, and will be asked to explain how the proposals relate to local planning and economic policies, objectives and priorities.

In terms of the local context, consideration will also be given to the assessments and findings from the ongoing Environmental Impact Assessment (EIA) which will help to define the likely range and scale of residual impacts from the proposals.

Q. *Where are all the people to fill these jobs going to come from (local unemployment in the villages is very low)?*

A. The detailed traffic modelling will begin once the Northamptonshire County Council Strategic Transport Model is updated – that work will help inform an understanding of the likely patterns of movement to and from the site, including any particular issues in terms of routing in the surrounding area. Once the modelling outputs are understood we can share further details about the responses and solutions to any such issues.

The jobs created would include use of shifts, with travel spread across a number of 'change-overs' rather than all during the traditional morning and evening peak times which helps to minimise the local traffic impacts.

The proposals will include a Public Transport Strategy, and discussions are already underway about improvements to existing bus services as well as provision of new services to serve the site.

Q. *Has Network Rail provided any commitment to the scheme?*

- A.** We are in ongoing discussions with Network Rail who are fully aware of the proposals, and who will play an active role in helping deliver Government Policy regarding the growth and improvement of the rail network.

Technical work with Network Rail regarding how the site will be connected to the Northampton Loop is being undertaken. This will provide a basis for their input into the planning process as it progresses, but at this early stage they have confirmed their role in helping deliver the Government's policy of enabling more rail freight.

The establishment of a new SRFI in this area is consistent with Network Rail's Freight Market Study (published in August 2016). This sets out Network Rail's view of the way in which in the rail freight market will grow up to 2043.

It is also consistent with DfT's Freight Strategy published in September 2016, which sets out Government's strategy for growing the proportion of freight moved by rail up to 2030.

Q. *Why does your ES Scoping Report dismiss the Rail Central site?*

- A.** The ES Scoping Report references early consideration of the likely effects of both Roxhill and Ashfield Land sites because an assessment of the cumulative effects is required as part of the Environmental Statement.

The Scoping Report includes the opinion that the overall likely cumulative effects of both sites may well be considered unacceptable. For example, there are likely to be significant landscape and visual effects, and our early judgement is that the Rail Central site is more sensitive in environmental terms than the Junction 15 site. However, the full assessment of cumulative effects has not yet been undertaken.

Our initial technical analysis suggests that it would be difficult to install connections to both sites within the existing Network Rail track and signalling infrastructure.

Q. *It is understood that PINS will be interested to consider the cumulative effects of the two separate NSIP applications (Roxhill and Rail Central). Could both schemes be rejected by PINS?*

- A.** PINS will need to assess the schemes in the context of the National Policy Statement and the associated evidence base as it relates to the need for an expanded network of SRFIs, as well as with regard to the findings of the Environmental Impact Assessments and other supporting information which will form part of the two separate applications. It is understood PINS will consider the potential cumulative effects of both schemes as well as the individual effects.

The Planning Inspectorate will examine the applications and make a recommendation to the Secretary of State for Transport, who will make the decision on whether to grant or to refuse

development consent. It cannot be ruled out that one or both of the proposals could be recommended for refusal by PINS.

Q. *The DfT rail forecasts are ‘unconstrained’ – they are therefore not realistic, and not a sound basis for planning major developments.*

There is no need for another SRFI given the long-term capacity at DIRFT.

A. The rail freight industry uses an overall set of forecasts for ‘unconstrained growth’ (the Office of Road and Rail’s Freight Market Study). This illustrates what would happen if there were no infrastructure or operating constraints, and is used to assess the value of the contribution that various enhancement works can make.

DfT’s Rail Freight Strategy is not based on these unconstrained forecasts, but on a further market review carried out by Arup, which produced lower ‘constrained’ growth rates which do take account of the impact of routes where freight paths are limited (the West Coast Main Line south of Northampton is not a constrained route). These forecasts are set out in Table 1 of the DfT Rail Freight Strategy.

It is these realistic ‘constrained’ forecasts which predict that container traffic will double by 2030, and which have led to the identification of the delivery of an expanded network of SRFI as a key action to deliver this forecast rail freight growth.

DIRFT alone will not provide the capacity needed to accommodate the forecast doubling in intermodal container rail freight traffic. Even the additional capacity offered by DIRFT 3 is insufficient to meet DfT’s forecast of volumes doubling within 15 years.

The site is 16 miles away from DIRFT, and an SRFI site here would help serve a different core market area based around Northampton, Wellingborough, Bicester and Milton Keynes, with very good rail connections to all the major container import ports on the South Coast, East Coast and Thames Estuary. The site will also be configured to allow good to be transferred by rail between the SRFI and other regional rail terminals.

In addition, it will also have the capability to load express rail freight, which is a market that DfT expects to grow significantly in the next few years.

There could be complimentary effects from having two SRFIs relatively close together (DIRFT and Roxhill Gateway) in terms of aggregating traffic to regional rail freight terminals.

Q. *What’s the break-even point for use of rail freight?*

A. The choice of road or rail for the movement of containers is driven by a number of factors, of which price is only one component. Other factors include:

- The ability of rail to offer local timed delivery services to customers free from long distance trunk road congestion;
- Guarantees of road transport availability to clear the unloading areas at the port;

- Deadlines for delivery and requirements for intermediate storage (which is usually more efficient at the rail terminal than at the port);
- Proximity of rail termini to the ultimate destination/market;

Rail is able to move large numbers of containers away from the port immediately they are offloaded from the ship (around 60 containers per train). This is valued by shippers and is leading to demand for additional trains from each of the main deep-sea ports.

For these reasons the 'break-even point' is reducing, and is currently between 80 and 150 miles depending on the specific circumstances. DIRFT already handles traffic from Felixstowe, Tilbury and Southampton, and it is reasonable to expect that Northampton Gateway would also be competitive with road for these distances.

In addition DfT offers grant support for the modal transfer of container traffic to rail (the Mode Shift Revenue Support scheme). This grant recognises the environmental benefits of moving traffic by rail and has been successful in broadening the range of destinations served by container trains.

Q. *Will occupiers be compelled to use rail freight? If not, what guarantee will there be that it would even be built?*

Do they pay a premium to locate on a rail connected site?

A. Occupiers are not forced to use the rail terminal or required to adopt rail freight as part of their supply chains. However, Roxhill expects to be required to deliver (i.e. build) the rail terminal with triggers incorporated into any Development Consent Order to ensure the site does not come forward without it. Therefore, the terminal will be available to, and could attract, occupiers keen to make use of rail freight, as well as serving other companies using rail freight who are located off-site.

Rental levels and values on this site are likely to be similar to those seen at equivalent strategic sites in or close to Northampton.

Q. *A45 road capacity is already under pressure and with the J15 development could be more problematic than the M1 – what will you do to address any major issues on the A45?*

A. The Transport Assessment is ongoing, and the detailed modelling awaits completion of an update to the County Council's Strategic Transport Model. That modelling will highlight the likely issues or any problems caused on the road network as a result of the additional traffic from the site.

In recognition of the importance of the A45 in helping to support growth and sustain the economy throughout the region, Highways England has agreed a protocol with neighbouring Planning and Highways Authorities for its future management and safe-guarding. Forming part of the *Northampton Growth Management Strategy*, the proposals comprise a series of

Demand Management measures such as signalisation and ramp-metering to limit congestion along the A45 at peak times.

Nevertheless, we are aware of the existing challenges during the peak hours on the A45, and will review and discuss the modelling data with Highways England and local highway authority (Northamptonshire County Council) when it is available – this is expected during early 2017.

Q. *The drainage strategy assumes provision of balancing pond features, but the water table is very high in surrounding areas and may be too high to accommodate both a lowering of site levels and provision of ponds – if so how will you drain the site?*

A. Our work to date suggests the site can be successfully drained through implementation of a strategy based around attenuation features to store and manage the release of water into the existing watercourse network nearby. The application and proposals are informed by a Ground Investigation and other surveys. Our earlier work on development proposals on this site (in 2014) did not raise any significant problems or challenges in terms of implementing a similar drainage strategy.

While the concerns raised are noted, the emerging strategy would see drainage features predominantly provided around the eastern part of the site where the ground levels are already lowest, and where ground levels would be changed least by the emerging earthworks strategy. However, the detail of the drainage strategy remains work in progress, and further information will be available in due course.

Q. *What are the projected lorry movements per day once fully operational?*

A. The Transport Assessment is ongoing, and the detailed modelling is not yet underway - we await completion of an update to the County Council's Strategic Transport Model before that can begin.

However, initial work has been undertaken without use of the model based on typical trip generation from large-scale distribution sites, and as a worst-case this initial assessment suggested the site could generate up to 6000 daily HGV trips once fully operational. Since that initial worst-case estimate we have continued to work with the relevant highway authorities and to analyse trip generation data, and it is anticipated that a more realistic figure will be around or below 5000 daily HGV trips.

A robust assessment of the traffic and transport impacts will be available once the technical modelling work has been undertaken – this is expected to begin during early 2017.

Q. *Mezzanine floorspace is also included in the description of development (in the ES Scoping Report), so the proposals are for close to 7m sq.ft. altogether – what are the additional transport implications of that?*

A. The description of development includes an allowance for the potential provision of some mezzanine floorspace on the site (up to 155,000 sq.m.). This flexibility is important to the future attractiveness of the site and buildings to occupiers. Mezzanine space in warehousing buildings tends to be used differently to traditional floorspace, and does not generate the same density of employment or storage, and as a result does not generate the same numbers of trips (or jobs) per sq.m.

However, the ongoing Transport Assessment does take into account the likely impacts of that mezzanine space, and so the assessment of transport impacts will take into account the traffic associated with that component of the proposals.

Q. *What is the point of holding consultation exhibitions in December 2016 if full details about the likely impacts of the scheme won't be available at that stage?*

A. Early engagement and consultation with the local communities is considered important, and is actively encouraged by best practice. Early consultation enables us to understand key local issues and concerns which can help to inform how we progress some aspects of the technical work. In this case, we are specifically keen to discuss the alignment of the proposed Road Bypass which is not yet fixed.

We appreciate there will be criticism by some however we approach consultation – some people find it unhelpful if engagement and consultation is undertaken in advance of having done all of the technical work because they do not receive detailed answers to detailed questions; other people object if consultation presents already complete and final technical work which can create the perception that consultation events are 'going through the motions' with no scope to respond to local input or comments.

We are currently consulting the local authorities on a Consultation Strategy which will provide the basis for a future Statement of Community Consultation to set out how we undertake consultation activity in 2017. We are proposing two stages to public consultation:

- a non-statutory stage beginning in December 2016 with three public exhibitions to provide information about the site, the proposals, and the emerging EIA. These are being held soon after the EIA Scoping Opinion is expected from PINS. These events will enable people to comment on, and potentially inform, the ongoing EIA and other technical work.
- The statutory stage will be held in 2017 by which time we will have progressed the EIA, refined some key aspects of the proposals, and have a more developed Environmental Statement.

The two-stage process proposed would enable input both early and later in the application preparation process.

- Q.** *Your suggested 'committed developments' (in the ES Scoping Report) excludes the Rushden Lakes leisure and retail site under construction in East Northants further along the A45 and will generate significant movements – is that being considered in your transport modelling work?*
- A.** The transport modelling to underpin the application will be undertaken using the County Council's updated Strategic Transport Model – that takes into account all relevant committed developments (permitted and allocated sites), and so will include traffic anticipated from the Rushden Lakes leisure and retail scheme further north along the A45 at Rushden.