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27 January 2017

By Email and Post

Recorded Delivery

The Rt Hon. Andrea Leadsom MP
Member of Parliament for South Northamptonshire
House of Commons
London
SW1A 0AA

Dear Mrs Leadsom

Thank you for your letter of 9 January. We have found the points you make very helpful in our understanding of the local concerns.

As you note in your letter, we have recently commenced work on-site at our Strategic Rail Freight Interchange (SRFI) alongside East Midlands Airport in North West Leicestershire and our experience there has, we believe, stood us in good stead for the proposal at 'Northampton Gateway'.

The context for the scheme is, of course, provided in the Government's National Policy Statement (NPS), which confirms the 'compelling need' for an expanded network of SRFIs, in order to deliver the required shift in the movement of freight from road to rail. Schemes, the NPS says, should be 'market led'.

There continues to be significant demand from the logistics sector for new floor space. Indeed, 2016, was a record year for take up space, which was in excess of 4.65 million square meters (50m sq.ft), an increase of 7.5% from 2015. Northampton continues to be a key location for the logistics sector due to its proximity to the M1, its location between London and Birmingham and the availability of labour.

The market is also seeing a growing number of occupiers seeking to utilise rail as part of their business operations together with some businesses who are specifically seeking directly connected units.

The NPS includes rail freight forecasts which the Government has accepted for planning purposes. This includes a forecast of 12% compound growth in domestic intermodal rail freight between 2011 and 2033. A recent network Rail draft Freight Route Study (August 2016) identifies the assumptions on which this growth forecast is based. This includes a very significant expansion in rail-connected warehousing sites which it forecasts will need to expand from 'the current area of approximately 1.6m sq.mtrs (17.2m sq.ft) to approximately 5.9m sq.mtrs (63.5m sq.ft) by 2023, 9.6m sq.mtrs (103m sq.ft) by 2033 and 13.3m sq.mtrs (143m sq.ft) by 2043'.

The number of locations suitable for SRFIs is commercially limited by the market and by the locational requirements as set out in the NPS; these include direct access to the main line rail network, suitably gauge cleared and direct access to the national road network. SRFIs must be of a sufficient size to accommodate 775m long trains, together with interchange facilities and warehousing. In this regard, we are currently aware of only one nearby alternative location (Rail Central). We have, however, confirmed in our scoping submission that, in our view, Rail Central is not a suitable alternative because it would cause unacceptable harm to the environment.

The NPS requires us to assess alternative ways of developing our site, which we are doing as part of the on-going iterative process of consultation, consideration and refinement. We will continue to work with local authorities and communities to consider other alternative locations if they are identified.

Ultimately, there will be up to 16 trains running to and from Northampton Gateway each day. These trains will be up to 775m long and carry up to 72 (40' and 20') containers. As well as typical intermodal traffic the Northampton Gateway proposal also provides flexibility for the provision of a Rapid Rail Freight Terminal which Network Rail see as a future expanding market. In addition to the intermodal terminal the proposals provide for over half the total floor area of the scheme to be directly rail connected.

Our analysis of the Network Rail Working Timetable suggests that there are at least 20 train paths per day that are completely unused, and that of the train paths booked less than half are used on a daily basis. Freight traffic uses the Slow Lines rather than the Fast Lines used by passenger trains (other than at night when no passenger trains are running). Therefore the additional freight paths will not compromise the passenger train timetable, which it is acknowledged is running at near capacity during peak times.

When fully operational the Northampton Gateway scheme has the potential to remove significant volumes of HGV freight movements from the road network and onto rail, with consequent environmental as well as road capacity benefits. We fully recognize however (as acknowledged in the NPS) that the proposal will result in localised increases in HGV movements and their resultant impacts. We are working hard to fully assess the potential effects of the scheme and through design and mitigation minimize effects where possible.

The strategic case for HS2 outlines that its implementation will create between 20 and 40 additional train paths per day on the southern section of the WCML. Therefore, we are confident that there is sufficient capacity to accommodate Northampton Gateway in both the short and long term.

The impact of road-based traffic is inevitably a concern to local people and we have been working closely with the Highway Authorities to minimise it. We currently estimate that the net impact of HGVs to the north of the site on the M1 is likely to be in the order of 1%. The benefits gained at junction 15, which is proposed to be rebuilt as part of the SRFI scheme, will significantly reduce queueing from the north, thereby eliminating the current 'tailback' of peak hour stationary traffic.

We note from your letter that your constituents do not believe that the Northampton Gateway proposal is aligned with the aims of the Northampton Town Transport Strategy (NTTS). In this regard, there are two strategy documents covering the area of the SRFI currently in existence; one being the NTTS and the second the Northampton Growth Management Strategy (NGMS) which deals mainly with the A45. We are mindful of both and at the outset of the scheme sought the County Council's (NCC's) views as to how best to align the development with both from a sustainability perspective.

There are a number of threads to the NTTS and your letter highlights two that are of concern to your constituents; sustainable transport choice and reducing carbon through tackling congestion. We would respond to each concern as follows:-

1. Sustainable transport choice is about providing future employees with good and reliable alternatives to the private car, with the NTTS targeting a 20% reduction in Single Occupancy Car Journeys as its main goal. Bus, cycle and pedestrian journeys within Northamptonshire are well below the national average currently, but car-sharing is well above it, indicating the influence of warehousing on journey-to-work travel patterns locally, with its inherent reliance on shift working. For this type of development our experience would suggest that car-sharing is indeed the most effective way of reducing car usage at the SRFI and for this reason it is one of our main proposals for meeting the NTTS target. Such a proposal would be invisible to your constituents, but it nevertheless is an effective weapon and will be instigated from the outset through the Travel Plan. When combined with the proposed extensions of the existing bus services into the site from the nearby Grange Park and improvements to the cycle network to the south of the A45 through M1 Junction 15 we believe that the site will be sustainable from a transport perspective as a result. This strategy has the support of NCC; the author of the NTTS of course.
2. SRFIs by their very nature deliver substantial reductions in carbon emissions nationally through the transfer of freight from road to rail. In the Rail Freight Strategy of 2016 DFT estimates that each freight train removes between 43 and 76 HGVs from the roads, and that each tonne of freight moved by rail reduces carbon emissions by 76% compared to road transport. In the context of HGVs being responsible for 17% of UK transport emissions (in 2014) this underlines how at the strategic level SRFIs play a direct and significant role in meeting a range of carbon reduction and environmental objectives. Locally by far the most significant cause of congestion and hence carbon emissions is M1 Junction 15. With queues of over 300 vehicles being commonplace at peak times and the junction currently operating at around 27% above capacity, it is highlighted in the NTTS as being of major concern, with £2.31m being suggested for its improvement (see Page 55). The SRFI will deliver that improvement and more, providing additional capacity, taking account of both our SRFI and other identified growth. This will leave the junction with spare capacity in the future (even after allowing for the SRFI itself) where none would exist otherwise. NCC has confirmed that without this SRFI funding, neither they nor Highways England has the money to deliver any meaningful improvement for the foreseeable future. As a result, we believe that the SRFI will be a major contributor to helping to deliver the NTTS and reduce carbon emissions both locally and nationally. It is therefore fully aligned and indeed supportive of its priorities.

An integral part of the SRFI proposal is the construction of a bypass for Roade. A commitment would be made to construct the bypass within a given period of time following a start on-site. Whether or not the Roade bypass would lead to further development in the village, would of course be a question for the local authority. Roxhill has no interest in the land beyond the bypass construction.

Finally, we apologise for not running our first exhibition on a Saturday. We would welcome a discussion on consultation with you. We are anxious to consult widely, but we undertook our first consultation with as much information available as possible, to make it meaningful. Rest assured however that our ongoing consultation will aim to reach everyone and provide people with an opportunity to understand, comment on and influence our eventual submission to the Inspectorate.

We look forward to meeting you next week, when perhaps we can discuss further your concerns and we can elaborate on our ambitions.

Yours sincerely



Graham Pardoe
Senior Development Director