



HOUSE OF COMMONS

LONDON SW1A 0AA

Rail Central Phase Two Consultation
Ashfield Land
St. Catherine's Court
Berkeley Place
Clifton
Bristol
BS8 1BQ

20th April 2018

Ref: AL/TG/1804

To whom it may concern,

RE: Phase Two Statutory Consultation on Rail Central

I am writing to you formally to submit my response to Ashfield Land's second phase in its statutory consultation with the local community on the proposals to develop Rail Central, a Strategic Rail Freight Interchange, between the villages of Blisworth and Milton Malsor at the junction of the West Coast Main Line and the Northampton Loop Line.

Please find my comments broken down into sections: introduction; network capacity; site suitability; traffic; community engagement; conclusion.

At this stage, I am only providing cursory remarks in each section as I intend to raise further substantive objections through the Planning Inspectorate's examination of the application.

I confirm that I am responding in my capacity as the Member of Parliament for South Northamptonshire and on behalf of my constituents based on the concerns they have raised.

With best wishes,

A handwritten signature in blue ink that reads "Andrea Leadsom".

The Rt Hon. Andrea Leadsom MP
Member of Parliament for South Northamptonshire

Cc: Planning Inspectorate

Member of Parliament for South Northamptonshire



Submission by the Rt Hon. Andrea Leadsom MP to Ashfield Land's phase two statutory consultation on the proposals for the development of Rail Central

1. Introduction

- 1.1 I am wholly supportive of the Government's aims in encouraging a modal shift of freight from road to rail, which is a key aspect of our transport policy, and recognise that with effective implementation it can result in a reduction of carbon emissions, shorter and more efficient journeys, and fewer road casualties.
- 1.2 The delivery of a national network of Strategic Rail Freight Interchanges (SRFIs) forms a key part of recognising this aim, and the criteria for these are set out in the National Policy Statement for National Networks and the Strategic Rail Freight Interchange Policy Guidance documents.
- 1.3 These documents are clear that existing operational SRFIs and other intermodal RFIs are situated predominantly in the Midlands and the North, and that SRFI capacity needs to be provided at a wide range of locations, to provide the flexibility needed to match the changing demands of the market¹.
- 1.4 In the East Midlands, where the proposed Rail Central SRFI would be sited, there is around 39m sq. ft of SRFI-related warehousing either completed or under construction.
- 1.5 It is unclear whether further SRFI capacity in the East Midlands is required, and whether it would be compliant with the National Policy Statement that such sites should be provided at a wide range of locations and that the network should be distributed evenly across the regions.

2. Network Capacity

- 2.1 Following meetings and correspondence with Network Rail, I remain unconvinced that it has been adequately demonstrated that there is sufficient available freight capacity on the West Coast Main Line to allow for the additional *minimum* four freight paths per day required by the National Policy Statement.
- 2.2 The Department for Transport has said that it is not possible to accurately forecast the number of available freight paths on the West Coast Main Line after the opening of Phase One of the High Speed Two line. Existing SRFIs, freight operating companies, and passenger service companies will be considering their requirements for train paths in the post-2026 period.

¹ Para 2.58 | Government's Policy for Addressing Need for SRFIs | National Policy Statement for National Networks | December 2014



- 2.3 It would be unacceptable should the four freight path requirement be met via the reallocation of existing freight paths from nearby sites to Rail Central. The National Policy Statement is clear that new rail freight interchanges should attract substantial businesses that are generally new to rail².
- 2.4 Development Consent Orders are not granted on speculative futurity, and it must be demonstrated by Ashfield Land that Rail Central will meet the requirements for the minimum freight paths from day one of the site's operation, and through new businesses to the area.
- 3. Site Suitability**
- 3.1 The site is currently a greenfield site, situated between the two villages of Blisworth and Milton Malsor in rural Northamptonshire.
- 3.2 No amount of mitigation, landscaping or environmental bunding would fully compensate for the loss of open green space.
- 3.3 The height of the buildings and scale of the site mean that the visual blight created by Rail Central will be seen for miles around, and will substantially negatively impact on residents in the two villages as well as a number of other communities in the wider area.
- 3.4 The light pollution generated through the site's night-time operations will create considerable disturbance, and I am unconvinced that adequate assessments have been undertaken to establish a baseline for existing light pollution in the area from all surrounding vantage points.
- 3.5 There are considerable concerns about air pollution generated by HGVs accessing the site, worker journeys to and from the site, and the internal movement of vehicles.
- 3.6 Noise pollution once the site is operational (including from trains decelerating into and accelerating out of the rail freight terminal and the express freight terminal, air brakes and auditory brakes on HGVs, the movement of gantry cranes, and the movement of vehicles accessing and on site) is also of concern.
- 3.7 The local area benefits from substantially lower unemployment than the national average, suggesting that the 8,000-strong workforce will have to travel some considerable distances each day.
- 3.8 As outlined in paragraph 2.2, if the minimum freight path requirement is met by a reallocation of existing business from one nearby site to another, there will be no net gain in employment in the local area.

² Para 2.50 | Rail Freight Growth | National Policy Statement for National Networks | December 2014



3.8 There remain unresolved concerns about the future of a number of veteran and ancient trees that would be threatened by Rail Central, and I am aware that the Woodland Trust has also raised this point specifically as a key issue.

4. **Traffic**

4.1 Given that the precise phasing of the works has not yet been determined and the vague statements on the timings for the delivery of the express freight terminal, the projected traffic flows incorporated within the proposals are questionable.

4.2 Ben Copithorne has stated that “*occupiers would be required to pay an estate service charge and rail costs for using either or both Rail Terminals*” as an assurance that Rail Central will not become a road-based logistics hub, because why “*pay more and then not use rail?*”.

4.3 His wording suggests that the estate service charge and rail costs would only be levied if a business actually used the rail terminal i.e. if a business wanted to only use the warehousing and move freight solely by road, there would be no difference in cost to using Rail Central over a comparable site like Swan Valley or Prologis Pineham.

4.4 In addition to the considerable HGV movements associated with Rail Central, there are concerns about the movement of workers to and from the site and the impact on the local roads as outlined in paragraph 3.7.

5. **Community Engagement**

5.1 I have received letters and emails from hundreds of residents since Rail Central was first announced, with the overwhelming majority being steadfastly against the scheme. I have also had substantial concerns raised with me on the doorstep in the affected communities, in surgery appointments, and in meetings both in South Northamptonshire and Westminster.

5.2 There is a strong feeling locally that Ashfield Land do not fully grasp the impact that Rail Central will have on the area, the disruption that will be caused by the construction and operation of the site, and that no amount of mitigation will compensate for the loss of open green space.

5.3 Ashfield Land has engendered a sense of mistrust amongst the communities from the beginning, particularly with the unauthorised use of Network Rail’s logo in letters to residents and the lack of accessible events during the Phase One consultation.

5.4 Residents feel that Ashfield Land has been dismissive of issues and concerns that are raised, and any response is a vague theoretical solution that would not be effective in a real-world environment taking into consideration local conditions and views.



6. **Conclusion**

- 6.1 I have provided this response as the Member of Parliament for South Northamptonshire, on behalf of the large number of my constituents who have raised substantial concerns with me about the proposals.
- 6.2 I remain thoroughly unconvinced that the Rail Central proposals meet the criteria set out in the National Policy Statement, or that the site will have any positive benefit to the local area or my constituents.
- 6.3 There are other points that I will be raising with the Planning Inspectorate at the appropriate stage, and I also intend to provide more substantive detail on the above areas at that time as well.
- 6.4 I look forward to the Planning Inspectorate starting their consideration so that local residents can have the opportunity to make the strength and depth of their concerns known directly.

Andrea Leadsom

The Rt Hon. Andrea Leadsom MP
Member of Parliament for South Northamptonshire
20th April 2018