

THE RT HON. ANDREA LEADSOM MP



HOUSE OF COMMONS

LONDON SW1A 0AA

Mr Philip Asquith
Lead Member of the Examining Authority
National Infrastructure Planning
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your Ref: TR050006
Our Ref: AL/TG/1902

7th February 2019

Dear Mr Asquith,

Re: Application by Roxhill (Junction 15) Limited for an Order Granting Development Consent for the Northampton Gateway Rail Freight Interchange

Further to the publication on the 5th February of the Examining Authority's second round of written questions and requests for information, I write on behalf of my constituents in South Northamptonshire who continue to have substantial and specific concerns about the above project.

I confirm that I continue to act solely in my capacity as the elected Member of Parliament for South Northamptonshire, and I am registered as an Interested Party for this purpose.

This response is further to my letter of the 22nd October 2018 when I responded to the ExA's first round of written questions. Whilst I note no reference is made to this response in ExQ2, I trust that you have fully considered the points I raised on behalf of my constituents, and I should be grateful if you could also consider the further points I am about to make.

My remarks are limited to the questions arising from the sections on Air Quality and Emissions, Socio-economic Effects, and Transportation and Traffic.

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

[Enc.]

Member of Parliament for South Northamptonshire



2.1 Air Quality and Emissions

As you will recall from section five of my response to ExQ1, I set out my constituents' substantive concerns relating to air quality. In particular, I focused on the proximity of the proposed site to a number of Air Quality Management Zones, and the requirement as set out in the National Policy Statement for National Networks (NPSNN) that the Secretary of State should consider air quality impacts over the wider area likely to be affected, as well as in the near vicinity of the scheme. In all cases the Secretary of State must take account of relevant statutory air quality thresholds set out in domestic and European legislation.¹

The NPSNN states that the Secretary of State should refuse consent where, after taking into account mitigation, the air quality impacts of the scheme will: result in a zone/agglomeration which is currently reported as being compliant with the *Air Quality Directive* becoming non-compliant or; affect the ability of a non-compliant area to achieve compliance within the most recent timescales reported at the time of the decision.²

My constituents are very worried that the applicant does not appear to be taking proactive steps to fully address the concerns around air quality and emissions; this can be evidence by the 35 questions in this area set out by the ExA in ExQ2.

ExQ2.1.13

I welcome this question, specifically the focus on an increase in the level of failure to comply in AQMA 6, and clear guidance as set out in the NPSNN.

ExQ2.1.23

My constituents are concerned that the applicant's Environmental Statement (Transportation) assumes a single occupancy car target of 73.6 per cent. It is stated that the applicant's travel plan includes the target of reducing reliance on the private car by 20 per cent from the baseline, and that this will be achieved through a Public Transport Strategy and the promotion of car sharing, cycling and walking schemes.³

ExQ2.1.24

It is not unreasonable to assume that, absent any enforcement mechanism, the total daily vehicle movements could be much closer to those of the Swan Valley baseline which has a single occupancy car driver usage rate of 92 per cent, car passenger modal share of 5 per cent, and low pedestrian and cycle usage of 3 per cent.⁴

As shown in Table 8, this would be 17,657 total daily person trips with substantially increased numbers at peak hours and in the early morning, to a peak of 1,701 vehicles between 5am and 6am, and 1,393 vehicles between 5pm and 6pm.⁵

¹ 5.10 | Air Quality | NPSNN | December 2014

² 5.13 | Air Quality | NPSNN | December 2014

³ 9.1 | TN2 – Trip Generation | Transport Assessment | Environmental Statement Appendix 12.1 | June 2018

⁴ 5.8 | TN2 – Trip Generation | Transport Assessment | Environmental Statement Appendix 12.1 | June 2018

⁵ Table 8 | TN2 – Trip Generation | Transport Assessment | Environmental Statement Appendix 12.1 | June 2018



2.8 Socio-economic Effects

ExQ2.8.1

I refer the ExA to my response to ExQ2.1.23 and ExQ2.1.24 above.

ExQ2.8.3

As far as this question relates to the comments by Stop Roxhill Northampton Gateway Action Group, I refer the ExA to the remarks I made about the availability of a local workforce in ExQ1.

Whilst I always welcome new employment opportunities for my constituents, the reality is that local job numbers are already very strong. The applicant's proposal would have the impact of creating significant daily journeys from workers travelling to the site from further afield, adding to traffic congestion on roads some considerable distance outside of the applicant's mitigation scoping area.

The NPSNN states that SRFIs can provide considerable benefits for the local economy, and that the availability of a suitable and economic local workforce will therefore be an important consideration for the applicant.^{6 7}

Northampton Borough Council's Planning Committee has stated in its response to the applicant's statutory consultation that the proposed site was put forward for consideration as a strategic employment site as part of the consultation process for the WNJCS. The site was considered unsuitable for allocation at the time by reason of being located in the open countryside away from the existing urban area, which would conflict with the desire to provide good linkages between existing and new communities; it was considered contrary to the aims of promoting sustainable transport modes; there was concern regarding impacts on access to the M1 at Junction 15 and the strategic highway network; and the site was detached from the urban area and would represent a substantial extension of urban development into open countryside with potential impacts on landscape character.⁸

2.9 Transportation and Traffic

I made substantive comments about the capacity of the local road network as well as the capacity of the West Coast Main Line in section three of my response to ExQ1. My constituents are still firmly of the view that neither the roads nor rail network can handle the impact of an SRFI at this location.

ExQ2.9.1

My constituents feel it is entirely unacceptable for the applicant to be this far into the process, and for Network Rail not to have been able to categorically confirm that there is the capacity on their network for the minimum four freight paths per day required, as well as for the eventual expansion to 16 freight paths per day.

⁶ 2.52 | Drivers of Need for Strategic Rail Freight Interchanges | NPSNN | December 2014

⁷ 4.87 | Transport Links and Location Requirements | NPSNN | December 2014

⁸ 6.1 | Consultation Response | Planning Committee Northampton Borough Council | November 2017



Response to ExQ2 on the application by Roxhill (Junction 15) Limited for an Order Granting Development Consent for the Northampton Gateway Rail Freight Interchange by the Rt Hon. Andrea Leadsom MP

ExQ2.9.2

I refer the ExA to my response to ExQ2.9.1 above.

Further, the West Northamptonshire Joint Core Strategy (WNJCS) Local Plan (Part 1) states that access onto the fast West Coast Main Line will remain challenging. Consequently, it is considered that new rail freight interchanges in West Northamptonshire, in addition to DIRFT, would not be deliverable within this plan period (up to 2029).⁹

ExQ2.9.3

Development Consent Orders are not granted on speculative futurity of network capacity, and it must be demonstrated that Northampton Gateway will meet the requirements for the minimum freight paths from day one of the site's operation. What would happen if, for whatever reason, the construction and/or operation of HS2 were delayed?

The Department for Transport has stated that it is not possible to accurately forecast the number of available freight paths on the West Coast Main Line post-2026, when HS2 Phase One is due to open, as DIRFT and other existing SRFIs will be bidding on that capacity as their need continues to grow. Other passenger train operating companies and freight operating companies will be considering their requirements for train paths in the pre- and post-2026 period.

ExQ2.9.4

Mr Bodman is a lay authority on rail matters, and I am pleased the ExA is taking his concerns about the GRIP process seriously.

I have raised this issue several times previously, and enclose copies of letters to Network Rail and the Planning Inspectorate that were not satisfactorily answered. This is evidenced by ExQ2.9.4 having to be asked.

ExQ2.9.5

In ExQ1.11.15, the ExA highlighted concerns in other Relevant Representations that an increase in rail freight paths locally might have an adverse effect on the future growth of passenger traffic.¹⁰ I am disappointed that this question has not been resolved by the applicant.

Northamptonshire County Council has outlined in its Northamptonshire Rail Strategy that released capacity on the West Coast Main Line should be used to improve the frequency and journey times of trains serving Northamptonshire stations,¹¹ with additional peak commuter services to match capacity particularly at Northampton station.¹²

ExQ2.9.6

Mr Bodman has raised substantive points about the applicant's interpretation of the NPSNN. I would welcome a clear response from the applicant.

⁹ 5.72 | Warehousing | West Northamptonshire Joint Core Strategy Local Plan (Part 1) | December 2014

¹⁰ ExQ1.11.15 | Transportation, Traffic and Rail | ExQ1 | October 2018

¹¹ Policy Rail 3 | Service Improvements | Northamptonshire Rail Strategy – Fit For Purpose | January 2013

¹² Policy Rail 7 | West Coast Main Line | Northamptonshire Rail Strategy – Fit For Purpose | January 2013



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ExQ2.9.7

I refer the ExA to my response to ExQ2.9.5 above.

ExQ2.9.11

It would be unacceptable should the requisite four freight paths be delivered via the reallocation of existing freight paths from nearby sites to Northampton Gateway. This would not be new intermodal activity.

The NPSNN is clear that new rail freight interchanges should attract substantial businesses that are new to rail.¹³ The NPSNN also states that four freight paths is a minimum and SRFIs should be capable of increasing the number of trains handled.¹⁴

This was referred to in ExQ1.0.6 where the ExA made clear that moving the existing GRS business located in Northampton would be *merely* a transfer of rail paths, rather than attracting new business to Northampton Gateway.¹⁵

Conclusion

I confirm that I have provided this response to ExQ2 as the Member of Parliament for South Northamptonshire, on behalf of the many constituents who have contacted me to raise their significant and substantial concerns about the applicant's proposal to develop the Northampton Gateway SRFI.

I am grateful to the ExA for its consideration of these points, and those raised by my constituents, local authorities, parish councils, and others.

I would be happy to elaborate on any of the points I have made should it be helpful, although I am disappointed that my request for Issue Specific Hearings and / or Open Floor Hearings to be held on dates when my duties in the House of Commons did not preclude me from being able to attend.

I confirm that my Parliamentary Assistant, Tommy Gilchrist, will be attending ISH4 on my behalf on the 12th March 2019.

The Rt Hon. Andrea Leadsom MP
Member of Parliament for South Northamptonshire
7th February 2019

¹³ 2.50 | Drivers of Need for Strategic Rail Freight Interchanges | NPSNN | December 2014

¹⁴ 4.89 | Scale and Design | NPSNN | December 2014

¹⁵ ExQ1.0.6 | General and Cross-Topic Questions | ExQ1 | October 2018