



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/1903

12th March 2019

Dear Mr Asquith,

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

Thank you for allowing me the opportunity today to set out my constituents' concerns about the two proposed strategic rail freight interchanges in South Northamptonshire: Northampton Gateway by Roxhill and Rail Central by Ashfield Land.

I am aware that this Issue Specific Hearing is focused on the cumulative and interaction issues between the two proposed developments, and with other schemes and projects in the area. I am therefore very grateful to the Examining Authority for giving me permission to speak more widely on a number of substantive issues related to Northampton Gateway, through my Parliamentary Assistant, as my duties in Westminster this week prevent me from being at the hearings.

I would like to first make clear that I do not myself take a personal view on the merits, or otherwise, of the application by Roxhill for their Northampton Gateway SRFI. The comments I make and the concerns I set forward are entirely on behalf of my constituents in my capacity as their elected Member of Parliament.

The two rail freight interchanges have been proposed for several years now, with Rail Central first to be brought forward and Northampton Gateway following a year or so later. I have received hundreds and hundreds of emails, letters, and 'phone calls from my constituents about both developments in the intervening period, and I have held a series of public meetings in the affected communities in South Northants to hear directly from residents about their views. I can count on one hand the pieces of correspondence I have had in support of either proposal, and I would like to assure the Examining Authority that the overwhelming clear majority are utterly opposed to one or both being brought forward.

Member of Parliament for South Northamptonshire



This is not NIMBYism, but rather an expression of the very real and substantive concerns on a number of issues, including but not exclusively the application of the National Policy Statement for National Networks in its clear strategic objective 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 market; the impact on local and regional transport links, particularly increased HGV movements on the roads and the competing demands on train path availability between freight and an expansion of passenger services through Northampton; and increased local levels of air pollution.

I do not intend to repeat in full the points that I have made previously to the Examining Authority – these are well documented in my Written Representation of the 22nd October 2018 and my response to your Further Written Questions of the 7th February 2019, as well as in my submission to Roxhill's statutory consultation of the 19th November 2017 and my submission to their initial project information consultation of the 9th January. I have also variously raised concerns on behalf of my constituents – particularly around rail network capacity, GRIP stages, HGV traffic, and environmental matters – directly with the Planning Inspectorate as well as with Network Rail and others.

However, I would like to use this opportunity to focus the Examining Authority's attention, if I may, on a few of the key issues my constituents have with the Northampton Gateway proposal as a standalone, as well as the cumulative and interaction issues with Rail Central and other projects in the area.

Turning first to the NPSNN, and whether Northampton Gateway is compliant. I would like to put on record that I am very supportive of the Government's aim in encouraging a modal shift of freight from road to rail, which is a key aspect of our transport policy, and the delivery of a national network of SRFIs is at the core of this. You will be familiar from my previous submissions, as well as those of Professor Gough who is an expert in logistics from the University of Northampton and of Mr Andrew Bodman from the South Northants Action Group, that the NPSNN is very clear on what a national network should constitute, where SRFIs should be sited, and other criteria relating to an SRFI application.

Mr Bodman has previously set out in his Written Representation that the Northampton Gateway proposal is non-compliant with at least 28 paragraphs of the NPSNN, and with at least 14 paragraphs of the National Planning Policy Framework. Mr Bodman has also highlighted that it would be non-compliant with many policies of the West Northants Joint Core Strategy (WNJCS) including where strategic rail freight interchanges should be situated. As you will be aware, the WNJCS was reviewed and approved by the Planning Inspectorate. The proposal is also non-compliant with at least three policies of South Northants Council.

To be clear, siting a new SRFI less than 20 miles away from the Daventry International Rail Freight Terminal – which is the largest SRFI in the country – is not helping to create a national network, and would put the two sites in direct competition with each other for new and existing business, reducing the capacity for a modal shift.



On the impact on road and rail, I know that my constituents were particularly alarmed that, in its response to ExQ2, Network Rail admitted that even if instructions were received from the Applicant and/or Rail Central at this stage, it would have insufficient time to undertake any meaningful feasibility work on cumulative line capacity or operational compatibility before the close of the Examination.

It cannot be right that this application has progressed so far through the Examination, and Network Rail cannot guarantee whether both sites would be able to operate on their rail network. The implications are quite serious. Were a Development Consent Order to be granted for Northampton Gateway, there is the possibility that this would preclude Rail Central from being granted its DCO should Network Rail subsequently find that there is no operational compatibility between the two proposals or available line capacity.

Whilst my constituents would prefer no SRFI to be brought forward at this location, in the event that the Examining Authority is minded to recommend a DCO for one to the Secretary of State, they are clear that it must be the best proposal not just the first one considered.

Looking at passenger services, 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, with additional peak commuter services to match capacity particularly at Northampton station. My constituents have noted that Network Rail has stated that the granting of additional rights, beyond the requisite minimum of four freight paths per day, for the Applicant's Proposed Development will potentially constrain passenger growth.

I would like to reiterate that the NPSNN is clear that four freight paths is a minimum and new SRFIs should be capable of increasing the number of trains handled; this should not be at the expense of existing freight and passenger operators. Roxhill has indicated that Northampton Gateway would eventually serve 16 container trains per day and has previously indicated it would serve up to 12 express freight trains per day. This has not been demonstrated to be possible, and I draw the Examining Authority's attention to Network Rail's statement that it cannot confirm how any future capacity on the West Coast Main Line, including from HS2 should it be built, will be allocated.

On road traffic movements, I have set these concerns out in some detail in my Written Representation, particularly around the peak volumes per hour, single occupancy car targets, and the impact on the local roads. I refer the Examining Authority to this, and would highlight that no consideration appears to be given by the Applicant to the cumulative impact of construction traffic for the Towcester Vale Southern Extension, HS2 Phase One, the expansion of housing at Brackley, the proposed Cambridge-Milton Keynes-Oxford corridor which will include the completion of the East West Rail Link by 2024, or the many other sub-regional proposed and committed development schemes.

Many of the HGVs and other vehicles associated with these developments will use the same roads that the Applicant is proposing to use for the construction and operation of their SRFI.



Many of my constituents' concerns relate to air quality, and the impact – cumulatively or otherwise – of the Northampton Gateway proposal.

I note from Northampton Borough Council's response to ExAQ2 that the Government has said that Northampton does not have a persistent air quality problem and does not require a Clean Air Zone feasibility assessment as it is expected to meet the Air Quality Objective / EU Limit Value within the required EU compliance timeframes. However, my constituents have drawn my attention to the Borough Council's Low Emission Strategy for the period 2017 – 2025, which states that NO₂ levels in Northampton are significantly elevated in key locations and that it is the Council's view that the Government's modelling is over optimistic in predicting compliance with the EU Limit Values in Northampton by 2020.

I would highlight the existence of a number of Air Quality Management Areas in the vicinity of the site. One is on the A45 north of M1 junction 15 as it approaches the Queen Eleanor roundabout and the other is on the M1 between junctions 15 and 16. Almost two thirds of the additional traffic movements generated by this SRFI would pass through one or the other of these two AQMAs. There is a further AQMA on the A5 through Towcester which is likely to be affected by additional HGV movements generated by Northampton Gateway.

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.

In closing, I would reiterate the point that my constituents are firmly of the opinion that Northampton Gateway is a road-based warehousing project seeking to use the NPSNN as a means to circumvent the local planning process. The WNJCS is clear that the site has previously been rejected for strategic employment use. Network Rail is clear that it cannot demonstrate there will be the capacity on the West Coast Main Line for the Applicant's desired future growth in freight paths, or when further capacity will be available. Local road users are clear that the local road network cannot cope with the site's anticipated HGV and worker movements, and that it would likely collapse once the cumulative impact of all proposed and committed development schemes are considered. Residents in the surrounding area are clear that the development of the site is very likely to be in breach of the *Air Quality Directive*.

Thank you for your time today.

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

[Delivered orally by Tommy Gilchrist, Parliamentary Assistant]