



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/1810

22nd October 2018

Dear Mr Asquith,

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

I write to you regarding the above application which, along with David Brock, you are considering as the Examining Authority appointed by the Secretary of State.

I confirm that I am submitting a Written Representation, as set out in the Rule 8 Letter, on behalf of the hundreds of my constituents who have raised significant and substantial concerns with me about the SRFI proposed by Roxhill (the applicant), and I also confirm that I am doing so solely in my capacity as the elected Member of Parliament for South Northamptonshire. I have registered as an Interested Party for this purpose.

This Written Representation is supplementary to the Relevant Representation I made in July this year, and further to the points I have raised with the applicant through their initial non-statutory consultation and subsequent pre-application statutory consultation. Copies of my responses to both these consultations have previously been supplied to the Case Manager for this application, Ms Kate Mignano, and I would ask that these also be considered alongside my Written Representation. I will also be providing a separate summary of this Written Representation.

I am very grateful for your consideration of the points I am raising, and for your careful examination of this proposal which a great many of my constituents have concerns about.

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

Member of Parliament for South Northamptonshire



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

1. Introduction

- 1.1 I am wholly 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.
- 1.2 I am also aware that with effective implementation this modal shift can result in a reduction of carbon emissions, shorter and more efficient journeys, and fewer road casualties, amongst other clear benefits.
- 1.3 The delivery of a national network of Strategic Rail Freight Interchanges (SRFIs) forms a key part of recognising this aim, and the criteria for SRFIs are set out in the National Policy Statement for National Networks (NPSNN).
- 1.4 It is absolutely vital that the distribution of individual SRFIs supports the establishment of this national network, and that specific proposals are suitable for the local area including, but not limited to:
 - a) strategic site location;
 - b) rail and road capacity, including vehicle movements and congestion;
 - c) supporting new businesses;
 - d) availability of a local workforce;
 - e) air pollution.
- 1.5 The suitability of any one proposal for an SRFI is open to scrutiny; particularly whether the criteria set out in the NPSNN is met, and if the economic and environmental benefits of the development outweigh the impact on local residents, namely my constituents.
- 1.6 My constituents, many hundreds of whom have contacted me since the Northampton Gateway proposal was first brought forward, have significant and substantial concerns about the viability and suitability of the applicant's SRFI, Northampton Gateway.
- 1.7 These concerns have been reflected in the number of written questions and requests for information that have been set out by the Examining Authority in ExQ1; 270 questions across 84 pages, the majority of which are directed toward the applicant.
- 1.8 For comparison, when Roxhill (Kegworth) Limited's East Midlands Gateway Rail Freight Interchange was being examined by the Planning Inspectorate, the Examining Authority's First Written Questions amounted to a total of 98 across 27 pages.
- 1.9 It should also be noted that the Northampton Gateway proposal has received 848 Relevant Representations, whereas the East Midlands Gateway only received 311.
- 1.10 Clearly, the Examining Authority, local residents, parish councils and other local authorities, and other statutory and non-statutory consultees have concerns about the application, and the impact should a Development Consent Order be granted.



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2. Strategic Site Location

- 2.1 The NPSNN is clear that existing operational SRFIs and other intermodal RFIs are situated predominantly in the Midlands and the North,¹ 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 market.²
- 2.2 A clear need is also identified in the NPSNN for an expansion of the rail freight network in London and the South East, where most intermodal RFI and rail-connected warehousing is on a small scale and/or poorly located in relation to the main urban areas.³
- 2.3 Referring back to the Government's aim of achieving a modal shift in freight from road to rail, again, the NPSNN is clear that a network of SRFIs is needed across the regions, to serve regional, sub-regional and cross-regional markets.⁴ The wider Government vision for the transport system as a driver of economic growth and social development stipulates that the rail network must provide for the transport of freight across the country, and to and from ports.⁵
- 2.4 Whilst the NPSNN is clear that the enhanced connectivity provided by a network of SRFIs should, in turn, provide improved trading links with our European neighbours and improved international connectivity and enhanced port growth,⁶ it is also important to consider the evolving global trading links with new international partners as a result of opportunities presented through the UK leaving the European Union, and the movement of goods through other ports.
- 2.5 In the East Midlands, there is around 39m sq. ft. of SRFI-related warehousing either completed, under construction, or under consideration.
- 2.6 This includes the Daventry International Rail Freight Terminal (DIRFT) and its expansions, the East Midlands Gateway Rail Freight Interchange, the East Midlands Intermodal Park, the Hinckley National Rail Freight Interchange, the Rail Central Strategic Rail Freight Interchange, as well as Northampton Gateway.
- 2.7 It is unclear whether further SRFI capacity in the East Midlands is required, and whether it would be compliant with the NPSNN in that such sites should be provided at a wide range of locations, and that the need is for an expanded network of large SRFIs across the regions to accommodate the long-term growth in rail freight.⁷

¹ 2.57 | Government's Policy for Addressing Need for SRFIs | NPSNN | December 2014

² 2.58 | Government's Policy for Addressing Need for SRFIs | NPSNN | December 2014

³ 2.57 | Government's Policy for Addressing Need for SRFIs | NPSNN | December 2014

⁴ 2.54 | Government's Policy for Addressing Need for SRFIs | NPSNN | December 2014

⁵ 2.29 | Importance of the National Rail Network | NPSNN | December 2014

⁶ 2.54 | Government's Policy for Addressing Need for SRFIs | NPSNN | December 2014

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



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- 2.8 I note that, in ExQ1.0.19 the Examining Authority has asked the applicant to respond to the need for Northampton Gateway, given the above points and those made in other Relevant Representations and oral submissions at the Open Floor Hearing on the 10th October.⁸ I welcome this question from the Examining Authority.
- 2.9 I also note that in the same question the Examining Authority has invited the district planning authorities to comment on the role of demand and need in the consideration of the application and the NPSNN. From discussions with Dr Andrew Gough, an Associate Professor in Operations Management and Logistics at the University of Northampton who is submitting his own Written Representation, I understand that the Northampton Gateway proposal represents an over-provision of rail-connected warehousing of around 145 per cent, compared to the forecasts of need that have been published by Network Rail. I would therefore welcome the Examining Authority seeking comments on this point from Network Rail, in addition to those of the applicant and the district planning authorities.

3. Rail and Road Capacity

- 3.1 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 (WCML) to allow for the additional minimum four freight paths per day required by the NPSNN.⁹
- 3.2 In ExQ1.11.11, the Examining Authority has asked for clarification on what further detailed rail capacity studies the applicant has undertaken.¹⁰ This is a fundamental point on whether the site is or is not viable.
- 3.3 In ExQ1.11.13, the Examining Authority outlines the requirement that the SRFI must be capable of handling at least 4 goods trains per day, although there is no compulsion for rail to be used despite the construction of a rail terminal and rail-connected warehousing.¹¹ I would welcome clarification on what guarantees there are that Northampton Gateway would not become a road-based warehousing facility.
- 3.4 This is referred to in ExQ1.0.5 where the Examining Authority makes clear that earlier designs showed a greater percentage of warehousing being directly connected to rail, but this has reduced to only around 60 per cent in the current proposal.¹² The NPSNN states that whilst it is not essential for *all* buildings on the site to be rail-connected from the outset, a significant element should be.¹³ The wording here in the NPSNN would suggest that *all* buildings should *eventually* be rail-connected.

⁸ ExQ1.0.19 | General and Cross-Topic Questions | Examining Authority's Written Questions | October 2018

⁹ 4.89 | Scale and Design | NPSNN | December 2014

¹⁰ ExQ1.11.11 | Transportation, Traffic and Rail | Examining Authority's Written Questions | October 2018

¹¹ ExQ1.11.13 | Transportation, Traffic and Rail | Examining Authority's Written Questions | October 2018

¹² ExQ1.0.5 | General and Cross-Topic Questions | Examining Authority's Written Questions | October 2018

¹³ 4.88 | Scale and Design | NPSNN | December 2014



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- 3.5 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. The NPSNN is clear that new rail freight interchanges should attract substantial businesses that are new to rail.¹⁴ The NPSNN also states that four freight paths is a minimum and SRFIs should be capable of increasing the number of trains handled.¹⁵ This is referred to in ExQ1.0.6 in which the Examining Authority makes 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.¹⁶
- 3.6 In ExQ1.11.12, the Examining Authority acknowledges the applicant's position that rail freight capacity will be boosted by the opening of High Speed Two (HS2).¹⁷ However, 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?
- 3.7 I would note that the Department for Transport has stated that it is not possible to accurately forecast the number of available freight paths on the WCML 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.
- 3.8 Further, the West Northamptonshire Joint Core Strategy (WNJCS) Local Plan (Part 1) states that access onto the fast WCML will remain challenging even after HS2. 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).¹⁸
- 3.9 In ExQ1.11.15, the Examining Authority highlights 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.¹⁹ Northamptonshire County Council has outlined in its Northamptonshire Rail Strategy that released capacity on the WCML should be used to improve the frequency and journey times of trains serving Northamptonshire stations,²⁰ with additional peak commuter services to match capacity particularly at Northampton station.²¹ The Department for Transport has previously indicated that this would be the case for future capacity on the WCML.

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

¹⁵ 4.89 | Scale and Design | NPSNN | December 2014

¹⁶ ExQ1.0.6 | General and Cross-Topic Questions | Examining Authority's Written Questions | October 2018

¹⁷ ExQ1.11.12 | Transportation, Traffic and Rail | Examining Authority's Written Questions | October 2018

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

¹⁹ ExQ1.11.15 | Transportation, Traffic and Rail | Examining Authority's Written Questions | October 2018

²⁰ Policy Rail 3 | Service Improvements | Northamptonshire Rail Strategy – Fit For Purpose | January 2013

²¹ Policy Rail 7 | West Coast Main Line | Northamptonshire Rail Strategy – Fit For Purpose | January 2013



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- 3.10 In ExQ1.11.35, the Examining Authority requests that Network Rail provide a detailed explanation of the capacity of the rail network to support the applicant's SRFI proposal, specifically including the wider rail network beyond the WCML and the Northampton Loop Line, as well as the anticipated demand for freight paths and passenger paths from existing, consented and proposed developments.²² I very much welcome this question, which encompasses most of the points I have made in 3.1 through 3.9.
- 3.11 Turning to road capacity, Table 12.9 in Chapter 12 of the applicant's Environmental Statement (Transportation) outlined the anticipated off-site vehicle trips for the Northampton Gateway SRFI if their travel plan is enacted. This assumes total daily journeys of 14,116 vehicles comprised of 4,245 HGVs and 9,871 light vehicles.²³
- 3.12 Residents are extremely concerned about the impact that these additional 14,116 vehicles will have on the local road network, and that traffic will be constant throughout the site's 24-hour operation. Only for three one-hour periods will the vehicle movements be below 200 per hour (150 vehicles from 1am to 2am; 180 vehicles from 3am to 4am; and 155 vehicles from 11pm to 12am). Peak traffic movements occur between 5am and 6am when an additional 1,294 vehicles will be on the roads; the two next highest frequency movements occur across the evening rush hour with 1,096 additional vehicles from 5pm to 6pm, and a further 1,037 vehicles from 6pm to 7pm.²⁴
- 3.13 The total of 14,116 vehicle movements 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.²⁵ However, the requirement from Northamptonshire County Council is only to include a target; what enforcement mechanism is available to ensure the applicant achieves this reduction?
- 3.14 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.²⁶
- 3.15 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.²⁷

²² ExQ1.11.35 | Transportation, Traffic and Rail | Examining Authority's Written Questions | October 2018

²³ Table 12.9 | Chapter 12 – Transportation | Environmental Statement | June 2018

²⁴ Table 9 | TN2 – Trip Generation | Transport Assessment | Environmental Statement Appendix 12.1 | June 2018

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

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

²⁷ Table 8 | TN2 – Trip Generation | Transport Assessment | Environmental Statement Appendix 12.1 | June 2018



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- 3.16 My constituents believe the impact of this volume of additional site traffic on the local road network, in particular the A508 and A45, would negate the potential benefits that an SRFI could bring. This impact is exacerbated by the unexpected closure of other roads used by HGVs and commuter traffic which can affect the A43, A5 and minor roads as traffic diverts through the local villages. This could have a substantial impact on communities like Towcester, Shutlanger, Stoke Bruerne, Blisworth, Milton Malsor, Quinton, Hartwell and others further afield.
- 3.17 My understanding is that the proposed access would require all HGV traffic leaving the site to use the M1 northbound and southbound, or east on the A45, but in no circumstances the A508 via Roade, unless there is an official diversion route in force (presumably when the M1 is closed); this would be supported by Automatic Number Plate Recognition and other enforcement methods.^{28 29}
- a) Given that the M1 closes with unusual frequency, what provisions are being made to ensure that the A508 through Roade and beyond can handle the volume of HGV traffic should an official diversion route be in force, and what impact will this have on communities along the A508 and wider road network?
 - b) Additionally, ExQ1.11.6 and ExQ1.11.25 only refer to HGV traffic leaving the SRFI site; what about HGV traffic arriving at the site? Can these vehicles access the site via the A508 via Roade?
- 3.18 I am concerned that not enough consideration has been given to the cumulative effects from the proposed development and committed schemes, particularly on the local road network. Chapter 15 of the applicant's Environmental Statement (Cumulative Impacts) states that the main sites of relevance are the Bovis Homes Northampton South Sustainable Urban Extension at Collingtree; the Rail Central SRFI proposed by Ashfield Land; Highways England's 'Smart Motorways' programme (M1 motorway) – north and south of Junction 15 (13-16); and the Sustainable Urban Extension to the south of Brackmills.³⁰
- 3.19 I note that the Examining Authority has raised concerns about missing information on cumulative impacts of other developments several times,^{31 32 33 34 35} however 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.

²⁸ ExQ1.11.6 | Transportation, Traffic and Rail | Examining Authority's Written Questions | October 2018

²⁹ ExQ1.11.25 | Transportation, Traffic and Rail | Examining Authority's Written Questions | October 2018

³⁰ Matrix 1 | Chapter 15 – Cumulative Effects | Environmental Statement | June 2018

³¹ ExQ1.0.7 | General and Cross-Topic Questions | Examining Authority's Written Questions | October 2018

³² ExQ1.1.48 | Air Quality and Emissions | Examining Authority's Written Questions | October 2018

³³ ExQ1.8.23 | Noise and Vibration | Examining Authority's Written Questions | October 2018

³⁴ ExQ1.9.7 | Cumulative Impacts and Assessments | Examining Authority's Written Questions | October 2018

³⁵ ExQ1.12.8 | Water Environment | Examining Authority's Written Questions | October 2018



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- 3.20 It is reasonable to expect that 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, and wider consideration must be given to the cumulative impact of all traffic movements on the local road networks.
- 3.21 I would ask that the Examining Authority requests the applicant to consider the cumulative impacts across a much wider area.

4. Local Workforce

- 4.1 I always welcome new employment opportunities for my constituents, but the reality is that local job numbers are already very strong; South Northamptonshire has very low levels of unemployment, with only 0.7 per cent of the economically active population claiming benefits.
- 4.2 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.
- 4.3 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.^{36 37}
- 4.4 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.³⁸
- 4.5 In ExQ1.10.5 and ExQ1.10.6, the Examining Authority highlights the need for clarification by the applicant on whether there is an adequate pool of workers, with the right levels of qualifications, and whether these workers will come from other existing businesses in the area rather than generating new employment.^{39 40} I welcome both of these questions.

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

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

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

³⁹ ExQ1.10.5 | Socio-Economic Effects | Examining Authority's Written Questions | October 2018

⁴⁰ ExQ1.10.6 | Socio-Economic Effects | Examining Authority's Written Questions | October 2018



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5. Air Pollution

- 5.1 The UK has always led on improving air quality and reducing air pollution, and in 1997 became the first country in Europe to develop an air quality strategy.
- 5.2 The Department for Environment, Food & Rural Affairs is in the process of updating the current policy, and has recently held a consultation from 22nd May to 14th August this year on developing a new Clean Air Strategy.
- 5.3 This will outline UK air quality standards and policy objectives for reducing levels of health-threatening pollutants, including benzene, 1,3-butadiene, carbon monoxide, lead, nitrogen dioxide, particulate matter (PMs), sulphur dioxide, ground level ozone, and polycyclic aromatic hydrocarbons.
- 5.4 The *Air Quality Regulations 2000* and the *Local Air Quality Management Technical Guidance* provide a legal basis for some of the objectives, and local authorities must investigate the levels of pollution in their area, declaring an Air Quality Management Area (AQMA) if one of these legally-defined objectives is likely to be breached.⁴¹
- 5.5 Once an AQMA is declared, the local authority must develop an Action Plan.
- 5.6 The Northampton Gateway proposal is very close to two AQMAs established by Northampton Borough Council; Zone 1 (the M1 Corridor) and Zone 5 (the A45 London Road). The site is also not far from the AQMA established by South Northamptonshire District Council on the A5 Watling Street through Towcester.
- 5.7 In ExQ1.1.3, the Examining Authority is clear that the UK Government is very much focused on the implementation and compliance with the EU's *Air Quality Directive*, which became law in England via the *Air Quality Standards Regulations 2010*. Additionally, the *European Union (Withdrawal) Act 2018* has ensured that we have incorporated the whole body of the *acquis communautaire* into UK domestic law. I am pleased that the Examining Authority has asked the applicant to make clear whether Northampton Gateway would be in line with UK and international law.⁴²
- 5.8 The requirement for the Secretary of State to be provided with a judgement on the risk as to whether the project would affect the UK's ability to comply with the *Air Quality Directive* is clearly set out in the NPSNN.⁴³ The NPSNN states 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.⁴⁴

⁴¹ Technical Guidance TG16 | Local Air Quality Management | DEFRA | February 2018

⁴² ExQ1.1.3 | Air Quality and Emissions | Examining Authority's Written Questions | October 2018

⁴³ 5.9 | Air Quality | NPSNN | December 2014

⁴⁴ 5.10 | Air Quality | NPSNN | December 2014



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- 5.9 I welcome the questions set out by the Examining Authority in ExQ1.1.23 and ExQ1.1.30 regarding the use of local diffusion tubes, and seeking clarification from the applicant on why Air Quality Standards are not considered relevant for nearby residential properties.^{45 46}
- 5.10 Rod Sellers, Chairman of the Stop Northampton Gateway local action group, has previously raised concerns about the air quality measurement processes being used by the local authorities and the applicant, through me as his constituency Member of Parliament, with the Department for Environment, Food & Rural Affairs. He was particularly concerned whether measurements from diffusion tubes could provide sufficiently accurate data for planning purposes, given that his understanding of current policy guidance is that these results should be regarded as indicative and then validated using continuous automatic monitoring.
- 5.11 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.⁴⁷

6. Other Matters

- 6.1 I know that many residents remain concerned that the proposals will cause substantial visual blight for the communities surrounding the site, given the height of the buildings and the gantries, and that the bunding and other environmental mitigations are not enough to mitigate the impact on their local area.
- 6.2 The site is a greenfield site, situated between the villages of Blisworth, Collingtree and Milton Malsor in rural Northamptonshire. No amount of mitigation, landscaping or environmental bunding would fully compensate for the loss of open green space.
- 6.3 The light pollution generated through the site's night-time operations will create considerable disturbance, and residents are unconvinced that adequate assessments have been undertaken to establish a baseline for existing light pollution in the area from all surrounding vantage points, and that the Lighting Strategy is therefore inadequate. Figure A11.2.1 demonstrates that no night time view locations have been included from Collingtree toward the proposed site,⁴⁸ and the external lighting baseline survey has only been conducted on one night on the 8th March 2017, when the moon was 85 per cent full.⁴⁹

⁴⁵ ExQ1.1.23 | Air Quality and Emissions | Examining Authority's Written Questions | October 2018

⁴⁶ ExQ1.1.30 | Air Quality and Emissions | Examining Authority's Written Questions | October 2018

⁴⁷ 5.13 | Air Quality | NPSNN | December 2014

⁴⁸ Figure A11.2.1 | External Lighting Baseline Survey | Environmental Statement Appendix 11.2 | June 2018

⁴⁹ A11.2.1 | External Lighting Baseline Survey | Environmental Statement Appendix 11.2 | June 2018



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- 6.4 Residents are also concerned about the loss of a number of locally-important mature trees, and I am aware that this has been raised in ExQ1.2.6 by the Examining Authority.⁵⁰

7. **Conclusion**

- 7.1 I confirm that I have provided this Written Representation 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.
- 7.2 I am grateful to the Examining Authority, Philip Asquith and David Brock, for their consideration of the points included in my Written Representation, and the Written Representations of my constituents, local authorities, parish councils, and others.
- 7.3 I would be happy to elaborate on any of the points I have made should it be helpful, and will be providing a separate summary of this Written Representation.
- 7.4 I also intend to submit a notification to attend an Accompanied Site Visit, and a notification of my wish to speak at a subsequent Open Floor Hearing.

Andrea Leadsom

The Rt Hon. Andrea Leadsom MP
Member of Parliament for South Northamptonshire
22nd October 2018

⁵⁰ ExQ1.2.6 | Biodiversity, Ecology & Environment | Examining Authority's Written Questions | October 2018