



HOUSE OF COMMONS

LONDON SW1A 0AA

Northampton Gateway SRFI  
PO Box 10570  
Nottingham  
NG2 9RG

19<sup>th</sup> November 2017

Ref: AL/TG/1711

**Re: Stage 2 Public Consultation**

**Copy to: Roxhill (Junction 15) Limited. Lumonics House, Valley Drive, Swift Valley Industrial Estate, Rugby CV21 1TQ**

This document forms my response to Roxhill's statutory public consultation, and is submitted on behalf of the many residents in my constituency of South Northamptonshire who have raised their concerns with me about the proposals and the impact that the Northampton Gateway Strategic Rail Freight Interchange will have on their local area.

I am, of course, very supportive of the Government's overall policy on Strategic Rail Freight Interchanges (SRFIs), as set out in the National Policy Statement for National Networks (NPSNN) and the Strategic Rail Freight Interchange Policy Guidance (SRFI PG).

Modal shift of freight from road to rail is a key aspect of the Government's transport policy, and is critically important in reducing carbon emissions, journey times, and road casualties. Network Rail notes<sup>1</sup> that rail achieves a faster, greener, safer and more efficient way of transporting loads across Britain by:

- taking lorries off the road, drastically reducing road congestion (each freight train can typically take around 60 lorry journeys off the road);
- reducing carbon emissions; rail freight produces around a 76 per cent reduction in CO2 emissions over road freight per tonne carried, helping us to improve our carbon footprint;
- lorries are responsible for a disproportionate number of road casualties so reducing their numbers on our roads will save a significant number of lives and injuries every year;
- haulage by rail is more efficient than by road; on average, a gallon of fuel will move a tonne of goods 246 miles on the railway, but only 88 miles by road;
- rail freight produces less than a tenth of the nitrogen oxide and fine particulates of road haulage per tonne carried.

The suitability of any one proposal for an SRFI is open to scrutiny; particularly whether the criteria set out in the NPSNN and SRFI PG are met, and if the economic and environmental benefits of the development outweigh the impact on local residents.

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<sup>1</sup> Executive Summary | Value and Importance of Rail Freight | Network Rail | July 2010



### **Strategic Location**

The NPSNN is clear that there is a need for an expanded network of large SRFIs across the regions to accommodate the long-term growth in rail freight, and that new rail freight interchanges, especially in areas poorly served by such facilities at present, are likely to attract substantial business, generally new to rail<sup>2</sup>.

However, the NPSNN also states that existing operational SRFIs and other intermodal RFIs are situated predominantly in the Midlands and the North<sup>3</sup>, 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<sup>4</sup>.

Focusing on the East Midlands, the second expansion of the Daventry International Rail Freight Terminal (DIRFT) has been granted a Development Consent Order (DCO) which will add a further 8m sq. ft to its existing 8m sq. ft operational capacity. The East Midlands Gateway has also been granted a DCO for an SRFI covering 6m sq. ft. In addition, three further SRFI proposals are at the pre-application stage including Northampton Gateway (5m sq. ft), Rail Central (8m sq. ft), and East Midlands Intermodal Park (6m sq. ft); there is also a proposal for a further SRFI with 6m sq. ft at Hinckley. This is a total of 39m sq. ft of SRFI-related warehousing either under construction or being proposed in the East Midlands alone, not including the existing SRFI warehousing capacity already present nor other SRFIs in the wider Midlands region.

My constituents view this concentration of SRFI capacity in the East Midlands as contrary to the guidance issued in the NPSNN that such sites should be provided at a wide range of locations and the network should be distributed across the regions. They will continue to present these views to the Planning Inspectorate at later stages in the application process.

### **Rail Capacity & Feasibility**

The SRFI PG describes an SRFI as a large multi-purpose rail freight interchange and distribution centre linked into both the rail and trunk road system which has rail-connected warehousing and container handling facilities<sup>5</sup>. The NPSNN states that, as a minimum, an SRFI should be capable of handling four trains per day and, where possible, be capable of increasing the number of trains handled<sup>6</sup>.

Network Rail has made clear that the West Coast Main Line is nearing capacity, and it is uncertain whether the freight paths are available to support the minimum requirement of four trains per day. Whilst a modular capacity study has been commissioned by both Roxhill and the developers of Rail Central, Ashfield Land, to look at the Northampton Loop Line, the West Coast Main Line was excluded due to the difficulty of modelling freight path availability without detailed information on the origins and destinations of the freight journeys.

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<sup>2</sup> Para 2.50 | Rail Freight Growth | NPSNN | December 2014

<sup>3</sup> Para 2.57 | Government's Policy for Addressing Need for SRFIs | NPSNN | December 2014

<sup>4</sup> Para 2.58 | Government's Policy for Addressing Need for SRFIs | NPSNN | December 2014

<sup>5</sup> Para 2.2 | What is a Strategic Rail Freight Interchange (SRFI)? | SRFI PG | November 2011

<sup>6</sup> Para 4.89 | Scale and Design | NPSNN | December 2014

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 High Speed (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 service companies and freight operating companies will be considering their requirements for train paths in the pre- and post-2026 period. DCOs are not granted on speculative futurity, and it must be demonstrated that there is current available capacity on the West Coast Main Line for the requisite minimum four freight paths per day for an SRFI application to meet the NPSNN criteria.

Northamptonshire County Council has outlined in its Northamptonshire Rail Strategy that released capacity on the West Coast Main Line will be used to improve the frequency and journey times of trains serving Northamptonshire stations<sup>7</sup>, with additional peak commuter services to match capacity particularly at Northampton station<sup>8</sup>.

### **Impact on Local Roads**

Table 9 in Appendix 12.7 of Roxhill's Transportation Strategy<sup>9</sup> summarises the predicted traffic profiles for the Northampton Gateway SRFI if the travel plan is enacted. This assumes a total daily movement of 14,116 vehicles comprised of 4,245 HGV trips and 9,871 other vehicles.

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-6pm, and a further 1,037 vehicles from 6pm-7pm.

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, as we have seen in recent weeks with the M1, by the unexpected closure of other roads used by HGVs and commuter traffic which can affect the A43, A5 and minor roads 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.

Residents do not believe that enough consideration has been given to the cumulative effects from proposed development and committed schemes, particularly on the local road network. Chapter 15 of Roxhill's Environmental Statement states that, as referred to in previous chapters, the main sites of relevance are the Northampton South Urban Extension located on the opposite side of the M1 (north-west of Collingtree), the Rail Central proposed SRFI to the west of the

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<sup>7</sup> Policy Rail 3 | Service Improvements | Northamptonshire Rail Strategy – Fit For Purpose | January 2013

<sup>8</sup> Policy Rail 7 | West Coast Main Line | Northamptonshire Rail Strategy – Fit For Purpose | January 2013

<sup>9</sup> Table 9 | App. 12.7 (Technical Note 2: Trip Generation) | Chapter 12 – Transportation | Environmental Statement



Northampton Loop railway line between Milton Malsor and Blisworth, and Highways England's 'Smart Motorways' programme (M1 motorway) – north and south of Junction 15 (13-16)<sup>10</sup>.

No consideration appears to be given to the cumulative impact of construction traffic for the Towcester Vale Southern Extension, HS2 Phase One (particularly when the A43 closes so the road can be lifted to allow the high-speed line to pass underneath), 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.

It is reasonable to expect that many of the HGVs and other vehicles associated with these developments will use the same roads that Roxhill is proposing to use for the construction and operation of its SRFI, and wider consideration must be given to the cumulative impact of all traffic movements on the local road networks. I made this point in my submission to Roxhill's initial non-statutory consultation.

### **Employment and Local Workforce**

The NPSNN states that SRFIs can provide considerable benefits for the local economy, and that the availability of a suitable workforce will therefore be an important consideration<sup>11</sup>. It is well-known that South Northamptonshire has exceptionally low levels of unemployment, with only 0.6 per cent of the economically active population claiming benefits; indeed, South Northamptonshire has the sixth lowest claimant rate in the country. The majority of the workforce would therefore have to originate from outside of South Northamptonshire.

### **General Site Concerns**

The SRFI PG summarises one of the objectives of the Government's policy for SRFIs as supporting the long-term development of efficient rail freight distribution logistics to ensure a network of SRFIs in appropriate locations<sup>12</sup>.

Northampton Borough Council's Planning Committee has stated in its response to Roxhill'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 West Northamptonshire Joint Core Strategy.

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; 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<sup>13</sup>.

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<sup>10</sup> Matrix 1 | Cumulative Effects Assessment | Chapter 15 – Cumulative Effects | Environmental Statement

<sup>11</sup> Para 2.52 | UK Economy, National and Local Benefits – Jobs and Growth | NPSNN | December 2014

<sup>12</sup> Para 2.1 | Summary of Government Policy | SRFI PG | November 2011

<sup>13</sup> Para 6.1 | Consultation Response | Northampton Borough Council Planning Committee | November 2017

The West Northamptonshire Joint Core Strategy Local Plan (Part 1) states that access onto the fast West Coast Main Line 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)<sup>14</sup>.

My constituents believe that the reasons the site was originally considered unsuitable for allocation as a strategic employment site still stand, and the significant impacts on the landscape's character mean that the location remains inappropriate for development, including as an SRFI.

### **Other Matters**

In addition to the above points, my constituents are 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.

On behalf of the many constituents who have contacted me about Roxhill's proposals to develop a Strategic Rail Freight Interchange, Northampton Gateway, in South Northamptonshire, please treat the above as my submission to the pre-application statutory consultation. As with the initial consultation earlier in the process, I will be publishing this submission and any subsequent response on my website for the benefit of local residents.

With best wishes,



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

Cc: Planning Inspectorate

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<sup>14</sup> Para 5.72 | Warehousing | West Northamptonshire Joint Core Strategy Local Plan (Part 1) | December 2014