BLISWORTH PARISH COUNCIL

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WRITTEN REPRESENTATION TO THE PLANNING INSPECTORATE

ON

NORTHAMPTON GATEWAY

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Abbreviations

AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality management Area
DfT	Department for Transport
DIRFT	Daventry International Rail Freight Terminal
EIA	Environmental Impact Assessment
EMDA	East Midlands Development Agency
EMG	East Midlands Gateway
EMIP	East Midlands Intermodal Park
ESSR	Environmental Statement Scoping Report
FOC	Freight Operating Company
GBFM	Great Britain Freight Model
GEML	Great Eastern Mainline
GRIP	Governance for Railway Investment Projects
KIG	Kent International Gateway
MML	Midland Mainline
MOSSEND	Mossend International Rail Freight Park
NBC	Northampton Borough Council
NPSNN and NPS	National Policy Statement for National Networks
NRFMS	Network Rail Freight Market Study
NSIP	Nationally Strategic Infrastructure Project
ORR	Office of Road and Rail
RFI	Rail Freight Interchange
SRFI	Strategic Rail Freight Interchange
SRIFP	Strategic Rail Freight Interchange Policy March 2004
SNC	South Northants District Council
SUE	Sustainable Urban Extension
WCML	West Coast Mainline
WNJCS	West Northants Joint Core Strategy

Executive Summary

Blisworth Parish Council strongly object to the Northampton Gateway SRFI proposal for the reasons detailed in this submission.

ES1 Rail freight has an important part to play in the national distribution landscape of the UK. However, it is important to appreciate that the extent to which a modal shift from road to rail can occur is ultimately constrained by factors such as rail capacity, economics, flexibility, convenience and, foremost, demand. It is therefore essential that finite capacity is allocated where it is most likely to facilitate a modal shift. The fact that there are (at the time of writing) two recently consented SRFIs, one at examination, one at pre-examination and three more at the pre-application stage in the Midlands alone, whilst there are none in any other part of country, is an indication that an optimum strategic national network '***across the regions'*** may not be emerging.

ES2 The proposed Application is at odds with the stipulations laid down in the National Policy Statement for National Networks (NPS) in so far as: it is not ideally located near the business markets it claims it will serve; there is not an available and economic local workforce; it is not ideally located to reduce the secondary (road) leg of a freight journey; the requirement for a strategic network *'across the regions'* will not be met at this location (nor will a *'wide range of locations'*); the local area is far from *'poorly served'*; it is not a brownfield site (nor have any alternative brownfield sites been considered); it delivers no local environmental or social benefits; and it does not follow investment in the strategic rail network.

ES3 The proposed development is contrary to the West Northants Joint Core Strategy (WNJCS) which directs new, large scale and rail-connected development to the recently consented DIRFT 3 and seeks to maintain a balanced economy by avoiding over-reliance on one employment sector (the logistics sector). The WNJCS also commits to safeguarding the rural economy by ensuring that development proposals are an appropriate scale for their location, respect the environmental quality and character of the rural area and protect the best and most versatile agricultural land.

ES4 The current local plan protects the rural community from the expansion of the conurbation south of the M1, identifying the Application site as an ***Area of Important Local Gap*** (South Northamptonshire Local Plan (1988 - 2006) Adopted Oct 1997) [Policy EV8]. Should Northampton Gateway be consented this protection will be lost. The location has already been turned down as a suitable and sustainable location by an Inspector appointed by the Secretary of State for Communities and Local Government. ***2nd October 2014 PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED) SECTION 20 REPORT ON THE EXAMINATION INTO THE WEST NORTHAMPTONSHIRE JOINT CORE STRATEGY LOCAL PLAN***

ES5 The objective of the NPS is to deliver a national strategic network. The Applicant has not considered whether any other (UK) sites may be better placed to deliver this strategic objective. The Applicant has made a number of unsuccessful attempts to develop this particular piece of land for (non-rail connected) warehousing and now appears to be dressing it up as a National Strategic Infrastructure Project (NSIP) in another attempt to realise long held commercial aims. The fact only the most basic of rail provision need be provided and that there is no sanction for not utilising the rail makes the NSIP a convenient vehicle for ignoring local need and by-passing local planning law.

The Examiner's view in the Kent International Gateway decision sets a particularly pertinent precedent:

KIG 18.207 *In formulating the question in this way, I acknowledge that it is not realistic to expect that all the goods that pass through the warehouses should be moved onwards by rail. Some (indeed the majority) would inevitably go by road – as the SRA recognise would be the case with all SRFIs. However, it is plain to me that, in the absence of any train traffic (or indeed very little train traffic), then the planning balance would fall squarely against granting planning permission for what would in effect be a very large collection of (primarily) road-based warehouses in open countryside adjoining an AONB. Accordingly, the extent to which the proposal can be reasonably expected to generate train traffic (as opposed to simply acting as a collection of road-based warehouses) is, to my mind, a critical consideration to be taken into account in the overall planning balance.* ***Appeal by Kent International Gateway Ltd concerning an application for Kent International Gateway Rail Freight Interchange 31st March 2010***

ES6 The NPS and the EIA Directive require projects with significant environmental effects to include an outline of the main alternatives (an options appraisal) studied by the Applicant and an indication of the main reasons for the Applicant's choice, taking into account the environmental effects. The Applicant has failed to produce an options appraisal prior to (or after) selecting, promoting and investing in this location. This is a significant non-compliance.

ES7 The close proximity of Northampton Gateway to DIRFT which has consented rail connected capacity for (approximately) the next 12 years and the competition between the two for rail paths and tenants would lead to under-utilised rail freight resources and neither site achieving their full potential. Carbon emissions would also be increased by the duplication of plant and vehicles. The precedent set in the Mossend RFI decision is of particular relevance. It was concluded that consenting an extension to the Mossend Terminal would have an adverse effect on the economic viability of other similar facilities in the locality.

"The reporter thought that, if Mossend were to succeed in attracting business, much of that business would be displaced from other locations. This was more likely to be true of distribution activity than of manufacturing, some of which might be attracted to the rail freight park and could represent a net gain to Scotland. Nevertheless, there would be a real prospect of the closure of the Freightliner terminal at Coatbridge, and potentially a risk to other facilities in central Scotland. The reporter goes further; at paragraph 2.29 of his report he identified three alternative sites, the Freightliner facility at Coatbridge, which had spare capacity, the Eurocentral terminal to the east of the appeal site, and a new site at Kilgarth designated in the development plan. The reporter concluded that "A strong case can be made out for a strategic look at rail freight needs and priorities at the national (NPF4), regional (SDP review) and local (LDP) levels, so as to ensure the optimum pattern of development". ***Decision by Scottish Ministers dated 3 August 2015 upholding an appeal by Peter D Stirling Ltd and the I D Meiklam Trust and granting planning permission in principle for the expansion of Mossend railhead***

ES8 The WCML is the core freight route to the north west of England and Scotland, and 43% of all UK rail freight traffic and 90% of all intermodal traffic travels over it at some point. The route is now at full capacity in peak periods. Additional demands will be placed on this route by developments such as the expansion of DIRFT (aspirations for a further 20 paths); the East West rail feed at Bletchley; a demand for additional passenger services; the new Rugby Parkway passenger terminal; and, potentially, other SRFI proposals centred exclusively in the Midlands. There is therefore a limit to future expansion and a high risk that passenger services may be adversely affected by perturbation.

ES9 Northampton Gateway is located on a constrained rail corridor, whose priority is, and always will be, to prioritise passenger capacity to serve the commuter markets to London. Notwithstanding this

constraint, the majority of freight traffic travels from the major ports of Felixstowe and London via the North London line which presents the most significant bottleneck on the freight network. The on-going investment in the Felixstowe to Ipswich branch line (and likely improvements at Ely) provide a more favourable route into the Midlands, avoiding the congested WCML and its known bottlenecks. Future SRFI development should follow investment in rail capacity, not precede it (as directed by the NPS).

ES10 MDS Transmodal, the company responsible for producing the unconstrained forecasts used by the Government to predict future rail freight movements, have publicly declared that there is insufficient capacity on the rail network (and in particular the WCML) to effectively service any more warehousing beyond the DIRFT3 expansion **(Chapter 18).** Furthermore, the Strategic Freight Network sets out the requirement for the core routes, one of the objectives of which is to minimise freight via London and protect the WCML south of Nuneaton for enhanced passenger services. Building SRFIs on the southern section of the WCML is therefore contrary to over-riding strategic objectives. Proposed SRFIs in the West Midlands and Hinckley are far better placed to facilitate the national freight strategy. *'For capacity schemes, consideration regarding routing options is crucial to optimise path availability, journey times and passenger service interaction. An example of where the freight industry has created a core freight route is Felixstowe to the West Midlands and the North route, routing services 'cross-country' to avoid the capacity and performance issues of travelling across London and on two congested main lines'* ***Long Term Planning Process: Freight Network Study (Draft for Consultation), August 2016. Appendix 5***

ES11 'As a rough approximation rail then road is cheaper than road-only if the rail leg is over 170 miles. Some estimates put this rail leg at closer to 270 miles'. ***Long Term Planning Process: Freight Market Study, October 2013.*** The proximity of Northampton Gateway to the ports of Liverpool, Southampton, London Gateway and Felixstowe raises concerns about the economic viability of the location (from a rail perspective) and the ability to facilitate an effective modal shift from road to rail. The economic landscape is such that there is currently no incentive for commercial organisations to switch from road to rail. Given the relatively short distances involved and without Government subsidy the modal shift at Northampton Gateway is likely to be modest.

ES12 The Department for Transport's National Transport Model has identified that by 2040 the section of the M1 between junction 15 and junction 18 will be severely congested. It can reasonably be surmised that the DfT model is included as an annex in the NPS to steer Developers towards parts of the road network that are more able to accommodate the additional traffic. The 7.5 million square feet of expansion at DIRFT will already increase the traffic on this congested section of the motorway, another SRFI (or more), along with the already consented local developments, on the same congested section will further exacerbate the problem (even earlier than 2040).

ES13 The Highways modelling completed by the Applicant assumes a 'perfect world' scenario with all parts of the network operating at an optimum, unstressed, level. Given the single point of access to the site and the significant reliance on the M1 for its smooth and effective operation, this simplistic approach is not considered suitable or sufficient. On the basis that the section of the M1, upon which the facility is reliant, is frequently congested, and sometimes closed, there should be a requirement to stress test the model to fully clarify the knock on effects for the local road network and neighbouring local communities. It is unrealistic to assert that there will be no overspill from a

development of this size. This requirement becomes even more critical when considering the cumulative impact of Rail Central.

ES14 The proposed works to the local road network will have the effect of increasing traffic on some country lanes and through the centres of villages; they will not, as the Applicant contends, reduce it. The proposed weight limits on a number of country lanes are not enforceable and are likely to be ignored. There is a significantly increased risk to the safety and well-being of local residents from increased light and heavy traffic on unsuitable roads.

ES15 The available labour pool has been overstated by the Applicant by using the figures for gross increases in population rather than the increase in those of a working age (15,890 compared to 1,500). Those locally available for employment in the logistics sector barely fill the employment opportunities created by the current allocation of commercial development areas in the West Northants Joint Core Strategy. The Applicant's contention that 60% of the workforce will travel from Northampton and 90% from within the study area is strongly refuted as it is based on the application of incorrect employment figures. The absence of a suitable local pool of labour will increase travel journeys to work and negate any carbon benefits of transferring freight onto rail. The large increase in logistics employment will unbalance the local economy and job migration in the local area will create further local economic pressures. The local area has one of the lowest rates of unemployment in the country and the highest proportion of the population employed in logistics.

ES16 The Applicant has failed to produce a suitable and sufficient cumulative impact assessment as required by the NPS and EIA Directive. They have failed to give consideration to other NSIPs in the region and the cumulative impact that the consecutive development of seven SRFIs in the Midlands region will have on: the efficacy of a national strategic network; rail network capacity and resilience; road congestion; and the ultimate success or failure of Government policy. They have also failed to specifically identify the combined environmental impacts of Rail Central and Northampton Gateway in terms of the effect on local and national roads; disruption of passenger services; the efficacy of footpath diversions and the social and environmental impacts on the local community.

ES17 We believe that the Applicant has failed to prove that, on the balance of probabilities, their proposal site will effectively fulfil the function of a SRFI within a strategic rail freight network and, consequently, would primarily be a road based logistics operation. The proposal is considered to be a speculative, rather than strategic, development and should be judged through the more appropriate (local) planning process. We are of the strong opinion that the disbenefits will far outweigh any marginal benefits from the transfer of minimal freight onto rail.

1. Planning Context

1.1 Qualification as a SRFI

1.1.1 The Applicant has failed to provide sufficient evidence that their proposal is a "strategic" (as opposed to a "non-strategic") RFI and that it should be judged through the NSIP process rather than be determined by the local Planning Authority.

1.1.2 The differences between a SRFI and a RFI can be found in Appendix B of the SRA Strategic Rail Freight Interchange Policy March 2004[1] and in paragraphs 2.43 and 2.44 of the NPS[2].

1.1.3 From the SRA policy 2004[1] we can deduce:

- SRFIs should be located at nationally strategic sites proximate to major conurbations; RFIs at important sites within the regions
- SRFIs require high capacity rail links: RFIs require rail links with sufficient capacity
- There is no size differentiation between a SRFI and RFI, only minimum standards to be achieved in order to be judged through the NSIP process
- It can reasonably be assumed that a RFI will also service a minimum of 4 trains in order to make it viable and could also be able to accommodate the longer trains. These points are therefore immaterial in determining the classification.

1.1.4 From the NPS[2] we can deduce that in order to qualify (and indeed prove that it will function) as a Strategic RFI the Applicant should be required to demonstrate:

- That the use of rail will be optimised
- That the rail trunk haul will be maximised, e.g. in comparison to alternative sites
- What elements of secondary distribution have been minimised
- That the proposal is likely to reduce the cost to users of moving freight by rail
- That trip mileage of freight movements on both the national and local road networks will be reduced by the proposal

1.1.5 The Office of National Statistics classifies Northampton as 37th in the list of most populated areas in its 2011 census and it fails to qualify as a conurbation[3] incorporating only small villages within its boundaries. It is not a strategic location for a Rail Freight Interchange; it is, at best, an important regional location.

1.1.6 The Applicant has failed to demonstrate that the WCML, given all the current and future pressures and demands, provides a high capacity rail link, as opposed to a rail link with sufficient capacity.

1.1.7 The Applicant has failed to demonstrate that their proposal satisfies the specific requirements of a SRFI (as opposed to a RFI) as laid out in the NPS.

References

1. Strategic Rail Freight Interchange Policy 2004

Type of RFI	Function	Likely Size	Transport Requirements	Examples
Strategic	Major interchange with significant intermodal and warehousing, located at **nationally strategic sites proximate to major conurbations**	100 – 400 ha	Requires high quality links to motorway and trunk road network. Rail links **need high capacity** and good loading gauge.	Hams Hall, Daventry – DIRFT, Mossend
Non-strategic sub-regional	Large interchange with significant intermodal and warehousing, located at **important sites within regions**.	20 – 250 ha	Requires high quality links to motorway and trunk road network. Rail links need **sufficient capacity** and good loading gauge.	Potter Group, Selby. Malcolm Group, Grangemouth
Intermodal only	Interchange handling only intermodal traffic, often located at key points in urban areas.	10 – 30 ha	Requires good quality links to motorway and trunk road network. Rail links require sufficient loading gauge.	Freightliner terminals. O'Connor Group, Widnes

2. National Policy Statement National Networks

Section 2.43 states that "*Rail Freight Interchanges **(RFI)** enable freight to be transferred between transport modes, thus allowing rail to be used to best effect to undertake the long-haul primary trunk journey, with other modes (usually road) providing the secondary (final delivery) leg of the journey.*"

Section 2.44 states that "*The aim of a strategic rail freight interchange **(SRFI)** is to **optimise the use of rail** in the freight journey by **maximising rail trunk haul** and **minimising** some elements of the **secondary distribution leg by road**, through the co-location of other distribution and freight activities. SRFIs are a key element in **reducing the cost to users of moving freight by rail** and are important in facilitating the transfer of freight from road to rail, thereby **reducing trip mileage of freight movements on both the national and local freight networks**.*"

3. Wikipedia: *'A conurbation is a region comprising a number of cities, large towns, and other urban areas that, through population growth and physical expansion, have merged to form one continuous urban or industrially developed area.'*

1.2 Alignment with the National Policy Statement for National Networks (NPS)

NPS 2.10 *The Government has therefore concluded that at a strategic level there is a compelling need for development of the national networks – both as individual networks and as an **integrated system**. The Examining Authority and the Secretary of State should therefore start their assessment of applications for infrastructure covered by this NPS on that basis.*

1.2.1 The Applicant has not positioned their proposal in terms of how it will contribute to an integrated rail freight distribution network taking into account road and rail capacity and investment therein. The justification put forward is based solely on the site's own individual viability as a logistics park. This contrary to NPS 2.10.

NPS 2.45 *The logistics industry provides warehousing and distribution networks for UK manufacturers, importers and retailers - currently this is predominantly a road based industry. However, the users and buyers of warehousing and distribution services are increasingly looking to integrate rail freight into their transport operations with rail freight options sometimes specified in*

procurement contracts. This requires the logistics industry to develop new facilities that need to be located alongside the major rail routes, close to major trunk roads ***as well as near to the conurbations that consume the goods.***

1.2.2 SRFIs are required in relatively small numbers and close to conurbations. Northampton does not meet the definition of a conurbation and is only the 37th most populous urban area in the United kingdom. Siting a SRFI in Northampton will be to the detriment of a more favourable location with a larger population. Northampton is already serviced by DIRFT 1, 2 and 3.

NPS 2.47 *A network of SRFIs is a key element in aiding the transfer of freight from road to rail, supporting sustainable distribution and rail freight growth and meeting the changing needs of the logistics industry, especially the ports and retail sector. SRFIs also play an important role in* ***reducing trip mileage of freight movements on the national and local road networks.***

1.2.3 The pattern of SRFIs that is emerging, as driven by the private sector, is not a network, it is a cluster centred on the Midlands. This clustering perpetuates the traditional "golden triangle" road-based logistics model and does nothing to reduce the trip mileage of freight on the road networks: clustering the warehouses in the Midlands, and away from the major markets, means trip mileage on the roads will be increased in reaching the freight's final destination.

NPS NN 2.44 ***The aim of a strategic rail freight interchange (SRFI) is to optimise the use of rail in the freight journey by maximising rail trunk haul and minimising some elements of the secondary distribution leg by road****, through co-location of other distribution and freight activities. SRFIs are a key element in reducing the cost to users of moving freight by rail and are important in facilitating the transfer of freight from road to rail, thereby reducing trip mileage of freight movements on both the national and local road networks.*

1.2.4 The objective of maximising the rail trunk haul and minimising the secondary distribution leg by road can only be achieved by the careful and considered positioning of the nodes within the strategic national network. The chosen location must take into account the market it is to serve and the proximity to adjacent SRFIs and other rail connected terminals. Locating one node too close to another distorts the optimum network and necessarily increases the secondary road leg of the journey due to competition for the same local markets. The close proximity of Northampton Gateway to DIRFT makes it a sub-optimal strategic option. The development of Rail Central (if consented) would further distort a strategic network.

NPS 2.49 *The industry, working with Network Rail, has produced unconstrained rail freight forecasts to 2023 and 2033. The results are summarised in the table below.* ***These forecasts, and the method used to produce them, are considered robust and the Government has accepted them for planning purposes****. These forecasts will change over time as our understanding improves and circumstances change, but the table below demonstrates the scale of pressure.*

1.2.5 The Great Britain Freight Model (GBFM) which provides the figures used by the Government to forecast rail freight movements uses rail-connected warehousing as an INPUT into the model on the premise of "build it and they will come". This methodology is not considered robust, has been

widely challenged and is in need of review. In addition the forecasts are unconstrained and take no account of the capacity constraints of the network when estimating the quantum of rail connected warehouse space that might be built across the regions. The inflated figures produced by the GBFM are distorting the actual demand for rail connected warehousing and ignoring the ability of the rail network to deliver. This will ultimately result in an over-supply of warehousing that can never benefit from the rail connection.

NPS 2.50 *Whilst the forecasts in themselves, do not provide sufficient granularity to allow site-specific need cases to be demonstrated, they confirm the need for an expanded network of large* ***SRFIs across the regions*** *to accommodate the long-term growth in rail freight. They also indicate 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.*

1.2.6 Currently the Midlands is served by SRFIs at Hams Hall, Birmingham International Freight Terminal and DIRFT. A further 12m sq ft are under construction at DIRFT 3 and East Midlands Gateway. In addition, also within a 30 mile radius of Coventry, there is a further (circa) 36 million square feet in the application process at Rail Central, West Midlands Interchange, East Midlands Intermodal Park, Hinckley and Northampton Gateway. The South Northamptonshire constituency is currently served by Daventry International Rail Freight Terminal (DIRFT) with approximately 6.5 million square feet of rail served warehousing. Dating from 1997 the rail terminal continues to be underutilised with the number of trains processed not having increased in the last 5 years. Consent has been granted for an additional 7.5 million square feet and a new rail terminal. DIRFT is only 15 miles from Northampton Gateway and will have capacity for companies requiring the use of rail based logistics for at least the next 12 years. By 2040 DIRFT is likely to remain the largest SRFI in the UK. Since being consented in 2014 the rail head has not been constructed and no rail connected warehouses built. The region is far from **POORLY SERVED**. ***Appendix 1.1 Planning Context***

1.2.7 There are no current SRFI applications in any other region of the country: the *'strategic network'* emerging is not **across the regions; it is all within one region**. Previous studies have been completed in an attempt to identify the number of SRFIs needed and their optimum locations: some Developers have chosen to ignore these signposts.

NPS 2.52: *SRFIs can provide considerable benefits for the local economy. For example, because many of the on-site functions of major distribution operations are relatively labour-intensive this can create many new job opportunities and contribute to the enhancement of people's skills and use of technology, with wider longer term benefits to the economy.* ***The availability of a suitable workforce will therefore be an important consideration****.*

1.2.8 Of a resident population of 88,200 in South Northants, 54,100 (61.3%) are in the 16-64 age group. 46,600 (83.3%) of these are economically active and of these, 1,100 (2.4%) are unemployed. Of the 9,000 (16.7%) economically inactive resident population, 7,000 (83.2%) of those stated they do not want a job. Unemployment in Northants has dropped to 1.5%, its lowest level in the past decade. In a region dominated by logistics there is already a labour shortage in the sector. ***Source: The Office of National Statistics***

NPS 2.53 *The Government's vision for transport is for a low carbon sustainable transport system that is an engine for economic growth, but is also safer and* ***improves the quality of life in our***

***communities**. The Government therefore believes it is important to facilitate the development of the intermodal rail freight industry. The transfer of freight from road to rail has an important part to play in a low carbon economy and in helping to address climate change.*

1.2.9 The minimal benefits for the nation of a SRFI **in this location** are far outweighed by the dis-benefits to the residents of Northamptonshire, namely: the loss of the rural environment; loss of ancient footpaths; destruction of habitats; increased motorway congestion; increased traffic on local roads through villages and country lanes; increased pollution; and more crime. The area proposed for development is designated an 'Area of important local gap' in the South Northamptonshire Local Plan 1998-2006 adopted October 1997 (policy EV8). Over-riding of this policy will lead to the coalescence of the villages of Blisworth, Milton Malsor and Roade into the Northampton conurbation and destroy the rural environment and cultural heritage of the wider area.

NPS 2.56 'It is important that SRFIs are located near the business markets they will serve – major urban centres, or groups of centres

1.2.10 Locations in the industrial heartlands would be better suited to a SRFI both for facilitating industrial development and also distributing consumer goods. A critical consideration in the location of a Strategic Rail Freight Interchange is related to the likely final destination of the goods. SRFIs need to be located near to densely populated areas and areas with concentrations of industry to minimise the distance that the goods need to travel by road. For example, an analysis of the freight trains from Southampton heading to the Midlands and North shows that three quarters of these trains are travelling to Birmingham, Manchester or Liverpool which are each heavily populated areas. The most densely populated areas of the East Midlands are Nottingham, Leicester and Derby. Therefore, the recently approved East Midlands Gateway SRFI is a logical location in this context. In contrast the population in the Northampton and Milton Keynes areas is about 30% of the combined population of the Nottingham, Leicester and Derby areas making it far less suitable as road journeys from Northampton Gateway would be greater to reach densely populated areas. Northampton already has DIRFT. Northampton Gateway will only serve as a distribution centre for imported consumer goods. Northampton (population only 217,000), and its surrounding rural areas does not have the type and scale of industry to enable the rail connection to be economically utilised for the return journey to the ports.

***NPS 2.57** Existing operational SRFIs and other intermodal RFIs are situated predominantly in the Midlands and the North. Conversely, in London and the South East, away from the deep-sea ports, most intermodal RFI and rail-connected warehousing is on a small scale and/or poorly located in relation to the main urban areas.*

1.2.11 The NPS makes it clear that the priority for the next generation of SRFIs lies outside of the Midlands which is recognised as already being well served. The absence of any alternative site assessment is evidence that the national need has not been taken into account.

***NPS 2.58** This means 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, possibly with traffic moving from existing RFI to new larger facilities. There is a particular challenge in expanding rail freight interchanges serving London and the South East.*

1.2.12 The policy calls for SRFIs at a 'wide range of locations'. We contend that the reliance on the private sector to determine location is resulting in a very narrow range of locations being brought forward and argued on the basis that they lie within the logistics 'Golden triangle'**.** This argument is not valid in the development of a strategic rail freight network where the primary objective is to reduce the secondary (road) leg of the journey. Siting a large number of SRFIs in the centre of the country will not achieve this aim; they need to be distributed across the nation to serve LOCAL markets.

NPS 3.3 *In delivering new schemes, the Government expects applicants to avoid and mitigate environmental and social impacts in line with the principles set out in the NPPF and the Government's planning guidance. Applicants should also provide evidence that they have considered reasonable opportunities to* ***deliver environmental and social benefits*** *as part of schemes. The Government's detailed policy on environmental mitigations for developments is set out in Chapter 5 of this document.*

1.2.13 No opportunities have been taken to deliver environmental and social benefits. Alterations to junction 15 of the M1 are only designed to maintain the status quo (not worsen the situation) and, contrary to the Applicant's contentions, further proposed road alterations will result in **greatly increased** traffic through villages and along inferior country lanes. The highways modelling undertaken has made some unjustified assumptions and, critically, does not attempt to depict the situation that would occur when the M1 becomes disrupted.

NPS 4.8 *In the case of strategic rail freight interchanges, a judgement of viability will be made within the market framework, and taking account of Government interventions such as, for instance,* ***Investment in the strategic rail freight network.***

1.2.14 Investment in the Rail Network should precede the development of SRFIs not vice versa. Investment in alternative routes such as the Felixstowe to Nuneaton route will release freight paths providing a favourable alternative to the intensively used WCML and north London routes. A location such as Hinckley therefore emerges as a favourable alternative to the Application site.

NPS 4.86 *SRFIs tend to be large scale commercial operations, which are most likely to need continuous working arrangements (up to 24 hours). By necessity they involve large structures, buildings and the operation of heavy machinery. In terms of location therefore,* ***they often may not be considered suitable adjacent to residential areas*** *or environmentally sensitive areas such as National Parks, the Broads and AONBs, which may be sensitive to the impact of noise and movements. However, depending on the particular circumstances involved, appropriate mitigation measures may be available to limit the impacts of noise and light.*

1.2.15 The application site is within 150 metres of the closest houses in Milton Malsor and circa 70 metres from the nearest houses in Collingtree. There are implications in terms of noise, light, traffic and visual impact for the residents of Collingtree, Milton Malsor, Roade and Blisworth. In accordance with **NPS 4.86** the site is not considered to be suitable due to its close proximity to rural villages.

NPS 4.87 *SFRIs can provide many benefits for the local economy. For example because many of the on-site functions of major distribution operations are relatively labour intensive, this can create many new job opportunities.* ***The existence of an available and economic local workforce will therefore be an important consideration for the applicant****.*

1.2.16 Unemployment statistics from September 2017 in the local constituencies show the following unemployment rates: Northampton South 2.7% (1420); Northampton North 2.5% (1080); Wellingborough 2.2% (1175); Milton Keynes North 1.9% (1300); Daventry 1.8% (870); North East Bedfordshire 1.2% (715); Mid Bedfordshire 0.9% (515); Buckingham 0.7% (375) and South Northamptonshire 0.7% (415). This is a total of 7,865 people without work. Currently around 12% of the workforce in Northants is involved in the logistics industry so if this trend perpetuates it is reasonable to assume that only around 943 will be looking for jobs in logistics. Northampton Gateway requires over 7,500 employees and will be competing against a number of other developing employment sites including DIRFT, Swan Valley, Junction 16 (M1), Silverstone, Brackmills, Bedford Road and, potentially, Rail Central (8,500 positions claimed) for the same limited workforce. At a conservative estimate this will equate to over 25,000 local vacancies to be filled. The additional travel distances for the workforce will negate any carbon benefit of removing a limited number of HGVs from the roads. The Applicant's stated recruitment area having up to a 45 minute drive time would appear to be underestimated given the employment statistics. In addition, warehouse workers may well find this travel distance to be cost-prohibitive

NPS 4.89 *As a minimum, a SRFI should be capable of handling four trains per day and, where possible,* ***be capable of increasing the number of trains handled****. SRFIs should, where possible, have the capability to handle 775 metre trains with appropriately configured on-site infrastructure and layout. This should seek to minimise the need for on-site rail shunting and provide for a configuration which, ideally, will allow main line access for trains from either direction.*

1.2.17 This indicates that SRFIs need to have the capability to expand. This was expressed even more explicitly in earlier documents produced by the Strategic Rail Authority on strategic rail freight interchange policy. Nonetheless the NPS makes repeated references to sustainable development as does the National Planning Policy Framework. It is difficult to see how the proposed Northampton Gateway site is capable of sustainable development. It would be bounded on its east and North by the Highway network and to the west side by the WCML and therefore the site itself would be incapable of further expansion. Furthermore the site has been designed to be capable of handling trains up to a maximum length of 775 metres. A recent study conducted by MTRU on behalf of the Campaign for Better Transport stated that freight trains of 1,000 metres length would provide several advantages to generate further mode shift from road to rail. The proposed Northampton Gateway would not be sustainable as it has not been designed with the capability to handle future trains 1,000 metres long.

NPS 5.168 *Applicants should take into account the economic and other benefits of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification). Where significant development of agricultural land is demonstrated to be necessary, applicants should seek to use areas of poorer quality land in preference to that of a higher quality. Applicants should also identify any effects, and seek to minimise impacts, on soil quality, taking into account any mitigation measures proposed.* ***Where possible, developments should be on previously***

developed (brownfield) sites provided that it is not of high environmental value*. For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination and how it is proposed to address this.*

1.2.18 The whole site is classified as Good to Moderate (Grade 3 meaning moderate limitations) in common with 50% of the agricultural land in the UK. Alternative brownfield sites exist as identified in the ***DfT Rail Freight Growth & Modal Shift Study 1st September 2016 (Aecom Arup)***: *'The changes we are seeing in the economy are releasing a number of rail-connected brownfield sites that would be ideal for future rail freight terminal use – former power stations and MOD depots are obvious examples. To put some names to this as examples, Didcot, Rugeley and Ferrybridge power stations and MOD Bicester all have excellent rail and road links and are ideally suited as rail-based distribution hubs. Some existing terminals may have been run-down as their original purpose (such as shipment of a single commodity) has changed or ceased. There is the potential for these to be re-developed, where suitable, into rail freight terminals more relevant to the needs and requirements of the modern freight industry. Sites which are losing their core operation (such as power stations) may provide good opportunities for private sector development. Converting an already rail connected site significantly reduces the time needed to develop new viable rail business, and removes the considerable costs involved to create new network connections.'* The Applicant has failed to consider any national alternatives that might better benefit society as a whole.

NPS 5.170 *The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances. Applicants should therefore determine whether their proposal, or any part of it, is within an established Green Belt and, if so, whether their proposal may be considered inappropriate development within the meaning of Green Belt policy.* ***Metropolitan Open Land, and land designated as Local Green Space in a local or neighbourhood plan, are subject to the same policies of protection as Green Belt, and inappropriate development should not be approved except in very special circumstances.***

1.2.19 The current local plan protects the rural community from the expansion of the conurbation south of the M1, identifying the Application site as an Area of Important Local Gap (South Northamptonshire Local Plan (1988 - 2006) Adopted Oct 1997) (Policy EV8). Should Northampton Gateway be consented this protection will be lost. The proposal is contrary to NPS 5.170. ***https://www.southnorthants.gov.uk/downloads/39/1997-local-plan***

1.3 West Northants Joint Core Strategy

The West Northamptonshire Joint Core Strategy Local Plan is a key document in ensuring places are shaped and made in a way which meets the needs of the people of today whilst ensuring the needs of future generations are safeguarded. It sets out the long-term vision and objectives for the whole of the West Northamptonshire area for the plan period up to 2029, including strategic policies for steering and shaping development. It identifies specific locations for new strategic housing and employment and changes to transport infrastructure and other supporting community facilities, as well as defining areas where development will be limited. It helps to ensure the co-ordination and

delivery of other services and related strategies. The Northampton Gateway application is contrary to the fundamental objectives of the Joint Core Strategy which seeks to balance job creation and housing development to ensure that the two remain aligned. It also helps to promote one of the key objectives of government policy; that of reducing carbon emissions from excessive car journeys to work. The following clauses of the policy are relevant to our objection.

1.3.1 [Infrastructure and Development] 4.45 Historically the provision of infrastructure within West Northamptonshire has failed to keep pace with and fully support a growing population**. Elements of the existing infrastructure in the area are already at or close to capacity.**

1.3.2 [Infrastructure and Development] 4.46 Accommodating planned development in the area will require an increase in the capacity of the existing infrastructure. **Significant investment is needed in public transport, new roads, utilities (including trunk sewer improvements and increasing the capacity of water treatment facilities), health, education and emergency services**. There is also a requirement for investment in social infrastructure such as cultural and community facilities, children's play spaces and libraries, in order to build sustainable communities. It is critical that necessary infrastructure is provided in a timely manner.

1.3.3 [Infrastructure and Development] 5.95 Achieving sustainability is a core objective in all proposals for development and this approach will underpin the commitments made by partner Councils to tackling climate change (for example, as outlined in the Northamptonshire Climate Change Strategy[15], the South Northamptonshire Climate Change Strategy[16], and the Sustainable Community Strategies). This JCS sets out the strategic spatial planning policy framework needed to:

- make the places where we live, shop **and work more accessible by means that minimise the environmental burden of travel;**
- make such places resilient to future flood events;
- **protect, enhance and reconnect natural habitats;**
- **minimise the use of energy and water;**
- manage the water environment; and
- ensure natural resources are used prudently - including those used in construction.

1.3.4 [The Economy] 4.53 The area is attractive to the warehouse and storage industry due to the excellent road and rail connections. However, **it is important that the area does not become over-reliant on one employment sector and continues to provide diverse employment opportunities for its residents.** The economic downturn has adversely affected jobs growth in West Northamptonshire. Provision must be made through the JCS to ensure a range of job opportunities can be delivered which takes account of job losses.

1.3.5 [The Joint Core Strategy Vision] 4.61 Our rural areas will support a network of vibrant rural communities**. Villages will retain their local distinctiveness and character, providing affordable homes for local people set within a beautiful landscape.** The countryside will support a diverse rural economy including leisure and tourism through its waterways, country houses, parks and woodlands.

1.3.6 [Warehousing] 5.70 The area remains attractive to the warehouse industry and indications are that it is likely to remain so for the life time of the Plan. However, **delivering new space to cater for the warehousing sector on a trend based trajectory would not be desirable nor sustainable in the long term in order to achieve a balanced economy.**

1.3.7 [Warehousing] 5.71 West Northamptonshire already has a large supply of warehouse development with planning consent in the pipeline including Swan Valley, Bedford Road (Former Cattle Market), and DIRFT. The majority of any new warehousing will be accommodated on existing employment sites through the employment land supply pipeline and churn of employment land. The allocation of a strategic employment site at Northampton M1 Junction 16 provides further support for demand in this sector in a sustainable manner consistent with the economic strategy within the Plan as a whole. **New large warehousing developments (in excess of 40,000 sqm) will normally be expected to be provided for at DIRFT.**

1.3.8 [Warehousing] 5.72 DIRFT is a logistics site of national importance and is covered in the Economic Advantage Section 8 of this JCS under Policy E4. DIRFT gains access to the rail network via the "slow" lines on the Northampton Loop Line. The West Coast Main Line fast lines that pass through West Northamptonshire are used by 125 mph passenger services while most freight traffic uses the slow lines via the Northampton Loop. It is essentially a matter of national policy that determines access onto the national rail network. It is expected that access onto the fast lines will remain challenging even after High Speed 2. **Consequently it is considered that new rail freight interchanges in West Northamptonshire, in addition to DIRFT, would not be deliverable within this plan period**. The local authorities in West Northamptonshire will continue to work with Network Rail and the freight industry to consider and support further sustainable opportunities for rail freight interchanges in the longer term once the opportunities for additional access onto the rail network to support viable rail freight interchanges are confirmed.

1.3.9 [Policy R2 - Rural Economy] Proposals which sustain and enhance the rural economy by creating or safeguarding jobs and businesses will be supported where they are of **an appropriate scale for their location, respect the environmental quality and character of the rural area and protect the best and most versatile agricultural land**. The following types of development are considered to be acceptable:

a) the re-use of rural buildings;

b) schemes for farm diversification involving small-scale business and commercial development that contribute to the operation and viability of the farm holding;

c) small-scale tourism proposals, including visitor accommodation;

d) proposals that **recognise the economic benefits of the natural and historic environment as an asset to be valued, conserved and enhanced**;

e) the **expansion of businesses in their existing locations**, dependent upon the nature of the activities involved, the character of the site and its accessibility;

f) **small scale employment development to meet local needs**; and

g) **the use of land for agriculture, forestry and equestrian activity**.

1.3.10 [Policy BN9] - planning for pollution control proposals for new development which are likely to cause pollution or likely to result in exposure to sources of pollution or risks to safety will need to

demonstrate that they provide opportunities **to minimise and where possible reduce pollution issues** that are a barrier to achieving sustainable development and healthy communities including:
a) maintaining and **improving air quality**, particularly in poor air quality areas, in accordance with national air quality standards and best practice;
b) protecting and improving surface and groundwater water quality;
c) **minimising light pollution**;
d) ensuring remediation of contaminated land so as not to pose a risk to health and the environment; and
e) **reducing the adverse impacts of noise**.
development that is likely to cause pollution, either individually or cumulatively, will only be permitted if measures can be implemented to minimise pollution to a level which provides a high standard of protection for health and environmental quality.

1.3.11 [Policy BN5 - The historic environment and landscape] **Designated and non-designated heritage assets and their settings and landscapes will be conserved and enhanced in recognition of their individual and cumulative significance and contribution to west Northamptonshire's local distinctiveness and sense of place.** In environments where valued heritage assets are at risk, the asset and its setting will be appropriately conserved and managed. In order to secure and enhance the significance of the area's heritage assets and their settings and landscapes, development in areas of landscape sensitivity and/ or known historic or heritage significance will be required to:

1. **Sustain and enhance the heritage and landscape features which contribute to the character of the area including**:
    a) **conservation areas**;
    b) significant historic landscapes including historic parkland, battlefields and ridge and furrow;
    c) **the skyline and landscape settings of towns and villages**;
    d) **sites of known or potential heritage or historic significance**;
    e) locally and nationally important buildings, structures and monuments
2**. Demonstrate an appreciation and understanding of the impact of development on surrounding heritage assets and their setting in order to minimise harm to these assets**; where loss of historic features or archaeological remains is unavoidable and justified, provision should be made for recording and the production of a suitable archive and report

1.3.12 [Policy R1 - Spatial strategy for the rural areas] The rural hierarchy in the part 2 local **plans will have regard to** but not exclusively, the following:

1) the presence of services and facilities to meet the day to day needs of residents, including those from surrounding settlements;
2) opportunities to retain and improve the provision and enhancement of services critical to the sustainability of settlements;
3) accessibility, particularly by public transport, to the main towns and sustainable employment opportunities;
4) evidence of local needs for housing (including market and affordable housing), employment and services;
5) **the role, scale and character of the settlement**;

6) **the capacity of settlements to accommodate development in terms of physical, environmental, infrastructure and other constraints**;
7) **the availability of deliverable sites including previously developed land in sustainable locations**;
8) sustaining the rural economy by retaining existing employment sites where possible, by enabling small scale economic development, including tourism, through rural diversification and by supporting appropriate agricultural and forestry development;
9) **protect and enhance the character and quality of the rural areas' historic buildings and areas of historic or environmental importance**; and
10) enabling local communities to identify and meet their own local needs.

1.3.13 [Policy S1 The distribution of development] **New development in the rural areas will be limited with the emphasis being on:**

1) **enhancing and maintaining the distinctive character and vitality of rural communities**;
2) **shortening journeys and facilitating access to jobs and services**;
3) strengthening rural enterprise and linkages between settlements and their hinterlands; and
4) **respecting the quality of tranquility**.
In assessing the suitability of sites for development **priority will be given to making best use of previously developed land** and vacant and under-used buildings in urban or other sustainable locations contributing to the achievement of a west Northamptonshire target of 30% of additional dwellings on previously developed land or through conversions.

1.3.14 [Employment areas] 8.5 **The plan area already has a considerable amount of employment floorspace in the planning pipeline in sustainable locations already consented through planning applications. DIRFT, Junction 16, Swan Valley**

1.3.15 [M1 Junction 16 Employment Site] 8.43 The scale of the allocation represents a level of provision that compliments the economic objectives for the Plan as a whole. Development associated with maximising the economic advantages of Northampton is proposed **in a manner that simultaneously reflects the direction of large scale strategic distribution activities towards DIRFT**.

1.3.16 [M1 Junction 16 Employment Site] 8.44 The scale and extent of B8 (Storage or Distribution) uses will be carefully controlled. This site is specifically allocated to meet the needs of Northampton, and is not intended to provide a strategic distribution park. Overall, B8 uses should be no more than 50% of the total floorspace on the site, subject to the provision for the relocation of existing Northampton based employers. **This is in recognition of the provision that has been made for large scale storage and distribution in more appropriate locations within the plan area, particularly at DIRFT.** This provision also intends to ensure that floorspace remains available for B2 manufacturing occupiers to continue to build on the strategic advantages for this sector within the local economy. Any B1(a) office provision will be restricted to no individual unit exceeding 1,000 sqm as new office development should concentrate at Northampton Town Centre.

1.4 Local Council Position

1.4.1 28 Parish Councils within SNC and NBC have signed a declaration opposing the cumulative impact of so many major developments on the local quality of life and reminding decision makers of the provisions in the NPS NN to wit (section 11 paragraph 109) *'preventing both new and existing*

development from contributing to or being put at unacceptable risk from, or being adversely affected by, levels of soil, air, water and noise pollution or land instability'.

1.4.2 On the 13th April 2016 South Northamptonshire Council passed motion 92 at a full meeting of the council to protect the interests of residents and communities against the proposed Rail Central development. In terms of effects on the community, environmental damage and conflict with the WNJCS, Northampton Gateway is little different to Rail Central: *'This Council notes the proposal for Rail Central, and believes that such a proposal could cause harm to the environment, blight the lives of residents and damage the quality of life in the area. This Council notes that it already has strong employment site proposals and renews its commitment to these major employment sites identified within the Joint Core Strategy, being Junction 16 M1, Silverstone Business Park, and smaller allocations within the Sustainable Urban Extensions at Towcester and Brackley. This Council pledges itself to protect the interests of residents and communities with regard to Rail Central, and allocates a sum of £100,000 from unallocated reserves to be used for the preparation of reports, technical assessments, expert evidence, legal and professional fees to support the Council's position in safeguarding our residents and communities'.* Votes with regard to this motion were: For 28, Against 2, and Abstain 5. Therefore South Northamptonshire Council has established a position of being against additional large scale developments in the area.

1.4.3 On the 10th September 2018 Northampton Borough Council passed a motion to write to the Secretary of State for Transport to ask for an urgent review of the **NPS** and all other associated policy guidance to ensure that SRFI capacity is deployed as a national network across the country rather than being built in areas where developers have pre-existing land options. This action was taken in response to the plethora of SRFIs being proposed in the Midlands and none in any other part of the country: a trend which is clearly contrary to the intent of the **NPS**.

1.5 Planning Precedent

1.5.1 *Appeal Decision 3rd February 2017 (Travis Perkins): Land at Milton Ham, Towcester Road, Northampton* The Planning Inspectorate recently made a decision at the planning appeal for Travis Perkins who wished to build a warehouse just over 1 mile from the site proposed by the Applicant. The planning inspector made the following remarks in his report:

44. *The JCS [Joint Core Strategy] is clear that the area has a large supply of existing warehouse developments and that delivering new space to cater for the warehousing sector on a trend based trajectory would not be desirable nor sustainable in the long term in order to achieve a balanced economy. It is for this reason, that strategic distribution sites are identified across the West Northamptonshire area, to ensure an appropriate balance between the provision of housing and employment.*

48*. Although Policy S8 does not preclude warehouse development at locations other than those specified in its criteria, I am not persuaded that there is an exceptional or justified need for Travis Perkins to locate the proposed development at the appeal site and so this matter does not outweigh the significant harm that I have identified with regards to the first main issue.*

See ***Appendix 1*** for full details of the decision

1.5.2 The Planning Inspectorate has already ruled on the suitability of this site for development within the current plan period. *Report to Daventry District, Northampton Borough and South Northamptonshire Councils by Nigel Payne BSc (Hons), Dip TP, MRTPI, MCMI an Inspector appointed by the Secretary of State for Communities and Local Government Date: 2nd October 2014 PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED) SECTION 20 REPORT ON THE EXAMINATION INTO THE WEST NORTHAMPTONSHIRE JOINT CORE STRATEGY LOCAL PLAN Document submitted for examination on 31 December 2012 Examination hearings held between 16 April 2013 and 21 March 2014*

[Paragraph 79] *Although various alternatives have been put forward, including in relation to J15 and J15A of the M1, none is a realistic or more sustainable location for this plan period, given doubts over deliverability, including regarding transport implications, especially for the strategic road network as advised by the HA and NCC. Additionally, some are of insufficient size to be properly considered as strategic scale allocations, whilst others are less well linked to existing communities and would represent an even greater intrusion of built development into the otherwise largely rural countryside around the town.*

http://modgov.southnorthants.gov.uk/documents/s10017/Agenda%20Item%206%20Appendix%201%20WN%20JCS%20Inspectors%20Report.pdf

Summary of Planning Objections

i) The Applicant has failed to demonstrate that their RFI is truly 'Strategic' and should be examined via the NSIP process rather than being determined by the local Planning Authority.

ii) The Proposal is at odds with the National Policy Statement in a number of areas and most importantly in that it fails to adequately address the strategic requirements of a nationally strategic infrastructure project.

iii) The Applicant's proposal is contrary to the West Northants Joint Core Strategy which seeks to enhance and maintain the distinctive character and vitality of rural communities.

iv) The Applicant's proposal is in conflict with the West Northants Joint Core Strategy which has allowed for significant amount of employment floor space in sustainable locations already consented through planning applications and directs large scale strategic distribution activities towards DIRFT. It also seeks to avoid over-reliance on one employment sector and putting a strain on the local infrastructure and resources.

iv) The proposal is not welcomed by South Northants District Council, Northampton Borough Council or any of the locally affected Parish Councils and is in conflict with recent planning precedent.

2. The Strategic Case

2.1 The question is not whether the development will succeed as a logistics operation but whether it will, on the balance of probabilities, satisfy the Government's national strategic rail freight objectives* better than other alternative locations and, ultimately, whether it will work as a SRFI.
specifically reducing road congestion and carbon emissions

2.2 Reduced Road Miles. SRFIs need to be located close to the markets that demand the goods (large cities or conurbations) to minimise the distance of the onward road journeys. This is the key objective of the SRFI policy. If SRFIs are all located together in the middle of the country HGVs will have to travel further to reach their final markets, the secondary (road) leg of the journey naturally lengthens, and carbon emissions increase. Northampton Gateway is too close to DIRFT and will be in competition for the same markets. The location is also remote from the industrial heartlands and consequently the rail terminal is likely to be mostly used for transport in one direction. The economics of freight logistics dictate that full train loads are required to compete with road and Northamptonshire does not have sufficient critical industrial mass to fulfil this requirement.

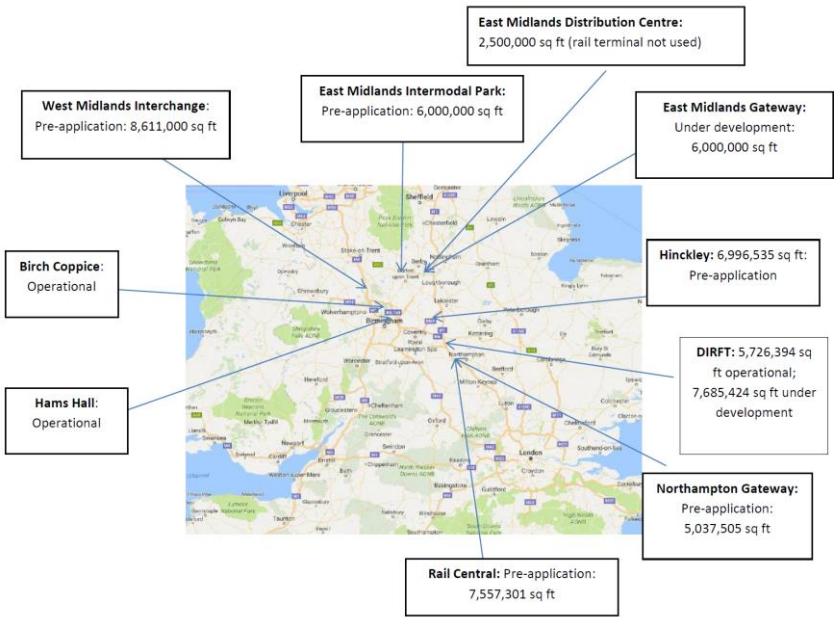
2.3 A Strategic Network. Since the Exel study in 1999 there has been no further attempt to establish what a strategic network should look like. The network envisaged when the 1999 study was completed bears no resemblance to the Developer-led network that is currently emerging, centred primarily on the Midlands. There has been no attempt made by the Applicant to justify the location in terms of how it fits in with, or contributes to, a strategic national network. The development of a strategic national network is the primary aim of the National Policy and this aim will not be achieved if potential SRFI locations are considered in isolation rather than in a national strategic context. The Strategic Rail Freight Policy 2004 (superseded) stated SRFIs are required '***in relatively small numbers to serve major conurbations***' and '***in appropriate locations to support the required growth of freight on rail***'. It can reasonably be assumed that the Policy did not envisage the scale of development proposals currently being brought forward exclusively in the Midlands and nowhere else in the country.

Regional totals excluding ports	Freight Trains 05/09/2017	Population (2011 census)	Trains per million population	Ranking
East Midlands	22	4,533,222	4.9	4
East of England	0	5,846,965	0.0	8
London		8,173,941	0.0	8
North East	6	2,596,886	2.3	5
North West	37	7,052,177	5.2	3
Scotland	33	5,313,600	6.2	1
South West	4	5,288,935	0.8	7
South East		8,634,750	0.0	8
Wales	4	3,063,456	1.3	6
West Midlands	32	5,601,847	5.7	2

Each movement is counted separately i.e. in and out are two movements

The table highlights the regions where the next generation of SRFIs should be developed: additional development in areas already well served will result in a planning imbalance.

2.4 Opportunity Cost. The 'opportunity cost' of consenting Northampton Gateway is that a strategically more suitable location may not be developed. In the Midlands there are three potential sites that can be regarded as direct competition for Northampton Gateway: West Midlands Interchange; East Midlands Intermodal Park and Hinckley [Rail Central has been discounted as, from a strategic perspective, it is exactly the same as Northampton Gateway]. In addition a site in Milton Keynes adjacent to junction 13 of the M1 is being considered. The Applicant has not made the strategic case for Northampton Gateway nor have they demonstrated that it is strategically more favourable than any alternatives. Rail capacity is finite; it should be allocated carefully to the strategically best placed sites and at the most appropriate time (for example, not when 13 million square feet of consented development in the Midlands has yet to be built). The following illustration shows the SRFIs in the Midlands (consented or proposed).



Prologis, the global leader in logistics real estate has also secured outline planning permission for an 887,000 square foot manufacturing and distribution development at the Hams Hall SRFI in Birmingham.

[Precedent] SRFIP *6.14 The SRA is aware of four potential sites identified by developers for Strategic RFI in the North West and three associated schemes for Strategic RFI. The proposed schemes are in fairly close proximity, for delivery within a similar general time frame, to accommodate growth within the same period. It will be for each promoter to justify the appropriateness of his proposal to the SRA in terms of its impact on the railway network and, in particular, on the route capacity available. In determining which of these should be taken forward, the planning system should have regard to proximity issues, together with a timeline for bringing new Strategic RFI's capacity on stream in the North West.* ***There is a risk that if all current proposals are delivered in the same time frame then there will be excess interchange capacity until the national growth in freight on rail has advanced sufficiently to match that capacity in a balanced way.***

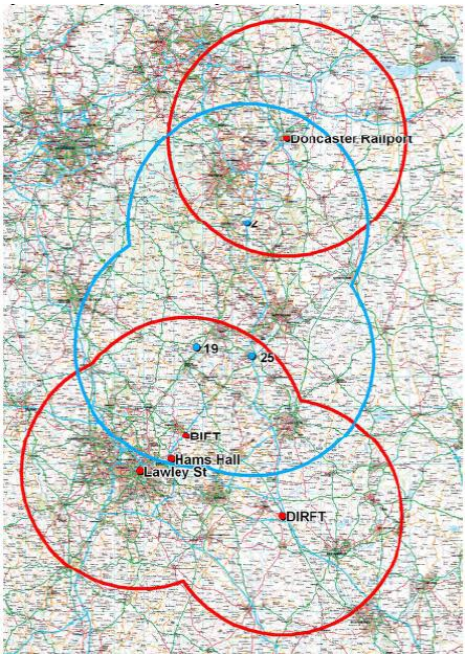
2.5 Investment in SRFIs should, ideally, follow delivered investment in rail freight capacity, not precede it. The Department for Transport have described the West Coast Mainline as "highly constrained, meaning that the route is operating close to capacity in the peak and it is challenging to

increase service levels still further". Consenting Northampton Gateway will reduce the paths available making potentially better placed locations unviable. By way of illustration, the proposal by dbsymmetry to bring forward a site near Hinckley draws on circa £350m of upgrades to the Felixstowe-Nuneaton freight corridor. Similarly, the plans for East-West Rail will deliver additional freight capacity (at least 1tph) with direct connectivity to the Port of Southampton; developers are already looking at a site near Ridgmont (J13 on the M1) as an ideal SRFI location to exploit. Northampton Gateway will be very slow to realise its potential for modal shift, due to the necessity to rely on post-HS2 paths that may well be taken up by DIRFT, passenger services or other consented SRFIs.

2.6 Emerging trends in logistics are undermining the traditional models of distribution and casting doubt over the need for large SRFIs clustered centrally in the middle of the UK. Professional opinion is that the logistics market will look very different in 10 years' time and that logistics strategies centred around large distribution parks in the midlands will have been replaced with alternative models including port-centric logistics and regional hubs. Proponents of Port Centric Logistics quite rightly point to the inefficiency of current distribution models that see many goods transported from Felixstowe, Southampton or the Channel Tunnel to the "Golden Triangle", only to be returned to the South and South East of England where they were landed. Such inefficiencies will not stand the test of time. The existing SRFI capacity already under development in the Midlands should be fully utilised before taking a gamble on what might be required in 15 years' time.

2.7 ***Strategic Rail Freight Policy 2004 (superceded):*** *'Economic issues have become increasingly important, as witnessed by the Working Time Directive, which is expected to exacerbate the growing shortage of lorry drivers. This, together with the effect of road congestion and economic trends****, indicates the potential for change in the pattern of distribution of goods in the UK from centralisation in the Midlands, to a more regionally focused activity for which there is already evidence of an emerging trend****.'***

2.8 ***East Midlands Regional Development Agency Study 2005*****.** A study commissioned by the former East Midlands Regional Development Agency (EMDA) in 2005/06 supported the need for three SRFI facilities within the East Midlands sub region whilst a further EMDA commissioned study (prepared by Aecom) in 2010 identified East Midlands Gateway, Etwall Common and Markham Vale as the three candidate sites to serve the sub region. Markham Vale due to its geographical position is likely to be best placed to serve the north Midlands and south Yorkshire markets. Etwall Common, if developed, would have a third party logistics potential. However it is likely, due to its proximity to the Toyota plant at Burnaston, to have an anchor focus on the needs of local manufacturing. The figure below (extracted from the 2010 Aecom study) shows the regional catchment area for the above three sites. The catchment is based on a 1 hour driving time, which is defined in the Aecom report as a 25 miles (40 km) distance. The catchment for the East Midlands Gateway SRFI (number 25) is shown by the blue (solid/dashed) circle. Northampton Gateway does not align with this strategic approach.



The 2010 Aecom Study shows the catchment areas for existing SRFIs. Northampton can be seen to be serviced by DIRFT (which will be the country's largest SRFI for many years to come). There is no "strategic" reason for building more rail interchanges within this catchment area

Summary of Strategic Objections

i) The Applicant has failed to provide evidence that their Proposal site is strategically the best placed in terms of enhancing and furthering a strategic rail freight network. A developer that proposes a *Strategic* Rail Freight Interchange should be able to place their case for the choice of location of the proposed development in a national strategic context. We have not seen such an argument from the Applicant.

ii) The application site is too close to DIRFT which has granted capacity for rail connected warehousing until at least 2030 and should, therefore, not be regarded as Strategic. Any attempt to build rail connected warehousing so close to the largest SRFI in the country should be decided by the local planning authority.

iii) The proposal site is not close to the major markets and remote from the industrial heartlands and as such is not well placed to fulfil the NPS objectives. It would also be wholly reliant on the most congested sections of the road and rail networks in the UK.

iv) The logistics market is changing and there are many varied opinions as to what a freight network should look like over the next 10 to 20 years. To consent individual applications based on their environmental merits rather than how they contribute to a national network is considered short-sighted folly.

v) We believe that the Applicant has failed to prove that, on the balance of probability, their proposal site will effectively fulfil the function of a SRFI and, consequently, will be primarily a road based logistics operation. This is contrary to the underlying Government objective of 'supporting long term development of **efficient** rail freight distribution logistics'

3. Economics and Need

3.1 Whilst it is accepted that Rail Freight has a part to play in the national freight landscape it has to be recognised that the potential for modal shift is limited by a number of factors including flexibility, rail capacity and commercial inertia but, primarily, the potential shift is limited by economics and demand. Therefore, SRFIs need to be relatively limited in number and located where they can best provide a cost-effective alternative to road.

3.2 Barriers to Rail Freight Growth. ***DfT Rail Freight Growth & Modal Shift Study 1st September 2016 (prepared for the Department for Transport by Aecom Arup)*** identified a number of barriers to modal shift (beyond the requirement for a wider network of SRFIs). These barriers include significant rail capacity issues, cost issues (rail usually requires subsidy to be competitive with road), commercial inertia (of both the Freight Operating Companies (FOCs) and the customer base) and logistical inflexibility. The building of RFIs alone will not facilitate the shift, the government (in the form of financial assistance and investment in infrastructure) and the Freight Operators (in terms of successfully changing their culture and adapting their business model) also need to step up to the plate. The Applicant has chosen not to address these issues in their market study. ***Appendix 3 DfT Rail Freight Growth & Modal Shift Study 1st September 2016 prepared for the Department for Transport by Aecom Arup***

3.3 Rail Freight Forecasting. For many years, MDS Transmodal (MDST) has provided forecasts of rail freight volumes to Network Rail and others through the use of its proprietary Great Britain Freight Model (GBFM). However, it is important to recognise that (a) provision of rail-connected warehousing is an *input* to the GBFM, not an output from it and (b) that the forecasts are unconstrained, i.e. that they assume no restriction on train paths or availability of suitable sites. The size of each site identified in the freight forecasts, and their geographical distribution, are therefore assumptions made on a "build it and they will come" basis. MDST has made no secret of these limitations, which are also acknowledged by independent audit of the model. The published forecasts *assume* (but do not *justify*, for the reasons given above) that 179,000 m^2 of rail-connected warehousing will be brought forward in South Northamptonshire by 2023/4, in addition to the expansion of DIRFT. This figure is projected to rise to 322,000 m^2 by 2033/4. Even taking into account the fact that rail connected warehousing is nothing more than an assumption, Northampton Gateway still represents an almost 60% over-provision of rail-served warehousing (468,000m^2). MDST's forecasts provide a similarly unconstrained view of rail freight capacity, identifying the need for 196 freight movements on the Northampton Loop per day by 2043/4, approximately three times the current level of traffic which is clearly unachievable. YOU CANNOT JUSTIFY THE DEVELOPMENT OF RAIL-CONNECTED FACILITIES BY QUOTING THE FREIGHT FORECAST, BECAUSE THAT FREIGHT FORECAST HAS ASSUMED THAT THE FACILITY HAS ALREADY BEEN BUILT. The entire rail freight modelling process is a circular argument.

3.4 The ***Draft Freight Market Study*** put out for consultation in April 2013 was released as a final version in October 2013. Both versions are on the Network Rail website. For some reason, the forecasts of domestic intermodal freight double between the draft and the final versions. The forecast of domestic intermodal traffic contained in the final version of Network Rail's Freight Strategy (7.1bn tonne km in 2023) is more than double that contained within the draft version (3.4bn tonne km in 2023). **Documents in the public domain show that a director of Ashfield Land**

lobbied for the revision of the forecasts. Without this uplift, especially in traffic from Scotland, the commercial viability of Rail Central and Northampton Gateway are even more questionable. Also, of particular concern, is the involvement of MDS Transmodal, a firm of consultants that were working for both Ashfield Land and Network Rail. There is an apparent conflict of interest in a relationship where (unqualified) increased forecasts are of benefit to a paying client. ***Appendix 5 Network Rail Long Term Planning Process; Freight Network Studies 2013 and 2016***

3.5 Rail Freight Volumes. Domestic intermodal traffic has shown an overall upward trend but international freight movements have reduced to less than half the 1999 figure. Contrary to the Applicant's contention that in recent years there has been 'unprecedented growth in intermodal traffic', The Office of Rail and Road have recently published data covering freight carried by rail for the year 2017-18. Domestic intermodal freight fell slightly as measured in net tonne-km (-1.4%). The average percentage increase in this measurement grew by only 1.1% per year between 2011/12 and 2017/18. Against this background, and given the capacity of rail-connected warehousing already in the pipeline, it is difficult to see how a massive building programme can be justified at this juncture.

3.6 Rail versus Road. Rail is neither an efficient nor more cost-effective alternative, due to an unacceptable record of slow and unreliable transits. Many companies would face a circa 35% increase in distribution costs if they were to move to rail. The chief reason for this situation is the prioritisation of passenger services. To enact a 30% reduction in road freight intensity would require a three-fold increase in rail freight intensity which, against a backdrop of rising passenger numbers, *"could not be accommodated on today's already busy railway*". ***Appendix 2 Lord Adonis Report: Congestion; Capacity, Carbon: Priorities for National Infrastructure. National Infrastructure Commission Report 13th October***

3.7 Break-even Distance. ***Long Term Planning Process: Freight Market Study, October 2013***. *'As a rough approximation rail then road is cheaper than road-only if the rail leg is over 170 miles. Some estimates put this rail leg at closer to 270 miles*. Whichever distance it is Northampton Gateway is too close to be economically served by the main ports of Liverpool, Southampton, London Gateway and Felixstowe. '*DIRFT has built up its traffic on the Scotland and (to a very small extent) Channel Tunnel routes, both over 200 miles and will therefore continue to exploit these markets to the detriment of any competitor. Average haul length is over 200 miles for intermodal traffic.'* The Applicant claims that the majority of freight will originate in London, a distance of no more than 70 miles. We consider that the majority of tenants will not routinely undertake the 250km+ hauls that would be economic by rail, and that the desire to replenish "little and often" would not lead to the full-length trains required to deliver economies of scale. Those that do will cluster around established sites such as DIRFT, or take up port-centric solutions. Our concern is therefore that Northampton Gateway will not function as an SRFI in practice, but will simply add to the warehousing stock used by road-based operators. The Applicant's claim that most traffic will originate in London raises further doubt over their commitment to the rail.

Wigan Rail Freight Study Final Report Prepared for: Transport for Greater Manchester & Wigan Council by MDS Transmodal Limited Date: May 2012 Ref: 211076r_ver Final *When operating between two rail-served sites (e.g. container port to rail-served distribution centre), rail freight should always offer a cost competitive solution (except for extremely short trips of a few kilometres); When one end of the journey is rail-served (e.g. container port to a non-rail-served distribution centre, or rail-served NDC to non-rail-served RDC), rail freight should offer a cost competitive option over approximately 250km; and where neither end of the journey is rail-served (e.g. NDC to RDC on non rail-served sites), rail*

freight should offer a cost competitive option over approximately 400km. These assume an average 75% loadings in both directions (24 units in both directions).

A3.3.5 [Precedent] Kent International Gateway *18.212 As to the economics, it is common ground that rail haulage of containers is best suited to longer distance journeys and that HGVs would be more economic for short journeys. But what is the break-even distance above which rail becomes economic without subsidy? On this matter, opinions are divided. The Council's witness suggests a break even distance of around 400km [6.190, 7.42]. Prof Braithwaite, for the Appellants, suggests 300km [7.41 and 7.43]. Mr Garratt, who also gave evidence for the Appellants, initially suggested 200km, but conceded in cross-examination that this distance assumes a subsidy for rail movements and accepted that, without a subsidy, the* ***break even distance would be higher at around 300km*** *[7.61].*

3.8 Mode Shift Revenue Support. In many cases rail freight requires subsidy to make it economically viable. For example, Stobart was given £400,000 by the UK Government and Scottish Executive to switch 70 per cent of its cross-border freight for Tesco from road to rail. In February 2017 The Government announced that it would be cutting back on Mode Shift Revenue Support by 20% (£4m) over the next two years. The economics of using rail for freight rather than road are very marginal, and this Government move may well reverse the recent modal shift of freight to rail. Russell Logistics, which currently uses rail for transport, estimated that there would be an additional 190,000 lorry movements per year (nationally) as a result of the reduction in this grant. It is clear that this grant is very important and can make the difference as to whether or not it is viable to use a train for the main part of a freight transit.

3.9 Commercial Model. ***Brian Ringer Modern Railways September 2016*** *"The industry needs to find new markets to replace the traditional ones: Freight Operating Companies have mostly stayed within their comfort zone concentrating on industries that provided train load quantities of traffic. De-industrialisation has taken a wrecking ball to this business model****: FOCs do not have a product to sell to the majority of British industry that sends its products out by the truckload rather than the trainload and they have little sales infrastructure to look after customers in the 'less than trainload' market****. Most logistics companies have only the haziest idea how rail freight is organised. Targeted marketing is required to replace the hole that will be left by the demise of the coal traffic. Whilst competition in the market place has benefited the 'train load' market (in the form of lower prices) it has been the death knell for the 'less than train load' operation with no FOC having the financial resources to provide a nationwide 'less than train load' service. There is no easy solution and if one is to be found it will require a great deal of cooperation between FOCs and not a little innovation. There are currently no signs of this happening. If well-established operations are struggling to find a solution then a new entrant to the market will be further disadvantaged".* ***DfT Rail Freight Growth & Modal Shift Study 1st September 2016 (Aecom Arup)*** *"Rail, by contrast, has demonstrated a requirement for large, steady shipments which provide 'critical mass' to underwrite the sending of the entire train. This minimum size requirement limits the number of firms which can use the railway to large distributors, and even these firms find the inability to flex the load size means that road haulage is often the fall-back for adjustable capacity. This is particularly the case with regard to domestic movements (exacerbated by the lack of domestic terminals)".* ***Appendix 3 DfT Rail Freight Growth & Modal Shift Study 1st September 2016 prepared for the Department for Transport by Aecom Arup (Barriers to Rail Freight Growth)***

3.10 The need argument is being based almost entirely on the **'Golden Triangle'** concept which may apply to the siting of warehouses but not to the optimum location of a SRFI. The Applicant's claim that the location brings the vast majority of the UK within a four hour drive clearly illustrates that

the Applicant does not understand, or is ignoring, the primary intent of the policy: to reduce the secondary (road) leg of a freight journey. This reduction cannot be achieved by locating all new SRFIs in the same region.

3.11 Warehouse Demand. Real estate advisors GVA produced an employment land study for South Northamptonshire Council in 2013. *"[6.14] It is clear that even by focusing on a small number of strategically important sites with current market interest the potential oversupply is significant, providing almost seven times the identified requirement."* Since 2013, further potential logistics sites have been identified although this table has not been updated by GVA. Hence the oversupply is likely to have increased and may well be greater than seven times the identified requirement.

3.12 It is important to note that some of the most recently completed rail freight interchanges don't yet appear to have a regular freight train service established. These include the East Midlands Distribution Centre and Markham Vale. There is a further RFI at Telford which according to a local newspaper was only used by 50 trains in its first year of operation. The East Midlands Gateway will have its first tenant before the rail terminal is in place. Building a rail freight interchange is no guarantee that it will attract logistics companies. Eurohub at Corby, which was originally consented with rail connection, had the rail terminal removed following an application for change in the planning conditions.

3.13 ***The European Parliament Study 2015 Freight on Road Why shippers prefer truck to train*** clearly shows that the proportion of freight actually carried by rail is decreasing. Only 40% of train paths are actually used in the UK.

Summary of Need Objections

i) The method used for forecasting the need for rail-connected warehousing is flawed and outdated and this is clearly evidenced by the published statistics. The consequence of using the GBFM figures to justify warehouse construction is that it is likely to result in a massive over-supply of 'rail-served' warehousing without the rail capacity to service it. The 6 fold increase of 6.4 billion tonne kilometres in 2011 to 42.9 billion tonnes in 2043 predicted by the "model" is based on the premise that if you build lots of rail connected warehousing goods will necessarily be moved to it by rail; current evidence would show that this is not the case: the modal shift is likely to be far more modest.

ii) Rail is competitive with road only over long distances. Northampton Gateway will struggle for rail customers due to its close proximity to all the major ports south of (and including) Liverpool. The reduction in Mode Shift Revenue Support only exacerbates the cost differential. The Applicant claims the majority of freight will come from the Port of London, a claim which does not stack up financially.

iii) Whilst the Applicant argues that their development is sustainable (and this is not disputed) it is truly questionable whether the application site will actually operate as a SRFI given the concerns over service levels, cost, flexibility, commercial viability of rail, warehouse over-capacity and competition for train paths.

iv) The Midlands is well supplied with existing and new warehousing, both rail and non-rail connected; it is questionable whether any additional development of this scale is either needed or sustainable in the medium term.

v) Existing rail connected facilities are under-used or not used at all which suggests the warehouse occupants are opting for the cheaper and more efficient transport solutions. The site of the former Castle Donnington power station was redeveloped into a 900,000 square foot distribution centre for Marks and Spencer opened in May 2013. A two track reception siding was created with a line into the terminal but not a single revenue earning train has operated as all goods have used road transport in and out of the site.

vi) The economics of rail freight is such that it will not be viable for any users not located within Northampton Gateway itself to choose rail freight over road. Why would any organisation move goods to the centre of the country by road and then back to the ports via rail when the ports are probably just as close in the first place?

4. Cumulative Impact

4.1 Cumulative Impact on a Strategic Network

4.1.1 Paragraph 1.6 of Advice Note 17 ***Cumulative Impacts Assessment*** states *'that applicants should, amongst other matters, consider mitigation for cumulative effects in consultation with other developers; assess cumulative effects on health;* ***give due consideration to other NSIPs within their region****; consider positive and negative effects; and consider environmental limits (e.g. the potential for water quality effects to arise due to incremental changes in water quality)'*. With regard to a policy intended to produce a strategic national network, the zone of influence must necessarily be regarded as the whole nation.

4.1.2 Consideration has not been given to the cumulative impacts of excessive SRFI development in one region on viability, potential for modal shift, traffic congestion, national rail capacity, demand for rail freight, last mile logistics and over-supply of warehousing.

4.1.3 There appears to be an excessive number of Rail Freight Interchanges being planned or operational within a 70 mile radius. If the radius is narrowed to 50 miles and one only considers SRFIs, there are still 9 SRFIs in existence, under construction, approved or being planned. That is greatly in excess of what is needed. The Applicant has given no consideration to the cumulative impact that the clustering of SRFIs in the Midlands would have on the efficacy of a national strategic network. Allocating finite rail capacity in one area will impact on the ability to allocate rail capacity to areas currently not well served, of which there are many.

DIRFT 1 & 2, Crick	SRFI	Operational
Hams Hall, Coleshill	SRFI	Operational (& being extended)
Birch Coppice, Tamworth	RFI	Operational
East Midlands Distribution Centre, Castle Donington	RFI	Operational
Keresley, Coventry	RFI	Operational
Burton on Trent	RFI	Operational
Lawley Street, Birmingham	RFI	Operational
DIRFT 3, Crick	SRFI	Under construction
East Midlands Gateway, Castle Donington	SRFI	Under construction
Radlett, Hertfordshire	SRFI	Approved
East Midlands Intermodal Park, Derby	SRFI	Pre application
West Midlands Interchange, Wolverhampton	SRFI	Examination
Rail Central, Northampton	SRFI	Pre application
Northampton Gateway	SRFI	Examination
Hinckley	SRFI	Pre-application
Magna Park, Peterborough	SRFI	Proposed
Sundon Quarry, Luton	SRFI	Under consideration
Ridgmont, Milton Keynes	SRFI	Under consideration

4.1.4 ***NPS 2.50*** states *'They also indicate 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'.* By inference, the converse is also true; an area that is abundantly supplied with rail freight interchanges will have difficulty in attracting further business. NPS EN-1 paragraph 4.2.6 goes on to state that the Secretary of State should consider how the *'accumulation of, and interrelationship between effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.'*

4.1.5 Whilst government policy clearly indicates a desire to encourage modal shift of freight from rail to road, that does not mean that every SRFI will be viable if each application is approved. Many of these SRFIs are, or will be, in competition for the same logistics operators, same rail paths and common sections of the strategic highway. It was reported that Prologis had not managed to sign any tenants for DIRFT3 as at June 2017 although the first warehouse on this site was due for completion in Q3 2017.

4.1.6 The application for the Mossend International Railfreight Park (east of Glasgow) went to appeal. At a subsequent Court of Session hearing in Edinburgh, judges recorded the views of the reporter Michael Cunliffe at the original appeal hearing [33]. ***[17] A large number of retail distribution centres existed within the Central Belt, and the council had suggested that there was already an effective network in place for the distribution of goods. The reporter thought that, if Mossend were to succeed in attracting business, much of that business would be displaced from other locations. Nevertheless, there would be a real prospect of the closure of the Freightliner terminal at Coatbridge, and potentially a risk to other facilities in central Scotland.*** The judges supported the reporter on several points. ***[35] The reporter goes further; at paragraph 2.29 of his report he identified three alternative sites, the Freightliner facility at Coatbridge, which had spare capacity, the Eurocentral terminal to the east of the appeal site, and a new site at Kilgarth designated in the development plan. The reporter concluded that "A strong case can be made out for a strategic look at rail freight needs and priorities at the national (NPF4), regional (SDP review) and local (LDP) levels, so as to ensure the optimum pattern of development". This appears to us to be an important feature of the report, and it is a highly material consideration ……***
[36] The reporter thought that if Mossend were to succeed in attracting business much of that would be displaced from other locations, especially in the field of distribution. The reporter further thought that there would be a real prospect of closure of the Freightliner terminal and potentially a risk to other facilities in central Scotland. He therefore suggested a cautious approach in assessing the net economic benefits. These possible disadvantages are plainly material, but they are not addressed in the decision letter, and once again we consider that this is a clear deficiency in its reasoning; the need for a cautious approach is clearly material to the assessment of the proposal's economic impact, which is in turn put forward as a factor justifying departure from the development plans. The judges decided to overturn the Scottish government's decision to grant planning permission for an expanded rail freight terminal at Mossend (although noted that in a subsequent appeal this decision has been reversed).

4.1.7 Whilst it is not suggested that Northampton Gateway would put DIRFT out of business, it is reasonable to suggest that if Northampton Gateway were to be built then it would significantly detract from the viability of both DIRFT and its own site. The NPS also has a view on this subject: ***NPS 4.8 In the case of strategic rail freight interchanges, a judgement of viability will be made within the market framework.*** Additional freight paths are a scarce commodity and again these SRFIs will be in competition to gain such paths. They will also be in competition to secure a suitable quantity of staff members.

4.1.8 The Applicant has not demonstrated that there is a specific need for a SRFI at their proposed

location, choosing to focus on commercial viability rather than the ability to satisfy the policy intent of the NPSNN. It would be most undesirable to continue to grant approvals to SRFIs in this area which is already well supplied with SRFIs when the additional demand is unproven. It is notable that the number of freight trains serving DIRFT has not increased in the last five years. While the RFIs at Keresley and East Midlands Distribution Centre are rail connected, there appears to be little sign of a regular service to either location, based on an analysis of data from the Realtime Trains website. That indicates that there are factors preventing the more widespread use of the movement of freight by rail.

4.2 Cumulative Impact on the Road Network

4.2.1 The DfT's National Transport Model has identified that by 2040 the section of the M1 between junction 15 and junction 18 will be severely congested. Three new SRFIs could be utilising this section of the M1; circa 60,000 additional vehicles equating to a 50% increase in traffic. The A508 will see a doubling of traffic and a 400% increase in HGV movements. The A43 will see a 50% increase in traffic overall and a 200% increase in HGV movements. Whilst it does not appear to be a requirement under the NSIP process, we believe it is essential that the model is stress tested to establish what will actually happen on the local roads when a part of the highways network suffers perturbation. It should be noted that the local communities already know what happens with far less volumes of traffic than are being proposed.

4.2.2 SNC have identified the undermentioned developments that need to be taken into account in the cumulative impact assessment. It is unclear whether full account of all these have been factored into the cumulative impact assessment.

- Brackley East SUE (B2)
- Brackley North SUE (B3)
- Weedon Depot (BN6)
- DIRFT3 (policy E4)
- Silverstone Circuit (E5)
- M1 Junction 16 Strategic Employment site (E8)
- Land west of M1 Junction 15a (proposed Rail Central SRFI)
- Northampton West SUE (N4)
- Northampton South SUE (N5)
- Northampton South of Brackmills SUE (N6)
- Northampton Upton Park SUE (N9)
- Northampton Norwood Farm / Upton Lodge SUE (N9A)
- Towcester South SUE (T3)
- HS2 including main construction compound at Brackley

4.2.3 We believe, with respect to the highways network, the Zone of Influence needs to be extended to include the increased traffic that will be generated by the extensive warehousing development both on this section of the M1 and further afield, for example at junction 13 of the M1 and the new developments to the East along the A45, much of the traffic from which will be utilising the M1. Residential developments in Milton Keynes will also impact traffic levels on the M1. The cumulative

effect of all of this additional traffic from the wider area needs to be included in the cumulative impact assessment along with on-going natural increases (over the life of the development). Smart motorways are unlikely to be the universal panacea to future increases in traffic on this core route.

4.2.4. Given the crash statistics over the last 5 years (between 2013 and 2017 (5 years) there were 337 crashes on the M1 between junction 14 and junction 18, 56 of which were serious and 9 of which were fatal)[1] it is reasonable to assume that increased traffic volumes will increase the incidence of accidents on the M1 and increase the amount of times traffic leaves the highways to seek alternative routes via local roads. The need to stress test the model becomes even more critical when assessing the cumulative impacts. The Applicant has refuted the need to do this.

4.3 Cumulative Impact on the Rail Network

4.3.1 Network Rail has identified a number of potential schemes/developments which could affect the Northampton loop. They were listed as follows: DIRFT 3 SRFI; Tarmac Aggregates Castle Yard, Northampton; Rail Central SRFI; Rugby Parkway Station (and potential Roade/Blisworth Parkway); and East/West Rail. If some of these developments are constructed at the same time they will have a cumulative effect on rail movements, road traffic and demand for local labour resources. It should also be noted that 43% of all UK freight and 90% of intermodal freight utilises the WCML on some part of its journey and concentrating excessive activity on the key part of the network will affect the viability of other potentially better placed SRFIs in other regions to contribute to Government aims.

4.3.2 DIRFT has aspirations for a further 20 train paths and Northampton Gateway and Rail Central have declared a further 16 and 21 respectively within their business model. That is a further 57 train paths on the Northampton loop alone. It can be reasonably assumed that the West Midlands Interchange will also be looking for a similar number further north on the WCML which could take it up to around 73. If the other proposed SRFIs (East Midlands Intermodal Park and Hinckley) are consented and an estimated 50% of their freight travels over the WCML (as is currently the case with intermodal traffic) then this could rise to around 96. In addition the consented East Midlands Gateway is not yet operational and may also be requiring paths on the WCML which could take the additional loading on the WCML to over 100 paths per day causing serious conflicts with the commitment to improve passenger services. If we also take into account the 2 passenger trains per hour feeding in from East West Rail at Bletchley, the figure is approaching 150 additional trains per day. If this is not achievable then an assessment needs to be made as to which locations would best serve Government aims. Additional demands from East West Rail and the natural passenger increases caused by the expansion of Milton Keynes and Northampton also have to be factored in when assessing rail freight capacity. ***N.B. figures provided are indicative only***

Scheme	Additional train paths per day	Comment
East West Rail	36 each way	An estimated 2 passenger trains per hour running to and from Milton Keynes
Increased Northampton passenger demand	28 each way	Based on population estimates and project housing growth (passenger numbers have doubled in the last 20 years; a conservative 50% increase in trains has been assumed to accommodate a doubling of passengers for the next 30 years)

DIRFT 3	20 each way	Additional on top of the 10-12 currently running
Rail Central	21 each way	Declared in the Environmental Statement and accompanying documents
Northampton Gateway	28 each way	Declared in the Environmental Statement
West Midlands Interchange	10 each way	According to the Scoping Report
Hinckley	4	Assumed based on floor space and 30% of traffic using the WCML*
East Midlands Gateway	8	Assumed based on floor space and 50% of traffic using the WCML**
East Midlands Intermodal Park	8	Assumed based on floor space and 50% of traffic using the WCML**
Total	**163 each way**	

4.4 Additional Cumulative Impacts of Rail Central

The Cumulative Impact of Rail Central and Northampton Gateway

4.4.1 If planning consent were to be granted to both Rail Central and Northampton Gateway, a further range of issues would be created. There would be an even greater increase in traffic both during construction and once operation commences. Rail Central will generate circa 21,988 vehicle movements, primarily utilizing the M1 to add to the 16,531 being generated by Northampton Gateway (at two consecutive junctions). If both sites were approved, there would be a greater increase of traffic movements from employee travel and more HGVs which would lead to increased air pollution issues. The ability of the network to recover from perturbation would be greatly diminished.

4.4.2 Traffic will be disrupted by the concurrent road works planned by Ashfield Land which are intended to increase road capacity. Further extensive road works would also be required to provide an electrical supply to both sites. It should be noted that the two Developers have conflicting plans

for the alterations to the same junctions. These and other works are planned to take place at: M1 Junction 15; M1 Junction 15a (both Developers have conflicting plans for this junction); Queen Eleanor roundabout, A45; A43 grade separated roundabout to access Rail Central; Tove roundabout (A43/A5).

4.4.3 When the M1 is congested traffic from two large SRFIs (close to 40,000 vehicles) will be seeking alternative routes, many via local villages and country lanes: Blisworth will be hit by significant and dangerous rat-running from two directions.

4.4.4 The currently planned footpath diversions of each individual application may no longer be possible as each involves the use of adjacent property which is included within the competing/concurrent development. In any case the attractiveness of using a public footpath (of significantly longer length) that passes between two intermodal terminals and alongside massive warehousing and a motorway would be completely obliterated.

4.4.5 A total of eight sets of points would be required which would use approximately 480 metres of track according to Rupert Dyer the Applicant's rail consultant. This may necessitate the displacement of some of the planned joining locations to the Northampton loop either northwards or southwards. Two SRFIs are likely to double the impact on the punctuality of passenger rail services.

4.4.6 It would be more difficult to find tenants for the warehouses due to an oversupply of warehousing hitting the market at the same time. DIRFT 3, Northampton Gateway and Rail Central would collectively introduce an additional (circa) 20 million square feet of warehousing onto the market over the same time period. Staff at these two sites would have further to travel to work due the low number of unemployed staff in this area and there would be a significant degree of job migration rather than job creation, creating problems in other parts of the economy.

4.4.7 Ecologically and environmentally the development of the two proposals would devastate the local area and destroy 1160 acres of productive farmland and natural heritage. They would obliterate the setting of the four closest villages (Blisworth, Milton Malsor, Roade and Collingtree) and four conservation areas and result in unsustainable pressure on local community resources, utilities and infrastructure. The effect on the quality of life for the local community is given little credence in the planning process but without doubt the effect would be devastating.

4.4.8 The surrounding villages would come under pressure to provide additional housing to accommodate the workforce required for two large warehouse parks which would further erode the character of the area. The DIRFT 3 development (of not dissimilar size) is accompanied by the construction of 6,000 new homes immediately adjacent. Whilst similar developments are not specifically detailed in the ESSR (because they do not have to be), it is not unreasonable to assume that applications for more housing development would naturally follow with the justification being to provide housing for the workers at Northampton Gateway and the adjacent Rail Central.

4.4.9 The bunding and screening proposed by the Applicant is pointless if the Rail Central proposal is brought forward. Due to the lie of the land the visual impact of Rail Central cannot be adequately screened from any angle.

4.4.10 Increases in light pollution and noise and reductions in air quality need to be cumulatively assessed on the basis that both developments are in place. We do not believe there is any effective mitigation for the massive impact two such concurrent developments will have: noise, light and exhaust emissions will double. The closest two houses to the railway in Milton Malsor are 20ms and 100ms respectively and the intensity of noise will be vastly increased by more and longer trains entering two SRFIs through the night.

4.4.11 In chapter 2.1 paragraph 2.37 of the Applicants draft Environmental Statement they state '***Work undertaken to date also indicates that the cumulative environmental effects of the development of the Rail Central scheme in addition to Northampton Gateway, would be unacceptable'.*** In making this statement the Applicant is conceding that, likewise, their proposal becomes unacceptable if the Rail Central scheme is approved. This inconvenient fact has not deterred the Applicant despite the fact that the Rail Central proposal was already in the pre-application stage before theirs was on the drawing board. We would therefore question the sense of examining both individually if there is limited prospect of both being viable or environmentally acceptable.

4.4.12 ***'15.20. With regards to the assessment of landscape character effects, judgements here too represent balance between the change created by the proposed introduction of new built development with the benefits of retained existing woodland and other features and the significant new landscaping proposed, including new footpaths and accessible open spaces. From the work undertaken to date it is considered that the negative effects do not combine to have a cumulative effect greater than minor effects overall over the longer-term'***. We contend that the building of two extremely large industrial parks will have far worse than a minor effect overall.

4.4.13 ***'15.24. In particular, there would be additional transport impacts on both the strategic and local road network which would create a need for additional mitigation measures. The combined transport impacts could result in some potentially significant or severe adverse local effects. Were both schemes approved there would also be an additional urbanising influence on the wider local landscape which may also generate more significant local effects'.*** We believe that the effects would have unacceptable impacts on the quality of life, health, safety and well-being of the local residents.

4.4.14 The potential oversupply of warehousing being introduced onto the market in the same region within the same 10 year period is likely to extend the construction period of each development as the rate of warehousing take-up will be slowed.

4.4.15 The question of utility capacity has not been addressed in the cumulative impact assessment. Can sufficient power, gas, water and waste water services be provided to both sites without having an adverse affect on other surrounding users. This issue is critical and fundamental but has not been addressed.

Summary of cumulative impacts objections

i) The cumulative impact of other SRFIs in the region has not been considered in terms of the efficacy of a "national network" or the ability of the rail network to effectively service them should some or all of them be consented. Allocating train paths to three SRFIs on one 15 mile stretch of the WCML (and all being reliant on the same 15 mile stretch of the M1) will affect the viability of better placed alternatives ***"across the regions"*.**

ii) There is a high risk of an excessive number of SRFIs being situated in the East Midlands which risks many of them being non-viable and not fulfilling one of Government's four primary policy objectives; that of carbon reduction. Having so many in close proximity also means the secondary leg of the freight journey will increase (rather than decrease as intended). There will also be unhealthy competition for tenants, staff members and train paths.

iii) We are not convinced that sufficient regard has been taken of the many other developments planned in the surrounding area (such as the relocation of the University campus) with the consequent impacts on traffic congestion and air pollution. With the massive increases in traffic volumes comes the increased risk of accidents and perturbation. The traffic model has not been stressed to reveal the realities of an interruption on the M1 or other major road. The ability of a stretched network to recover from incidents will be greatly reduced.

iv) The cumulative impact on the highways and local roads of both Rail Central and Northampton Gateway have not been modelled despite the offering being made by Northampton County Council. This is not acceptable.

v) If Northampton Gateway and Rail Central were both to be approved a whole range of additional issues arise, including but not limited to: extensive and unacceptable diversion of footpaths; labour migration and shortages; obliteration of heritage assets; impact on utilities and infrastructure; double the adverse impact on biodiversity and loss of scarce agricultural resources; impact on passenger rail services; accumulated noise and light pollution. The social and environmental impacts, including health effects on local residents, have been given little regard in the application process: these issues are significant.

References

1. www.crashmap.co.uk

5. Rail Capacity

5.1 ***NPS 4.89*** *'As a minimum, a SRFI should be capable of handling four trains per day and, where possible,* ***be capable of increasing the number of trains handled***.' The minimum stipulation of 4 trains per day may align with a SRFI of 60 hectares but for a SRFI of 210 hectares, four trains per day equates to less than 5% of goods being handled by rail. This represents a far from effective modal shift given the massive increase in HGV movements this will create locally. We contend that the ability to ultimately service a greater number of trains should be proven beyond reasonable doubt from the outset. The Applicant seems content to prove the minimum basic compliance. The Applicant's capacity study looks only at the Northampton loop in isolation and also ignores Rail Central and DIRFT 3 aspirations.

5.2 ***The Department for Transport*** has described the West Coast Mainline as *"highly constrained, meaning that the route is operating close to capacity in the peak and it is challenging to increase service levels still further"*. It is the busiest railway in Europe (43% of all UK rail freight traffic and 90% of all intermodal traffic travels over it at some point and it is the core freight route to the north west of England and Scotland) and is under pressure from passenger operators to improve their service and to increase the number of paths. The East-West Rail is estimated to require 20 to 30 additional passenger paths when it joins the WCML and DIRFT's aspiration to service 32 trains daily (up from the current 10/12) will put further strain on the line. Rail Central and the West Midlands Interchange, if consented, will also be competing for access and the limited paths on the WCML.

5.3 ***Long Term Planning Process: Freight Network Studies 2013 and 2016*** surmise the following: the growth of passenger and freight sectors in recent years has created considerable challenges over the allocation of capacity; decline of rail's traditional commodities such as coal, and the growth of the intermodal and aggregates sectors, is likely to change the geographic footprint of rail freight by moving demand to the key arteries and the routes to and from the deep sea ports; the forecast off-peak paths per hour are unconstrained and enhancements to capacity and/or in some cases capability of the current network are likely to be required beyond that which is currently committed if these forecasts were to be accommodated; investment in infrastructure is necessary to accommodate the anticipated growth in rail freight on the network; the study also assumes no reduction in current freight paths to accommodate growth in passenger services; failing to unlock capacity along the entire route means that the benefit of individual projects completed is not realised; and the freight industry has created a core freight route in Felixstowe to the West Midlands and the North route, routeing services 'cross-country' to avoid the capacity and performance issues of travelling across London and on two congested main lines. ***Appendix 5 Network Rail Long Term Planning Process; Freight Network Studies 2013 and 2016***

5.4 Capacity Constraints on the WCML Reference: Department for Transport Supplement to the October 2013 Strategic Case for HS2 Technical Annex: Demand and Capacity Pressures on the West Coast Main Line [***in summary***] The WCML has higher intensity of operation than comparable major fast lines in other European countries; the rail corridor remains highly constrained; it is operating close to capacity in the peak and it is challenging to increase service levels still further; physical constraints impact the traffic that can be operated all along the route; both Virgin West Coast and London Midland (now London Northwestern) have consistently operated below their Public Performance Measure; the performance risk of, effectively, filling the Fast Lines from the start of the

morning peak until after the end of the evening peak was considered to be too great, as the service would never have the opportunity to recover from any perturbation; the circumstances in which the additional services have been permitted lend weight to the evidence that it is difficult to operate additional trains on WCML in the peak; Long term forecasts point to continued growth in the passenger and freight rail markets; accommodating this demand on the WCML will be increasingly challenging; and investing in the WCML corridor to allow more services to operate, whether they be passenger or freight, is complex. ***Appendix 4 Capacity Constraints on the WCML Reference: Department for Transport Supplement to the October 2013 Strategic Case for HS2 Technical Annex: Demand and Capacity Pressures on the West Coast Main Line***

5.5 The company responsible for the unconstrained rail freight forecasts used by the Government has publicly declared that these levels of freight movement can never be achieved due to capacity constraints on the network. ***MDS Transmodal 'The future of rail freight and private sector investment in infrastructure*** *'Those network capacity constraints have the impact in the DfT's Central Constrained Forecast of reducing by over 80% the forecast volume of domestic intermodal traffic to just 4 million tonnes in 2030. In its Central Case the DfT forecast is for 101 million tonnes (including an allowance for Channel Tunnel traffic) and is therefore almost identical to the level arrived at in the TfN/GBFM results where no more SRFIs are assumed to be developed; overall a cut in total tonnes by rail as compared with 2014. However, the DfT's Central Constrained Forecast still anticipates a more than doubling of ports traffic from 15 million to 32 million tonnes lifted between 2011 and 2030. Given that the DfT study appears to have assumed no more capacity along the principal rail corridors (and in some cases less) it is difficult to see how this can be achieved; almost all this ports traffic uses the West Coast Main Line at some point in its journey'*. ***Appendix 6 MDS Transmodal 'The future of rail freight and private sector investment in infrastructure'***

5.6 Notwithstanding the problems with the WCML, one of the major constraints for freight movement from London ports and Felixstowe is the North London line which carries the majority of freight to the Midlands. Any freight trains from Felixstowe, London Gateway or other ports in south east England have to use the North London line to access the West Coast Mainline (WCML). Much of this is a two track line which is also used by the fast expanding London Overground services which stop at many stations. Therefore even if HS2 facilitates the release of a few train paths on the West Coast Mainline, that has very little significance if no capacity improvements are made to the very congested North London Line. The Applicant has indicated that they expect most freight journeys to originate in London. The recently announced improvements to the Felixstowe to Ipswich branch line (an increase of 50% on freight capacity) favours SRFI developments, such as Hinckley, which are not reliant on the north London and WCM lines.

5.7 ***Demand and Capacity Pressures on the West Coast Main Line 2015*** which was published in November 2015 confirms the view that Northampton Gateway is premature. Any capacity released by the Felixstowe to Nuneaton (F2N) upgrade would be expected to be taken by DIRFT 3, which will open well in advance of Northampton Gateway, Rail Central, and other SRFIs to the North West. Only when HS2 Phase 1 opens in 2026 would there be a prospect of securing sufficient paths to service a development of Northampton Gateway's scale; and possibly not until 2033 when HS2 phase 2a is available.

5.8 Before HS2 starts running, East West Rail is due to become operational in 2024. This will feed at least two East West passenger trains per hour onto the West Coast Mainline between Bletchley and Milton Keynes (or Northampton). Other passenger trains from further afield may also use this section of the WCML north of Bletchley. The Applicant's rail expert advised that existing freight trains from Southampton to the Midlands will be routed via Bletchley onto the WCML to reach the Midlands from 2024 onwards. This reduces the use of the single track section between Leamington Spa and Coventry. This will add up to 30 two way trips per day to the WCML based on current scheduled freight paths.

5.9 We have significant concerns over the forecasting mechanism that has been employed in quantifying the demand for new rail-connected facilities. MDST's forecasts provide an unconstrained view of rail freight capacity, identifying the need for 196 freight movements on the Northampton Loop per day by 2043/4, approximately three times the current level of traffic. In contrast, the 2016 Freight Network Study issued by Network Rail for consultation in August 2016 envisages upgrades to the Northampton loop that will provide only one extra freight train per hour, at a cost of £450m. The constrained capacity, therefore, is very much less than the unconstrained forecast would suggest, due in the most part to financial considerations. This upgrade has not even been approved in the current control period.

5.10 *'It should be noted that publicity about capacity released on the West Coast Main Line [WCML] becoming available for freight is misleading. Many of the constraints on freight paths will remain, especially north of Preston, and maintaining good passenger services for places like Stoke-on-Trent and Coventry while simultaneously satisfying the outer-London commuter demand would in practice mean no increase in paths for freight south of Rugby'.* ***HS2 and the railway network : the case for a review', Tony May and Jonathan Tyler, with contributions from Richard Allsop, James Croll and Stephen Plowden, 2016***

5.11 If the Office of Road and Rail (ORR) were to grant the requested extra freight paths, this could be at the expense of additional passenger train paths in the future. This is of concern in the context of North West Trains (formerly London Midland) being the fastest growing rail franchise in the last eight years (source DfT), London Midland experiencing the most growth on the Northampton/Milton Keynes to Euston journeys (source London Midland) and the significant amount of additional housing planned by the West Northamptonshire Joint Core Strategy and Milton Keynes council's plans to substantially increase their housing capacity. *'There are growing demands for rail passenger services and constraints on freight and passenger capacity, both on the Northern Loop Line and WCML. The addition of a terminal in this location will be the subject of an ORR Network Change approval, which is highly likely to be objected to by passenger Train Operating Companies, certainly prior to 2026'* ***Peter Baker Associates***

5.12 ***Northampton Rail Users Group*** believe that this proposal will have an adverse impact. Trains entering and leaving the facility will slow down passenger trains and affect line capacity, especially if in the morning and evening peaks. If outside the peaks it will have an effect on the down time available for track and signal maintenance. The ability for trains leaving Northampton to move to the "fast lines" is already limited, to further limit this through either more slow train movement on the same track, or new points and track requiring slower running to pass safely, must have an adverse effect. The NEP study identifies a 24% passenger growth on the WCML Euston to Birmingham up to

2023 and 84% to 2043. Such increases in passenger numbers will be in conflict with increasing the number of paths available for freight.

5.13 Section 9 of the Applicant's ***Draft Rail Capacity Report*** which states [9.1] that the Department for Transport's intention post-HS2 is to create more capacity on the southern end of the West Coast Main Line for intermediate stations, and [9.2] that this will create more capacity for freight services on the Slow Lines. Northampton is one of the largest intermediate stations on the West Coast Main Line and yet is only served by the Slow Lines, so it is unclear how both these statements can be achieved without Northampton and Long Buckby alone receiving a poorer service. It is also noted that in the emerging West Coast Capacity Plus Study, Network Rail have identified a significant future constraint in capacity between Denbigh Hall North Junction and Milton Keynes Central in particular, but also over the entirety of the Northampton Loop, such that increasing freight services over the Loop might require a reduction in the passenger service to Northampton. It is felt that this issue should be addressed in the ES, to ensure that the proposal does not make this more likely.

5.14 The [SLC Rail www.slcrail.com] ***Northamptonshire Rail Capacity Study April 2016*** commissioned by Northamptonshire Enterprise Partnership (NEP) Chapter 5 references the aforementioned Freight Markets Study and states the strategic solution for the predicted intermodal growth is to expand beyond the current principal single routing for imports from Felixstowe via the Great Eastern Main Line (GEML), North London and West Coast Main Line and expand capacity on other existing and new routes from Southampton. This "four route approach" spreads traffic as follows:

- Continued use of the GEML/N London/WCML for services to DIRFT
- Felixstowe to the North and East Midlands and North via Cambridge, Peterborough and Leicester
- Oxford-Birmingham line and the WCML at Milton Keyes and the MML at Bedford The use of East West rail when completed to even out distribution from Southampton across the
- Expansion of capacity on the Midland Main Line itself north of Bedford

The report goes on to identify the investment required to accommodate the increased pressure with the need for additional track capacity between Bletchley and Milton Keynes and dynamic freight loops on the Northampton loop. There is currently no commitment to invest in these upgrades. Therefore, the siting of additional SRFIs on the WCML is out of step with the strategy to spread freight traffic to less congested parts of the network and not in line with committed investment strategies. The NEP study also recommends the building of Parkway stations to improve passenger access to the network with a location in Roade/Blisworth being identified. Should Northampton Gateway be built an additional passenger stop to the south may be difficult to accommodate in the future.

5.15 ***Network Rail's Route Utilisation Study for the West Coast Main Line*** identifies an additional capacity constraint North of Rugby. This constraint is due to the presence of three-line and a short section of two-line track in that location. By clearing the gauge from Felixstowe to Nuneaton, Network Rail is able to route freight cross-country to join the WCML above the Rugby bottleneck. Further constraints are identified in the Hybrid Bill for HS2, namely the lack of sufficient locations

south of Milton Keynes where fast trains could overtake slower freight services, and the design of Hanslope Junction itself, where trains are obliged to slow before the fast and slow lines separate.

Summary of Rail Objections

i) The WCML has a higher intensity of operation than comparable major fast lines in other European countries and increasing capacity, without the risk of unacceptable perturbation, is difficult and complex. There will be even fewer paths once East West Rail opens.

ii) Available rail freight paths on the WCML are finite and their allocation is, and will be, subject to considerable competition from competing users. With DRIFT; Rail Central; Northampton Gateway and West Midlands Interchange all looking to directly access the WCML and East Midlands Gateway; East Midlands Intermodal Park; and Hinckley also looking to compete for paths with existing users, a decision needs to be made as to where in the country modal shift can be most effectively facilitated. There is a greater need for new SRFIs in many other parts of the country than there is in the East Midlands.

iii) SFRI developments should follow capacity enhancements not precede them. National Freight strategies and investments are focused on moving trains away from London and utilising the Felixstowe to Nuneaton route where capacity exists: current proposals to build SRFIs on the southern section of the WCML are contrary to this national strategy and in conflict with investment priorities.

iv) The local plan has been agreed and tested to protect capacity for DIRFT.

v) When HS2 opens in 2026, it may release some train paths. However, these will be of little help to freight as HS2 will not release any on the North London Line, an existing bottleneck through which freight trains access the West Coast Main Line at its southern end. Freight should be channelled along alternative routes (for example Felixstowe to Nuneaton) where there is greater capacity for freight, fewer physical constraints and fewer conflicts with increasing passenger service demand.

vi) The Applicant appears to have overlooked the continued need for expansion of the NorthWest Trains (ex London Midland) services, and where demand will be accelerated by the planned house building in the Northamptonshire and Milton Keynes areas. The granting of additional freight paths is in direct conflict with the commitment to deliver enhanced passenger services for Northampton as part of the mitigation for HS2. Risking better passenger services for Northampton, East West Rail and HS2 connectivity are significant economic perils.

vii) The growth of rail freight is constrained by numerous bottlenecks in the rail network and is likely to be undermined by the reduced funding for the Mode Shift Revenue Support scheme and the possible increase in track access charges.

viii) The growth of domestic intermodal rail freight is over-stated due to the limitations and assumptions within the GBFM: the predicted six fold increase in intermodal traffic cannot be justified nor can it be accommodated on the current network. There is, therefore, little justification for building more SRFIs in an area that is already well served.

ix) At this stage the Applicant's project is insufficiently advanced within the Network Rail GRIP planning process to offer a low level of risk. Network Rail have suggested a minimum of GRIP level 4 would be appropriate prior to submitting an application; the Applicant seems content with reaching GRIP 2.

References

1. MDS Transmodal 'The future of rail freight and private sector investment in infrastructure'
http://www.mdst.co.uk/articles/pages/rail-dec16

6. The Road Network

6.1 The **DfT's National Transport Model** has identified that by 2040 the section of the M1 between **junction 15 and junction 18 will be severely congested.** It can reasonably be surmised that the DfT model is included as an annex in the NPS NN to steer Developers towards parts of the road network that are more able to accommodate the additional traffic. The 7.5 million square feet of expansion at DIRFT will already increase the traffic on this congested section of the motorway, another SRFI (or more) on the same congested section will further exacerbate the problem. The A508 will see a doubling of light traffic and a four-fold increase in HGV movements. Between 2013 and 2017 there were 40 crashes involving injury, 13 of them serious, on the A508 between the M1 and A5 roundabout. ***Source www.crashmap.co.uk*** ***Appendix 7 Congestion on the Strategic Network 2040***

6.2 ***Department for Transport Circular 02/2013 The Strategic Road Network and the delivery of sustainable development referred to in NPSNN 4.85 Paragraph 9*** states. *"Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are **severe**".* The DfT has already identified that this section of the M1 will be severely congested even **without** the proposed development.

[Precedent] East Midlands Intermodal Park Roxhill Development's proposals (East Midlands Gateway) would seem to make sense, seeing as we have the East Midlands Airport, Junction 24 of the M1 and rail track already in existence. I can see this logic, but my concern would be the likelihood of TWO rail freight terminals within a short distance of each other and basically running the same highway – A50. [Same section of the M1 accommodating DIRFT, Northampton Gateway and Rail Central]

6.3 The Highways modelling completed assumes a 'perfect world' scenario with all parts of the network operating at an optimum, unstressed, level. Given the single point of access to the site and the significant reliance on the M1 for the smooth and effective operation of the site this simplistic approach is not considered sufficient. On the basis that the section of the M1, upon which the facility is reliant, is frequently congested, and sometimes closed, there should be a requirement to stress test the model to fully clarify the knock on effects for the local road network and neighbouring local communities now and in the future. This modelling needs to be completed for a number of scenarios and a number of time intervals. Between 2013 and 2017 (5 years) there were 337 crashes on the M1 between junction 14 and junction 18, 56 of which were serious and 9 of which were fatal[1]. During last 4 months of 2017, there were 18 closures of the M1 between J12-J16, 7 for over 2 hours, the longest being 14hrs 8mins, a total in all 64 hrs 12 mins and for 2017 the total was 87 hours 5 minutes.

	Fatal	Serious	Slight
Jun 14 to 15	3	26	144
Junction 15	0	4	17
Jun 15 to 15a	1	5	11
Junction 15a	0	1	13
Jn 15 to 16	0	11	20

Jn 16 to 18	5	9	67
Total	**9**	**56**	**272**

Period 2013 to 2017. Source www.crashmap.co.uk

6.4 Northampton Gateway has only one route into and out of the site compared to DIRFT which has three alternatives. Northampton Gateway feeds only onto the A508 and subsequently Junction 15 of the M1. The main alternative route when there is congestion on the M1 is south on the A508 or via various country lanes to access the motorway at other junctions. The proposal to allow HGV traffic only to exit the site to the left (towards the M1) is unsustainable given the frequency with which the M1 becomes inaccessible. At some stage in the life of the development it can be envisaged that the operator of the site will apply for a relaxation of this condition as logistics operations routinely grind to a halt. For periods all traffic will then be travelling south on the A508 to the busy Stony Stratford roundabout (or worse still along country lanes seeking alternative routes to the M1). Blisworth will be used to access the A43 and Courteenhall Road East/Wooton Road to access the A45 East. ***N.B. Planning conditions can be relaxed/removed as was demonstrated by the removal of the rail connection at Eurohub Corby***.

6.5 The proposed camera and fines scheme for HGVs making U-turns on the Junction 15 roundabout to then travel south on the A508 is similarly unsustainable and unlikely to be enforced by the local authority who ceased to operate the County's speed cameras some years ago. Notwithstanding the practicalities of such a scheme, there will be no compensation for the local community, who are the ones that will suffer. Once the development is built and found not to be operating effectively, the local authority will be put under extreme pressure to concede to changes to these Developer-led conditions. NO planning condition is guaranteed to survive in perpetuity.

6.6 Traffic travelling to the application site from the west along the A43 is highly likely to cut through Blisworth to avoid travelling to junction 15a and down to junction 15 along the M1 (shorter by 2.5 miles). The likelihood of this is increased at times when the M1 is congested and also at early morning and evening shift changeovers when local roads are clear. Residents living on Towcester Road, Blisworth High Street and Courteenhall Rd will be subject to increased traffic and noise just before 6.00am and just before 10.00pm when currently the roads are used very little. The same will apply to vehicles exiting the Northampton Gateway returning West. This has an unacceptable social and health impact on local residents. There will also be an increased use of the at-grade cross-over A43/Towcester Road junction which has been identified by the Highways Agency as presenting a very high risk to safety. ***Ref Highways Agency: Area 7 MAC A43(T) At-Grade Junctions (crossovers) SNC Scrutiny Committee Report March 2015***

6.7 The proposed restriction on turning right onto the Courteenhall Road will divert traffic heading to Blisworth onto Knock Lane and thence onto Stoke Road. Knock Lane is a sub-standard narrow country lane with un-made verges making passing on-coming traffic very difficult. Stoke Road is similarly unsuitable for increased traffic with residents (and patients visiting the Doctor's surgery) parking on the road side making passing dangerous. Both of these roads are routinely used by horse riders from local equestrian facilities. The increased traffic along this route, which is already a rat-run from the south, presents an unacceptable safety risk along narrow rural lanes and village streets. Stoke road runs atop a steep embankment leading down to the Grand Union Canal: this

embankment is monitored due to its instability and is vulnerable to increased traffic. This has not been addressed by the Applicant. The junction of Stoke Road and the High Street in Blisworth is an obvious bottleneck and will become dangerous to pedestrians if traffic increases. At times when the M1 is inaccessible this route will be used to gain access to the A43 (via Blisworth) to reach the A5 and alternative access to the M1 (both north and south).

6.8 The heat map produced by the Applicant shows a greater than 30% reduction in traffic on the Courteenhall Road and a greater than 30% increase on Knock Lane. The scheme is diverting traffic from a road that is better suited to handling traffic to a rural country lane that is not. This 30% increase on Knock Lane, according to the Applicant, results in no increase in traffic when turning right onto Stoke Road and towards Blisworth and a reduction if turning left towards Stoke Bruerne. We would question where this additional traffic goes at the end of Knock Lane. The rat-runners use the Stoke Road to access the centre of Northampton, not to get to the M1; the building of a Roade bypass will not change this behaviour. The Applicant appears to have made the assumption that the junction 15 improvements will change commuter behaviour but has provided no justification for this assumption.

6.9 The proposed restriction on turning right out of Courteenhall Road will greatly affect the quality of life of residents in Blisworth, increasing travel times for short local journeys. However, a likely consequence is that traffic will be diverted onto the Stoke Road and Knock Lane to travel south down the A508, a route far less suitable for heavier and more frequent traffic. Road widths:

Stoke Road	4.2 – 5 m	reduced to 3.3 by parked cars
Knock Lane	4.1 – 4.4	near Stoke Road
Courteenhall Road	5.1 – 5.4	4.5 on bridge over WC main line

6.10 The proposed Roade by-pass will be single carriageway and will introduce three roundabouts onto a section of road that currently only has one. This will slow the speed of traffic flow rather than increase it. Normal (non-HGV) traffic is likely to continue to use the existing shorter route through the village.

6.11 The development of a Smart motorway along this section of the M1 is not a universal panacea to the congestion problems. The Atkins report for Highways England has shown that the M25 Smart motorways widening has resulted in journey times worsening and traffic increasing by 13 percent within the first year. In any case Smart motorways make absolutely no difference in the event of an accident: there are exactly the same number of lanes as there were previously.

6.12 The Applicant's claim that 90% of the workforce will be travelling from within the study area is open to challenge given that the primary centres of population have considerable on-going warehouse development and hence competition for jobs: at Milton Keynes (Junction 13); Wellingborough (Raunds Business Park); Daventry (DIRFT); Towcester (Silverstone development); Northampton (Brackmills and Junction 16); Kettering and Corby. Any carbon benefits claimed by the potential use of rail will be negated by longer employee transits to work.

6.13 The proposed weight restrictions on country lanes through Stoke Bruerne, Blisworth, and Shutlanger are not enforceable, as has been demonstrated in the villages around DIRFT. Northampton CC do not operate cameras and width restrictions are not viable as the roads are used by commercial and agricultural vehicles. When questioned, Roxhill's consultant stated that enforcement would be reliant on local residents complaining to the Council who might then take action. This is unacceptable. The same concerns exist over the policing of any scheme involving ANPR cameras.

6.14 The Applicant's contention [15.19] in their Draft Environmental Study that ***'The centres of surrounding villages will all see reductions in through-traffic, with local benefits in terms of noise and air-quality'*** illustrates a complete lack of appreciation of the local area, the effects of disruption on the M1 and normal commuter behaviour. To suggest reduced traffic in the three villages that neighbour the proposal site is disingenuous. The roads in and around Blisworth are already over-stressed whenever there are problems on the M1 (we have video footage) and this is without the vast increase in traffic from the development that will be seeking alternative routes.

6.15 Northamptonshire County Council has previously recognised the high levels of congestion currently experienced on the A45 on the east side of Northampton. To address that it has conceived and implemented A45/M1 Northampton Growth Management Scheme. Despite this, the A45 remains congested at peak times as it passes the eastern side of Northampton.

Summary of Highway Objections

i) The M1 between Junction 15 and 19 is one of the most congested sections of the Highways Network: large scale commercial development reliant on the road network should be directed towards sections of the highway network more capable of supporting it.

ii) The consequences of traffic increases on local roads are potentially devastating and have not been properly quantified or explained. With one road to and from the site, overspill onto the surrounding local country roads is inevitable. The Applicant's contention that the surrounding villages will all see reductions in local traffic is without justification and unsupportable.

iii) Some of the road layout changes worsen the current situation rather than improve it. In particular the Applicant should be required to validate the heat map which shows an unjustifiable reduction in traffic along Stoke Road and through the centre of Blisworth.

iv) The modelling work completed is detached from reality and does not take into account human behaviour, current commuting patterns or disruptions to the 'perfect model'.

v) Planning conditions that can be relaxed and/or altered during the course of the site's life give the local community no reassurance that their normal everyday lives and safety will not be adversely affected by the considerable increases in local traffic, including HGVs on village roads.

References

1. www.crashmap.co.uk

7 Alternative Sites Assessment

7.1 Strategic Assessment

NPS 2.10 *The Government has therefore concluded that at a strategic level there is a compelling need for development of the national networks – both as individual networks and* ***as an integrated system.*** *The Examining Authority and the Secretary of State should therefore start their assessment of applications for infrastructure covered by this NPS on that basis.*

7.1.1 The applicant has, contrary to paragraph 2.10 of the NPS, failed to provide evidence that the chosen location is best placed to contribute to the over-arching objective of an **integrated** Strategic National Network. No alternative sites were assessed prior to the selection of the application site and little consideration given to the dis-benefits of being located 15 miles from DIRFT, a site with rail connected expansion capacity up until around 2030. An integrated system should also take account of the constraints of the strategic road and rail networks. The Applicant should be required to submit a formal strategic assessment of this site (and other national alternatives) to justify their chosen location.

7.1.2 In Chapter 2.1, paragraph 2.38 of their draft Environmental statement the applicant has stated *[sic]* ***'No other alternative sites which could meet the requirements for a strategic Rail Freight Interchange and address the market demand which the Northampton Gateway SRFI is intended to serve'*** clearly indicates that the national perspective has not been taken into account. It is not for the applicant to decide that their only considered site is the best from a national strategic perspective.

7.1.3 In chapter 2.1 paragraph 2.36 the Applicant states ***Rail Central is an inferior alternative site because it is less able to serve key markets and logistics supply chains and would result in significantly greater environmental effects across a wide range of environmental factors***. Whilst the latter half of the statement might well be true there is absolutely no reason why a site in almost exactly the same position geographically and accessing exactly the same parts of the road and railway network would not be equally as well placed to serve exactly the same markets. This statement requires validation.

7.2 Environmental Assessment

NPS 4.26 *Applicants should comply with all legal requirements and any policy requirements set out in this NPS on the assessment of alternatives. In particular: The* ***EIA Directive requires projects with significant environmental effects to include an outline of the main alternatives*** *studied by the applicant and an indication of the main reasons for the applicant's choice, taking into account the environmental effects and* ***NPS 4.27*** *All projects should be subject to an options appraisal.*

7.2.1 Contrary to sections 4.26 and 4.27 of the NPS no alternative sites have been but forward. The inclusion of an assessment of Rail Central late on in the application process is, at best, paying lip service, at worst treating the process with contempt.

7.3 Site History

7.3.1 The Northampton Gateway site (formerly known as Highgate) has been the subject of a number of previous proposals by Roxhill. The Developer has endeavoured to develop this land despite it being rejected as a development option when the West Northants Joint Core Strategy was ratified by the Government.

7.3.2 The Howden Joinery backed scheme was rejected in 2014 and on the 12th May 2016 Stop Rail Central Ltd (SRC) were invited to meet with Roxhill and Oxalis, to be shown plans to build a 5,000,000 sq ft warehouse park on the Highgate site (now Northampton Gateway). This development had no rail connection and Roxhill stated that they had no intention of building another SRFI in this location. On the 27th September 2016 SRC were invited to another meeting to be shown a new proposal for the site, being brought forward as a SRFI. The Applicant has been attempting to develop this site as warehousing for many years, the NSIP route just provides a convenient way to by-pass local planning. We contend that they are now investing resources in dressing up what was a standard warehouse park as a Nationally Strategic Infrastructure Project. The absence of an alternative sites assessment just confirms this.

7.3.3 On the 10th July 2017 Morag Thomson of Eversheds Sutherland, submitted the following enquiry to the Planning inspectorate: ***"Para 4.27 (of the NPS) states that "All projects should be subject to an options appraisal" but then goes on to say that the appraisal "should consider viable modal alternatives". The remainder of the paragraph cross refers to paragraphs 3.23 and 3.27 which deal with road and rail schemes and then contains further text which also is only referable to road and rail schemes. Given that the whole purpose of the SRFI scheme is to provide a modal alternative, and given the exclusive application of the majority of the text in paragraph 4.27 to road and rail schemes (not RFI) we have come to the conclusion that this paragraph is not aimed at schemes such as ours. Accordingly we do not propose to include an options appraisal considering viable modal alternatives in our application documentation. I would be grateful if you could indicate any disagreement with the above as soon as possible".*** There is no clearer evidence that the Applicant has never intended to consider any alternatives, contrary to the requirements of the NPS.

7.3.4 Based on the evidence, the facts and the history, the key question to ask is whether the Applicant has ever been committed to developing a SRFI in the most suitable location or whether they are merely dressing a previous (road based) logistics development up as a NSIP to by-pass the local planning system.

Summary of Concerns

i) The Applicant has made no attempt to identify the most strategically appropriate location for the siting of the next node of a strategic rail freight network

ii) The Applicant has made no attempt to identify alternative locations for the development of a SRFI and has consequently not assessed the relative environmental merits of any alternatives

iii) Any contention that alternative sites were assessed as part of the Applicant's previous SRFI proposal is invalid as the siting of a network node necessarily changes the optimum position of the next node to be developed in the network

iv) Comparing the suitability of the scheme to that of the adjacent Rail Central scheme is immaterial; from a strategic perspective they are exactly the same

v) The Application is non-compliant with the NPS paragraph [4.27] and the EIA Directive.

8. Employment

8.1 The draft environmental statement for Northampton Gateway states: Section 3.4.6 *"The forecast growth of the population in South Northamptonshire between 2011 and 2029 is an additional 15,890 people".* That is very misleading as the more relevant data to consider is the growth of the working age population. The latter is expected to increase from 54,200 to 55,700 between 2011 and 2029, i.e. an increase of 1,500 [1]. So there will not be a significant increase in local human resource to work in the warehouses or drive vehicles. It is the large increase of those of retirement age, which accounts for the major part of the expected overall population change in this district. The Applicant has grossly over-stated the working population.

8.2 The Office of National Statistics released population projections on the 25th May 2016 that cover the period 2016 - 2039. The highlight of the projection is the increase in population over the age of 65. Whilst the overall population of ***South Northamptonshire*** is expected to rise from 89,000 currently to 101,000 by 2036, the working age population (15-64) is expected to remain at 55,000 for the next 20 years. We can therefore conclude that the 7,500 jobs claimed by the Applicant will not be taken up by residents of South Northamptonshire.

8.3 Over the same period, the population of ***Northampton*** is expected to increase from 224,000 to 263,000. The working age population is expected to increase from 147,000 to 162,000 by 2036, requiring the creation of approximately 15,000 jobs. The current proportion of logistics jobs in Northampton is about 10%, reflecting the diversity of talent and vocation in the population. Not everyone wants to work in logistics. The Applicant claims the 7,500 jobs are new. Adding 7,500 jobs would represent a 55% increase in the Northampton logistics sector. If correct, then the project is of a scale that would provide over half of the required employment for additional residents of Northampton. However, if the current preferences for employment are maintained, then less than a thousand of these jobs will be taken up by Northampton residents. We therefore strongly refute the Applicant's claim that 60% of the workforce will be travelling from Northampton.

8.4 Strategic rail freight interchanges need to be situated where there is an availability of a suitable workforce; The NPS is quite specific about this. ***2.52 The availability of a suitable workforce will therefore be an important consideration.*** A very similar statement is made in paragraph **4.87** of the same document. Yet the South Northamptonshire constituency has one of the lowest claimant counts in the country; other constituencies nearby also have low claimant counts and have done for some time[1]. It is therefore highly likely that the 7,500 jobs will not be new, but will in fact relocated from the older industrial estates North East of Northampton as companies consolidate their operations in Northampton Gateway's massive warehouses (job migration rather than job creation).

[Unemployment] Claimant Rate by Constituency September 2017		
	Rate %	**Number**
Buckingham	0.7	375

South Northamptonshire	0.7	415
Mid Bedfordshire	0.9	515
North East Bedfordshire	1.2	715
Daventry	1.8	870
Northampton North	2.5	1080
Wellingborough	2.2	1175
Milton Keynes North	1.9	1300
Northampton South	2.7	1420
TOTAL		**7865**

United Kingdom	2.5

8.5 The West Northants Joint Core Strategy (WNJCS) (4.53) states clearly *'that the area is attractive to the warehouse and storage industry due to the excellent road and rail connections. However,* ***it is important that the area does not become over-reliant on one employment sector and continues to provide diverse employment opportunities for its residents'***. The WNJCS provides for a careful balance between jobs and housing - unemployment is presently at only 1% to 2%. The WNJCS states that only 3 'strategic employment sites' - at M1 Junction 16; Silverstone Circuit and DIRFT are needed. Northampton Gateway, with an alleged 7,500 employees, would constitute a fourth such 'strategic employment site' and would upset the careful planning balance between jobs and homes.

8.6 The Logistics Study commissioned by South Northants Council (SNC) indicates a lack of a surplus pool of labour: *10.21* ***"given the largely 'full employment' position in the District, could create some significant challenges".*** Therefore, employees will have to travel in from further afield. This study also indicated that Northamptonshire had almost twice as many people working in the logistics sector compared to the national average in 2016.

8.7 The level of vacancies in this area remains stubbornly high, especially in regard to HGV drivers. Unemployment is low, but wages in the sector are not rising because margins are under pressure. Referring again to the SNC commissioned Logistics Study, we can find the following: ***7.5 "The shortage of HGV drivers is currently estimated at 45,000 and for every individual seeking a HGV role, there are up to 18 positions being advertised. In a survey of logistics firms, 75% said they faced difficulty when attempting to recruit for driving positions".*** While this refers to the UK, it clearly demonstrates a significant shortage of HGV drivers.

8.8 No account has been taken of the fact that there will be numerous warehousing schemes competing for the same limited workforce. This competition includes, but is not limited to: sites allocated under the WNJCS (Silverstone, Junction 16 and DIRFT); Pineham Park; Junction 13 Milton Keynes (including Magna

Park); Rugby Gateway (Amazon); five Prologis warehouse developments in Northamptonshire with one more nearby in Warwickshire; db symmetry's seven warehouse developments either planned or approved in Northamptonshire and its immediately adjacent counties; Hinckley SRFI in Leicestershire and Rail Central SRFI. Roxhill are developing space on the south east edge of Northampton and in neighbouring Raunds; 5 million square feet at Midlands Park is just one of at least three developments in Corby currently being built or planned. With the ongoing expansion of road based warehousing and distribution in this area, the availability of drivers and warehouse staff is likely to get worse rather than better in the next few years. A search of (just) the Estates Gazette Property Link web site on the 13th August 2018 revealed the following warehouses over 100,000 sq ft available to let

Midland Park Corby	4,195,200	Altitude MK	700,000
Magna Park MK	312,700	AlecheM1 MK	196,268
Junction 16 Nthmptn	875,000	Mustang Park Daventry	171,180
Prologis Pineham	372,284	Latitude MK	186,443
Gowerton Rd Brackmills	163,907	Watling Park Daventry	250,931
Valor Park, MK	203,592	Brackmills 192	192,288
Liberty 196 Brackmills	196,000	Prologis Wellingborough	800,000
Arrow Park Nthmptn	132,380	Ogee Park Wellingborough	101,000
Brakey Road Corby	245,205	Kettering Business Park	150,000
Prologis Kettering	369,292	Cransley Park Kettering	270,000
Magentic park Kettering	150,001		

Circa 10,235,000 square feet (950,700 sq ms) available to let and requiring staffing.

8.9 Data from the Valuations office reveals the following volume of warehousing under development:

Postcode	Existing Warehouse Space, m^2	Known Developments, m^2
SNC	122,584	565,822
NBC	773,426	
KET	254,959	156,000
COR	284,921	627,599
ENC	392,180	
MK	845,146	112,647
BED	179,720	
DAV	923,890	144,766
HAR	680,078	379,553
RUG	272,878	742,984
Total	**4,729,784**	**2,729,371**

Applying an employment ratio of one person to every 77 square metres would mean that this level of development will require a further 35,446 people taking up work in the logistics sector and catchment area they claim will serve Northampton Gateway. With the ongoing expansion of road based warehousing and distribution in this area, the availability of drivers and warehouse staff is likely to get worse rather than better in the next few years.

8.10 We anticipate that employees for Northampton Gateway could only be found further away in places such as Coventry, Leicester and Bedford. However, warehouse jobs are relatively low paid as are those for HGV drivers. Therefore people living that far away may not find it financially worthwhile to drive such distances every day. That raises the question of where will employees for this site be found. As the majority

of the workforce will be required to travel some distance to work this will put pressure on local road networks and will be contrary to the Government's core environmental objective of CO2 reduction. The majority of the jobs will be low skilled and will not enhance skill levels or add to the employment diversity objectives laid down in the WNJCS. This influx of workers may also drive pressures for additional low cost housing in the area. Furthermore the impact of severe motorway and local road congestion in the area may have a long term negative impact on local growth reducing the aggregate jobs total.

8.11 A study of the vacancies (in the logistics industry) across the three largest recruitment agencies (Total Jobs, Reed and Indeed) in June 2018 revealed a total of 2,064 vacancies for warehouse operatives and 633 for HGV Drivers. This is clear evidence that there is already a problem filling roles in the area and that any additional vacancies will only further exacerbate the problem. ***Appendix 8***

Summary of Employment Objections

i) The WNJCS seeks to maintain a balance of employment opportunities and avoid an over-reliance on one employment sector. A further 7,500 logistics positions in the area will exacerbate this over-reliance (a 55% increase in logistics employment in the region from this development alone).

ii) The available labour pool has been overstated by the Applicant by using the figures for gross increases in population rather than the increase in those of a working age (15,890 compared to 1,500). Those locally available for employment in the logistics sector barely fill the employment opportunities created by the current allocation of commercial development areas in the West Northants Joint Core Strategy. The Applicant's contention that 60% of the workforce will travel from Northampton and 90% from within the study area is strongly refuted.

iii) Labour will migrate from other employment positions in the area perpetuating labour shortage concerns: the development will not create new employment, it will mostly perpetuate labour migration.

iv) The shortage of labour will result in workers travelling greater distances to get to work which will negate any carbon benefits that might be obtained by increasing the ratio of rail to road freight movements (one of the four primary aims of the NPS) and greatly exacerbate the current stress on the national and local road network.

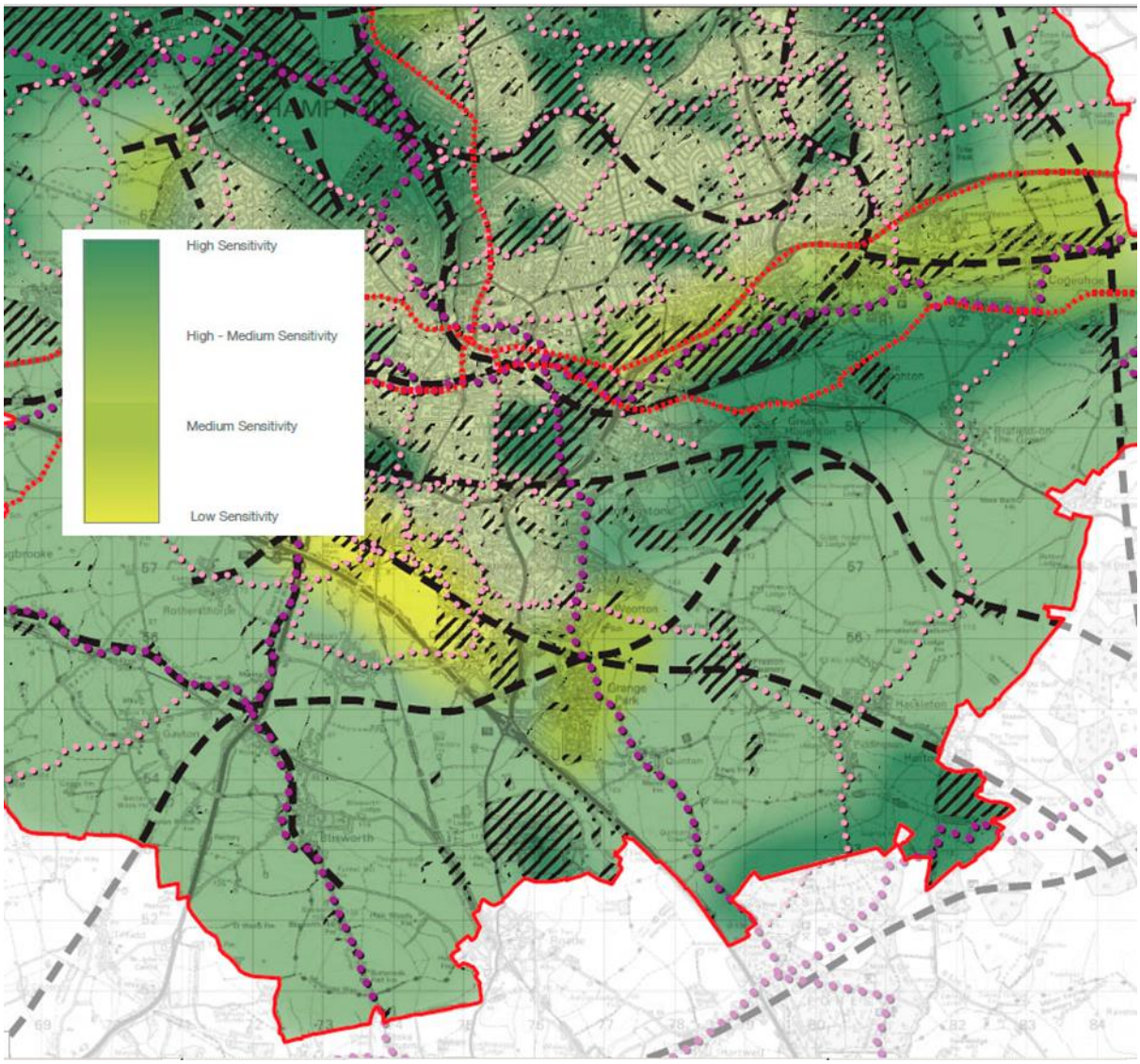
v) Should Rail Central also make it through the planning process a further 8,500 jobs is mooted and the proportion of the workforce theoretically employed in logistics would then increase by close to 100%

References

1. ***Employment Statistics for Northamptonshire Taken from NOMIS Labour Market Statistics 2014-2015*** (www.nomisweb.co.uk)

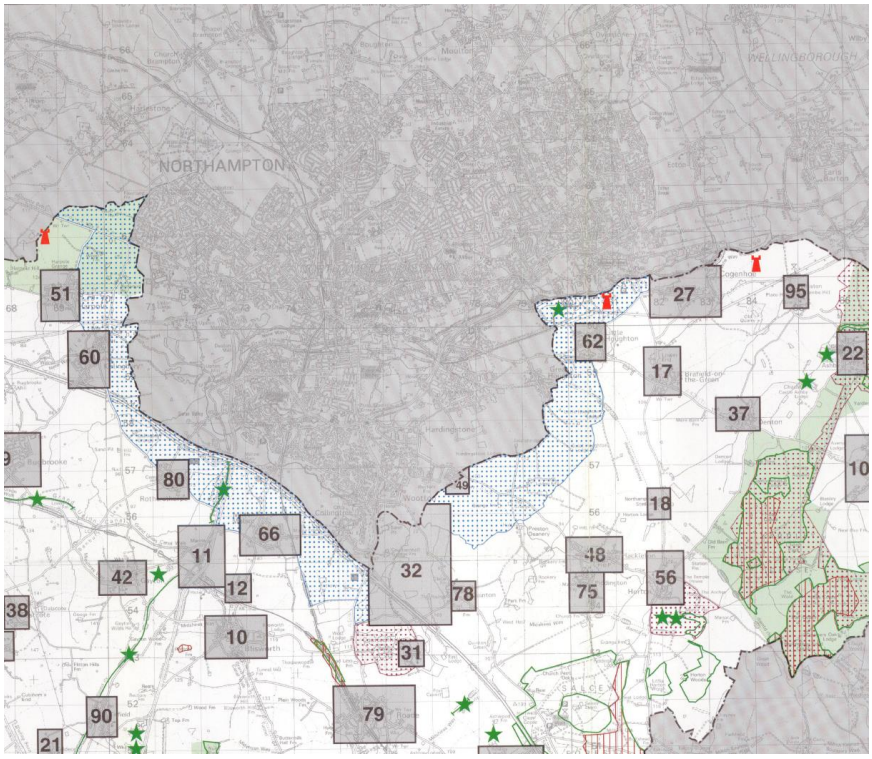
9. Social and Environmental Impacts

9.1 The Proposal site is situated in close proximity to three conservation areas whose primary access routes are via open countryside. The setting and approaches to all three would be significantly adversely affected by the siting of Northampton Gateway; the proposed landscaping not being designed to conceal the development in its entirety. ***[NPS 5.122*** *Those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called 'heritage assets'. Heritage assets may be buildings, monuments, sites, places, areas or landscapes. The sum of the heritage interests that a heritage asset holds is referred to as its significance.* ***Significance derives not only from a heritage asset's physical presence, but also from its setting****].* The Applicant is only attempting to partially mitigate the visual impact of the development from the West. The rural setting of the villages of Roade, Blisworth and Milton Malsor will be detrimentally impacted as the industrial development will be fully visible from the primary access route to the villages along the A508 and part of the Courteenhall Road. The wider rural setting will be replaced by an industrial landscape. The landscape has been classified as having a high to medium sensitivity.



9.2 In the recent appeal decision (3rd February 2017) re the Travis Perkins on land at Milton Ham, Towcester Road, Northampton, the Inspector concluded: ***"It would introduce a substantial industrial building into an area which is currently open and separated from the established industrial area and would result in a marked and permanent change to the landscape in the vicinity of the site, which could not be fully mitigated by landscaping".*** The proposed location in this instance was less obtrusive than the Application Site but turned down due the detrimental effect it would have on the rural character of the area and the untoward visual impact. See ***Appendix 1*** for full details of the decision.

9.3 If Northampton Gateway is consented there will be inevitable infill and further development south of the M1 (in particular on the land marginalised by the proposed Roade by-pass). The rural character of the area will be lost forever and the villages of Milton Malsor, Roade, Collingtree, Courteenhall and Blisworth would be engulfed in the Northampton conurbation. The current local plan protects the rural community from the expansion of the conurbation south of the M1, identifying the Application site as an Area of Important Local Gap (South Northamptonshire Local Plan (1988 - 2006) Adopted Oct 1997) (Policy EV8). Should Northampton Gateway be consented this protection will be lost. The NPS specifically refers to giving such land the same protection as green belts. ***[NPS 5.170*** *The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances. Applicants should therefore determine whether their proposal, or any part of it, is within an established Green Belt and, if so,* ***whether their proposal may be considered inappropriate development within the meaning of Green Belt policy. Metropolitan Open Land, and land designated as Local Green Space in a local or neighbourhood plan****, are subject to the same policies of protection as Green Belt, and inappropriate development should not be approved except in very special circumstances].* The coalescence of the villages of Milton Malsor, Roade and Blisworth into the Northampton conurbation will cause significant harm to the quality of life of the local communities. One of the primary tenets of the WNJCS is to *'protect the quality and setting of Northamptonshire's villages*.' ***https://www.southnorthants.gov.uk/downloads/39/1997-local-plan***



9.4 The area is currently completely dark at night and unaffected by the lights of Northampton. It would be impossible to shield the surrounding villages from the light pollution caused by a 24 hour operation. The rail terminal is also on the side of the development closest to Milton Malsor and Blisworth. Our night skies would be lost forever.

9.5 The relocation of the public footpath connecting the villages of Collingtree, Blisworth and Milton Malsor from open countryside to the perimeter of an industrial park will result in a significant loss of recreational utility. The route is currently enjoyed by ramblers and dog walkers alike primarily because it is open countryside; the destruction of such a rural environment will inevitably result in a loss of attractiveness to these users. The footpath will be routed primarily alongside the motorway, rail track and the Collingtree Road. Furthermore, there will be a period of between 5 and 10 years when it is alongside an active construction site with the attendant noise pollution and increased detrimental visual impacts. The many field margins, regularly used by walkers and dog-owners, would also be an asset lost to the community.

*[**NPS NN 5.184** Public rights of way, National Trails, and other rights of access to land (e.g. open access land) are important recreational facilities for walkers, cyclists and equestrians. Applicants are expected to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other public rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve access. In considering revisions to an existing right of way consideration needs to be given to the use, character, attractiveness and convenience of the right of way.]*

9.6 In addition to the obvious health impacts from lighting at night, noise and air pollution, there is ample evidence that access to green spaces is conducive to psychological and physical well-being and an effective and naturalistic means to recovery from ill health and mental distress. This includes recovery from the distress that warrants input from community mental health services. Key to such benefits is the ease in which such areas are accessible. Indeed, clinicians are developing approaches that rely on the use of green spaces as therapeutic approaches in themselves. Living in greener spaces is associated with sustained mental health improvements over a significant period of time and across the lifespan. The availability of green spaces provides the opportunity for not only individual escape or sedentary peace, but also various forms of social activity. These approaches to using green spaces have demonstrated benefits for the individual at the psychological, physiological, physical, biochemical and social levels. In the context of a rail freight proposal, what is particularly concerning is the finding that simply viewing the scenes of nature and our green spaces has been shown to improve mood, self-esteem and can reduce blood pressure – that is, our sights (and sites) that are at threat can actually alter our automatic nervous system for the better. They cannot if huge warehouses, cranes and containers reside there instead.

*[**NPS NN 4.15** All proposals for projects that are subject to the European Union's Environmental Impact Assessment Directive [52] and are likely to have significant effects on the environment, must be accompanied by an environmental statement (ES), describing the aspects of the environment likely to be significantly affected by the project.[53] The Directive specifically requires an environmental impact assessment to identify, describe and assess effects on human beings,[54]* **The effects on human beings includes effects on health.**

9.7 Contrary to policy objectives this development would not take place on brownfield land and would result in the loss of 520 acres of productive grade 2 and 3 farmland. The loss of 520 acres (210 hectares) of productive farmland is a significant issue in a country that is reliant on food imports for well over 48% (and rising) of its food supply **https://www.foodsecurity.ac.uk/challenge/uk-threat/**. It is estimated that, at the present time, we would need 3.6 UKs to become self-sustaining. To reduce

the productive capability and increase the reliance on food imports in a country with an increasing population is in no way sustainable in the longer term. The building of warehouses to import more consumer goods (rather than invest in our manufacturing /export base or agricultural industry) is equally as unsustainable in the longer term.

9.8 Whilst given no credence in the planning process there is likely to be a dramatic and negative effect on house prices as a result of historic villages and conservation areas that are currently set in open countryside finding themselves on the edge of a massive industrial development. This will have a hugely adverse negative impact on the well-being (and health) and financial security of many thousands of residents who are reliant on the value of their house for their and their family's future financial security.

9.9 Northampton Gateway would be located alongside two existing Air Quality Management Areas (AQMAs). 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. There is a further AQMA on the A5 through Towcester which is likely to be affected by additional vehicle movements generated by this SRFI. ***NPS [5.13]*** states '*Planning consent should be refused if it affects the ability of a non-compliant area to achieve compliance with the AQD'.* Increases in traffic volume will increase pollution: there is no mitigation for this.

Summary of Social and Environmental Objections

i) The loss of a designated strategic gap which is essential to the villages of South Northants retaining their rural identity and preventing them becoming absorbed into the Northampton conurbation

ii) The loss of recreational utility associated with redirecting public footpaths from a rural environment to the periphery of an industrial estate and the dislocation of the three villages that they connect.

iii) With three villages in such close proximity it is not possible to fully mitigate the visual impact nor the effects of light pollution from a 24 hour operation. The noise and light generated at night will impact on the quality of life and may pose a significant risk to health.

iv) A significant reduction in the quality of life for those that have chosen to live in a rural environment surrounded by biodiversity, wildlife, agriculture and quiet tranquillity rather than next to tall warehousing, container parks, cranes and heavy traffic.

v) Unquantifiable impacts on the health and well-being of local residents from the loss of the natural environment. More quantifiable impacts from the increased air pollution that will inevitably be generated.

vi) The loss of productive agricultural land (and an important green lung close to the town) to be replaced by sheds to import more consumer goods from abroad is not environmentally sustainable in any timescale.

10 Crime

10.1 In order to provide an objective view, a study was undertaken on the crime statistics for the area surrounding the Daventry Rail Freight Interchange (DIRFT). This location was chosen for comparison because it is the most similar in nature and size and, being only 15 miles away, similar in its geography. It is important to note that the crime figures within the Rail Freight Interchange itself have remained stable, it is the increases in the surrounding areas that paint a stark picture.

10.2 DIRFT commenced operation around 1997. Crime statistics compiled for the area within which DIRFT was built show a marked increase over recent years, which can reasonably be attributed to the arrival of a massive logistics development in what used to be a rural environment. DIRFT falls into 2 wards: Barby & Kilsby and Crick wards and between 2000/2001 to 2015/16 crime in these areas rose by **176%**

Crime Tree LV4 Desc	2007-2008	2008-2009	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	Total	Average	Percentage
ARSON	3	1			3		2	3	5	**17**	**2.83**	**0.65%**
CRIMINAL DAMAGE	26	26	39	32	38	28	16	33	29	**267**	**29.67**	**10.16%**
DRUG POSSESSION	5	7	6	8	13	12	11	8	6	**76**	**8.44**	**2.89%**
DRUG TRAFFICKING	9	4	8	6	6	8	6	2	3	**52**	**5.78**	**1.98%**
MISCELLANEOUS CRIMES AGAINST	4	12	5	10	8	29	16	26	43	**153**	**17.00**	**5.82%**
PUBLIC DISORDER	1	2	2	2	1	3	3	6	9	**29**	**3.22**	**1.10%**
OTHER SEXUAL OFFENCES	6	2	3	5	4	7	8	14	15	**64**	**7.11**	**2.44%**
RAPE		1	1			2	4	1	7	**16**	**2.67**	**0.61%**
ALL OTHER THEFT OFFENCES	7	26	36	52	76	40	41	48	30	**356**	**39.56**	**13.55%**
BICYCLE THEFT		1	2	1	6		1	1		**12**	**2.00**	**0.46%**
DOMESTIC BURGLARY	13	20	27	9	23	10	16	10	16	**144**	**16.00**	**5.48%**
NON-DOMESTIC BURGLARY	12	14	32	35	20	30	24	26	29	**222**	**24.67**	**8.45%**
THEFT FROM MOTOR VEHICLE	18	28	27	40	49	34	47	30	44	**317**	**35.22**	**12.07%**
THEFT OF MOTOR VEHICLE	8	5	13	9	4	9	3	4	5	**60**	**6.67**	**2.28%**
VIOLENCE WITH INJURY	25	26	21	35	42	39	86	110	104	**488**	**54.22**	**18.58%**
VIOLENCE WITHOUT INJURY	16	9	14	19	22	24	36	66	69	**275**	**30.56**	**10.47%**
POSSESSION OF WEAPONS	2		2	2					5	**11**	**2.75**	**0.42%**
ROBBERY OF PERSONAL		2	1	2			1	3	1	**10**	**1.67**	**0.38%**
VEHICLE INTERFERENCE	2		4	3	5	2	3	5	18	**42**	**5.25**	**1.60%**
SHOPLIFTING		2	1	1		2	1	2	2	**11**	**1.57**	**0.42%**
ROBBERY OF BUSINESS	2		1		1	1				**5**	**1.25**	**0.19%**
Total	**159**	**188**	**245**	**271**	**321**	**280**	**325**	**398**	**440**	**2627**	**291.889**	**100.00%**

Reference: *C1507 Ian Kelly | Freedom of Information and Data Protection Team Leader; Information Unit; Tel: 101 Ext 346940; ian.kelly@northants.pnn.police.uk Force Headquarters, Wootton Hall, Northampton, NN4 0JQ*

Description of Crime	Percentage increase in Crick/Barby & Kilsby Wards 2007/08 to 2015/16	Percentage increase Nationally 2004/05 to 2015
Arson	66	-55
Criminal damage	11	-55
Drug possession	20	2

Drug trafficking	-66	9
Misc crimes against society	975	-19
Public disorder	800	1
Other sexual offences	150	47
Rape	700*	148
All other theft offences	328	-41
Bicycle theft	0	-17
Domestic burglary	23	-40
Non-domestic burglary	141	-42
Theft from motor vehicle	144	-52
Theft of motor vehicle	-38	-67
Violence with injury	316	-19
Violence without injury	331	58
Robbery of personal property	100*	-45
Vehicle interference	800	-43
Shoplifting	200*	19
Robbery of business property	-200*	-31

Please note where these figures were 0 in 2007/2008 and an increase or decrease has been identified this has been classed as 100% for 1 crime, 200% for 2 crimes etc.

N.B the availability of crime statistics do not allow for exact comparisons by year

10.3 Only 4 out of 21 recorded crimes have decreased in the Crick/Barby and Kilsby wards in comparison to national figures. Miscellaneous crimes against society have increased 975% yet nationally decreased 19%. Public disorder has increased 800% in the local area, yet nationally only increased by 1%. Rape has increased 700% (please note there were 0 reported rapes in 2004/2005 and 7 in 2014/2015 which is how this figure is accounted for). It is noted that there has been an increase nationally of 148% but a significant degree of variance is still evident. Perhaps most significant in relation to the proposed development is the increase in vehicle interference, which has increased 800% locally but nationally has decreased by 43%.

10.4 Daventry District Council completed a study in relation to Lorry Parks in 2008 (https://www.daventrydc.gov.uk/EasysiteWeb/getresource.axd?AssetID=13908&type=full&servicetype=Attachment) The study found that there are issues around lorry parks being very expensive

therefore drivers not using them, rather using local roads. This would have a severe detrimental impact on our local area as traffic is something we already have huge issues with. Within the study it was also highlighted that there have been difficulties in moving lorry drivers to more appropriate parking facilities due to language barriers.

10.5 It is evident that there is an increase in crime in the area surrounding DIRFT, but yet nationally the reported crime is going down. With their close proximity to the warehouse park Collingtree, Roade, Blisworth and Milton Malsor will suffer the most. This will not only make the villages less desirable (the majority of villagers have moved here for a quiet and peaceful way of life), but it will also impact upon other aspects of life such as car and household insurance premiums. The effects of increased crime in the villages will be exacerbated by the high proportion of elderly residents.

10.6 The previous Police and Crime Commissioner, Adam Simmonds, has stated that the budget is balanced until 2018 but if the government spending review goes ahead, the Police will have to cut costs by 20% which means they are likely to have to reduce the 1220 police we currently have serving Northamptonshire. http://www.northantstelegraph.co.uk/news/top-stories/pcc-says-government-cuts-may-mean-northants-police-cannot-sustain-1-220-officers-in-future-years-1-7051177 Therefore, if as predicted based on the information within this chart crime does increase, there are no mitigating factors in respect of having a more visible police presence to be able to minimise the impact on our local community.

10.7 The residents of Crick have a team of volunteers to pick up the litter left by lorry drivers parking alongside the A5. Litter is a major blight on a rural environment which will be made significantly worse by the proposed industrialisation.

Summary of Objections

i) Whilst warehouse facilities themselves are very secure there is clear evidence that their presence increases the incidence of crime in the areas surrounding. There are many vulnerable and elderly residents in the adjoining villages whose lives would be seriously affected.

ii) There is a great concern over the vast influx of a transient and unknown (and unfamiliar) workforce into a small rural community. Vulnerable members of society using local roads for pursuits such as dog walking and jogging will be exposed to increased peril.

iii) Illegal and unsolicited parking will occur in surrounding villages. An increase in HGV parking outside of the designated areas and unsocial behaviour and littering in the surrounding rural environment can be anticipated as has been experienced in the villages around DIRFT.

iv) There will be no corresponding increase in Police funding to deal with increased crime in the area or to deal with the unsocial behaviour that accompanies developments such as these.

Appendix 1. Appeal Decision 3rd February 2017 (Travis Perkins): Land at Milton Ham, Towcester Road, Northampton

Conclusion *(in full)*

52. I have had regard to the social and economic benefits that would arise from the proposed development through jobs during construction, those created by the scheme and the ongoing operational benefits for the appellant. I attach this matter significant weight in the context of the Framework's objectives to build and support a strong, competitive economy.

53. I also note other benefits that would arise from the scheme in terms of additional landscaping and habitat creation that would contribute towards environmental objectives, as well as those of the Northampton Green Infrastructure Plan (May 2016). However, these physical environmental benefits are far outweighed by the landscape and visual harm that I have identified and the conflict with the development plan. The development does not fulfil the environmental objectives of the Framework, which should be sought jointly and simultaneously with social and economic objectives to achieve sustainable development.

54. Even cumulatively, the benefits of the scheme would not outweigh the significant harm that I have identified. It has not been demonstrated that the appeal site is the only location available for the proposed development or that such a need exists for this development as to outweigh the significant harm to the character and appearance of the area that would result.

55. In light of the above, and having considered all other matters, the appeal is dismissed.

Highlights

- The Council's reason for refusal refers to effects on the existing network of green space.
- The proximity of the site to the canal, a key component of the corridor, is such that it can clearly influence its sense of place and Policy BN1 of the JCS should, therefore, be applied.
- Policy BN5 of the JCS is entitled 'The Historic Environment and Landscape' and there was no other policy within the JCS which sought to protect landscape. The policy sets a general requirement to conserve and enhance the landscape and I consider that it is relevant to this appeal.
- It would introduce a substantial industrial building into an area which is currently open and separated from the established industrial area and would result in a marked and permanent change to the landscape in the vicinity of the site, which could not be fully mitigated by landscaping.
- It would significantly erode the rural characteristics of the site and its contribution to the green area separating the town from the strategic highway network, as well as the visual connection with the wider countryside. This impact would be compounded by the significant landscaping bunds surrounding the proposed building which, whilst necessary to mitigate its visual impacts, would be seen as engineered features in the landscape.
- Impacts would also be experienced from the canal towpath forming a key component of the green infrastructure corridor

- The proposals would cause an immediately apparent or fundamental change in character in a landscape of low importance.

- A major and immediately apparent part of the scene, changing its overall character from the currently rural views, the overall significance of effect would be major and adverse due to the dominating changes to views from moderately important receptors.

- Residential occupiers are likely to be highly sensitive to changes in views, even if that view is not of the highest quality in landscape terms.

- Views from the public right of way HW11 which runs along the boundary of the Counties Crematorium towards the M1 underpass. I have seen nothing that persuades me that receptors using this route would be anything other than highly sensitive to changes in the landscape as suggested by the Council. *Note: Worse still on the same road between Milton Malsor and Blisworth*

- The magnitude of effect on receptors enjoying the canal towpath would be moderate, leading to a major/moderate significance of effect, even at year 10.

- There is further dispute between the parties in respect of views from the Northamptonshire Round public right of way, a circular walk through the villages and countryside surrounding Northampton which is of greater than local significance for recreational walkers. The route is likely to be used primarily for leisure and recreation pursuits, including to enjoy scenic views. Therefore, receptors are undoubtedly of high sensitivity to changes in the landscape.

- The development would harm the character and appearance of the area. This would be in conflict with Policies BN1, BN5 and S10 of the JCS.

- The JCS identifies the allocation of a strategic employment site at Northampton M1, Junction 16. In addition, a strategic site known as the Daventry International Rail Freight Terminal (DIRFT) is allocated, where the majority of new large warehousing developments (in excess of 40,000sqm) are expected to be located.

- The JCS is clear that the area has a large supply of existing warehouse developments and that delivering new space to cater for the warehousing sector on a trend based trajectory would not be desirable nor sustainable in the long term in order to achieve a balanced economy. It was also considered that the allocation of strategic employment sites for B8 uses, particularly the Midway site at Junction 16 of the M1 and DIRFT, would accommodate these needs and ensure an appropriate and balanced supply of suitable land.

- The JCS directs large scale warehouses to DIRFT under normal circumstances and so the effects on the location of employment have been anticipated and planned for.

Appendix 2. Lord Adonis Report: Congestion; Capacity, Carbon: Priorities for National Infrastructure. National Infrastructure Commission Report 13th October 2017 [Long-distance freight]

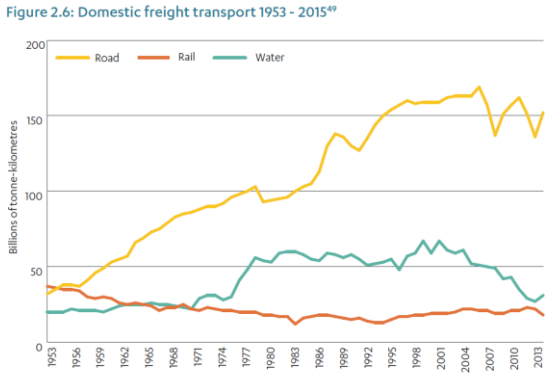
A2.1 Businesses need to be able to move goods between ports, airports, production and distribution sites, and to their customers as efficiently as possible. Poor connectivity and congestion impact on costs, which are ultimately passed through to prices affecting UK consumers and international competitiveness. The majority of freight is transported by road. Over longer distances and for certain types of goods, rail becomes more competitive. Total volumes of rail freight have remained broadly constant over the last 50 years, while volumes on the road have doubled (see Figure 2.6).

A2.2 An argument for shifting freight from road to rail is often made on grounds of congestion and environmental benefits. Rail freight will always have its place, and some enhancements may be cost-effective, but the Commission believes the pilots of "platooning" truck convoys on motorways and major A roads may open the way to radical improvements in the efficiency and capacity of major freight distribution by road in the future (see Chapter 5). This would free up rail capacity for enhanced commuter and inter-city passenger services. The Commission will report further on this in the future.

A2.3 Rail freight is already increasingly limited by network capacity as passenger demand increases. The issues with mixed traffic on the network are well documented – freight trains travelling at 70mph on the same track as passenger trains travelling at 125mph results in a significant capacity constraint. Whilst freight can travel at night in some areas, this competes with maintenance work, which also needs access to the track at night.

A2.4 Reducing road freight by only one-third would require more than a three-fold increase in rail freight capacity, which simply could not be accommodated on today's already busy railway. The Commission believes that upgrades needed for this sort of shift would be prohibitively expensive, whilst the benefits would be questionable, particularly if truck platooning is successful, given the industry's clear preference for road transport in most cases.

Figure 2.6: Domestic freight transport 1953 - 2015



Appendix 3. DfT Rail Freight Growth & Modal Shift Study 1st September 2016 prepared for the Department for Transport by Aecom Arup (Barriers to Rail Freight Growth)

A3.1 The Department for Transport (DfT) commissioned this report in 2016 to help it to understand the future growth potential in the UK rail freight market, in particular the scope for modal shift from road to rail. The study also investigated the policy measures required to realise this potential and assess the reduction in carbon emissions these measures may bring. One of the background drivers to this report has been the greater than expected rate of decline of traditional markets, especially coal movements, which has resulted in industry and government needing to respond through exploiting opportunities enabled by this decline.

A3.2 With the precipitous decline (and near extinction) of coal freight in the UK, the Rail Freight Industry is at somewhat of a cross roads. Rail is ideally suited to moving heavy bulk commodities such as coal but the industry now finds itself in the precarious position of trying to replace this mainstay with alternative markets before it falls into terminal decline.

A3.3 The rail freight sector now faces a situation where its ability and rate of innovation and growth of other markets needs to be significantly increased in order to fill the volume and revenue gap. This is crucial to provide the required revenues and profits in order to develop additional traffic opportunities to meet both its own, its customers, and Government objectives. In addition to the structural changes facing the industry, rail freight needs to become more agile at competing with the main transport mode in the United Kingdom: road haulage.

A3.4 The report summarises potential for rail freight increases in a limited number of areas including domestic intermodal, port intermodal and construction. Growth via the Channel Tunnel is likely to be limited in the short term and unknown in the future due to the uncertainties of Brexit. However the constrained forecasts are vastly different to the unconstrained forecasts produced by the Network Rail Freight Market Study (NRFMS) in 2013

A3.5 With respect to Port Intermodal whilst there is some capacity at terminals and on certain routes, significant growth in this sector would test the limits of the infrastructure both on the rail network, in the ports and at terminals. Existing terminals will require capacity enhancements, new terminals will need to be developed to match demand and there will need to be more capacity and paths for freight trains on the wider rail network.

A3.6 Domestic intermodal is somewhat of a niche market and requires bespoke logistics solutions to be crafted by a multiplicity of suppliers in the logistics chain, controlled by individual large clients, who through their purchasing power are able to achieve considerable benefits from using rail. Furthermore it requires regular, stable volumes and sufficient critical mass to justify trainload operation for individual clients. Mode Shift Revenue Support grants are available from the government to support these movements, but domestic flows currently receive only a small proportion of the available funding. Growth has not occurred as predicted in the NR FMS

A3.7 The express freight (or parcel) market was deemed to be too insignificant to merit modelling. .

A3.8 To assist in the achievement of the successful delivery of the strategy, the private sector requires stable and clear policy statements backed up by subsequent delivery of specific enhancements and initiatives.

A3.9 In response to this situation the Government commissioned the Department for Transport to undertake a study to identify what commodities could replace coal and what measures might be required to facilitate the move from heavy raw materials to fast moving consumer goods (one of the few markets, along with construction, identified with any growth potential). The study identified a large number of challenges and barriers that need to be overcome in order for rail to compete in these very different market sectors.

A3.10 These barriers include significant rail capacity issues, cost issues (rail usually requires subsidy to be competitive with road), commercial inertia (of both the Freight Operating Companies (FOCs) and the customer base) and logistical inflexibility. Most significantly, the Government has stated its belief that the building of more rail freight interchanges is one of the most important interventions required to facilitate the modal shift from road to rail.

Appendix 4. Capacity Constraints on the WCML Reference: Department for Transport Supplement to the October 2013 Strategic Case for HS2 Technical Annex: Demand and Capacity Pressures on the West Coast Main Line

'**12** Today, the WCML Fast Lines (the "Fast Lines") carry 15-16 trains per hour (tph) at the busiest peak periods. This is more than the 13-14tph envisaged at the time of the upgrade due to the pressure to run more outer-suburban commuter services along with today's inter-city timetable. This is **a higher intensity of operation than comparable major fast lines in other European countries**, including purpose-built high speed lines.

13 Despite its recent modernisation, the WCML rail corridor remains highly constrained, meaning that the route is operating close to capacity in the peak and it is challenging to increase service levels still further. This is due to: a) Physical constraints with the infrastructure such as the flat junctions, two-track sections and bottlenecks at station approaches and b) 2 The complex mix of inter-city, commuter, local and freight traffic that operates on the rail corridor with trains having varying speeds and stopping patterns

14 It is notable that **these constraints impact the traffic that can be operated all along the route**. They limit how many commuter services run into Birmingham and Manchester and the ability to run additional freight trains in the North and Midlands – not just the number of passenger services that can be run into Euston in the peak.

15 Operating the WCML at this intensity makes it challenging to maintain acceptable performance levels. **Both Virgin West Coast and London Midland have consistently operated below their Public Performance Measure** (PPM) targets since the route upgrade, and these targets have been revised down for Control Period 5 (CP5) in the face of the difficulties experienced in delivering higher performance levels.

16 The difficulties of operating additional trains on the WCML, particularly in the peak, have previously been acknowledged by the Office of Road and Rail (ORR). Between 2011 and 2013 the ORR turned down applications from Alliance Rail, Grand Central Railway, London Midland and Virgin West Coast to run additional services. This was because **the performance risk of, effectively, filling the Fast Lines from the start of the morning peak until after the end of the evening peak was considered to be too great, as the service would never have the opportunity to recover from any perturbation**.

17 Two further applications have since been at least partially successful. However, **the circumstances in which the additional services have been permitted lend weight to the evidence that it is difficult to operate additional trains on WCML in the peak**.

18 The first of these applications was for the two further peak hour London Midland trains, introduced in December 2014, increasing the frequency on the Fast Lines during peak hours to 15-16tph. ORR could only grant access because the additional services were timetabled by operating faster 110mph rolling stock and 'flighting' two 110mph trains in a path previously occupied by one

100mph service. Making this timetabling solution work also required reducing commuter stops south of Rugby.

19 The second, and most recent award (August 2015), is the 10 year track access rights granted to Alliance Rail to operate six daily (five on a Sunday) off-peak return services between Blackpool and Queens Park station in London from December 2017. This means that some of the limited capacity available in off-peak periods (when frequency falls to 12tph) will be taken up. However, no additional peak services will be run.

20 Long term forecasts point to continued growth in the passenger and freight rail markets. Accommodating this demand on the WCML will be increasingly challenging.

21 The route capacity on the WCML is constrained at several points along the corridor, and each section of the route has different individual capacity constraints. However, because most trains need operating paths across several of these route sections, any solution to introduce more trains needs to be developed in a joined-up way along the route. With the route used so intensively, a constraint in one section can affect the timetabling of trains a considerable distance away in another section of line. Because of this, **investing in the WCML corridor to allow more services to operate, whether they be passenger or freight, is complex**.'

Appendix 5. Long Term Planning Process Freight Network Studies 2013 and 2016

5.1 'The growth of passenger and freight sectors in recent years has created considerable challenges over the allocation of capacity. The provision of adequate capacity on the rail network to respond to demand will be a key enabler for further growth'.

5.2 'The decline of rail's traditional commodities such as coal, and the growth of the intermodal and aggregates sectors, is likely **to change the geographic footprint of rail freight by moving demand to the key arteries and the routes to and from the deep sea ports**. This is also where there are higher levels of population and where the majority of passenger growth is forecast. Balancing the needs of different users of the rail network to ensure the optimal use of limited capacity will therefore increasingly be a challenge'. *Freight Network Study (Draft for Consultation) Summary Document, August 2016*

5.3 'The forecast off-peak paths per hour are unconstrained and enhancements to capacity and/or in some cases **capability of the current network are likely to be required beyond that which is currently committed if these forecasts were to be accommodated**. It will be for the Route Studies to assess if and how these path forecasts could be accommodated as well as the value for money of any proposed interventions. They will also have to consider, where applicable, different options for both freight routeing and also of the tonnes per train to establish the choice for funders'. *Long Term Planning Process: Freight Market Study, October 2013*

5.4 'As the rail freight sector has grown, the markets served have evolved. This has seen a geographical shift in freight flows towards busier rail corridors. Passenger numbers on these corridors are also increasing. This has led to increasing capacity constraints on the rail network. **Investment in infrastructure is necessary to accommodate the anticipated growth in rail freight on the network'**. *Freight Network Study (Draft for Consultation) Summary Document, August 2016*

5.5 'As noted in **Chapter 3**, the freight forecasts were unconstrained. **The study also assumes no reduction in current freight paths to accommodate growth in passenger services**. The interaction between passenger and freight traffic already creates capacity challenges on the route [the West Coast Main Line]. With strong growth forecast in key commodities carried on the WCML, coupled with the introduction of HS2 services north of Manchester, a range of capacity gaps have been identified to enable the required future freight volumes to be delivered'. *Long Term Planning Process: Freight Network Study (Draft for Consultation), August 2016*

5.6 'The MML [Midland Main Line] is also anticipated to carry an increased amount of traffic to enable the freight market to grow across the network. Due to capacity constraints on the WCML, flows would be routed on the MML to maintain the required path capacity for freight flows, save for the lack of capacity and gauge clearance on the MML.' *Long Term Planning Process: Freight Network Study (Draft for Consultation), August 2016*

5.7 'Across all corridors, the key capacity challenge is to ensure that full benefits are realised for a line of route. **Failing to unlock capacity along the entire route means that the benefit of individual**

projects completed is not realised.' *Long Term Planning Process: Freight Network Study (Draft for Consultation), August 2016*

5.8 'For capacity schemes, consideration regarding routeing options is crucial to optimise path availability, journey times and passenger service interaction. An example of where the freight industry has created a **core freight route is Felixstowe to the West Midlands and the North route, routeing services 'cross-country' to avoid the capacity and performance issues of travelling across London and on two congested main lines'**. *Long Term Planning Process: Freight Network Study (Draft for Consultation), August 2016*

Appendix 6. MDS Transmodal 'The future of rail freight and private sector investment in infrastructure'

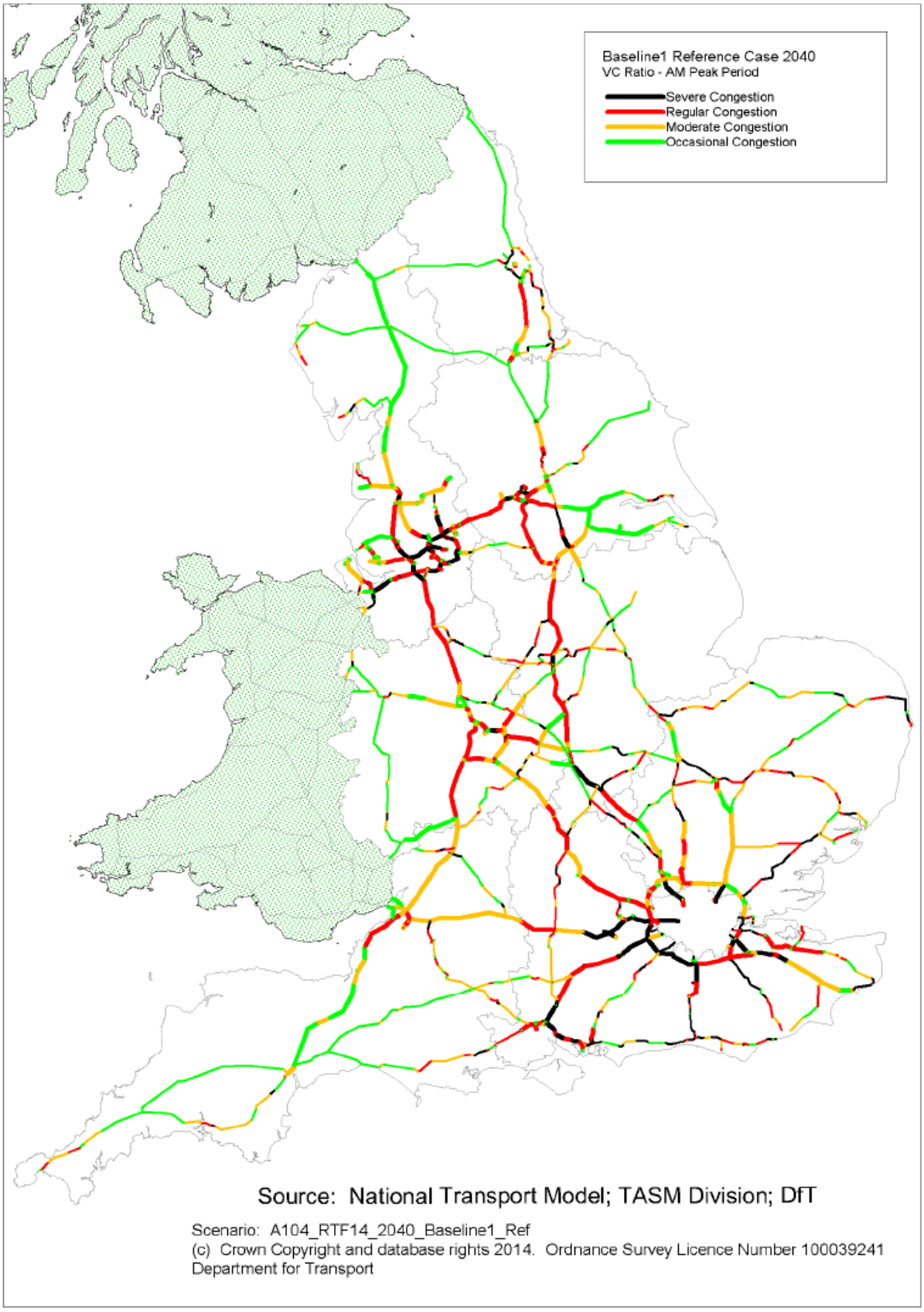
A6.1 'Those network capacity constraints have the impact in the DfT's Central Constrained Forecast of reducing by over 80% the forecast volume of domestic intermodal traffic to just 4 million tonnes in 2030. In its Central Case the DfT forecast is for 101 million tonnes (including an allowance for Channel Tunnel traffic) and is therefore almost identical to the level arrived at in the TfN/GBFM results where no more SRFIs are assumed to be developed; overall a cut in total tonnes by rail as compared with 2014.

A6.2 However, the DfT's Central Constrained Forecast still anticipates a more than doubling of ports traffic from 15 million to 32 million tonnes lifted between 2011 and 2030. Given that the DfT study appears to have assumed no more capacity along the principal rail corridors (and in some cases less) it is difficult to see how this can be achieved; almost all this ports traffic uses the West Coast Main Line at some point in its journey.

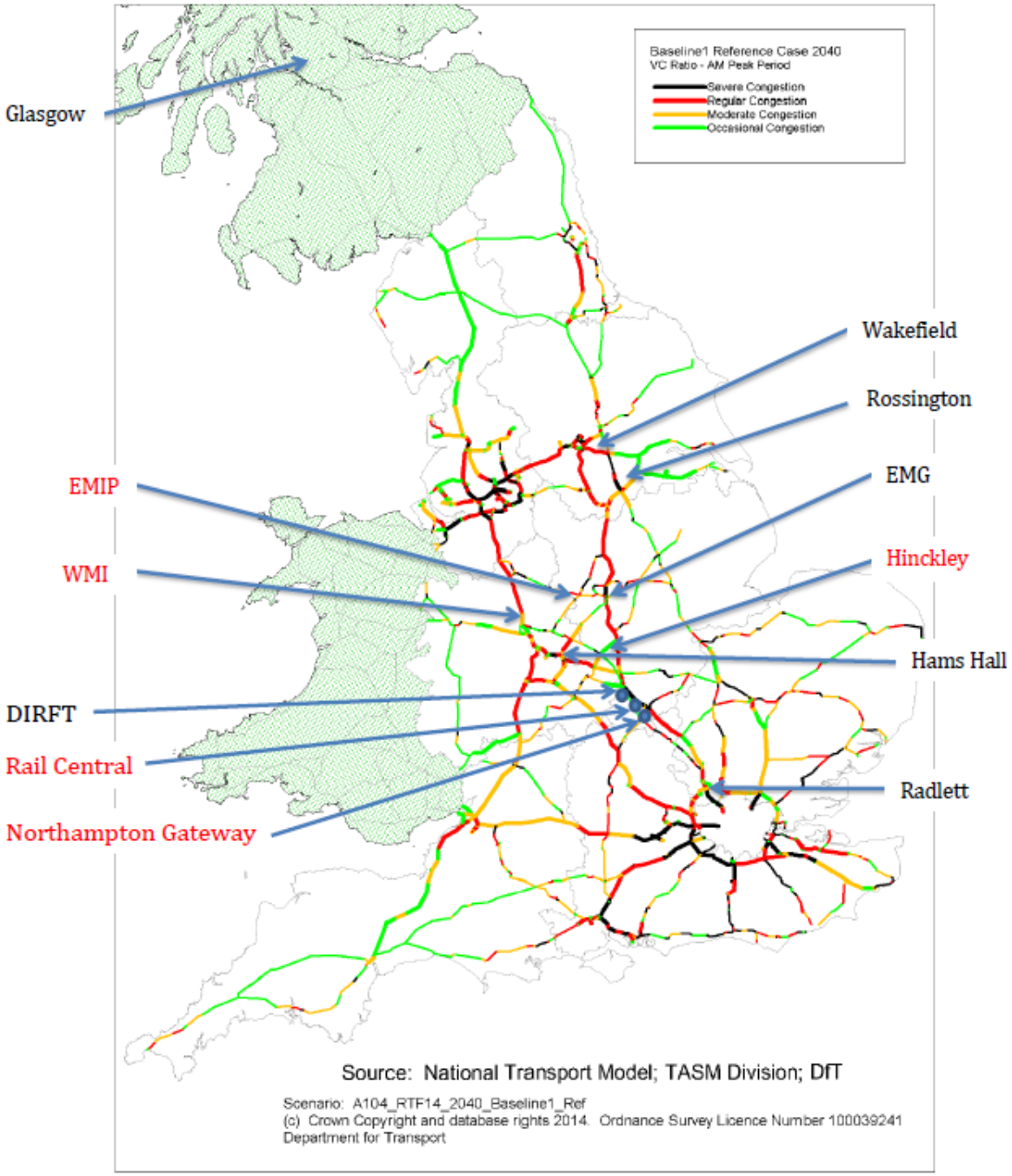
A6.3 The DfT strategy does, however, highlight the crucial impact of limiting the capacity of the network available to freight. As already noted, the DfT Strategy's Central Constrained Forecast anticipates that such a capacity constraint is likely to limit the development of domestic intermodal freight to just 4.0 million tonnes, which is only double the traffic that passes through the largest SRFI currently operating (DIRFT, near Daventry). Given that DIRFT is itself being expanded so that it will provide double the level of warehouse floor space and terminal capacity, this projection could imply that the DfT expects no more SRFIs will be built or will, at least, make no contribution towards a shift of freight from road to rail.

A6.4 The most effective role that can be played by Government to promote rail freight is to expand the capacity made available to it on the main north-south routes, thereby encouraging the development of SRFIs. The DfT strategy itself shows that, without such capacity, rail freight potential will be cut by at least 30%.

Appendix 7. Congestion on the Strategic Network 2040



Location of Current SFRIs and SRFI Proposals (2017)



Appendix 8 Warehouse & HGV Vacancy Listings – Local And Wider Impact Areas

Information taken from 3 key recruitment sites in June 2018; however, there are others who also hold vacancies. Some of these could be duplicated across a number of sites. Cover local and wider impact areas, within a 5 mile radius of the specified area. This would be a quieter time for many logistics companies. The number of vacancies would significantly increase in the lead up to Christmas, as well as sale times throughout the year for e-com operations. The numbers reflect the number of job listings, rather than number of jobs, as multiple roles in a listing count as 1, i.e. on Pertemps site there are only 16 listings for DIRFT, however, the ads refer to recruiting a number of roles.

NORTHAMPTON	
Warehouse	**HGV**
Indeed: 203 https://www.indeed.co.uk/jobs?q=Warehouse&l=Northamptonshire&radius=5 **Total Jobs:** 190 https://www.totaljobs.com/jobs/warehouse/in-northampton?radius=5&s=header **Reed:** 495 https://www.reed.co.uk/jobs/warehouse-jobs-in-northampton?proximity=5 **Pertemps**:	**Indeed**: 88 https://www.indeed.co.uk/jobs?q=HGV+Driver&l=Northampton&radius=5 **Total Jobs**: 126 https://www.totaljobs.com/jobs/hgv/in-northampton?radius=5&s=header **Reed**: 127 https://www.reed.co.uk/jobs/hgv-driver-jobs-in-northampton?proximity=5
MILTON KEYNES	
Indeed: 238 https://www.indeed.co.uk/jobs?q=Warehouse&l=Milton+Keynes&radius=5 **Total Jobs:** 172 https://www.totaljobs.com/jobs/warehouse/in-milton-keynes?radius=5&s=header **Reed:** 345 https://www.reed.co.uk/jobs/warehouse-jobs-in-milton-keynes?proximity=5	**Indeed**: 47 https://www.indeed.co.uk/jobs?q=HGV+Driver&l=Milton+Keynes%2C+Buckingham hire&radius=5 **Total Jobs**: 87 https://www.totaljobs.com/jobs/hgv/in-milton-keynes?radius=5&s=header **Reed**: 49 https://www.reed.co.uk/jobs/hgv-driver-jobs-in-milton-keynes?proximity=5
RUGBY	
Indeed: 102 https://www.indeed.co.uk/jobs?q=Warehouse&l=Rugby%2C+Warwickshire&radius=5 **Total Jobs**: 111 https://www.totaljobs.com/jobs/warehouse/in-rugby?radius=5&s=header	**Indeed**: 60 https://www.indeed.co.uk/jobs?q=HGV+Driver&l=Rugby%2C+Warwickshire&radiu =5 **Total Jobs**: 123

Reed: 303 https://www.reed.co.uk/jobs/warehouse-jobs-in-rugby?proximity=5	https://www.totaljobs.com/jobs/hgv/in-rugby?radius=5&s=header **Reed**: 117 https://www.reed.co.uk/jobs/hgv-driver-jobs-in-rugby?proximity=5
COVENTRY	
Indeed: 143 https://www.indeed.co.uk/jobs?q=Warehouse&l=Coventry%2C+West+Midlands&radius=5 **Total Jobs**: 115 https://www.totaljobs.com/jobs/warehouse/in-coventry?radius=5&s=header **Reed**: 291 https://www.reed.co.uk/jobs/warehouse-jobs-in-coventry?proximity=5	**Indeed**: 58 https://www.indeed.co.uk/jobs?q=HGV+Driver&l=Coventry%2C+West+Midlands&radius=5 **Total Jobs**: 107 https://www.totaljobs.com/jobs/hgv/in-coventry?radius=5&s=header **Reed**: 99 https://www.reed.co.uk/jobs/hgv-driver-jobs-in-coventry?proximity=5
WELLINGBOROUGH	
Indeed: 80 https://www.indeed.co.uk/jobs?q=Warehouse&l=Wellingborough%2C+Northamptonshire&radius=5 **Total Jobs**: 39 https://www.totaljobs.com/jobs/warehouse/in-wellingborough?radius=5&s=header **Reed**: 228 https://www.reed.co.uk/jobs/warehouse-jobs-in-wellingborough?proximity=5	**Indeed**: 28 https://www.indeed.co.uk/jobs?q=HGV+Driver&l=Wellingborough%2C+Northamptonshire&radius=5 **Total Jobs**: 57 https://www.totaljobs.com/jobs/hgv/in-wellingborough?radius=5&s=header **Reed**: 62 https://www.reed.co.uk/jobs/hgv-driver-jobs-in-wellingborough?proximity=5
DAVENTRY	
Indeed: 58 https://www.indeed.co.uk/jobs?q=Warehouse&l=Daventry%2C+Northamptonshire&radius=5 **Total Jobs**: 36 https://www.totaljobs.com/jobs/warehouse/in-daventry?radius=5&s=header **Reed**: 230 https://www.reed.co.uk/jobs/warehouse-jobs-in-daventry?proximity=5	**Indeed**: 28 https://www.indeed.co.uk/jobs?q=HGV+Driver&l=Daventry%2C+Northamptonshire&radius=5 **Total Jobs**: 50 https://www.totaljobs.com/jobs/hgv/in-daventry?radius=5&s=header **Reed**: 88 https://www.reed.co.uk/jobs/hgv-driver-jobs-in-daventry?proximity=5

TOWCESTER	
Indeed: https://www.indeed.co.uk/jobs?q=Warehouse&l=Towcester%2C+Northamptonshire&radius=5 **Total Jobs**: https://www.totaljobs.com/jobs/warehouse/in-towcester?radius=5&s=header **Reed**: 169 https://www.reed.co.uk/jobs/warehouse-jobs-in-towcester?proximity=5	**Indeed**: 0 within 5 miles, 79 within 10 miles https://www.indeed.co.uk/jobs?q=HGV+Driver&l=Towcester%2C+Northamptonshire&radius=10 **Total Jobs**: 7 https://www.totaljobs.com/jobs/hgv/in-towcester?radius=5&s=header **Reed**: 44 https://www.reed.co.uk/jobs/hgv-driver-jobs-in-towcester?proximity=5
DIRFT	
Indeed: Not shown as a separate search area **Total Jobs**: 75 https://www.totaljobs.com/jobs/warehouse/in-daventry-rail-freight-terminal?radius=5&s=header **Reed**: 68 https://www.reed.co.uk/jobs/warehouse-jobs-in-daventry-rail-freight-terminal?proximity=5 **Pertemps**: 16 https://www.pertemps.co.uk/find-a-job/?category=&keywords=Warehouse&location=Daventry International Rail Freight Terminal&radiusMiles=5&fromSalary=~&toSalary=~&jobType=#job-results	**Indeed**: Not shown as a separate search area **Total Jobs**: 76 https://www.totaljobs.com/jobs/hgv/in-daventry-rail-freight-terminal?radius=5&s=header **Reed**: 33 https://www.reed.co.uk/jobs/hgv-driver-jobs-in-daventry-rail-freight-terminal?proximity=5

HGV recruiters are advertising as urgently requiring drivers. ADR are trying to recruit drivers in Kettering, Corby, Crick, Thrapston, Hinckley, Lutterworth, Northampton, Rugby, including vacancies for multiple customers with one logistics provider in Northants
https://www.adrnetwork.co.uk/hgv-driver-jobs-in-northampton

BLISWORTH PARISH COUNCIL

Ref 20010215

A SUMMARY OF THE

WRITTEN REPRESENTATION TO THE PLANNING INSPECTORATE

ON

NORTHAMPTON GATEWAY

TR050006

6th November 2018

Executive Summary

Blisworth Parish Council strongly object to the Northampton Gateway SRFI proposal for the reasons detailed in this submission.

ES1 Rail freight has an important part to play in the national distribution landscape of the UK. However, it is important to appreciate that the extent to which a modal shift from road to rail can occur is ultimately constrained by factors such as rail capacity, economics, flexibility, convenience and, foremost, demand. It is therefore essential that finite capacity is allocated where it is most likely to facilitate a modal shift. The fact that there are (at the time of writing) two recently consented SRFIs, one at examination, one at pre-examination and three more at the pre-application stage in the Midlands alone, whilst there are none in any other part of country, is an indication that an optimum strategic national network '***across the regions'*** may not be emerging.

ES2 The proposed Application is at odds with the stipulations laid down in the National Policy Statement for National Networks (NPS) in so far as: it is not ideally located near the business markets it claims it will serve; there is not an available and economic local workforce; it is not ideally located to reduce the secondary (road) leg of a freight journey; the requirement for a strategic network *'across the regions'* will not be met at this location (nor will a *'wide range of locations'*); the local area is far from *'poorly served'*; it is not a brownfield site (nor have any alternative brownfield sites been considered); it delivers no local environmental or social benefits; and it does not follow investment in the strategic rail network.

ES3 The proposed development is contrary to the West Northants Joint Core Strategy (WNJCS) which directs new, large scale and rail-connected development to the recently consented DIRFT 3 and seeks to maintain a balanced economy by avoiding over-reliance on one employment sector (the logistics sector). The WNJCS also commits to safeguarding the rural economy by ensuring that development proposals are an appropriate scale for their location, respect the environmental quality and character of the rural area and protect the best and most versatile agricultural land.

ES4 The current local plan protects the rural community from the expansion of the conurbation south of the M1, identifying the Application site as an ***Area of Important Local Gap*** (South Northamptonshire Local Plan (1988 - 2006) Adopted Oct 1997) [Policy EV8]. Should Northampton Gateway be consented this protection will be lost. The location has already been turned down as a suitable and sustainable location by an Inspector appointed by the Secretary of State for Communities and Local Government. ***2nd October 2014 PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED) SECTION 20 REPORT ON THE EXAMINATION INTO THE WEST NORTHAMPTONSHIRE JOINT CORE STRATEGY LOCAL PLAN***

ES5 The objective of the NPS is to deliver a national strategic network. The Applicant has not considered whether any other (UK) sites may be better placed to deliver this strategic objective. The Applicant has made a number of unsuccessful attempts to develop this particular piece of land for (non-rail connected) warehousing and now appears to be dressing it up as a National Strategic Infrastructure Project (NSIP) in another attempt to realise long held commercial aims. The fact only the most basic of rail provision need be provided and that there is no sanction for not utilising the rail makes the NSIP a convenient vehicle for ignoring local need and by-passing local planning law.

The Examiner's view in the Kent International Gateway decision sets a particularly pertinent precedent:

KIG 18.207 *In formulating the question in this way, I acknowledge that it is not realistic to expect that all the goods that pass through the warehouses should be moved onwards by rail. Some (indeed the majority) would inevitably go by road – as the SRA recognise would be the case with all SRFIs. However, it is plain to me that, in the absence of any train traffic (or indeed very little train traffic), then the planning balance would fall squarely against granting planning permission for what would in effect be a very large collection of (primarily) road-based warehouses in open countryside adjoining an AONB. Accordingly, the extent to which the proposal can be reasonably expected to generate train traffic (as opposed to simply acting as a collection of road-based warehouses) is, to my mind, a critical consideration to be taken into account in the overall planning balance.* ***Appeal by Kent International Gateway Ltd concerning an application for Kent International Gateway Rail Freight Interchange 31st March 2010***

ES6 The NPS and the EIA Directive require projects with significant environmental effects to include an outline of the main alternatives (an options appraisal) studied by the Applicant and an indication of the main reasons for the Applicant's choice, taking into account the environmental effects. The Applicant has failed to produce an options appraisal prior to (or after) selecting, promoting and investing in this location. This is a significant non-compliance.

ES7 The close proximity of Northampton Gateway to DIRFT which has consented rail connected capacity for (approximately) the next 12 years and the competition between the two for rail paths and tenants would lead to under-utilised rail freight resources and neither site achieving their full potential. Carbon emissions would also be increased by the duplication of plant and vehicles. The precedent set in the Mossend RFI decision is of particular relevance. It was concluded that consenting an extension to the Mossend Terminal would have an adverse effect on the economic viability of other similar facilities in the locality.

"The reporter thought that, if Mossend were to succeed in attracting business, much of that business would be displaced from other locations. This was more likely to be true of distribution activity than of manufacturing, some of which might be attracted to the rail freight park and could represent a net gain to Scotland. Nevertheless, there would be a real prospect of the closure of the Freightliner terminal at Coatbridge, and potentially a risk to other facilities in central Scotland. The reporter goes further; at paragraph 2.29 of his report he identified three alternative sites, the Freightliner facility at Coatbridge, which had spare capacity, the Eurocentral terminal to the east of the appeal site, and a new site at Kilgarth designated in the development plan. The reporter concluded that "A strong case can be made out for a strategic look at rail freight needs and priorities at the national (NPF4), regional (SDP review) and local (LDP) levels, so as to ensure the optimum pattern of development". ***Decision by Scottish Ministers dated 3 August 2015 upholding an appeal by Peter D Stirling Ltd and the I D Meiklam Trust and granting planning permission in principle for the expansion of Mossend railhead***

ES8 The WCML is the core freight route to the north west of England and Scotland, and 43% of all UK rail freight traffic and 90% of all intermodal traffic travels over it at some point. The route is now at full capacity in peak periods. Additional demands will be placed on this route by developments such as the expansion of DIRFT (aspirations for a further 20 paths); the East West rail feed at Bletchley; a demand for additional passenger services; the new Rugby Parkway passenger terminal; and, potentially, other SRFI proposals centred exclusively in the Midlands. There is therefore a limit to future expansion and a high risk that passenger services may be adversely affected by perturbation.

ES9 Northampton Gateway is located on a constrained rail corridor, whose priority is, and always will be, to prioritise passenger capacity to serve the commuter markets to London. Notwithstanding this

constraint, the majority of freight traffic travels from the major ports of Felixstowe and London via the North London line which presents the most significant bottleneck on the freight network. The on-going investment in the Felixstowe to Ipswich branch line (and likely improvements at Ely) provide a more favourable route into the Midlands, avoiding the congested WCML and its known bottlenecks. Future SRFI development should follow investment in rail capacity, not precede it (as directed by the NPS).

ES10 MDS Transmodal, the company responsible for producing the unconstrained forecasts used by the Government to predict future rail freight movements, have publicly declared that there is insufficient capacity on the rail network (and in particular the WCML) to effectively service any more warehousing beyond the DIRFT3 expansion **(Chapter 18).** Furthermore, the Strategic Freight Network sets out the requirement for the core routes, one of the objectives of which is to minimise freight via London and protect the WCML south of Nuneaton for enhanced passenger services. Building SRFIs on the southern section of the WCML is therefore contrary to over-riding strategic objectives. Proposed SRFIs in the West Midlands and Hinckley are far better placed to facilitate the national freight strategy. *'For capacity schemes, consideration regarding routing options is crucial to optimise path availability, journey times and passenger service interaction. An example of where the freight industry has created a core freight route is Felixstowe to the West Midlands and the North route, routing services 'cross-country' to avoid the capacity and performance issues of travelling across London and on two congested main lines'* ***Long Term Planning Process: Freight Network Study (Draft for Consultation), August 2016. Appendix 5***

ES11 'As a rough approximation rail then road is cheaper than road-only if the rail leg is over 170 miles. Some estimates put this rail leg at closer to 270 miles'. ***Long Term Planning Process: Freight Market Study, October 2013.*** The proximity of Northampton Gateway to the ports of Liverpool, Southampton, London Gateway and Felixstowe raises concerns about the economic viability of the location (from a rail perspective) and the ability to facilitate an effective modal shift from road to rail. The economic landscape is such that there is currently no incentive for commercial organisations to switch from road to rail. Given the relatively short distances involved and without Government subsidy the modal shift at Northampton Gateway is likely to be modest.

ES12 The Department for Transport's National Transport Model has identified that by 2040 the section of the M1 between junction 15 and junction 18 will be severely congested. It can reasonably be surmised that the DfT model is included as an annex in the NPS to steer Developers towards parts of the road network that are more able to accommodate the additional traffic. The 7.5 million square feet of expansion at DIRFT will already increase the traffic on this congested section of the motorway, another SRFI (or more), along with the already consented local developments, on the same congested section will further exacerbate the problem (even earlier than 2040).

ES13 The Highways modelling completed by the Applicant assumes a 'perfect world' scenario with all parts of the network operating at an optimum, unstressed, level. Given the single point of access to the site and the significant reliance on the M1 for its smooth and effective operation, this simplistic approach is not considered suitable or sufficient. On the basis that the section of the M1, upon which the facility is reliant, is frequently congested, and sometimes closed, there should be a requirement to stress test the model to fully clarify the knock on effects for the local road network and neighbouring local communities. It is unrealistic to assert that there will be no overspill from a

development of this size. This requirement becomes even more critical when considering the cumulative impact of Rail Central.

ES14 The proposed works to the local road network will have the effect of increasing traffic on some country lanes and through the centres of villages; they will not, as the Applicant contends, reduce it. The proposed weight limits on a number of country lanes are not enforceable and are likely to be ignored. There is a significantly increased risk to the safety and well-being of local residents from increased light and heavy traffic on unsuitable roads.

ES15 The available labour pool has been overstated by the Applicant by using the figures for gross increases in population rather than the increase in those of a working age (15,890 compared to 1,500). Those locally available for employment in the logistics sector barely fill the employment opportunities created by the current allocation of commercial development areas in the West Northants Joint Core Strategy. The Applicant's contention that 60% of the workforce will travel from Northampton and 90% from within the study area is strongly refuted as it is based on the application of incorrect employment figures. The absence of a suitable local pool of labour will increase travel journeys to work and negate any carbon benefits of transferring freight onto rail. The large increase in logistics employment will unbalance the local economy and job migration in the local area will create further local economic pressures. The local area has one of the lowest rates of unemployment in the country and the highest proportion of the population employed in logistics.

ES16 The Applicant has failed to produce a suitable and sufficient cumulative impact assessment as required by the NPS and EIA Directive. They have failed to give consideration to other NSIPs in the region and the cumulative impact that the consecutive development of seven SRFIs in the Midlands region will have on: the efficacy of a national strategic network; rail network capacity and resilience; road congestion; and the ultimate success or failure of Government policy. They have also failed to specifically identify the combined environmental impacts of Rail Central and Northampton Gateway in terms of the effect on local and national roads; disruption of passenger services; the efficacy of footpath diversions and the social and environmental impacts on the local community.

ES17 We believe that the Applicant has failed to prove that, on the balance of probabilities, their proposal site will effectively fulfil the function of a SRFI within a strategic rail freight network and, consequently, would primarily be a road based logistics operation. The proposal is considered to be a speculative, rather than strategic, development and should be judged through the more appropriate (local) planning process. We are of the strong opinion that the disbenefits will far outweigh any marginal benefits from the transfer of minimal freight onto rail.