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Mr Sarah Richards
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29th October 2018

Sarah,

**RE: PHASE TWO COMMUNITY CONSULTATION ON ROXHILL'S
NORTHAMPTON GATEWAY.**

I write to ask you to consider rejecting the above planning proposal.

I have previously expressed the concerns of my constituents regarding Stage 1 of the aforementioned proposal and I write to express these concerns once again. I would like to stress, as I have done previously, that this development affects my constituents in Milton Malsor adversely, however a great deal of these concerns have also been echoed by the Rt Hon. Andrea Leadsom's constituents. However, I am writing purely in the capacity as Daventry's representative.

Although I write regarding 'Daventry', I will reference areas of concern outside of my constituency which my constituents will nonetheless be effected by.

Since my previous submission, a great deal more concerned constituents have expressed further objections to the proposed development. I also recently attended a public meeting in which further grievances were expressed surrounding the proposal.

Given the above, I write to ask you to consider rejecting this development on the following grounds:

Communities and Involvement

Many of the villages surrounding the proposed site are renowned for their peaceful atmosphere. Northampton Gateway is likely to effect this. Increased air, noise and light pollution are major concerns.



The proposed area is dark at night, however after development of Northampton Gateway, light will be visible for at least a 2 mile radius given that it can be expected to be active 24 hours a day. During the day, residents feel that the Northampton Gateway will be an eyesore, covering 210 hectares with warehouses up to 21.5 metres in height. Proposed vegetation cannot change the sight of this development to the surrounding area and landscape particularly given that the proposed plans do not reflect the local history, character or identity. Northampton Gateway would impact on the setting of Courteenhall, which has a registered park and garden in addition to Collingtree's conservation area. Furthermore, the application site is within 200 metres of the closest houses in Milton Malsor and Collingtree.

It must also be said that the Northamptonshire branch for the Wildlife Trust have conducted research that states there is a potential wildlife site within the land proposed for Northampton Gateway. In order for it to be classified as 'potential' it must have special features. Although admittedly much of this wildlife site will remain if Northampton Gateway is to go ahead, the northwestern corner will be removed to make space for train tracks. This will be compounded by the fact that the wooded area will be not far from the lorry park and the rail locomotives at least 90% of which will be polluting the air with their diesel fumes.

Roads

The obvious congestion that would be caused to the roads surrounding the site are of obvious concern to road users. This will be to the detriment of local businesses and therefore the local economy. Traffic congestion is known to constrain existing economic activity as well as economic growth since it increases costs to businesses and makes it harder for them to access export markets. This is of particular concern to business owners in the local area. It must also be said that businesses regularly consider access to good roads as a key criteria in making decisions about where to locate. Future developments and investments could potentially be placed at risk.

Roxhill propose building Northampton Gateway immediately next to what is expected to be the longest section of severe congestion on the M1 north of the M25 between junctions 15 and 17. This section is forecast to suffer severe congestion by 2040 and so Roxhill's proposals are of utmost concern to residents in the nearby communities as Northampton Gateway will exacerbate an already existing problem.

The potential increase in through-traffic is of particular concern to residents of Gayton and Milton Malsor, who would almost certainly witness traffic routed through their villages as a result of the above as drivers attempt to mitigate the delays they would experience between junctions 15 and 17. Given that some, if not many, of these vehicles will be HGVs, these quaint villages can expect these large and slow vehicles to add further air and noise pollution whilst congesting their small and narrow streets.

Northampton Gateway would add significant additional traffic to the A508 and A45, both of which are 'Active Red Routes' as a consequence of their accident rates. This would have an adverse effect on road safety for drivers, putting lives at risk.



In addition, the junction on the A43 where northbound traffic for Blisworth would turn right to join the Towcester Road has been the scene of many serious accidents such that Highways England and South Northants Council have been monitoring this junction for several years. As some employees are likely to use this route as a “rat run” to reach Northampton Gateway, this will only increase the risk of further accidents at this junction.

Site Viability / Aims of the Project

Any proposed Strategic Rail Freight Interchange (SRFI) should adhere to government guidance which is as follows:

- Reduces road congestion (a)
- Reduces carbon emissions (b)
- Integrates into existing SRFIs (c)
- Supports growth and creates employment (d)

Please see the below link for greater detail on this guidance:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/694825/strategic-rail-freight-interchange.pdf.

I will set out how Northampton Gateway fails to meet the necessary requirements:

As evidenced previously under roads, the proposed programme would in fact increase road congestion on an already incredibly busy M1 between junctions 15 and 17 – so the project fails to satisfy criterion (a).

Furthermore, Northamptonshire Highways (NH) have previously recognised the omission of information in Roxhill’s published environmental statement in relation to how busy the West Coast Mainline is now and how much busier it is likely to become. This as a result of already approved rail developments and the anticipated growth of passenger demand from Northampton Rail station. Similarly Roxhill does not make any suggestion that additional freight services may have an adverse impact on rail passenger services. With this in mind, it would be a fair assumption to make that there would be more road users to avoid an inconvenient rails service, once again clashing with criterion (a).

Constrictions on rail passenger services will almost inevitably give rise to an increase in the number of car journeys and in turn see an increase in air pollution and congestion. Since the passenger train services would be replaced by freight services we would surely see an increase in the county’s carbon footprint as there would be the same number of trains on the tracks and more cars on the roads – evidence to dispute criterion (b).

NH clarified that Network Rail have identified a significant future constraint over the entirety of the Northampton Loop, such that increasing freight services over this might require a reduction in the passenger service to Northampton. A reduced train



service to Northampton could potentially see jobs lost and generate negative growth, evidence to dispute criterion (d) stated above.

What the points raised above demonstrate is that the development would not only fail to satisfy the requirements set out by government policy in relation to supporting SRFI infrastructure, but in fact it would have a detrimental impact on the lives of residents in the whole of Northamptonshire; notably those who live close to the proposed development site. Many of these residents are questioning the need for another SRFI given that the 300-acre Daventry International Rail Freight Terminal (DIRFT) is less than twenty miles up the road. Such a close proximity would seem to undermine criterion (c).

Attempts at Mitigation and Compensation

A regular claim made by those in favour of Northampton Gateway is that employment in the local area will be boosted. However, I have previously made the point, and will do so again, that there is not a suitable workforce for Northampton Gateway in the surrounding areas. The claimant rate in all surrounding constituencies is under the national average and the constituency which is to be most affected, South Northamptonshire, has an unusually low claimant rate of 0.7%.

The same study found that Northamptonshire has almost twice as many people working in the logistics sector compared to the national average in 2016. This remains high today, particularly amongst HGV drivers. A look at DIRFT and Brackmills Industrial Estate in Northampton indicates that more drivers and warehouse operatives have been needed. DIRFT have been looking since August 2017 and Brackmills since September 2017.

The 'Logistics Study', commissioned by South Northants Council (SNC) indicates a lack of a surplus pool of labour suggesting employees will have to travel from further afield. Coventry, Leicester and Bedford have been suggested as such areas. However, warehouse jobs are relatively low paid, as are those for HGV drivers.

Therefore, those people not living in such close proximity may not find it financially appropriate to travel such distances every day at great cost. If this is the case, then the question remains of where employees for this site will be found. If it is the case that employees travel from such distances, greater travel times for employees further impacts both traffic and environment. If the average commute is 10 miles, this equates to 35,930,440 miles a year. Northampton Gateway will thus not be able to reduce traffic miles on roads by transferring goods onto rail because employee commuting distances will exceed HGV journey distance savings.

Regarding HGVs, one suggestion to reduce air pollution from these vehicles is to ensure they should be 'Euro 6' compliant. However, there will be a significant proportion of HGVs delivering to the site which are not based at Northampton Gateway, operators at Northampton Gateway can have no say in what Euro emissions standards these vehicles will meet and thus no control over the air quality.



Miscellaneous Issues

There are a number of less prominent concerns, however these are by no means less significant for local residents. These include: overpopulation and a lack of affordable housing to accommodate the workforce.

I will draw your attention, in particular to the issue of crime. There is evidence to suggest that crime increases around warehouse developments where a large proportion of the workforce are not local residents.

Crime statistics compiled for the area within which DIRFT was built show a marked increase over recent years. DIRFT falls into 2 wards: Barby & Kilsby and Crick wards. Between 2000/2001 to 2015/16 crime in these areas rose by 176%. The consequences of such increases leads to likely rises in car and household insurance premiums. This is naturally extremely concerning for local residents.

Conclusion

I would be grateful if the above can be considered in any decisions that will take place regarding Northampton Gateway on behalf of the constituents of Daventry.

Yours sincerely,

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