

From: Terence Owen [REDACTED]
Sent: 06 November 2018 08:39
To: Northampton Gateway
Subject: Northampton Gateway - TR050006 - Written Representation - NGR-AFP076 - Deadline 6/11/18

Hello

I live on the A508 1 mile south of Roade at [REDACTED]

I object very strongly to the proposed Roxhill 'NSIP / SRFI' at M1 J15.

The project cannot be considered to be either an NSIP Nationally Important Infrastructure Project or an SFRI Strategic Rail Freight Interchange.

The developer Roxhill has used the designations NSIP and SFRI in an attempt to smuggle a huge, very damaging, unwanted and unnecessary Road Freight Logistics Hub with an incidental attached rail connection under the camouflage of a Strategic / Nationally Important project thereby deftly side stepping the authority of the Local Planners who previously rejected the earlier Roxhill Howden application in accordance with very strong public objection.

Please study the attached document which contains all my objections to Northampton Gateway and from which I hope you can gauge the strength of my objections.

My main objections are:-

a) The intolerable level of additional traffic burden on the already overloaded local road system. Some days I have to wait more than 5 minutes to safely exit my driveway onto the A508. The traffic on a daily basis backs up from M1 J15 to Roade, and frequently as far as the Ashton / Stoke Bruerne junction on the A508. And the whole local road network regularly collapses into chaos when an RTA causes disruption to traffic flow on the M1, A508, A45, A43. That such RTA are common is a strong indicator of the traffic overload in this area and the frustration and impatience of drivers who are confronted daily with long costly traffic queues. The A508 is designated a 'Red Route' because of the traffic density and RTA hazards along its length.

Northampton Gateway according to Roxhill's own figures will dump an extra 18,000 vehicle movements per day onto these roads for the benefit of removing, at very best, 800 intermodal HGV from the roads. That represents a DAILY NET INCREASE of 17,200 vehicle movements per day onto roads that are already grossly overloaded. The Roxhill proposition must be classified as an ABSURDITY because it greatly exacerbates the very problem it claims to solve and which Roxhill uses to speciously claim qualification as an NSIP / SRFI.

b) There are three AQMA close to the proposed site that will be badly affected by Northampton Gateway. Poor air quality is a killer and in this area the main polluter is road traffic, especially stationary road traffic with engines running very inefficiently at idle / low revs in the daily queues.

c) DIRFT with its approved New Rail Head is the regional SFRI. It is designed to take 64 full sized freight trains a day (that's 50% of the total WCML freight capacity). The existence of DIRFT and its approved expansion disqualifies Northampton Gateway from its claim to be an SFRI or a NSIP. Northampton Gateway is neither of those things. DIRFT does the job. Northampton Gateway is simply not required. DIRFT has been included in the

Industry Analyses and notably in the 2015 Technical Annexe to the Strategic Case for HS2: Demand and Capacity on the WCML. Northampton Gateway has not.

Those are my main objections but please read the attachment to understand the full range of my objections and why I need you to reject the Northampton Gateway project.

Thank You
Terry Owen

Northampton Gateway



“Wrong Place ... Wrong Time”.

“Cover it ... Lose it forever”.

“An Absurd Proposition”.

REJECT

An Absurd Proposition

The true purpose of an SRFI is to reduce intermodal HGV traffic on the connecting roads between the Container Ports and Inland Railheads.

Using Roxhill's own figures* the Northampton Gateway SRFI scheme is an:-

ABSURD SELF DEFEATING PROPOSITION.

At very best Northampton Gateway can handle 16 trains per day equivalent to a reduction of 800 intermodal HGV.

The operational plan for Northampton Gateway dumps 18,000 extra vmpd onto the roads.

NET Road Traffic INCREASE 17,200 vmpd

REJECT

*4 to16 trains per day each with 50 wagons.
18,000 extra vehicle movements per day on local roads.
vmpd vehicle movements per day.

“Cover it ... Lose it forever”



Roxhill's Plan

The Story In Easy Pieces – 1/3

The National Policy Statement for National Networks is flawed in that it encourages speculative SRFI projects.

There are 10 SRFI projects ranging from planning stage to fully operational within 30 mile radius of Coventry.

There are two SRFI undergoing planning application on the SW edge of Northampton - Northampton Gateway / Rail Central.

Northampton has one SRFI already operating and with expansion underway for a new rail terminal – DIRFTIII.

Northampton Gateway / Rail Central are planned to cover green field rural prime agricultural land.

Northampton Gateway is being proposed by Roxhill a speculative company with substantial land bank 1.6kA and capital MP105.

Roxhill is backed by CBRE the biggest commercial real estate services and investment firm in the world - 2017 Rev \$14.2 billion.

The Roxhill scheme for a Howden's warehouse on the site was rejected by the Local Planning authority.

Roxhill subsequently proposed a SRFI on the site deftly circumventing Local Planning under the camouflage of NSIP NPSNN.

To qualify as SRFI the terminal must be able to handle 4 trains per day equivalent to 200 HGV.

At M1 J15 it takes only 10 minutes for 200 full size HGV to pass by.

200 fewer intermodal HGV per day will make no discernable improvement to the M1 / A43 / A45 traffic density.

The reduction in 200 HGV per day comes at a cost of 18,000 extra vehicle movements a day onto local roads.

Northampton Gateway is in reality a large road freight warehousing terminal with a vestigial rail line appendage.

At best after HS2P1 Roxhill claim Northampton Gateway can handle 16 trains per day but this not included in WCML planning.

The Story In Easy Pieces – 2/3

On completion DIRFTIII can handle 64 trains per day at their brand new rail terminal handling 50% of the available WCML capacity.

DIRFTIII approved intermodal freight capacity is 4x that of Northampton Gateway which is therefore simply not needed.

The remaining 50% WCML capacity will be used to service facilities further north and southbound freight to London and the ports.

Northampton Gateway trains per day needs are not included in any of the industry analyses / forecasts.

Northampton Gateway is not included on the WCML freight route schematic taken from Nov 2015 WCML Capacity Tech Annex.

DIRFTIII is included in industry analyses / forecasts and the Nov 2015 WCML Capacity Tech Annex.

The WCML is congested today but HS2PI will release capacity.

No decisions have yet been made about allocation of this freed capacity between Intercity, Commuter and Freight services.

Northampton Gateway is therefore disqualified from being and made redundant as an SRFI – DIRFTIII is real and does the job.

Northampton Gateway is a speculative, opportunistic, for profit project by Roxhill, CBRE, investors and the local landowner.

Northampton Gateway will dump 18,000 additional road traffic movements per day onto an already congested local road system.

In 2010 the A45 and the M1 at J15 were categorised as regularly / severely congested in the National Transport Model.

By 2040 the National Transport Model these classifications worsen to severely congested extending up to the M1 M6 confluence.

The Roxhill application includes modifications to J15, Roade by pass, and minor works to A508 south of Roade.

The Story In Easy Pieces – 3/3

At the Public Consultations Roxhill's traffic simulations showed free running traffic on all local roads at peak times.

When pressed the Roxhill representative conceded that severe congestion will result in the event of RTA disruption.

3/11 Northampton AQMA with excess road traffic NO2 pollution on the M1 and A45 will suffer detrimental additional pollution.

Overtopping the M1 barrier protecting undeveloped rural environment will encourage more feckless speculative projects.

Many negative issues and objections have been raised by local government, industry experts, local MPs and the public.

Neither SRFI is compatible with the West Northants Joint Core Strategy which stipulates DIRFT as the area SRFI.

South Northants Councils overwhelmingly voted to oppose the Rail Central SRFI proposal on 13th April 2016.

Roxhill claim 7,500 new jobs will be created but South Northants has low unemployment 2.4%.

Northampton Gateway will increase commuter traffic from distant higher unemployment centres such as Luton and Leicester.

Northampton Gateway will cause:-

- Loss of habitat for bats, birds, newts.
- Loss of hedgerows and ancient trees.
- Loss of SSI.
- Loss of long established footpaths and byways.
- Loss of countryside amenity.
- Loss of productive agricultural land.
- Pollution of watercourses.
- Obliteration of rural views by huge ugly monolithic structures.
- Increased Crime.
- Exacerbation of noise pollution, HGV vibration damage to property, light pollution and air pollution.

Nationally Significant Infrastructure Projects (NSIPs)

- New roads which are to form part of the strategic road network (motorways and trunk roads) operated by Highways England.
- New railway lines in England which are to be operated by Network Rail.
- New rail freight interchanges over 60 hectares in area in England.
- New large scale harbours in England or Wales.
- New airports in England capable of handling at least 10 million passengers per year.

Government Policy - NPSNN.

The government is encouraging a National Network of Strategic Rail Freight Interchanges SRFI in its National Policy Statement for National Networks – NPSNN.

SRFI to be:-

- Few in number.
- Large.
- Distributed across the Regions.
- Not be adjacent to residential areas
- Situated on brown field sites.

NPSNN - Weakness

The Strategy was based upon a theoretical approach but at the time it was not clear how that approach had been applied.

There was little consultation with the distribution industry.

Demand forecasts tended to be based on models which assumed that past trends will continue which are not necessarily well suited to forecasting future changes such as port-centric distribution.

Predicted Rail Freight growth without consideration of the limitations of infrastructure restrictions.

NPSNN - Weakness

The Strategy does not designate the distribution of SRFI across the regions

The Strategy does not designate the density of SRFI within a region.

There is no guidance for the Planning Inspectorate to review SRFI Applications against the distribution of competing SRFI across the regions or within a region.

The Inspectorate may therefore judge each SRFI in isolation.

NPSNN - Weakness

The Policy fails in that it does not lay out a 'joined up' National Strategy for SRFI.

SRFI are not mandated to properly utilise the site rail facilities*.

The Policy is an invitation for Rich Developers to build "SRFI" wherever they can acquire land and permission.

In reality many "SRFI" will be huge Truck Logistics Terminals* with an incidental rail line attached.

Such weaknesses have encouraged rich developers to plan a plethora of opportunist applications under the camouflage of SRFIs.

* Ashfield Land have conceded that 90% of freight handled Rail Central will be transported by road and just 10% by rail.

NPSNN - Weakness

The opportunistic exploitation of the policy weakness by developers is clear:-

Within a 30 mile radius of Coventry:-

4 Terminals are in application / pre application stages.

1 Terminal is approved and under construction by Roxhill near Derby.

1 Terminal is in planning stage.

3 Terminals are operational.

1 Terminal is disused.

The Northampton Schemes

There are two proposed SRFI for this area ...

Northampton Gateway – Roxhill

Located west of the M1 at J15 M1 bounded by the M1 and A508
5,000,000 sqft

<http://www.northampton-gateway.co.uk>



Rail Central - Ashfield Land.

Located west of the M1 at J15A bounded by the M1 and A43 and J15A M1
8,000,000 sqft

<http://railcentral.com>



Total 13,000,000 sqft

These two Terminals are geographically adjacent and considered as a whole would form the biggest such facility in Europe.

Roxhill Land Bank

Our Portfolio

Since 2010 the company has acquired or controls over 1,690 acres of land in strategic locations throughout the UK. We specialise in acquiring land with and without planning consent, using our in-house team to manage major planning issues and complex infrastructure projects to deliver large scale schemes. We continue to acquire additional land at key locations throughout the country either under ownership or management agreements. Our current land bank is broken down as follows:-

Land Owned	525 acres	9,450,000 sq ft
Land with Options	855 acres	15,390,000 sq ft
Land with Development Agreements	310 acres	5,580,000 sq ft

<http://www.roxhill.co.uk/portfolio/>





Roxhill Funding

Our Finance

Roxhill was originally funded by its shareholders comprising the Senior Management Team, Forum Partners, Abstract Securities and CBRE Global Multi Manager. With committed funding peaking **at** £105m the capital is used to acquire, control and ultimately develop prime UK logistics land in the Midlands, M1 corridor and the South East.

<http://www.roxhill.co.uk/finance/>

	Aylesford
	Coventry
	East Midlands
	Howbury
	Kettering
	Maidstone
	Northampton
	Northampton J15 M1
	Peterborough
	Peterborough (residential Application)
	Raunds
	Rugby
	Tilbury
	Westerham

	Planning in Progress		Planning Granted
	Land Available		Under Construction
	Complete		Complete and Ready for Occupation
	Complete and Fully Occupied		



Roxhill Backer CBRE

CBRE Group - World's largest commercial real estate services and investment firm.

2017 revenues - \$14.2 billion.

80,000 employees.

Based in Los Angeles with 450 offices worldwide.

Clients in more than 100 countries.

Serving > 90 of the top 100 companies on the Fortune 100.

Revenue

- US\$14.210 billion (2017) ^{[1]:24}
- US\$13.072 billion (2016)

Operating income

- US\$1.071 billion (2017) ^{[1]:24}
- US\$0.815 billion (2016)

Net income

- US\$0.691 billion (2017) ^{[1]:24}
- US\$0.572 billion (2016)

Total assets

- US\$11.484 billion (2017) ^{[1]:25}
- US\$10.780 billion (2016)

Total equity

- US\$4.080 billion (2017) ^{[1]:57}
- US\$3.057 billion (2016)

The CBRE logo is displayed in a bold, green, sans-serif font.

Northampton Gateway - Not NSIP

Roxhill planned to build a Howden Distribution Centre on the site.

This was rejected by Local Planning after much local protest.

In response Roxhill have proposed an SRFI on this site for which they have secured control from the landowner.

By including the capability to handle 4 freight trains per day* they have deftly bypassed the normal local planning process under the camouflage of SRFI / NSIP.

Secretary of State for Transport is responsible for judgement on advice from the Planning Inspectorate.

Northampton Gateway is not part of a 'joined up' National Transport Infrastructure.

- It's a speculative, opportunistic, for profit project by Roxhill / CBRE.
- It is a Non Solution to the problem of Road Transport.
- It will severely exacerbate the everyday problems already experienced by those blighted by it.

* Coincidentally 4 freight trains per day is the lower limit for SRFI qualification.



Northampton Gateway - Not NSIP

Roxhill Public Consultation Experts claim:-

Northampton Gateway will handle 16 trains of 50 trucks per day.

- Equivalent to 800 HGV per day.

In reality, until HS2 is available, Northampton Gateway plan only 4tpd* (trains per day).

- Equivalent to only 200 HGV per day.

Simple M1 traffic count reveals it takes only 10 minutes for 200 full size HGV to pass J15 on the M1.

No discernable reduction in M1/ A43 / A45 intermodal freight traffic will be realised.

As a road based distribution centre it will dump 18,000 additional daily vehicle movements onto already congested local roads.

Northampton Gateway tpd needs DO NOT appear to be included in any of the industry analyses and forecasts so far.

* Coincidentally 4 freight trains per day is the lower limit for SFRI qualification.

November 2015



Supplement to the October 2013
Strategic Case for HS2
Technical Annex: Demand and Capacity
Pressures on the West Coast Main Line



Northampton Gateway - Not NSIP

The purpose of an SRFI is to reduce intermodal HGV traffic on the connecting roads between the Ports and Inland Railheads.

Using Roxhill's own figures the Northampton Gateway SRFI scheme is a SELF DEFEATING proposition. (4 to 16 trains per day. 18,000 vehicle movements per day on local roads)

At very best Northampton Gateway can handle 16 trains per day equivalent to 800 HGV.

The reduction of 800 intermodal HGV vmpd dumps 18,000 additional vmpd onto the roads.

NET Road Traffic INCREASE – 17,200 vmpd

REJECT

Northampton Gateway - Not NSIP

Northampton Gateway is disqualified from being SRFI by the existence of **DIRFT**

DIRFT Today

Largest SRFI in the UK

Location - M1 J18 18 miles north of Northampton Gateway

Rail Connection - WCML taking 10 trains per day

Current Capacity - 8,000,000 sqft

DIRFT Expansion - DIRFT III

- 8,000,000 sqft under development
- expansion capability until 2031
- brand new rail terminus - capacity 64tpd



DIRFTIII, approved and under construction, has the capability to fully utilise the available WCML Intermodal Freight Capacity 64/132 tpd until at least 2033

DIRFT can handle the regions future intermodal freight requirements without Northampton Gateway.

DIRFT renders Northampton Gateway redundant and a non solution to the problem.



DIRFTIII

DIRFTIII is an approved SRFI and is currently under construction.

As part of the next phase of Prologis RFI DIRFT a new, state of the art and nationally significant rail freight terminal will be built.

THIS IS THE FUTURE

DIRFT III
PLANNING FOR THE FUTURE

THE EXPANSION OF DAVENTRY INTERNATIONAL
RAIL FREIGHT INTERCHANGE

This report has been prepared by WSP with input from MDS Transmodal, URS Scott Wilson, and Prologis. The report has been reviewed by Network Rail. It provides information on the operation of the proposed extension of the Daventry International Rail Freight Terminal (DIRFT) at DIRFT III on land at the Rugby Radio Station.

6.2 Forecast Demand for Trains Per Day

6.2.1 The Need Assessment¹ sets out a demand forecast for a facility which will be required to accommodate an average of 32 trains of up to 600m in length per day in each direction by 2033. This compares to the present throughput of around 10 trains per day, and allows for growth in line with accepted industry forecasts.

7.6.12 In summary, the volumes forecast for DIRFT III are included in and consistent with the industry forecasts of 132 trains per day on the southern section of the WCML. If Network Rail meets its plan to accommodate forecast industry demand, then, in doing so, Network Rail will be meeting planned demand for DIRFT. III.

Year	Trains Per Day (each direction)
2015	12
2020	18
2025	22
2030	30
2033	32

The assets of the Rugby Radio Station site present an unparalleled opportunity to support regional and national aims for economic growth and increased sustainability in the logistics and distribution sectors through an expansion of DIRFT.

DIRFTIII

[News](#)[Transport](#)[Crime](#)[Education](#)[Business](#)[Politics](#)[Environ](#)

DIRFT III gets planning permission

Published: 14:27
Thursday 03 July 2014



The plans to expand the Daventry International Rail Freight Terminal have been given the go-ahead by the government.

DIRFT III, which is likely to bring 9,000 jobs to the area, was granted permission by the Department of Transport.

Development consent has been granted for the expansion of the existing Daventry International Rail Freight Terminal by the construction and operation of a new rail link to a replacement interchange, together with new transshipment sidings, container storage, an HGV reception area, up to 731,000 square metres of rail served storage and a strategic open space.



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Our Ref: TWA 8/17
Your Ref: MET VT 4437-1-1

3 July 2014

Secretary of State's overall conclusions and decision

48. For the reasons given in this letter, the Secretary of State considers that there is a clear need for DIRFT III which is supported by national policy guidance on SRFIs. He is satisfied that the benefits of the project outweigh the residual adverse impacts, taking into account the mitigation measures secured by the Order, and that those impacts are acceptable. He is further satisfied that there is a compelling case in the public interest for conferring the compulsory acquisition powers sought by the applicant; and that the Order as modified is appropriate for the implementation of the project.

Dear Sirs,

PLANNING ACT 2008
APPLICATION FOR THE PROPOSED DAVENTRY INTERNATIONAL RAIL FREIGHT
INTERCHANGE ALTERATION ORDER

WCML Capacity

At some points, the WCML is highly congested. This is despite the capacity increases that followed the West Coast Route Modernisation.

Network Rail's "Capacity Plus" study of strategic options for rail service operations after HS2 Phase One will include options for WCML train services made possible through the released capacity. Options being assessed include:-

- new long distance passenger services
- additional capacity for freight growth
- London commuting growth

No decisions have been taken on the introduction of these new services.

Well established processes will be used with shared evidence base and consultation with passengers, communities and freight users, to make decisions ahead of the introduction of a new timetable.

WCML Capacity

Roxhill claim Northampton Gateway could handle 16tpd* after HS2P1.

Northampton Gateway tpd* needs are not included in any of the industry analyses / forecasts so far and is not included on the WCML freight route schematic taken from Nov 2015 Tech Annex shown below.

DIRFT is able to handle 64 tpd* of the forecast 2030 WCML freight capacity of 132tpd. DIRFT will absorb 50% WCML freight capacity with 50% bound to the rest of the country.

DIRFT tpd* needs ARE included in the industry analyses and the Nov 2015 Tech Annex shown below.

DIRFT is shown on the WCML freight route schematic taken from Nov 2015 Tech Annex.

DIRFTIII, approved and under construction, has the capability to fully utilise the available WCML intermodal freight capacity until at least 2033

DIRFT III is the SRFI this region needs.



Northampton Gateway is not.

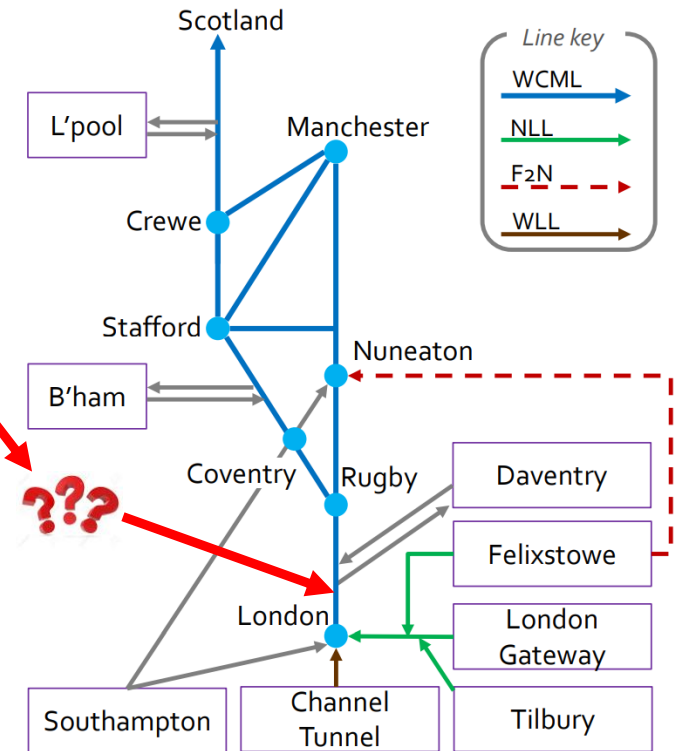


Figure 65 WCML and major freight feeder routes



November 2015

Supplement to the October 2013
Strategic Case for HS2
Technical Annex: Demand and Capacity
Pressures on the West Coast Main Line

tpd * – trains per day

Road Traffic Modelling

Predicted SRFI Traffic Density increases on A43 / M1 / A5:-

- Northampton Gateway – +18,000 vehicle movements / day.
- Rail Central - +24,000 vehicle movements / day.

Roxhill Public Consultation Traffic Flow Demonstrations.

The Roxhill representatives claimed their simulations showed freely running traffic on the local roads because of the proposed improvements at J15, at Roade and the Smartification of the M1.

However, when pressed, the expert presenters grudgingly conceded that the simulations were only realistic if the M1, A45 and A43 are running smoothly.

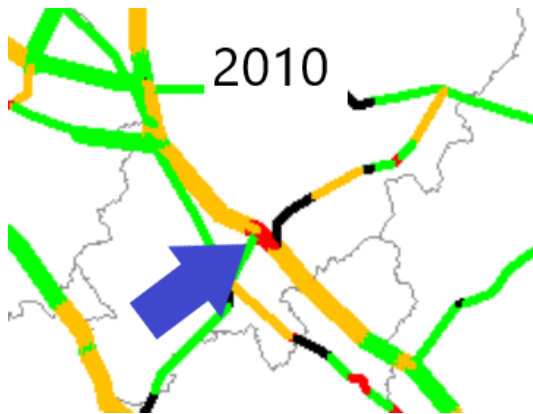
It is clear that the additional 18,000vmpd traffic burden will significantly worsen the existing daily congestion and in the event of an RTA in the locale very severe disruption will result despite the proposed 'road layout improvements'.

vmpd – vehicle movements per day

Road Traffic

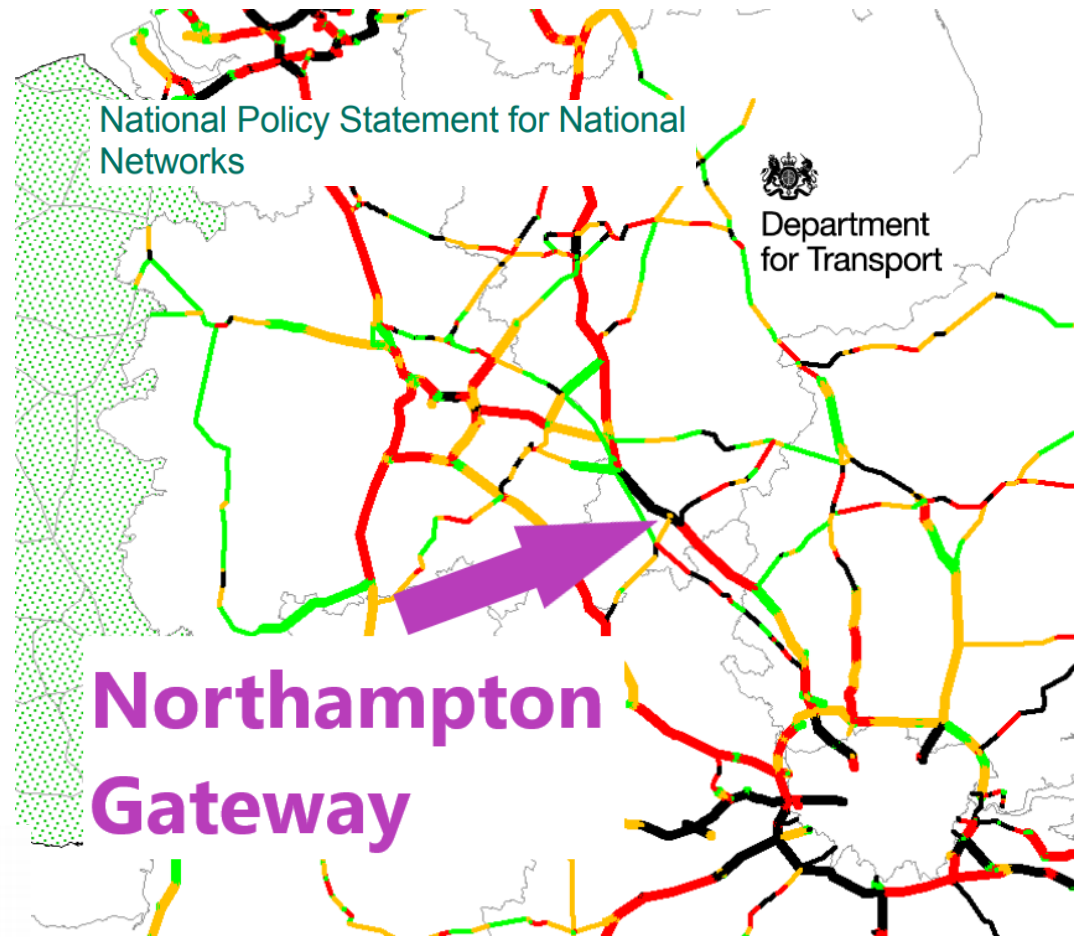
The location of Northampton Gateway at M1 J15 is a zone designated as one of Severe Congestion.

Adding an additional burden of 18,000 daily vehicle movements is astonishingly ill advised.



Baseline1 Reference Case 2040
VC Ratio - AM Peak Period

- Severe Congestion
- Regular Congestion
- Moderate Congestion
- Occasional Congestion



Source: National Transport Model; TASM Division; DfT

Scenario: A104_RTF14_2040_Baseline1_Ref

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Department for Transport

Air Pollution AQMA – NO₂

Air Quality Management Areas (AQMAs)

What are Air Quality Management Areas?

Since December 1997 each local authority in the UK has been carrying out a review and assessment of air quality in their area. This involves measuring air pollution and trying to predict how it will change in the next few years. The aim of the review is to make sure that the [national air quality objectives](#) (PDF) will be achieved throughout the UK by the relevant deadlines. These objectives have been put in place to protect people's health and the environment.

Northampton has 11 AQMA.

All are caused by road traffic borne NO₂

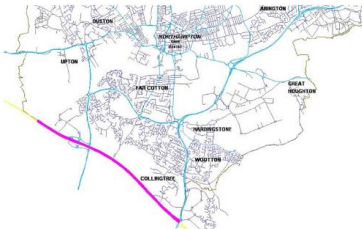
Increased road traffic servicing Northampton Gateway (18,000vmpd) will have detrimental effect upon three of these, Nos 1,5,11 along the M1 and 2 sections of the A45 within 3 miles of M1 J15.

Northampton AQMA No.1 (Northampton Borough Council)

06/01/2003, The area of land which runs alongside the southbound carriageway of the M1 motorway within the boundaries of Northampton Borough Council. The area varies in depth from between 40 and 54 metres when measured from the central reservation on the M1.

Source: Highways Agency Road

Click the map below to open a full size version in a new window.



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Northampton AQMA No.5 (Northampton Borough Council)

16/04/2005, An area encompassing properties in Woolton Hall Park, Cotterdore Drive and Chestnut Drive close to the A45 London Road.

Source: Mixture of road types

Click the map below to open a full size version in a new window.



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Northampton AQMA No.11 (Northampton Borough Council)

16/04/2005, An area encompassing a number of properties in Bowthorpe Close, New Valley Way.

Source: Mixture of road types

Click the map below to open a full size version in a new window.



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Northampton Borough Council	Northampton AQMA No.1	Nitrogen dioxide NO ₂
Northampton Borough Council	Northampton AQMA No. 2	Nitrogen dioxide NO ₂
Northampton Borough Council	Northampton AQMA No.3	Nitrogen dioxide NO ₂
Northampton Borough Council	Northampton AQMA No.4	Nitrogen dioxide NO ₂
Northampton Borough Council	Northampton AQMA No.5	Nitrogen dioxide NO ₂
Northampton Borough Council	Northampton AQMA No.6	Nitrogen dioxide NO ₂
Northampton Borough Council	Northampton AQMA No.7	Nitrogen dioxide NO ₂
Northampton Borough Council	Northampton AQMA No.8	Nitrogen dioxide NO ₂
Northampton Borough Council	Northampton AQMA No.9	Nitrogen dioxide NO ₂
Northampton Borough Council	Northampton AQMA No.10	Nitrogen dioxide NO ₂
Northampton Borough Council	Northampton AQMA No.11	Nitrogen dioxide NO ₂

Air Pollution - Scientific Papers

There are a huge number of scientific papers emanating from the UK, the USA, Holland and Germany that clearly state the health risks of residential developments within 250 metres of major highways.

In summary, they state that:-

Residents, particularly children, of houses near major highways have an increased risk of asthma, heart disease, and lung disease, and are 40% more likely to die from any of these causes compared to others in less congested areas.

Pregnant women have a 20% higher risk of having a premature birth, and that they produce babies with lower birth weights.

Children living within 250 metres of busy roads are 600% more likely develop cancer and 800% more likely to develop leukaemia.

Children living near highways also suffer from 71% higher levels of benzene, resulting in increased occurrences of anaemia and leukaemia.

Note that one paper defines a 'busy road' as one with just 20,000 vehicles per day.

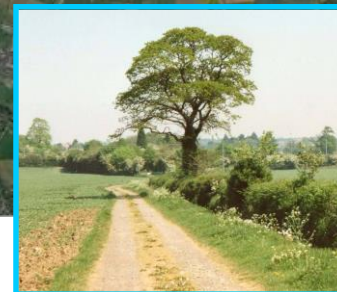
The M1 currently carries > 90,000 per day.

Northampton Gateway will add 18,000 ADDITIONAL vehicle movements every day.

M1 Barrier

The M1 is a barrier separating the Northampton conurbation to the NE from the rural prime agricultural land and small villages to the SW.

Approval of the proposed SRFIs will be recognised as a breach of the boundary and establish a strong precedent incentivising developers and land owners to plan more exploitative unwanted damaging development in the area.



Employment

Roxhill claims 7500 jobs will be created.

South Northants is an area of low unemployment – 2.4%

The employment opportunities will not benefit the local population.

Local employers will face recruitment difficulties.

Employees will be attracted from far and wide Leicester 4.6%, Luton 6.3%, Coventry 5.2%, Milton Keynes 4.3% further overloading the saturated local commuter routes and rat runs.

nomis

official labour market statistics

Labour Supply

Employment and unemployment (Apr 2017-Mar 2018)

	South Northamptonshire (Numbers)	South Northamptonshire (%)	East Midlands (%)	Great Britain (%)
All People				
Economically Active†	47,800	84.7	77.9	78.4
In Employment†	46,200	82.3	74.7	75.0
Employees†	38,300	69.7	64.9	64.0
Self Employed†	7,600	12.6	9.3	10.6
Unemployed (Model-Based)§	1,100	2.4	4.1	4.3

Housing Development

Towcester - The construction of 2,750 new homes has started.

Roade – The village has grown significantly in the last few years with a total of 400 new homes either built or under construction, a growth of over 50% since 2011.

Grange Park - Approval for the initial development of the village was in 1998, initially for 1000 houses, schools and community centre.

Census data shows:-

- 2001 - 327 people in 118 houses.
- 2007 - 3,500 people in 1,439 houses
- 2011 - 4,404 people

Collingtree Park – Bovis have been granted permission to build the first phase of 1000 houses.

The Strategic Economic Plan for the **South East Midlands**, which includes Milton Keynes and Northampton, sets out plans to deliver 86,700 new homes by 2020/21 to accommodate an increase in population of 151,400.

All this New housing in the region will increase the road traffic burden and place extra demand on the WCML commuter capacity. More commuter trains means less capacity to service SRFI.

Expert Comments

‘Rail Central is in the wrong place and at the wrong time’

The plan to build so close to DIRFT and on the WCML was “intriguing” ... why are the Developers not looking to develop sites further away from existing SRFI to better fulfil the ‘across the regions’ stipulation laid down in the NPS NN.

Traffic to/from the Midlands is going to be reduced due to the effect of London Gateway, the new port in London.

The SRA SRFI was based on theoretical research into distribution flows and patterns ... and is not necessarily well suited to forecasting future changes such as port-centric distribution.

The Policy Statement itself (the NPS NN) states that SRFIs may not be considered suitable adjacent to residential areas and where possible should utilise brown field sites

The GVA report March 2017 commissioned by SNC points out problems with :-

- Significant over-supply of warehousing in the area
- Considerable additional pressure on local roads
- Detrimental effects on labour availability
- Implications for housing
- Environmental emissions
- Immaturity of the rail freight network
- Constraints on rail capacity on the north London routes from the ports

Official Objections

Neither SRFI is compatible with the West Northants Joint Core Strategy which requires that any such development of this nature should be based at Daventry International Rail Freight Terminal (DIRFT).

South Northants Councils decided by an overwhelming majority to oppose the Rail Central proposal on 13th April 2016

With increased freight trains running on the very crowded West Coast Main Line to serve either SRFI will reduce the number of additional trains that can be run from Northampton/Milton Keynes to London Euston. As this has been one of the fastest growing train routes in the country, such constrictions on future rail passenger growth would be most unwelcome.

Andrea Leadsom MP has been openly opposed to both SRFIs from the outset.

At a presentation made by Chris Heaton-Harris MP in Milton Malsor on October 20th it is clear that he is also strongly opposed to these proposed SRFIs.

Rail Central would have an adverse impact on at least two conservation areas.

Environmental 1/2



Loss of habitat for bats, birds, newts.
Loss of hedgerows and ancient trees.
Loss of SSI.
Loss of long established footpaths and byways.
Loss of countryside amenity.
Loss of productive agricultural land.
Pollution of watercourses.
Obliteration of rural views by huge ugly monolithic structures.



Environmental 2/2

Air Quality

NO₂ levels are already in excess of the limits on the A508 at the Blisworth junction. More traffic especially HGVs braking and accelerating to enter the Roade By Pass will exacerbate the problem.

Noise

Peak noise levels will not increase much but with more traffic movements the noise will become a continuous and intrusive nuisance.

Vibration

The older houses close to the A508 in Grafton Regis are already suffering from vibration damage associated with HGV disturbance.

Light Pollution

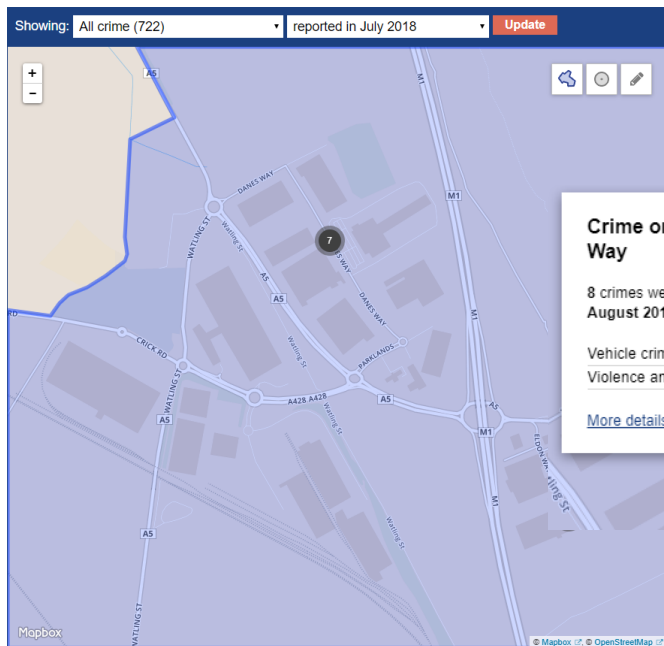
The Terminal site will be illuminated for night operations and will add to the existing intrusive night glare from Northampton

Crime

Crime

Data obtained through a Freedom of Information request for the wards around the DIRFT site shows that although crime within the rail freight interchange has remained stable, there has been an almost trebling of reported crimes in the surrounding areas between 2000/01 and 2015/16.

Daventry District Council found that drivers are often reluctant to use lorry parks nearby and may therefore park in inappropriate places instead.



Crime on or near Danes Way

8 crimes were reported here in August 2017.

Vehicle crime	4
Violence and sexual offences	4

[More details](#)

Crime on or near Danes Way

7 crimes were reported here in December 2017.

Other theft	5
Possession of weapons	1
Vehicle crime	1

[More details](#)

Crime on or near Danes Way

7 crimes were reported here in July 2018.

Anti-social behaviour	1
Theft from the person	1
Vehicle crime	3
Violence and sexual offences	2

[More details](#)



Danes Way - DIRFT

Conclusion

Northampton Gateway does not qualify as an NSIP or SRFI.

DIRFTIII now under construction is the NSIP SRFI for the Northants area with the capability to fully utilise the available WCML Intermodal Freight Capacity until at least 2033.

Northampton Gateway is not needed.

It creates problems and solves none.

It is designed to evade local plans and democracy.

The real intent, camouflaged under the guise of NSIP SRFI, is to construct a road based logistics park with a rail line appendage.

The real motive is profit for the opportunistic and speculative company Roxhill, it's backer CBRE and their investors and the local landowner.



Conclusion

Accordingly Northampton Gateway
must be rejected.

REJECT