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**To:** Northampton Gateway  
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Deadline 6th November 2018

The whole principle of rail freight is that we have a national network of interchanges near major conurbations. This enables trunking of freight via rail, with the final leg by road. Northampton Gateway fails to meet this model, as Northampton is not a major conurbation and there are no sites which cannot be served from the existing DIRFT.

Northampton is not dominated by manufacturing sites, nor is it a major retail centre, Indeed, it could be argued that the town centre is dying as shoppers travel to Milton Keynes or Rushden lakes.

The appeal of Northampton for the logistics industry (and this is confirmed in the market analysis report) is that around 87% of the UK population is within a 4.5 hour HGV drive time (a day's round trip)

The market report also indicates that there is an existing large pool of occupiers” Those occupiers currently use HGVs to deliver goods. It seems most likely that the occupiers will continue to use HGV rather than rail.

Whilst I accept the need for RFIs to be strategically distributed around the country, having 3 (NG, DIRFT and Rail Central) within 20 miles of each other does nothing to create a national network. We already have DIRFT which is not full and has capacity to expand so should be developed.

It simply cannot be right to position SRFIs because of pre-existing relationships between developers and land owners

Many of the warehouses do not have rail access, and will be served purely by road. These units should go through the normal planning process as they are not strategic. It seems obvious that this development is a distribution park served by HGVs and the addition of a rail component is purely a distraction intended to enable the developer to bypass the local planning rules. This is a rail interchange in name only as the likelihood is that no additional freight will travel by rail.

There is no mention in the market analysis report of Rail Central so viability cannot be established in the event that both go ahead. It is critically important that consideration is given to the cumulative effects of all major developments to the south of Northampton, not just the SRFIs but also the already approved SUEs with thousands of houses. We must consider the cumulative impact on rail and road capacity, pollution and the impact on public services of the significant increase in population.

Whilst jobs are welcome, this is an area of low unemployment so it is not clear where the workforce will come from. If from overseas, where will they live? There is already a housing shortage. What impact will there be on local public services? Surely it is much more productive to site this development in an area with an available workforce

The local plan, the joint core strategy, covers this area and seeks to balance demands for employment housing and public services. This is an important role for local government. It is important that this principle is followed. A huge development like this will have a significant impact on the plan and skew the balance

Many of the vehicles will be HGVs, with consequential traffic and pollution problems. Most will come out onto Junction 15 which is already heavily congested at peak times.

The west coast main line is already congested and even post HS2, there is no guarantee of capacity for freight, as more capacity is needed for commuter services as passenger numbers are forecast to increase to increase.

Regards, Colin Davidson

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