

# THE RT HON. ANDREA LEADSOM MP



## HOUSE OF COMMONS

LONDON SW1A 0AA

Mr Philip Asquith  
Lead Member of the Examining Authority  
National Infrastructure Planning  
The Planning Inspectorate  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Your Ref: TR050006

Our Ref: AL/TG/1810

22<sup>nd</sup> October 2018

Dear Mr Asquith,

**Re: Application by Roxhill (Junction 15) Limited for an Order Granting Development Consent for the Northampton Gateway Rail Freight Interchange**


I write to you regarding the above application which, along with David Brock, you are considering as the Examining Authority appointed by the Secretary of State.

I confirm that I am submitting a Written Representation, as set out in the Rule 8 Letter, on behalf of the hundreds of my constituents who have raised significant and substantial concerns with me about the SRFI proposed by Roxhill (the applicant), and I also confirm that I am doing so solely in my capacity as the elected Member of Parliament for South Northamptonshire. I have registered as an Interested Party for this purpose.

This Written Representation is supplementary to the Relevant Representation I made in July this year, and further to the points I have raised with the applicant through their initial non-statutory consultation and subsequent pre-application statutory consultation. Copies of my responses to both these consultations have previously been supplied to the Case Manager for this application, Ms Kate Mignano, and I would ask that these also be considered alongside my Written Representation. I will also be providing a separate summary of this Written Representation.

I am very grateful for your consideration of the points I am raising, and for your careful examination of this proposal which a great many of my constituents have concerns about.

With best wishes,

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

*Member of Parliament for South Northamptonshire*



Written Representation by the Rt Hon. Andrea Leadsom MP on the application by Roxhill (Junction 15) Limited for an Order Granting Development Consent for the Northampton Gateway Rail Freight Interchange

**1. Introduction**

- 1.1 I am wholly supportive of the Government's aim in encouraging a modal shift of freight from road to rail, which is a key aspect of our transport policy.
- 1.2 I am also aware that with effective implementation this modal shift can result in a reduction of carbon emissions, shorter and more efficient journeys, and fewer road casualties, amongst other clear benefits.
- 1.3 The delivery of a national network of Strategic Rail Freight Interchanges (SRFIs) forms a key part of recognising this aim, and the criteria for SRFIs are set out in the National Policy Statement for National Networks (NPSNN).
- 1.4 It is absolutely vital that the distribution of individual SRFIs supports the establishment of this national network, and that specific proposals are suitable for the local area including, but not limited to:
  - a) strategic site location;
  - b) rail and road capacity, including vehicle movements and congestion;
  - c) supporting new businesses;
  - d) availability of a local workforce;
  - e) air pollution.
- 1.5 The suitability of any one proposal for an SRFI is open to scrutiny; particularly whether the criteria set out in the NPSNN is met, and if the economic and environmental benefits of the development outweigh the impact on local residents, namely my constituents.
- 1.6 My constituents, many hundreds of whom have contacted me since the Northampton Gateway proposal was first brought forward, have significant and substantial concerns about the viability and suitability of the applicant's SRFI, Northampton Gateway.
- 1.7 These concerns have been reflected in the number of written questions and requests for information that have been set out by the Examining Authority in ExQ1; 270 questions across 84 pages, the majority of which are directed toward the applicant.
- 1.8 For comparison, when Roxhill (Kegworth) Limited's East Midlands Gateway Rail Freight Interchange was being examined by the Planning Inspectorate, the Examining Authority's First Written Questions amounted to a total of 98 across 27 pages.
- 1.9 It should also be noted that the Northampton Gateway proposal has received 848 Relevant Representations, whereas the East Midlands Gateway only received 311.
- 1.10 Clearly, the Examining Authority, local residents, parish councils and other local authorities, and other statutory and non-statutory consultees have concerns about the application, and the impact should a Development Consent Order be granted.



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## 2. Strategic Site Location

- 2.1 The NPSNN is clear that existing operational SRFIs and other intermodal RFIs are situated predominantly in the Midlands and the North,<sup>1</sup> and that SRFI capacity needs to be provided at a wide range of locations, to provide the flexibility needed to match the changing demands of the market.<sup>2</sup>
- 2.2 A clear need is also identified in the NPSNN for an expansion of the rail freight network in London and the South East, where most intermodal RFI and rail-connected warehousing is on a small scale and/or poorly located in relation to the main urban areas.<sup>3</sup>
- 2.3 Referring back to the Government's aim of achieving a modal shift in freight from road to rail, again, the NPSNN is clear that a network of SRFIs is needed across the regions, to serve regional, sub-regional and cross-regional markets.<sup>4</sup> The wider Government vision for the transport system as a driver of economic growth and social development stipulates that the rail network must provide for the transport of freight across the country, and to and from ports.<sup>5</sup>
- 2.4 Whilst the NPSNN is clear that the enhanced connectivity provided by a network of SRFIs should, in turn, provide improved trading links with our European neighbours and improved international connectivity and enhanced port growth,<sup>6</sup> it is also important to consider the evolving global trading links with new international partners as a result of opportunities presented through the UK leaving the European Union, and the movement of goods through other ports.
- 2.5 In the East Midlands, there is around 39m sq. ft. of SRFI-related warehousing either completed, under construction, or under consideration.
- 2.6 This includes the Daventry International Rail Freight Terminal (DIRFT) and its expansions, the East Midlands Gateway Rail Freight Interchange, the East Midlands Intermodal Park, the Hinckley National Rail Freight Interchange, the Rail Central Strategic Rail Freight Interchange, as well as Northampton Gateway.
- 2.7 It is unclear whether further SRFI capacity in the East Midlands is required, and whether it would be compliant with the NPSNN in that such sites should be provided at a wide range of locations, and that the need is for an expanded network of large SRFIs across the regions to accommodate the long-term growth in rail freight.<sup>7</sup>

<sup>1</sup> 2.57 | Government's Policy for Addressing Need for SRFIs | NPSNN | December 2014

<sup>2</sup> 2.58 | Government's Policy for Addressing Need for SRFIs | NPSNN | December 2014

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

<sup>4</sup> 2.54 | Government's Policy for Addressing Need for SRFIs | NPSNN | December 2014

<sup>5</sup> 2.29 | Importance of the National Rail Network | NPSNN | December 2014

<sup>6</sup> 2.54 | Government's Policy for Addressing Need for SRFIs | NPSNN | December 2014

<sup>7</sup> 2.50 | Drivers of Need for Strategic Rail Freight Interchanges | NPSNN | December 2014



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- 2.8 I note that, in ExQ1.0.19 the Examining Authority has asked the applicant to respond to the need for Northampton Gateway, given the above points and those made in other Relevant Representations and oral submissions at the Open Floor Hearing on the 10<sup>th</sup> October.<sup>8</sup> I welcome this question from the Examining Authority.
- 2.9 I also note that in the same question the Examining Authority has invited the district planning authorities to comment on the role of demand and need in the consideration of the application and the NPSNN. From discussions with Dr Andrew Gough, an Associate Professor in Operations Management and Logistics at the University of Northampton who is submitting his own Written Representation, I understand that the Northampton Gateway proposal represents an over-provision of rail-connected warehousing of around 145 per cent, compared to the forecasts of need that have been published by Network Rail. I would therefore welcome the Examining Authority seeking comments on this point from Network Rail, in addition to those of the applicant and the district planning authorities.

### **3. Rail and Road Capacity**

- 3.1 Following meetings and correspondence with Network Rail, I remain unconvinced that it has been adequately demonstrated that there is sufficient available freight capacity on the West Coast Main Line (WCML) to allow for the additional minimum four freight paths per day required by the NPSNN.<sup>9</sup>
- 3.2 In ExQ1.11.11, the Examining Authority has asked for clarification on what further detailed rail capacity studies the applicant has undertaken.<sup>10</sup> This is a fundamental point on whether the site is or is not viable.
- 3.3 In ExQ1.11.13, the Examining Authority outlines the requirement that the SRFI must be capable of handling at least 4 goods trains per day, although there is no compulsion for rail to be used despite the construction of a rail terminal and rail-connected warehousing.<sup>11</sup> I would welcome clarification on what guarantees there are that Northampton Gateway would not become a road-based warehousing facility.
- 3.4 This is referred to in ExQ1.0.5 where the Examining Authority makes clear that earlier designs showed a greater percentage of warehousing being directly connected to rail, but this has reduced to only around 60 per cent in the current proposal.<sup>12</sup> The NPSNN states that whilst it is not essential for *all* buildings on the site to be rail-connected from the outset, a significant element should be.<sup>13</sup> The wording here in the NPSNN would suggest that *all* buildings should *eventually* be rail-connected.

<sup>8</sup> ExQ1.0.19 | General and Cross-Topic Questions | Examining Authority's Written Questions | October 2018

<sup>9</sup> 4.89 | Scale and Design | NPSNN | December 2014

<sup>10</sup> ExQ1.11.11 | Transportation, Traffic and Rail | Examining Authority's Written Questions | October 2018

<sup>11</sup> ExQ1.11.13 | Transportation, Traffic and Rail | Examining Authority's Written Questions | October 2018

<sup>12</sup> ExQ1.0.5 | General and Cross-Topic Questions | Examining Authority's Written Questions | October 2018

<sup>13</sup> 4.88 | Scale and Design | NPSNN | December 2014



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- 3.5 It would be unacceptable should the requisite four freight paths be delivered via the reallocation of existing freight paths from nearby sites to Northampton Gateway. The NPSNN is clear that new rail freight interchanges should attract substantial businesses that are new to rail.<sup>14</sup> The NPSNN also states that four freight paths is a minimum and SRFIs should be capable of increasing the number of trains handled.<sup>15</sup> This is referred to in ExQ1.0.6 in which the Examining Authority makes clear that moving the existing GRS business located in Northampton would be *merely* a transfer of rail paths, rather than attracting new business to Northampton Gateway.<sup>16</sup>
- 3.6 In ExQ1.11.12, the Examining Authority acknowledges the applicant's position that rail freight capacity will be boosted by the opening of High Speed Two (HS2).<sup>17</sup> However, Development Consent Orders are not granted on speculative futurity of network capacity, and it must be demonstrated that Northampton Gateway will meet the requirements for the minimum freight paths from day one of the site's operation. What would happen if, for whatever reason, the construction and/or operation of HS2 were delayed?
- 3.7 I would note that the Department for Transport has stated that it is not possible to accurately forecast the number of available freight paths on the WCML post-2026, when HS2 Phase One is due to open, as DIRFT and other existing SRFIs will be bidding on that capacity as their need continues to grow. Other passenger train operating companies and freight operating companies will be considering their requirements for train paths in the pre- and post-2026 period.
- 3.8 Further, the West Northamptonshire Joint Core Strategy (WNJCS) Local Plan (Part 1) states that access onto the fast WCML will remain challenging even after HS2. Consequently, it is considered that new rail freight interchanges in West Northamptonshire, in addition to DIRFT, would not be deliverable within this plan period (up to 2029).<sup>18</sup>
- 3.9 In ExQ1.11.15, the Examining Authority highlights concerns in other Relevant Representations that an increase in rail freight paths locally might have an adverse effect on the future growth of passenger traffic.<sup>19</sup> Northamptonshire County Council has outlined in its Northamptonshire Rail Strategy that released capacity on the WCML should be used to improve the frequency and journey times of trains serving Northamptonshire stations,<sup>20</sup> with additional peak commuter services to match capacity particularly at Northampton station.<sup>21</sup> The Department for Transport has previously indicated that this would be the case for future capacity on the WCML.

<sup>14</sup> 2.50 | Drivers of Need for Strategic Rail Freight Interchanges | NPSNN | December 2014

<sup>15</sup> 4.89 | Scale and Design | NPSNN | December 2014

<sup>16</sup> ExQ1.0.6 | General and Cross-Topic Questions | Examining Authority's Written Questions | October 2018

<sup>17</sup> ExQ1.11.12 | Transportation, Traffic and Rail | Examining Authority's Written Questions | October 2018

<sup>18</sup> 5.72 | Warehousing | West Northamptonshire Joint Core Strategy Local Plan (Part 1) | December 2014

<sup>19</sup> ExQ1.11.15 | Transportation, Traffic and Rail | Examining Authority's Written Questions | October 2018

<sup>20</sup> Policy Rail 3 | Service Improvements | Northamptonshire Rail Strategy – Fit For Purpose | January 2013

<sup>21</sup> Policy Rail 7 | West Coast Main Line | Northamptonshire Rail Strategy – Fit For Purpose | January 2013



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- 3.10 In ExQ1.11.35, the Examining Authority requests that Network Rail provide a detailed explanation of the capacity of the rail network to support the applicant's SRFI proposal, specifically including the wider rail network beyond the WCML and the Northampton Loop Line, as well as the anticipated demand for freight paths and passenger paths from existing, consented and proposed developments.<sup>22</sup> I very much welcome this question, which encompasses most of the points I have made in 3.1 through 3.9.
- 3.11 Turning to road capacity, Table 12.9 in Chapter 12 of the applicant's Environmental Statement (Transportation) outlined the anticipated off-site vehicle trips for the Northampton Gateway SRFI if their travel plan is enacted. This assumes total daily journeys of 14,116 vehicles comprised of 4,245 HGVs and 9,871 light vehicles.<sup>23</sup>
- 3.12 Residents are extremely concerned about the impact that these additional 14,116 vehicles will have on the local road network, and that traffic will be constant throughout the site's 24-hour operation. Only for three one-hour periods will the vehicle movements be below 200 per hour (150 vehicles from 1am to 2am; 180 vehicles from 3am to 4am; and 155 vehicles from 11pm to 12am). Peak traffic movements occur between 5am and 6am when an additional 1,294 vehicles will be on the roads; the two next highest frequency movements occur across the evening rush hour with 1,096 additional vehicles from 5pm to 6pm, and a further 1,037 vehicles from 6pm to 7pm.<sup>24</sup>
- 3.13 The total of 14,116 vehicle movements assumes a single occupancy car target of 73.6 per cent. It is stated that the applicant's travel plan includes the target of reducing reliance on the private car by 20 per cent from the baseline, and that this will be achieved through a Public Transport Strategy and the promotion of car sharing, cycling and walking schemes.<sup>25</sup> However, the requirement from Northamptonshire County Council is only to include a target; what enforcement mechanism is available to ensure the applicant achieves this reduction?
- 3.14 It is not unreasonable to assume that, absent any enforcement mechanism, the total daily vehicle movements could be much closer to those of the Swan Valley baseline which has a single occupancy car driver usage rate of 92 per cent, car passenger modal share of 5 per cent, and low pedestrian and cycle usage of 3 per cent.<sup>26</sup>
- 3.15 As shown in Table 8, this would be 17,657 total daily person trips with substantially increased numbers at peak hours and in the early morning, to a peak of 1,701 vehicles between 5am and 6am, and 1,393 vehicles between 5pm and 6pm.<sup>27</sup>

<sup>22</sup> ExQ1.11.35 | Transportation, Traffic and Rail | Examining Authority's Written Questions | October 2018

<sup>23</sup> Table 12.9 | Chapter 12 – Transportation | Environmental Statement | June 2018

<sup>24</sup> Table 9 | TN2 – Trip Generation | Transport Assessment | Environmental Statement Appendix 12.1 | June 2018

<sup>25</sup> 9.1 | TN2 – Trip Generation | Transport Assessment | Environmental Statement Appendix 12.1 | June 2018

<sup>26</sup> 5.8 | TN2 – Trip Generation | Transport Assessment | Environmental Statement Appendix 12.1 | June 2018

<sup>27</sup> Table 8 | TN2 – Trip Generation | Transport Assessment | Environmental Statement Appendix 12.1 | June 2018



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- 3.16 My constituents believe the impact of this volume of additional site traffic on the local road network, in particular the A508 and A45, would negate the potential benefits that an SRFI could bring. This impact is exacerbated by the unexpected closure of other roads used by HGVs and commuter traffic which can affect the A43, A5 and minor roads as traffic diverts through the local villages. This could have a substantial impact on communities like Towcester, Shutlanger, Stoke Bruerne, Blisworth, Milton Malsor, Quinton, Hartwell and others further afield.
- 3.17 My understanding is that the proposed access would require all HGV traffic leaving the site to use the M1 northbound and southbound, or east on the A45, but in no circumstances the A508 via Roade, unless there is an official diversion route in force (presumably when the M1 is closed); this would be supported by Automatic Number Plate Recognition and other enforcement methods.<sup>28 29</sup>
- a) Given that the M1 closes with unusual frequency, what provisions are being made to ensure that the A508 through Roade and beyond can handle the volume of HGV traffic should an official diversion route be in force, and what impact will this have on communities along the A508 and wider road network?
  - b) Additionally, ExQ1.11.6 and ExQ1.11.25 only refer to HGV traffic leaving the SRFI site; what about HGV traffic arriving at the site? Can these vehicles access the site via the A508 via Roade?
- 3.18 I am concerned that not enough consideration has been given to the cumulative effects from the proposed development and committed schemes, particularly on the local road network. Chapter 15 of the applicant's Environmental Statement (Cumulative Impacts) states that the main sites of relevance are the Bovis Homes Northampton South Sustainable Urban Extension at Collingtree; the Rail Central SRFI proposed by Ashfield Land; Highways England's 'Smart Motorways' programme (M1 motorway) – north and south of Junction 15 (13-16); and the Sustainable Urban Extension to the south of Brackmills.<sup>30</sup>
- 3.19 I note that the Examining Authority has raised concerns about missing information on cumulative impacts of other developments several times,<sup>31 32 33 34 35</sup> however no consideration appears to be given by the applicant to the cumulative impact of construction traffic for the Towcester Vale Southern Extension, HS2 Phase One, the expansion of housing at Brackley, the proposed Cambridge-Milton Keynes-Oxford corridor which will include the completion of the East West Rail Link by 2024, or the many other sub-regional proposed and committed development schemes.

<sup>28</sup> ExQ1.11.6 | Transportation, Traffic and Rail | Examining Authority's Written Questions | October 2018

<sup>29</sup> ExQ1.11.25 | Transportation, Traffic and Rail | Examining Authority's Written Questions | October 2018

<sup>30</sup> Matrix 1 | Chapter 15 – Cumulative Effects | Environmental Statement | June 2018

<sup>31</sup> ExQ1.0.7 | General and Cross-Topic Questions | Examining Authority's Written Questions | October 2018

<sup>32</sup> ExQ1.1.48 | Air Quality and Emissions | Examining Authority's Written Questions | October 2018

<sup>33</sup> ExQ1.8.23 | Noise and Vibration | Examining Authority's Written Questions | October 2018

<sup>34</sup> ExQ1.9.7 | Cumulative Impacts and Assessments | Examining Authority's Written Questions | October 2018

<sup>35</sup> ExQ1.12.8 | Water Environment | Examining Authority's Written Questions | October 2018



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- 3.20 It is reasonable to expect that many of the HGVs and other vehicles associated with these developments will use the same roads that the applicant is proposing to use for the construction and operation of their SRFI, and wider consideration must be given to the cumulative impact of all traffic movements on the local road networks.
- 3.21 I would ask that the Examining Authority requests the applicant to consider the cumulative impacts across a much wider area.

**4. Local Workforce**

- 4.1 I always welcome new employment opportunities for my constituents, but the reality is that local job numbers are already very strong; South Northamptonshire has very low levels of unemployment, with only 0.7 per cent of the economically active population claiming benefits.
- 4.2 The applicant's proposal would have the impact of creating significant daily journeys from workers travelling to the site from further afield, adding to traffic congestion on roads some considerable distance outside of the applicant's mitigation scoping area.
- 4.3 The NPSNN states that SRFIs can provide considerable benefits for the local economy, and that the availability of a suitable and economic local workforce will therefore be an important consideration for the applicant.<sup>36 37</sup>
- 4.4 Northampton Borough Council's Planning Committee has stated in its response to the applicant's statutory consultation that the proposed site was put forward for consideration as a strategic employment site as part of the consultation process for the WNJCS. The site was considered unsuitable for allocation at the time by reason of being located in the open countryside away from the existing urban area, which would conflict with the desire to provide good linkages between existing and new communities; it was considered contrary to the aims of promoting sustainable transport modes; there was concern regarding impacts on access to the M1 at Junction 15 and the strategic highway network; and the site was detached from the urban area and would represent a substantial extension of urban development into open countryside with potential impacts on landscape character.<sup>38</sup>
- 4.5 In ExQ1.10.5 and ExQ1.10.6, the Examining Authority highlights the need for clarification by the applicant on whether there is an adequate pool of workers, with the right levels of qualifications, and whether these workers will come from other existing businesses in the area rather than generating new employment.<sup>39 40</sup> I welcome both of these questions.

<sup>36</sup> 2.52 | Drivers of Need for Strategic Rail Freight Interchanges | NPSNN | December 2014

<sup>37</sup> 4.87 | Transport Links and Location Requirements | NPSNN | December 2014

<sup>38</sup> 6.1 | Consultation Response | Planning Committee Northampton Borough Council | November 2017

<sup>39</sup> ExQ1.10.5 | Socio-Economic Effects | Examining Authority's Written Questions | October 2018

<sup>40</sup> ExQ1.10.6 | Socio-Economic Effects | Examining Authority's Written Questions | October 2018





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**5. Air Pollution**

- 5.1 The UK has always led on improving air quality and reducing air pollution, and in 1997 became the first country in Europe to develop an air quality strategy.
- 5.2 The Department for Environment, Food & Rural Affairs is in the process of updating the current policy, and has recently held a consultation from 22<sup>nd</sup> May to 14<sup>th</sup> August this year on developing a new Clean Air Strategy.
- 5.3 This will outline UK air quality standards and policy objectives for reducing levels of health-threatening pollutants, including benzene, 1,3-butadiene, carbon monoxide, lead, nitrogen dioxide, particulate matter (PMs), sulphur dioxide, ground level ozone, and polycyclic aromatic hydrocarbons.
- 5.4 The *Air Quality Regulations 2000* and the *Local Air Quality Management Technical Guidance* provide a legal basis for some of the objectives, and local authorities must investigate the levels of pollution in their area, declaring an Air Quality Management Area (AQMA) if one of these legally-defined objectives is likely to be breached.<sup>41</sup>
- 5.5 Once an AQMA is declared, the local authority must develop an Action Plan.
- 5.6 The Northampton Gateway proposal is very close to two AQMAs established by Northampton Borough Council; Zone 1 (the M1 Corridor) and Zone 5 (the A45 London Road). The site is also not far from the AQMA established by South Northamptonshire District Council on the A5 Watling Street through Towcester.
- 5.7 In ExQ1.1.3, the Examining Authority is clear that the UK Government is very much focused on the implementation and compliance with the EU's *Air Quality Directive*, which became law in England via the *Air Quality Standards Regulations 2010*. Additionally, the *European Union (Withdrawal) Act 2018* has ensured that we have incorporated the whole body of the *acquis communautaire* into UK domestic law. I am pleased that the Examining Authority has asked the applicant to make clear whether Northampton Gateway would be in line with UK and international law.<sup>42</sup>
- 5.8 The requirement for the Secretary of State to be provided with a judgement on the risk as to whether the project would affect the UK's ability to comply with the *Air Quality Directive* is clearly set out in the NPSNN.<sup>43</sup> The NPSNN states that the Secretary of State should consider air quality impacts over the wider area likely to be affected, as well as in the near vicinity of the scheme. In all cases the Secretary of State must take account of relevant statutory air quality thresholds set out in domestic and European legislation.<sup>44</sup>

<sup>41</sup> Technical Guidance TG16 | Local Air Quality Management | DEFRA | February 2018

<sup>42</sup> ExQ1.1.3 | Air Quality and Emissions | Examining Authority's Written Questions | October 2018

<sup>43</sup> 5.9 | Air Quality | NPSNN | December 2014

<sup>44</sup> 5.10 | Air Quality | NPSNN | December 2014



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- 5.9 I welcome the questions set out by the Examining Authority in ExQ1.1.23 and ExQ1.1.30 regarding the use of local diffusion tubes, and seeking clarification from the applicant on why Air Quality Standards are not considered relevant for nearby residential properties.<sup>45 46</sup>
- 5.10 Rod Sellers, Chairman of the Stop Northampton Gateway local action group, has previously raised concerns about the air quality measurement processes being used by the local authorities and the applicant, through me as his constituency Member of Parliament, with the Department for Environment, Food & Rural Affairs. He was particularly concerned whether measurements from diffusion tubes could provide sufficiently accurate data for planning purposes, given that his understanding of current policy guidance is that these results should be regarded as indicative and then validated using continuous automatic monitoring.
- 5.11 The NPSNN states that the Secretary of State should refuse consent where, after taking into account mitigation, the air quality impacts of the scheme will: result in a zone/agglomeration which is currently reported as being compliant with the *Air Quality Directive* becoming non-compliant or; affect the ability of a non-compliant area to achieve compliance within the most recent timescales reported at the time of the decision.<sup>47</sup>

## 6. Other Matters

- 6.1 I know that many residents remain concerned that the proposals will cause substantial visual blight for the communities surrounding the site, given the height of the buildings and the gantries, and that the bunding and other environmental mitigations are not enough to mitigate the impact on their local area.
- 6.2 The site is a greenfield site, situated between the villages of Blisworth, Collingtree and Milton Malsor in rural Northamptonshire. No amount of mitigation, landscaping or environmental bunding would fully compensate for the loss of open green space.
- 6.3 The light pollution generated through the site's night-time operations will create considerable disturbance, and residents are unconvinced that adequate assessments have been undertaken to establish a baseline for existing light pollution in the area from all surrounding vantage points, and that the Lighting Strategy is therefore inadequate. Figure A11.2.1 demonstrates that no night time view locations have been included from Collingtree toward the proposed site,<sup>48</sup> and the external lighting baseline survey has only been conducted on one night on the 8<sup>th</sup> March 2017, when the moon was 85 per cent full.<sup>49</sup>

<sup>45</sup> ExQ1.1.23 | Air Quality and Emissions | Examining Authority's Written Questions | October 2018

<sup>46</sup> ExQ1.1.30 | Air Quality and Emissions | Examining Authority's Written Questions | October 2018

<sup>47</sup> 5.13 | Air Quality | NPSNN | December 2014

<sup>48</sup> Figure A11.2.1 | External Lighting Baseline Survey | Environmental Statement Appendix 11.2 | June 2018

<sup>49</sup> A11.2.1 | External Lighting Baseline Survey | Environmental Statement Appendix 11.2 | June 2018

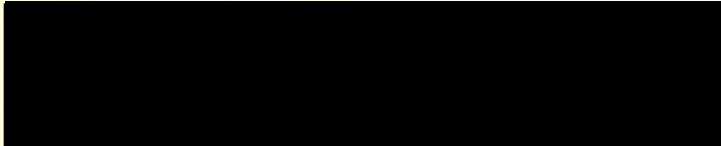


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- 6.4 Residents are also concerned about the loss of a number of locally-important mature trees, and I am aware that this has been raised in ExQ1.2.6 by the Examining Authority.<sup>50</sup>

**7. Conclusion**

- 7.1 I confirm that I have provided this Written Representation as the Member of Parliament for South Northamptonshire, on behalf of the many constituents who have contacted me to raise their significant and substantial concerns about the applicant's proposal to develop the Northampton Gateway SRFI.
- 7.2 I am grateful to the Examining Authority, Philip Asquith and David Brock, for their consideration of the points included in my Written Representation, and the Written Representations of my constituents, local authorities, parish councils, and others.
- 7.3 I would be happy to elaborate on any of the points I have made should it be helpful, and will be providing a separate summary of this Written Representation.
- 7.4 I also intend to submit a notification to attend an Accompanied Site Visit, and a notification of my wish to speak at a subsequent Open Floor Hearing.

  
The Rt Hon. Andrea Leadsom MP  
Member of Parliament for South Northamptonshire  
22<sup>nd</sup> October 2018

<sup>50</sup> ExQ1.2.6 | Biodiversity, Ecology & Environment | Examining Authority's Written Questions | October 2018



HOUSE OF COMMONS

LONDON SW1A 0AA

Mr Philip Asquith  
Lead Member of the Examining Authority  
National Infrastructure Planning  
The Planning Inspectorate  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Your Ref: TR050006

Our Ref: AL/TG/1810

29<sup>th</sup> October 2018

Dear Mr Asquith,

**Re: Application by Roxhill (Junction 15) Limited for an Order Granting Development Consent for the Northampton Gateway Rail Freight Interchange**

Further to my letter to you of the 22<sup>nd</sup> October which included my Written Representation relating to the above application that you are considering, along with David Brock, as the Examining Authority appointed by the Secretary of State, I am writing to you separately to summarise my submission as required by the Rule 8 Letter.

All of the issues that I raised and points that I made in my Written Representation were done in my capacity as the elected Member of Parliament for South Northamptonshire, and on behalf of the hundreds of my constituents who have put their significant and substantial concerns about the applicant's proposal to me over many months.

In brief, I am wholly supportive of the Government's policy of a modal shift of freight from road to rail, and in the delivery of a national network of Strategic Rail Freight Interchanges (SRFIs). However, these SRFIs must be compliant with the National Policy Statement for National Networks (NPSNN), and sited to truly allow a modal shift to occur and for the establishment of a national network, not merely to facilitate development on land options owned by the applicant. There must also be demonstrated a clear need and demand for additional SRFIs in a particular area, rather than "build it and see".

The strategic and local road networks in an area must be proven to cope with the inevitable increase in HGVs and other associated vehicles, not just on a day when the networks are operating as they should but also in the event of the closure of one of the main access routes.

*Member of Parliament for South Northamptonshire*



The rail network must also be proven to be able to substantiate the applicant's claims that the requisite minimum four freight paths are available, that these freight paths represent the addition of new business and new workers to the area rather than a relocation from nearby sites, and that the network has the capacity to accommodate a growth in freight paths beyond the minimum of four as the SRFI is built.

There must be a suitable workforce available locally that does not have to be brought in from outside of the immediate area, as if this were the case it would add further substantial pressures to the road networks across the region.

The site has previously been identified as unsuitable for allocation for employment.

There are significant concerns about air pollution locally, particularly given the three AQMAs nearby.

I confirm that I am submitting this letter as a summary of my Written Representation.

With best wishes,

A solid black rectangular box redacting the signature of the Member of Parliament.

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



HOUSE OF COMMONS

LONDON SW1A 0AA

Graham Pardoe  
Senior Development Director  
Roxhill Developments Ltd  
Lumonics House  
Valley Drive  
Swift Valley  
Rugby  
CV21 1TQ

9<sup>th</sup> January 2017

Ref: AL/TG/1701

**Re: Initial Project Information Consultation**

I write on behalf of my constituents who are directly and specially affected by the proposals to develop a Strategic Rail Freight Interchange (SRFI), Northampton Gateway, in my constituency of South Northamptonshire. The majority of these constituents are in Collingtree, Blisworth, Roade, Courteenhall and Grange Park however I have also received concerns from residents of other communities further afield.

I am responding to and engaging with this non-statutory initial project information consultation as the Member of Parliament for South Northamptonshire and any and all comments I make on this application are made solely in that capacity, representing the views of my constituents.

My constituents are grateful that Roxhill has engaged in additional non-statutory consultation phases, however there are a number of immediate concerns that I should like to raise with you on their behalf. At our meeting in early February I hope that you will be able to provide me with additional information and answers to these points ahead of a subsequent public meeting that I intend to hold for local residents in conjunction with Roade Parish Council.

Whilst I am supportive of Government policy to develop SRFIs to maximise the economic, environmental and social benefits of a modal shift in freight from road to rail, it is important to ensure that there is the workforce and housing availability in the local area as well as the track capacity on the rail network. If these conditions are not met, then the viability of a particular SRFI proposal in any one location would be called into question.

The strategic case for developing High Speed Two (HS2) was centred around the need for increased capacity on the West Coast Main Line (WCML)<sup>1</sup>, and the current growth rates for that part of the route network forecast that there will be a severe problem by the mid-2020s.

<sup>1</sup> HS2 Ltd | Strategic Case for HS2 | October 2013

[www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/260525/strategic-case.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/260525/strategic-case.pdf)

*Member of Parliament for South Northamptonshire*



HOUSE OF COMMONS

LONDON SW1A 0AA

Northampton Gateway SRFI  
PO Box 10570  
Nottingham  
NG2 9RG

19<sup>th</sup> November 2017

Ref: AL/TG/1711

**Re: Stage 2 Public Consultation**

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

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

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

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

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

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

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

## **Strategic Location**

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

However, the NPSNN also states that existing operational SRFIs and other intermodal RFIs are situated predominantly in the Midlands and the North<sup>3</sup>, and that SRFI capacity needs to be provided at a wide range of locations, to provide the flexibility needed to match the changing demands of the market<sup>4</sup>.

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

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

## **Rail Capacity & Feasibility**

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

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

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

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

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

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

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



The Department for Transport has stated that it is not possible to accurately forecast the number of available freight paths on the West Coast Main Line post-2026, when High Speed (HS2) Phase One is due to open, as DIRFT and other existing SRFIs will be bidding on that capacity as their need continues to grow. Other passenger service companies and freight operating companies will be considering their requirements for train paths in the pre- and post-2026 period. DCOs are not granted on speculative futurity, and it must be demonstrated that there is current available capacity on the West Coast Main Line for the requisite minimum four freight paths per day for an SRFI application to meet the NPSNN criteria.

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

### **Impact on Local Roads**

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

Residents are extremely concerned about the impact that these additional 14,116 vehicles will have on the local road network, and that traffic will be constant throughout the site's 24-hour operation. Only for three one-hour periods will the vehicle movements be below 200 per hour (150 vehicles from 1am to 2am; 180 vehicles from 3am to 4am; and 155 vehicles from 11pm to 12am). Peak traffic movements occur between 5am and 6am when an additional 1,294 vehicles will be on the roads; the two next highest frequency movements occur across the evening rush hour with 1,096 additional vehicles from 5pm-6pm, and a further 1,037 vehicles from 6pm-7pm.

My constituents believe the impact of this volume of additional site traffic on the local road network, in particular the A508 and A45, would negate the potential benefits that an SRFI could bring. This impact is exacerbated, as we have seen in recent weeks with the M1, by the unexpected closure of other roads used by HGVs and commuter traffic which can affect the A43, A5 and minor roads through the local villages. This could have a substantial impact on communities like Towcester, Shutlanger, Stoke Bruerne, Blisworth, Milton Malsor, Quinton, Hartwell and others further afield.

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

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

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

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

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

No consideration appears to be given to the cumulative impact of construction traffic for the Towcester Vale Southern Extension, HS2 Phase One (particularly when the A43 closes so the road can be lifted to allow the high-speed line to pass underneath), the expansion of housing at Brackley, the proposed Cambridge-Milton Keynes-Oxford corridor which will include the completion of the East West Rail Link by 2024, or the many other sub-regional proposed and committed development schemes.

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

### **Employment and Local Workforce**

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

### **General Site Concerns**

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

Northampton Borough Council's Planning Committee has stated in its response to Roxhill's statutory consultation that the proposed site was put forward for consideration as a strategic employment site as part of the consultation process for the West Northamptonshire Joint Core Strategy.

The site was considered unsuitable for allocation at the time by reason of being located in the open countryside away from the existing urban area, which would conflict with the desire to provide good linkages between existing and new communities; it was considered contrary to the aims of promoting sustainable transport modes; concern regarding impacts on access to the M1 at Junction 15 and the strategic highway network; and the site was detached from the urban area and would represent a substantial extension of urban development into open countryside with potential impacts on landscape character<sup>13</sup>.

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

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

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

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

The West Northamptonshire Joint Core Strategy Local Plan (Part 1) states that access onto the fast West Coast Main Line will remain challenging even after HS2. Consequently, it is considered that new rail freight interchanges in West Northamptonshire, in addition to DIRFT, would not be deliverable within this plan period (up to 2029)<sup>14</sup>.


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

### **Other Matters**

In addition to the above points, my constituents are concerned that the proposals will cause substantial visual blight for the communities surrounding the site, given the height of the buildings and the gantries, and that the bunding and other environmental mitigations are not enough to mitigate the impact on their local area.

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

With best wishes,

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

Cc: Planning Inspectorate

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



Virgin Trains and London Midland have indicated that they would have an interest in operating additional passenger services on the WCML, so it is unclear exactly how much spare track capacity there would be for more freight paths once Phase One of HS2 is operational.

In addition to the demand for an increase in passenger services from the franchised train operating companies, there is an existing SRFI – Daventry International Rail Freight Terminal (DIRFT) – just 20 miles up the M1 at the junctions between the motorway, the A5 and the A428. DIRFT is currently undergoing its second expansion, DIRFTIII, and this is not anticipated to be completed until the mid-2030s.

You are of course aware that Ashfield Land has put forward a rival proposal, Rail Central, on the other side of the Northampton Loop Line between Blisworth and Milton Malsor, adjacent to the WCML. The second phase of their public consultation process is due to begin this spring.

Given the expanding rail-connected warehousing capacity being delivered at DIRFT and its growing demands on the route network for increased WCML freight paths, my constituents have questioned the necessity and feasibility of one additional SRFI in the local area, let alone two.

Rail Central and Northampton Gateway would add 8 million sq. ft. and 5 million sq. ft. of warehousing respectively. My constituents have queried whether Northampton Gateway would be similar to Roxhill's East Midlands Gateway SRFI in being rail-served, with freight transported by road-based tractors from the track to the warehouse, or if it would be rail-connected as with DIRFT.

Government policy on SRFIs states that '*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*'<sup>2</sup>. My constituents would like information on how many trains Northampton Gateway proposes to handle per day as well as the daily volume of freight expected to be moved.

A number of my constituents have also pointed out that Northampton Gateway is scheduled to open two years prior to the anticipated completion of Phase One of HS2, and that the freight paths would therefore not be available. I raised this directly with Network Rail in December.

Local residents, particularly those with experience of Rail Central and who are knowledgeable about SRFIs, have asked why no alternative sites to Northampton Gateway appear to have been considered. Alternative site assessments are referred to obliquely by Roxhill in clause 1.2.3 of their Environmental Statement Scoping Report: '*the ES will include information as set out in the Schedule 4 of the 2009 Regulations*'<sup>3</sup>.

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<sup>2</sup> Department for Transport | Strategic Rail Freight Interchange Policy Guidance | November 2011

[www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/4377/strategic-rail-freight-interchange.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/4377/strategic-rail-freight-interchange.pdf)

<sup>3</sup> Roxhill | Environmental Statement Scoping Report | October 2016

[www.northampton-gateway.co.uk/downloads/scoping\\_report.pdf](http://www.northampton-gateway.co.uk/downloads/scoping_report.pdf)



The *Environmental Impact Assessment Regulations 2009* require 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<sup>4</sup>. My understanding of Ashfield Land's ES Scoping Report for Rail Central is that the Secretary of State for Transport welcomed '*the applicant's intention to present the alternatives considered and the reasons for selecting the preferred option*'<sup>5</sup>.

There is a strength of feeling amongst my constituents that the local community would have benefitted from Roxhill expanding on their process for identifying alternative sites ahead of this phase of the consultation. My constituents and I look forward to seeing details of the alternative site assessment for Northampton Gateway as soon as possible.

My constituents also have concerns around availability of local labour, traffic movements, and the consultation process itself.

South Northamptonshire has the 616<sup>th</sup> lowest claimant rate in the country – 0.7 per cent – and there are not enough people in the local area looking for work to justify such a large-scale development. The workers to fill the jobs that Northampton Gateway would create would have to travel to the site from further afield, and Roxhill has confirmed to my constituents at a public consultation event that this is an area that could extend as far away as Coventry or Leicester. A key aim of the national SRFI policy is to reduce the environmental impact of freight movements by a modal shift from road to rail; my constituents are concerned that this would be undermined by an increase in non-freight traffic from commuting workers.

Our area is undergoing significant development over the next ten years. I have already mentioned the construction of HS2; there is also the expansion of Towcester through the Towcester South Sustainable Urban Extension, an increase in housing provision in Brackley, and other planning proposals across South Northamptonshire. These are all to meet existing housing pressures. All of these developments will require HGVs to access the primary route network and other trunk roads. The M1, A43 and A5 are already brought to a standstill whenever a major incident occurs; additional HGV traffic serving a SRFI would severely impact the capacity of local roads.

Northamptonshire County Council's Northampton Town Transport Strategy aims, with the support of Northamptonshire Highways and Highways England, to address traffic flow problems in the local area<sup>6</sup>. Sustainable transport choices and reducing carbon through tackling congestion are key parts of their policy, and my constituents do not believe the Northampton Gateway proposal is aligned with these priorities.

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<sup>4</sup> Department for Transport | National Policy Statement for National Networks | December 2014

[www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/387222/npsnn-print.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/387222/npsnn-print.pdf)

<sup>5</sup> The Planning Inspectorate | Environmental Statement Scoping Opinion | January 2016

[www.railcentral.com/site/assets/files/1041/scoping\\_opinion.pdf](http://www.railcentral.com/site/assets/files/1041/scoping_opinion.pdf)

<sup>6</sup> Northamptonshire County Council | Northampton Town Transport Strategy | January 2013

[www3.northamptonshire.gov.uk/councilservices/northamptonshire-highways/transport-plans-and-policies/Documents/Northampton%20Town%20Transport%20Strategy.pdf](http://www3.northamptonshire.gov.uk/councilservices/northamptonshire-highways/transport-plans-and-policies/Documents/Northampton%20Town%20Transport%20Strategy.pdf)



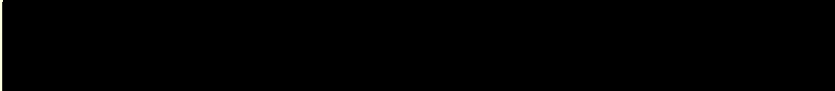
My constituents are concerned that public consultation events to date have been inadequate. Whereas Ashfield Land held events in five locations on eight different days (including weekends), Roxhill's consultations have been in one location on three days during the working week. This prevented many people who have an interest in the proposals from being able to attend or ask questions of the developers. I had the opportunity on Saturday 21<sup>st</sup> May to go to one of Ashfield Land's events in Blisworth, and I was disappointed to have been unable to come to one with Roxhill due to my parliamentary commitments in the House of Commons.

I am broadly supportive of Roxhill's suggestion to develop a bypass for Roade as part of their application. Many of my constituents have over the years spoken to me about the need to reroute the A508, reducing traffic and relieving congestion in the centre of the village.

However local residents are not convinced that the proposed single carriageway route would be beneficial, and it may be that Roxhill needs to consult more widely on the design and suitability of their proposed route. There are very specific concerns that the bypass would lead to a further loss of the green belt and allow infilling of the land between the road and existing properties.

Thank you for allowing my constituents and me the opportunity to provide you with some initial feedback on your proposals through this non-statutory phase of your consultation process. The views that I have put to you are representative of those that I have received from people in the area and across South Northamptonshire, and I look forward to your response on their behalf.

With best wishes,

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