

2 November 2022

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Dear Sir or Madam,

Land on the North East of J10 M42 Dordon/A5 (Ref: PAP/2021/0663)

I write in relation to the above planning application at Land on the North East of J10 M42 Dordon/A5, which is located in close proximity to the Birmingham Intermodal Freight Terminal (“BIFT”) and Hams Hall Rail Freight Terminal (“HHRFT”).

Rail Freight Group

Rail Freight Group (RFG) is the representative body for rail freight in the UK, and we campaign for a greater use of rail freight, to deliver environmental and economic benefits across the UK. We have over 100 member companies including rail freight operators, logistics companies, ports and equipment suppliers, as well as retailers, construction companies and support services.

Benefits of rail freight

Rail freight benefits society as a whole by reducing harmful emissions and congestion, providing high quality jobs, and helping many regions of the UK to prosper. It also offers many commercial advantages to its customers, including reliability, speed and cost-effectiveness.

Reliability and Speed – rail freight operators achieve 97% reliability on the premium services they run for retailers and, in general, rail freight can match or better road freight for reliability.

Cost-effective – rail freight companies’ continued investment is reducing costs for customers. Modern freight trains achieve higher speeds and heavier payloads as investment in UK rolling stock increases, with tonnage per train up by 80% in the last decade.

Environmental Benefits – rail freight reduces CO2 emissions by up to 76% compared to road, helping mitigate the effects of transport emissions on global warming – an increasingly important driver of rail freight uptake as corporations aim to meet Net Zero Carbon targets.

Improved Air Quality – rail produces up to 10 times less small particulate matter than road haulage and as much as 15 times less nitrogen oxide for the equivalent mass hauled.

Reduced Congestion – each freight train can remove up to 76 lorries from the roads, resulting in 1.6 billion fewer HGV kilometres every year nationally.

Supporting Regional Growth – of the 5,000+ people employed by the freight industry, more than 80% are employed outside the south east of England. Rail freight is also vital for the economic prosperity of ports, power stations, production centres and retail centres across the country.


Proposals at Land on the North East of J10 M42 Dordon/A5 in a national context

We note that the specific locational requirements of the freight / supply chain sector and the importance of focusing growth close to rail freight terminals is acknowledged in national planning policy¹, as well as several recent policy documents published by the Department of Transport (DfT)². In this context, 'suitably accessible locations'³ means as physically close to rail freight infrastructure as possible, in order to maximise future uptake and deliver the consequential benefits to society outlined above.

The application site is strategically located close to BIFT (c. 0.5 mi). We are aware that the application proposals therefore have the potential to be classed as 'rail-served' due to their close proximity to BIFT, effectively extending the rail linked warehousing onsite enabling more users to benefit directly from the rail terminal. We are also aware that BIFT has significant capacity for growth in the future. The proposed site is also close to HHRFT (c. 9 mi) with good trunk road links. It is therefore exceptionally well located in the West Midlands to facilitate the aims of national policy in relation to encouraging rail freight use and decarbonising transport.

We are therefore supportive the proposed development at Land on the North East of J10 M42 Dordon/A5 (Ref: PAP/2021/0663), which aligns with national policy support for the increased use of rail freight as well as our own initiatives and campaigns.

Yours sincerely,



Maggie Simpson OBE
Director General

¹ National Planning Policy Framework (NPPF) paragraphs 83 and 106.

² Future of Freight: a long-term plan; Decarbonising Transport: A Better, Greener Britain; and Great British Railways: The Williams-Shapps Plan for Rail; to name but a few.

³ NPPF paragraph 83