

PLANNING ACT 2008

INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

APPLICATION FOR THE WEST MIDLANDS INTERCHANGE DEVELOPMENT CONSENT ORDER
(Reference TR050005)

RESPONSE TO EXAMINING AUTHORITY'S SECOND WRITTEN QUESTIONS OF
NETWORK RAIL INFRASTRUCTURE LIMITED

5 July 2019

The Responses to the Examining Authority's Second Written Questions of Network Rail Infrastructure Limited (**Network Rail**) are contained in the following table:

2.2.10	<p>In its Wrong Location Report [REP2-167], Stop WMI Community Group refers to the National Infrastructure Commission's Future of Freight Report, December 2018. Section 15 of the Group's Deadline 3 submission also refers to this report and to other newly published documents that it suggests call into question the need for the proposed SRFI.</p> <p>(i) Can the applicant and NR please set out their comments as to relevance of the NIC report to the consideration of either the need for a SRFI to serve the BC and South Staffordshire or the suitability of the Four Ashes location for such a facility?</p> <p>(ii) Can the applicant comment on the relevance of the other recent publications mentioned by the Group to the consideration of either the need for a SRFI to serve the BC and South Staffordshire or the suitability of the Four Ashes location for such a facility?</p>
Network Rail's response:	<p>The National Infrastructure Commission's Future of Freight Report, December 2018 underlines the importance of a shift to rail and de-carbonising freight. The only practicable way to reduce carbon emissions for Great Britain bulk freight is to shift it to rail.</p> <p>Network Rail's Head of Freight Development has confirmed there is a need for sites to host the additional maritime intermodal traffic that Network Rail's Strategic Freight Network (SFN) enhancements unlock. This envisages 10 additional trains per day originating from Felixstowe and a similar quantity of additional containers through longer trains from Southampton together with organic growth from London Gateway and eastern seaboard feeder ports.</p> <p>Without a coherent network of SRFIs there will not be growth in the domestic intermodal sector; the single biggest opportunity for modal shift being inter-DC trunk haul moves (along the lines of Tesco & ASDA today).</p> <p>Moreover, Network Rail is witnessing an emerging market demand for express freight operations, such rail campus located warehousing dispatches smaller consignments for transit on 90-110mph units direct to urban centres. Again Network Rail believes SRFIs are critical to enabling this modal shift.</p>
2.2.12	<p>In its Wrong Location Report [REP2-167], Stop WMI Community Group states that "nowhere in the Ten-T Regulations is an intermodal hub mentioned or recommended for our area.</p> <p>(i) Can Stop WMI Group provide any examples of existing or proposed road/rail intermodal SRFI that are mentioned in those Regulations?</p>

	<p>(ii) Can the applicant and NR comment on that suggested omission and what significance this might have for consideration of the need for a SRFI to serve the BC and South Staffordshire or the suitability of the Four Ashes location for such a facility?</p>
<p>Network Rail's response:</p>	<p>The TEN-T policy 'Highlights the importance of nodes as an integral part of the network: maritime ports and airports as Europe's gateways, inland ports and rail road terminals as key infrastructure for inter-modal transport chains as well as urban nodes as the origin and destination of the majority of journeys on the trans-European transport network.'</p> <p>The 'North Sea - Mediterranean core network corridor' progress report states 'Promotion of economically efficient and high-quality transport. Efficiency must be enhanced through easy interconnection and interoperability between national transport networks, and through the optimal integration of intermodality between all transport modes for passengers, as for logistic chains.'</p> <p>'The development of the capacity of multimodal platforms at specific nodes is fundamental to undertake this last point.'</p> <p>The report does not mention any individual SRFI locations.</p>
<p>2.2.13</p>	<p>Need for WMI/ suitability of Four Ashes Site In its response to Qs 1.2.1 & 1.2.2 of the FWQs [REP2-132], NR states that the inclusion of WMI in the DfT Freight Strategy is "indicative of the market opportunity for a SRFI in this location and the feasibility of the location for a SRFI". To what extent does "market opportunity" equate to an identified need for a SRFI at Four Ashes or other nearby location?</p>
<p>Network Rail's response:</p>	<p>Intermodal inland terminals - location determinants</p> <p>With respect to maritime intermodal (railborne, primary distribution haul of ISO containers between Port & inland distribution facility):</p> <p>For shippers the attractiveness of the rail offer is determined by cost competitiveness versus road. The threshold rail competitive distance from Felixstowe reportedly lies north of the M1 / M6 junction, however, the introduction of 30-platform services is effectively pushing this boundary further south toward the A14 / M1 junction. From Southampton, rail is cited as competitive north of the M40 / M42.</p> <p>Over the longer distance haul from either Felixstowe or Southampton to the North West, rail is cited as holding a competitive advantage over road and is attracting a majority share of container movements to the region.</p> <p>For shipping lines, attracting backloads is critical to the overall rail transit economics, driving a need for inland terminal proximity to backload generating areas (within say a 20-30 mile radius) and availability of terminal space for cost effective standage of units pending back load / train slot fill.</p> <p>Most backload potential arises in the West Midlands, North West and Scotland. There are some high value export goods (whisky, cars) but more commonly they are low value bulk materials such as re-cycled metal, plastics and paper. Notably, key backload opportunities from the West Midlands arise in an arc around the southerly edge of Birmingham.</p> <p>GB's current inland terminal locations broadly reflect the major centres of population in the Midlands, North West and Yorkshire. The relative lack of population mass in areas like the South West therefore results in sparse terminal provision & less intermodal activity as a result. Scotland's rail intermodal market is also affected by volume abstraction to coastal shipping feeder services.</p>

2.2.14	In its response to Q1.2.1 of the FWQs [REP2-009], the applicant states that the inclusion of Four Ashes/Featherstone in the Forecasts Report that underpins the NR Long Term Planning Process-Freight Market Study 2013 is a clear recognition of the need for a SRFI at this location. Do the LAs accept that conclusion?
Network Rail's response:	No further comment from Network Rail.
2.2.15	Andrew Linney [REP1-013] puts forward a number of technical arguments about the need for a SRFI, the role that such a facility might be expected to fulfil, the need for quantum of warehousing proposed in the WMI scheme and the approach to be taken in an Alternative Sites Assessment. Can the applicant and NR please provide a written response to the points raised in Mr Linney's submission?
Network Rail's response:	<p>The Head of Freight Development at Network Rail has provided the below detailed response to the type of traffic on the network which is likely to see growth.</p> <p>The single biggest modal shift opportunity for rail is domestic intermodal – ostensibly the nationwide trunk haul of secondary distribution consumer / manufactured products in swap bodies from National Distribution Centres to Regional Distribution Centre's/stores.</p> <p>A swap body gives the same 26 pallet loading capacity as a 13.6m semi-trailer – the unit of currency for distribution.</p> <p>Whilst the line of route rail haul is extremely competitive per tonne / mile, the costs of public road shunt moves between a warehouse and a remote rail terminal - the collection / delivery leg - makes the overall offer uncompetitive.</p> <p>SRFIs co-locate warehousing and rail terminal facilities, in so doing they obviate the need for public road shunts of swap bodies between the warehouse loading dock and the lift on/off the rail vehicle.</p> <p>An appropriate disposition of SRFI facilities in the nation's distribution heartland will therefore enable a greater number of users to progressively locate in rail enabled warehousing.</p> <p>SRFIs may serve as receipt points for primary import container flows and also as dispatch / receipt points for secondary inter-DC swapbody flows.</p>
2.2.16	Christopher Walton [REP2-177] has attached two studies to his Deadline 2 submission which he says advocate the adoption of the Bescot site to meet the identified need for rail freight facilities in serve the WM. The studies are: WM Rail Freight Strategy, December 2016 and BC Gateway and Walsall-Stourbridge Freight Line Study Stage, December 2012. Can the parties provide a written response, setting out their views as to what these documents say as to the need for a SRFI to serve the BC and southern Staffordshire and the relative suitability of the WMI/ Bescot or any other site to meet that need?
Network Rail's response:	<p>West Midlands Rail Executive and Transport for West Midlands have been asked for comment. These are not Network Rail's documents.</p> <p>The WM Rail Freight Strategy, December 2016, produced by West Midlands Combined Authority, highlights the role of strategic rail freight interchanges and intermodal rail freight interchanges in encouraging freight to move by rail.</p>

	<p>'The metropolitan area believes there is an emerging case for the development of a West Midlands Strategic Freight Corridor from Stourbridge through to Lichfield via Walsall'. However this is on routes that are not in use and would need investment of several hundreds of millions to reinstate, before the costs of new SRFI are taken into consideration.</p> <p>The Walsall-Stourbridge Freight Line Study Stage, December 2012, considers three sites.</p> <p>One, Dudley, is landlocked on the line of a railway that has not been used since 1993, is about to be developed as an extension to Midland Metro, and the site itself will be leased/part sold to become a 'Very Light Rail' innovation centre.</p> <p>Another, Round Oak, is occupied by an active steel terminal and is only rail-served from the south (via Worcester and Stourbridge) on a route that is not gauge cleared to accommodate maritime containers</p> <p>Bescot Yard is not likely to be useable as a freight interchange, as it is about to see a sleeper manufacturing facility constructed on it. However the site will offer at least two lines for the purpose of recessing 775m trains, a point that has been raised separately in the DCO enquiry.</p>
2.2.17	<p>J S Goodwin [REP2-109] contends:</p> <p>(a) that there is no logic to locating a SRFI in the north of the region in order to supply Birmingham when most of the imports of goods from Europe and the Far East come through the southern ports;</p> <p>(b) that the spare capacity of existing terminals in the region and closure of others indicates a lack of demand for a SRFI; and</p> <p>(c) that planning permission has been granted for a rail freight terminal in Tunstall, Stoke-on-Trent which could meet some or all of the identified need.</p> <p>Can the applicant and NR please provide a written response to these arguments?</p>
Network Rail's response:	<p>a) For the Applicant to answer</p> <p>b) See answers on 2.2.16 and 2.2.18 regarding the suitability of alternative sites</p> <p>c) A Stoke-on-Trent location is unlikely to serve Wolverhampton, the Black Country or the West Midlands</p>
2.2.18	<p>The Deadline 2 submission from Sue Worrall [REP2-183] includes a link to an article in Railway Magazine which she suggests casts doubt over the need for any additional SRFI facilities in the Midlands.</p> <p>Can the applicant and NR please provide a written response to the matters raised in that article?</p>
Network Rail's response:	<p>The article is an opinion piece on the part of its author. It comments that 'Within the Midlands are a number of unsuccessful rail terminal schemes – Telford, which is lucky to see one train a week; Prologis Park, Coventry has only seen one, maybe two trains; and at Castle Donington, Marks & Spencer has a rail-linked distribution centre which – according to Network Rail – has never seen a revenue-earning incoming freight train.'</p> <p>Commentary on each:</p> <p>Telford is on a W6a gauge route and cannot accommodate maritime containers except via a circuitous route via Shrewsbury, and even then only by using special 'pocket' or 'low floor' wagons for the standard 9'6" maritime container.</p> <p>Prologis Park, Coventry, was a speculative development by a developer for palletised goods with warehousing, close to the M6. It was not built with facilities to handle containers. The terminal did take 4-5 trains a week of palletised goods for around three years in the mid 2000s for Danone, conveying water traffic from France. The vans were</p>

	<p>shunted on site onto an unloading siding from where there were stored in the linked warehouse. The traffic is now handled at DIRFT.</p> <p>Castle Donington (EMDC) is a single-user terminal (Marks & Spencer) and thus is a customer 'Yes/No' in terms of rail freight usage. Marks & Spencer have not yet moved any traffic by rail to/from the terminal. It appears that Marks & Spencer are actively looking to begin rail-freight services to/from the terminal: Road and Rail have been appointed as Terminal Operator and are actively seeking commercial rail freight opportunities. The site was used by Rail Operations Group (ROG) for stabling trains during the Derby re-modelling project in 2018. There is currently active interest in container traffic from Southampton and London Gateway. Road and Rail are also in active discussions with the main aggregates providers.</p>
2.2.21	<p>Capacity of Rail Network/ Availability of Rail Paths</p> <p>In its Wrong Location Report [REP2-167], Stop WMI Community Group asserts that no (planning) approval should be given for a SRFI project of this scale unless and until it has reached GRIP 5 stage in the NR approval process.</p> <p>Can the applicant/ NR provide a written response to this assertion?</p>
Network Rail's response:	<p>A developer is likely to consider that to expend GRIP 5 monies would be an unacceptable risk pre-consent with the possibility of £2m - £3m of abortive expenditure.</p> <p>There are a number of requirements of earlier GRIP stages without which, the project could not proceed to GRIP 5 (detailed design). These would include industry consents such as Network Change, signalling design (which require the designer to have a 'monopoly' on the safety critical existing signalling scheme plans), and safety verification which can't proceed without a consented and approved scheme.</p> <p>Network Rail would submit its own proposals for development consent or approval under the Transport and Works Act 1992 based on GRIP 3 or GRIP 4.</p>
2.2.22	<p>A number of IPs express concern that the information provided by NR with regard to the capacity of the network does not provide certainty that the necessary train paths to accommodate either 4 or 10 trains per day can be made available.</p> <p>Is there anything that NR wishes to say by way of response to these concerns, over and above the information provided in its SoCG with the applicant and its Deadline 2,3 and 4 submissions?</p>
Network Rail's response:	<p>An assessment of the current (May 2019) timetable has been made by an Network Rail Operational Planning Specialist.</p> <p>He has first looked at 'QJ Strategic Capacity paths' which travel between Bushbury Jn and Stafford Trent Valley Jn in both directions:</p> <p>Up Direction: The following QJ paths are currently available in the Up direction travelling on the West Coast Main Line (WCML) through Crewe and turning off at Stafford to run towards locations in the West Midlands:</p> <ul style="list-style-type: none"> • 4G60QJ [SX] 17.52 Crewe Bas Hall SSM to Hams Hall • 4G60QJ [SO] 15.00 Seaforth CT to Hams Hall • 4G62QJ [SX] 05.17 Seaforth CT to Bescot Down Side • 4G62QJ [SO] 04.44 Seaforth CT to Washwood Heath Down Sdgs • 6G64QJ [SO] 08.00 Liverpool Bulk Terminal to Ironbridge Power Station <p>Down Direction:</p>

	<p>The following QJ paths are currently available in the Down direction turning out onto the WCML at Stafford having travelled via Bushbury Jn:</p> <ul style="list-style-type: none"> • 4E04QJ [SO] 14.50 Bescot Down Side to Preston • 4F23QJ [WSX] 17.43 Hams Hall to Seaforth CT • 4F23QJ [WO] 17.43 Hams Hall to Crewe Bas Hall SSN • 4M55QJ [SUN] 21.13 London Gateway to Trafford Park Euroterminal • 6M52QJ [FSX and FO] 13.26 Hinksey Sdgs to Carlisle NY <p>From scanning the SX train graph, there are currently either 1 or 2 freight paths per hour in both directions on this line, of mixed classes (Class 0, Class 4 and Class 6). The number of paths is lower on SO and SUN.</p> <p>It should also be noted that the supply of traffic is not exclusively along the WCML. The two most probable entry ports are Felixstowe (trains access the West Midlands via the Ipswich-Peterborough-Nuneaton axis which has seen investment in gauge clearance and increased capacity) and Southampton (trains access the West Midlands via the Winchester-Reading-Banbury-Bescot axis which has seen similar investment).</p>
2.2.23	<p>In its response to Stop WMI Community Group’s Rail Report [REP2-159] the applicant appears not to deal with the points raised in paragraphs 2.9 and 2.10 about capacity constraints on the WCML and the forecast, within the Rail Use Strategy document, that the WCML will be at capacity by 2024 and the only option to improve capacity is through the construction of HS2.</p> <p>Can the applicant and NR please provide a written response to these comments?</p>
Network Rail’s response:	<p>Existing freight paths which could also call in at the terminal, the presence of the ‘QJ Strategic Capacity paths’, and the capacity available on core routes to the ports other than the WCML, as identified in the response to 2.2.22 above.</p> <p>The Rail Report [REP2-159] contains assumptions and statements and also contains numerous errors. Network Rail do not consider it an accurate representation of the situation.</p>
2.2.24	<p>In his Deadline 2 representation [REP2-141], Alan Powell sets out a number of detailed concerns about the suitability of the Site’s location in relation to WCML and the wider rail network and the potential effects of rail movements generated by the WMI on other rail services.</p>
Network Rail’s response:	<p>The representation describes Hortonwood Telford, about 12 miles west of Four Ashes. This houses the Telford Rail Freight Interchange. The Telford Rail Freight Interchange is not on the Strategic Freight Network, and due to the tight loading gauge of a number of structures, including Oakengates Tunnel, does not offer a route capable of accommodating maritime containers.</p>
2.2.25	<p>A number of IPs assert that there are regular and frequent delays to passenger services using the Stafford to Wolverhampton section of the WCML and that these delays are likely to be made worse as a result of the proposed development.</p> <p>(i) Is NR able to provide any historic data as to frequency and length of delays to passenger services on this line and to comment on the severity of any such delays?</p> <p>(ii) What is the anticipated effect of the proposal on the punctuality of existing passenger services and what is the evidence to support that assessment?</p>
Network Rail’s response:	<p>i) Data has been produced by Network Rail’s performance team based in Birmingham. The extract is for all of Control Period 5 92014-2019 and the first 3 periods of this year, and gives a picture of the delays caused by incidents occurring between Wolverhampton and Stafford. See table below: all delays between Wolverhampton to Stafford.</p>

Financial Year	Number of Incidents Per Year	Total Delay Per Year	Delay Per Incident	Average Delay to a Train Per Year	Largest Delay to a Passenger Service (Minutes)
2014/15	1726	67182	38.92	4.40	169
2015/16	1537	78289	50.94	3.54	149
2016/17	1330	47645	35.82	3.96	65
2017/18	1422	49896	35.09	4.38	61
2018/19	1542	55453	35.96	4.56	121
2019/20 to Period 3	345	20923	60.65	2.46	25

Summary

Delay in the last three years of CP5 showed a reduction compared to the first two. The first two years suffered from delays generated by overhead line defects, points failures and signalling system failures and other one large 'one-off' incidents a cable fault in 2014/15 and a signalling panel failure in 2015/16. Delay caused by the incidents in the sample period ranged from 1 to 7,294 minutes. The largest incident was a cable fault at Penkridge causing the 7,294 minutes in 2014/15. The total delay in 2019/20 is high for the number of periods so far due to a 5mph temporary speed restriction which was imposed at Bushbury Jn, totalling circa 9,000 minutes, which has affected the 'delay per incident figure' as well. There is no discernible trend in terms of the number of incidents with the highest number of incidents occurring in 2014/15 and the lowest number in 2016/17. The average delay per train has remained fairly static with best year being 2015/16 with a figure of 3.54 minutes.

Largest Delay to Passenger Services

2014/15 The delay caused was due to a fatality at Penkridge on 22nd January 2015.

2015/16 The delay caused was due to a signalling panel failure at Stafford 12th January 2016.

2016/17 The delay caused by an Overhead Line defect at Penkridge 30th May 2016.

2017/18 The delay caused was due to a points failure at Stafford Trent Valley Jn on 15th March 2018.

2018/19 The delay caused by an external fire at Wolverhampton on 2nd April 2018.

2019/20 The same amount of delay was caused to two trains one due to a unit defect at Penkridge on 7th June 2019 and an instance of trespass also at Penkridge on 5th April 2019.

ii) The timetable is written in a way that optimises the available capacity. This is done to a set of 'Timetable Planning Rules' which contains elements such as point-to-point times of different train types, 'junction margins' which indicate the time needed to clear and then reoccupy sets of points, and the allowances which are written into train schedules to allow for speed restrictions following track and maintenance work. Timetable 'paths' are not offered to operators if they do not comply with any of these Timetable Planning Rules.

2.15.1

The revised draft DCO [REP3-003] includes additional detailed provisions in respect of the draft Requirement 5 which are set out in Part 2 of Schedule 2 to the DCO. These seek to provide an increased level of commitment to the provision and use of the rail infrastructure.

(i) Do the statutory bodies and IPs have any detailed comments that they wish to make in respect of the wording of these provisions?

(ii) Should any additional provisions be added?

Network Rail's response:

No further comment from Network Rail

Network Rail Infrastructure Limited

5 July 2019