

BLISWORTH PARISH COUNCIL

Observations on the Applicant's responses to the Examining Authority's first written questions

Deadline 20th November 2018

1.0.5 The Secretary of State's decision to allow no rail connected warehousing was clearly in contravention of the NPS and for that reason the EMG development should not have been allowed. This decision should, therefore, not be used as a justification for lowering the amount of rail-connected warehousing on NG's development.

1.0.8 Further development around the Roade by-pass is an inevitable consequence, the proximate cause being the marginalisation of land around it. The Applicant cannot absolve themselves of any blame or responsibility for what follows. They are professional developers: they know what happens.

1.0.9 Policy EV8 remains live, relevant and applicable. The Applicant is not being truthful.

1.0.19 i) The Applicant's response to market need does not relate to the development of a strategic rail freight network, the primary intention of which is to reduce the secondary road leg of a journey: it perpetuates the inefficiencies of a road based distribution network and over-development in the Midlands. No reference is made to Government forecasts for the need for rail served warehousing (which NG alone exceeds) nor restricted (and finite) capacity on the rail network. The Applicant contends that most of their freight would originate in London which is widely accepted as an uneconomic distance for a rail freight journey. Contrary to the Applicant's statement, DIRFT does serve the area and, as the new rail head has not yet been built (nor any rail connected warehousing), will continue to do so for many years. [Were there such a pressing demand for accommodating additional rail freight, as contended, four years would not have passed following consent without any rail connected warehousing or new rail head being built].

ii) The Applicant fails to reference the relevant sections of the NPS where the terms "across the regions" and "at a wide range of locations" suggest other less well served regions should be a priority for SRFI development. NG is neither close to a major conurbation (Northampton is not one) nor close to any industry that would utilise the rail terminal. DIRFT remains more than sufficient.

1.0.21 The lack of substantial industry in the identified market radius, the short distance to the ports, the need for full trains to make transits economics and other operational barriers such as inflexibility of rail paths mean that most trains will be returning empty. The freight journey from NG to London Gateway is not economic when it involves an additional leg by road.

1.0.22 The Applicant has referred to the *Freight & National Passenger Operators Route Strategic Plan February 2018* (Appendix 7) to justify the building of an SRFI in Northampton. The document only refers to the building of "terminals" in areas such as Daventry and Northampton, not SRFIs ("2. Domestic & Deep Sea Intermodal Growth: Facilitate new terminal developments at Daventry, Northampton, West Midlands and Parkside"). Section 9 of Appendix B Geographical Route summaries refers to SRFI Terminal Development on the WCML where it states the aims of "Securing of sufficient capacity to support SRFI developments through planning and into use" and "Offer NR support to proposals when adequate strategic fit and capacity". There is no investment planned in

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the appropriate parts of the network to provide sufficient capacity. None of the rail enhancements detailed in the document have been committed to in the current control period. The statement that no capacity requirements are required to accommodate NG is misleading. This statement is made on the basis of the 4 train minimum requirement. It ignores the aspiration of DIRFT to service a further 20 trains, other proposed SRFIs and the impact on passenger services. Again, NG to London ports is not an economic rail freight journey compared to road and is also constrained by the north London line bottleneck.

1.0.25 The Applicant states that these occupiers “are more likely” to use rail, which is a leap of faith (with no substantiating evidence). The economics and capacity arguments remain relevant.

1.0.28 Government forecasts are driven by the Great Britain Freight Model which uses rail served warehousing as an input. The figures used in this model are guesses and it is then assumed that if you build warehouses they will necessarily then be serviced by the rail. This is not the case. The demand for rail freight is driven by economics, flexibility, train load dynamics and efficiency of operating models. The two elements are only tenuously connected. The recent fall in the amount of rail freight moved, despite the availability of new rail served warehouse space, is evidence of this disconnect.

1.0.30 Given that the primary objective is to reduce road miles by locating SRFIs close to the markets (major conurbations), the explanation provided by the Applicant demonstrates that NG is not aligned with policy. Modern trends in logistics has smaller hubs being sited in a wider area closer to the markets they serve: the centralised model is being challenged from a number of directions.

NCC have commented that in the market study, the statistics are shown to be beneficial in terms of demonstrating the marketability of the site for HGV access and for warehousing in general but in themselves and without further explanation they give no obvious demonstration of demand for rail served warehousing.

1.0.32 The percentages provided are misleading. The use of rail would be completely dependent on geography. To quote company facilities not in the same locality that use rail is no indication that this would be replicated in this particular area. One of the largest retailers in the UK with their main warehousing operations based in Northampton undertook a cost comparison between road and rail freight and determined that the transit from southern ports to Daventry was not economic on the rail: a freight transit to their other main warehouse in the north would have just been had it not been for the absence of subsidy (mode shift revenue support). This evidence is to be submitted as part of the Stop Rail Central submission against Rail Central.

1.0.33 Road and then rail movement is not competitive at present for any transits other than to Scotland: the distance is just not great enough.

1.3.4 [Rail Central Response] Re the conflicting proposals for plots 1/7 and 1/12; Rail Central state “Northampton Gateway landscaping proposed in this location will also serve to mitigate Rail Central's visual impact and impact on landscape character”. The landscaping to which they refer will be a bund which sits in the middle of the two developments. Hence it will provide no screening from

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either the east (Northampton) or West (the villages of Milton Malsor, Blisworth and the Blisworth Arm); it will be lost in the middle and hidden from both sides by warehousing. Northampton Gateway's attempt to screen views of the SRFI will be completely negated by the building of Rail Central. Rail Central's use of the same piece of land for screening is completely pointless: there are no receptors on that side of the rail (and the cranes are too tall to be screened anyway). There is also no mention of the single most salient point: the footpath is used mostly for recreational purposes; the increased length and destroyed setting means that the recreational utility of the all the paths across both sites will be destroyed. Neither Applicant has made any reference to this fact.

1.6.1 The additional traffic generated on the A508 will cause harm to the war memorial and those that visit it. It is also a safety issue with increased traffic passing by.

1.7.3 The Applicant has not answered the question on the height of the bunding.

1.7.4 Why has this question been answered n/a?

1.8.5 The data for the operational rail noise assessment was provided by the project consultants. We would contend that this is not an independent or neutral source.

1.8.8 The applicant concedes that additional mitigation for noise is required but fails to detail what this is and also states it will be limited by what is "reasonably practicable". Is this acceptable?

1.8.10 Is it acceptable for the Applicant to decide that vibration modelling is not required?

1.8.16 The applicant has failed to provide any estimate of out of hours working. This is a significant issue for the community, especially those in close proximity.

1.8.20 The Applicant has not answered the question on how rolling stock will be made quieter.

1.8.26 The Applicant has failed to answer the question on how the mitigation will be delivered for receptors R30 and R57.

1.9.6 NCC, as set out in their Written Representation, remain concerned about the mechanisms for dealing with cumulative impacts of Rail Central.

1.10.1 The Applicant has referred to an increase of 15,890 people between 2011 and 2029 in South Northamptonshire (paragraph 3.4.6). This is not the increase in the working age population. This figure is very misleading as the more relevant data to consider is the growth of the working age population. This is expected to increase from 54,200 to 55,700 between 2011 and 2029, i.e. an increase of only 1,500^[2]. The Applicant's whole socio-economic argument is based on the application of incorrect figures. This error also negates the validity of the transport modelling. This error has been pointed out in a number of representations but continues to be quoted by the Applicant.

1.10.14 The crime statistics were established by a Freedom of Information request **Reference:** C1507 Ian Kelly | Freedom of Information and Data Protection Team Leader; Information Unit; Tel: 101 Ext 346940; ian.kelly@northants.pnn.police.uk Force Headquarters, Wootton Hall,

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Northampton, NN4 0JQ. This information would also be available to the Applicant but they have not sought it.

1.11.6 Northamptonshire CC does not operate any traffic cameras so are unlikely to regulate any private camera scheme. If this is a private scheme who will ultimately be enforcing it for the future life of the site? We would suggest that continued enforcement is not feasible nor practical. What recompense will there be for the community if it is discontinued? Who will determine the level of fines and to whom will the fines be paid?

1.11.13 The rail movements at DIRFT have plateaued and remained static for well over 5 years. The key indicator for future need would be the take-up of rail served warehousing at EMG and more particularly DIRFT. At the latter two non-rail connected warehouses have been built since consent in 2014 and two new units at EMG before the rail connection has been made. There is therefore no relevant reference point to indicate likely take-up. However, the removal of the rail connection at Eurohub Corby and the absence of any rail freight at EMDC since it was opened are indications that the enthusiasm for take-up of rail transport is not reflected in the picture painted by the Applicant. The proposal is (at best) premature.

1.11.16 Trains of 1000 metres are already under consideration. The Applicant has not stated whether or not NG would be capable of handling the future.

1.11.31 The assumed 16 trains per day does not appear to align with the capacity of the rail network taking into account all other competing uses. Capacity has certainly not been proven. The Applicant has chosen only to prove the possibility of servicing the minimum 4 trains, not the 16. The Applicant needs to make it clear whether their wide ranging statements on the capacity of the rail and the fact that no improvements are needed relates to 4 or 16 trains or somewhere in between. They also need to include all other competing uses in a cumulative impact assessment. At present the true situation is being obscured.

1.11.35 [Network Rail response] NR has assessed that theoretically each of the two competing developments can accept four trains per day, based on studies completed separately by the Applicants. However they have also clearly stated that this ignores the demands from other SRFIs in the area (or those using the WCML) and is also dependent on the origin of the trains. It clearly does not confirm that the predicted 16 trains per day that the Applicant is claiming can be accommodated. Nor the 16 trains that Rail Central have used to justify their carbon reduction claims. There is also the caveat that trains can enter and leave at 40mph which is unproven. Network Rail have completely ignored the over-riding strategic objective of routing freight away from the north London line and congested WCML.

Appendix 3 Table 1 item 1 d) the applicant is required to provide *“a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment;”*. The Applicant has stated that this can be found in ES Chapter 2 – Description of Development and Alternatives. All that can be found is a dismissal of a site at junction 13 of the M1^[1] and a cursory comparison with Rail Central which, strategically, is the same site [Table 2 point 2: the need for alternative sites assessment is iterated

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here]. Roxhill, in other documents, have stressed the fact that NG located on the southern tip of the Golden Triangle and therefore suited to serve the London market. Surely a site closer to London (Milton Keynes) and a greater distance from DIRFT would reduce road miles further and take traffic away from the MOST congested section of the M1. The Applicant is therefore contradicting themselves when dismissing Junction 13 as a viable alternative.

Addendum

Little reference seems to have been made as the availability of the necessary power infrastructure to supply one or both of the competing SRFI proposals or the mechanics of providing such power. The power requirements of large industrial facilities has significant implications on energy security and also disruption to the wider area in terms of the highways work required to lay the necessary cables. I believe this is a material factor which needs to be given due consideration:

Northampton Electricity Supplies (Nov 2018)

Northampton is recognised as a growth area with the need for significant investment in the electricity supply infrastructure. Northampton and the surrounding areas are fed via three, 132kV overhead lines, from the National Grid Substation at Grendon, 12 miles to the East of Northampton. Due to existing demand growth, parts of this group are predicted to be outside of its firm capacity by 2020 and all of the group by 2025. Investment is required to meet demand requirements including an additional circuit into Northampton. (Firm capacity is the ability to be able to continue to meet the electricity demand after the failure of a single item of equipment)

The proposed rail freight developments will add considerably to the electrical demand in Northampton and exacerbate the problems noted in the WPD document. Demand normally drops in the Summer allowing the utilities to take plant out of service for maintenance but as some of the warehouses are likely to be cold storage then demand increases in the summer for this type of warehousing. This will make it even more difficult for WPD to maintain equipment and still apply the security of supply standard to the Northampton area.

To supply the sites, there will be a significant impact and this will trigger major reinforcement work.

Significant reinforcement of the supplies to Northampton including adding a fourth circuit from Grendon to Northampton, upgrading of the other circuits including tower replacements and replacement of some electrical switchgear.

It cannot be said that there are no issues with these developments. Clearly anything can be achieved given enough money, but it may not be economical.

Apart from the general Northampton area problems, the local work to provide electricity will have a major disruption to roads caused by the laying of cables.

WPD published a document noting the problems for Northampton in June 2017.

<https://www.westernpower.co.uk/docs/About-us/Our-business/Our-network/Strategic-network-investment/East-Midlands/Shaping-subtransmission-to-2030-East-Midlands-2017.aspx>

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References

1. "2.4.17 Key issues and factors which informed Roxhill's view that this (site at Junction 13) was not a preferable or suitable alternative include:

- Preferences by the landowners to retain some parcel of their land-ownership for residential or mixed-use development which represented uncertainty over the ability to mitigate likely impact on existing or new residents. Furthermore and importantly in terms of availability, the site is now being promoted and bought forward as residential led mixed-use development site.
- Challenging and potentially significant visual impacts on the nearby settlement of Aspley Guise and Woburn Sands exacerbated by the existing topography which would make the site very hard to screen adequately;
- Located two junctions further south on the M1 the site is considered less well located to meet the markets identified in the Market Analysis Report.

2.4.18 As a result of the above, no full comparative assessment has been undertaken. The site is not considered as a reasonable alternative because it is not available and less suitable in terms of environmental impact. In addition it will not meet the market area identified. It is therefore not treated as an alternative to the Proposed Development site."

2. Employment Statistics for Northamptonshire Taken from NOMIS Labour Market Statistics 2014-2015 (www.nomisweb.co.uk)