

## Review of Statement of Common Ground between Network Rail and Roxhill

Paragraph	Statement of Common Ground	My Response
4	This statement deals with agreement between the parties on the basis of the proposals put forward by Roxhill, being a stand-alone scheme and not in conjunction with the proposals being advanced to the west of the Northampton Loop Line, known as Rail Central. Nothing in this statement can be applied or be taken to have any relevance to, a scenario involving the Roxhill scheme being developed at the same-time as, or in conjunction with, Rail Central.	Therefore no cumulative impact assessment is being provided.
5	The following documents have informed this statement.	Missing from this list is the Network Rail West Coast Main Line Capacity Plus document, which is a significant omission. It suggests that neither organisation is as well informed as it should be.
22	Further work has been undertaken by the Applicant on the request of Network Rail to consider and evaluate the speed of connections into and out of the Northampton Gateway terminal from the Northampton Loop Line. Until this work has been verified by Network Rail, Network Rail cannot confirm that the connection speeds to the rail network as proposed are viable. The results of this work also have a bearing on Network Rail's assessment of capacity on the network to accommodate the SRFI, as we explain further below.	This SRFI application is being made prematurely as it is not possible to assess its effects on the rail network.
24	Various capacity studies have been undertaken, as we describe below. The results of these studies confirm that there is sufficient capacity for the SRFI to operate up to 4 paths per day at the proposed date of commencement of operation of NG.	Roxhill has forecast that up to 16 intermodal or bulk freight trains per day will use Northampton Gateway by 2043. In its draft environmental statement, Roxhill forecast that there would be up to 12 express freight trains per day using this SRFI. That has since been reduced to 2 per day (night). The Northampton Gateway application should be assessed on whether the rail network has the capacity to accommodate all of Roxhill's planned train path usage, not the bare minimum. Would plans for a new road

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		<p>or motorway be approved if it was known in advance it would run out of capacity in eight years' time?</p>
24	<p>This statement is, however, subject to the following caveats:            (a) .....            (b) the origin and destination of each train movement. This information will not be known until the SRFI is operational and therefore whether a path from the SRFI can be matched to a path at the origin/destination.</p>	<p>Roxhill's Transportation Appendix 34 covers Road to Rail Freight Modal Shift calculations. It describes a scenario of how the proposed 16 freight train paths per day might be used. A "what if" scenario could be run (but hasn't been) to determine whether these additional paths could be accommodated. With two such significant caveats in place, the statement that <i>"there is sufficient capacity"</i> is completely meaningless.</p> <p>Furthermore, Network Rail's stance appears to have changed. In their input to the Scoping Opinion document (Late Scoping Consultation Responses 15/12/2016), Network Rail said: <i>"Considering that there is a need for further feasibility work, the scoping document is silent on the impact of the proposal on the rail network. Given that this is a key risk, Chapter 12 (Transportation) needs to be expanded to consider the full impact of the proposal on the existing and future rail network both in terms of capacity and timetabling, with a detailed study scope to be agreed with Network Rail."</i></p> <p><i>Given that the location of the proposal is predicated on rail connectivity and the primary aim of the proposal is modal shift, detailed assessment of the impact of the proposal on the rail network at this early stage is crucial".</i></p> <p>Network Rail's relevant representation (1/8/2018) contained the following: <i>"The ability of the RFI to realise its optimal rail service throughput will require detailed capacity studies to be undertaken and, until further capacity studies have been carried out, Network Rail's position on the DCO application is neutral in this regard".</i></p>

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		<p>So, on two previous occasions, Network Rail has indicated the need for detailed capacity studies to be carried out on the rail network to assess the impact the additional trains associated with Northampton Gateway would have. There appears to be no evidence that such studies have taken place and certainly not since August 2018.</p> <p>Network Rail now appear to be saying that they are unable to make an assessment until the exact paths required by companies operating at Northampton Gateway are known.</p> <p>I suggest it would be preferable to go with the views expressed by Network Rail in December 2016 and August 2018 and conduct the studies proposed on those occasions. That would better inform the Planning Inspectorate of the impact that Northampton Gateway would have on the rail network.</p>
25	Roxhill carried out its own assessment of capacity on the West Coast Main Line between London and Rugby (covering the section of line Northampton Gateway is located on).	Referring again to Roxhill's Transportation Appendix 34, it appears that three quarters of the tonnage from ports is expected to come from Felixstowe and London Gateway. Half the tonnage alone would come from Felixstowe. Therefore assessments need to be made of the capacity available for additional train paths (now and in the future) on the North London, East London and Great Eastern lines. Similarly, to cater for planned trains to Scotland, an assessment needs to be made on the West Coast Main Line north of Preston which in future will be handling additional train paths as a result of the introduction of HS2 services, and where there is only one track in each direction, with the exception of some passing loops.
26	..... It confirms that there is sufficient capacity on the Northampton Loop for 4 paths per day at the proposed date of commencement of operation of Northampton Gateway, subject to the	This conclusion conflicts with the views expressed by Northamptonshire County Council (NCC) in their written representation (chapter 4). I draw particular attention to their paragraphs 4.4 to 4.7, 4.9 to 4.12, 4.15, 4.18, 4.20 to

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	caveats referred to at paragraph 24 above.	4.21. I would suggest that NCC with its local knowledge and by making use of the West Coast Main Line Capacity Plus document have a better understanding of the local issues on the Northampton Loop. In its written representation, the Northampton Rail User Group also expresses concerns regarding the adverse impact on rail passenger services caused by additional freight trains on the Northampton Loop. I draw attention to the expected doubling of passenger usage of Northampton station by 2043, which I highlighted in my written representation paragraphs 151 to 152.
Page 18	This report investigates the underlying available capacity on the Northampton Loop Hillmorton Junction to Hanslope Junction.	While such a report can be useful, it is necessary to also consider other busier sections of freight paths likely to be used to serve Northampton Gateway. These would include other sections of the West Coast Main Line, North London Line, East London Line and Great Eastern Line.
Page 18	The analysis shows without significant infrastructure improvements a choice must be made between maximising freight paths and creation of additional passenger paths,.	That ties in with the views expressed by Northamptonshire County Council, the Northampton Rail User Group and myself.
Page 19	Rail Central: Up to 16 paths per 24 hours in either direction by 2026	Ashfield Land's draft environmental statement has inconsistent documentation on the number of trains it plans to serve Rail Central. In the air quality chapter a figure of 21 trains per day is provided.
Page 19	Northampton Gateway: Up to 8 paths (6 south 2 north) per 24 hours by 2026	2026 is a very narrow time window to consider. Roxhill's aim for Northampton Gateway is 16 intermodal/bulk freight trains per day plus 2 express freight trains.
Page 19	There is an aspiration to run services from East West Rail into Northampton station	Due to the narrow scope of this review, this table overlooks the additional services to be run to Milton Keynes by East West Rail. They would take up additional paths on the West Coast Main Line. In my written representation, I have concluded that there would be an additional 36 trains per day (each way)

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		using the WCML as a result of East West Rail (my paragraphs 145 to 147).
Page 19		No consideration has been given to the growth of future passenger demand and associated rail services at Northampton. I have estimated this (conservatively) at an additional 28 trains per day each way by 2043 (my paragraphs 151 to 153).
Page 25	1. Given that capacity on the Northampton Loop isn't the only likely constraint, a wider study should be commissioned looking at the available capacity for additional services on the West Coast Main Line north of the Northampton Loop.	Agreed; but studies on other parts of the network are also required as I have previously indicated.

## Conclusion

The claim in the Statement of Common Ground that *“there is sufficient capacity for the SRFI to operate up to 4 paths per day at the proposed date of commencement of operation of NG”* is conditional on such significant caveats as to be completely meaningless. Furthermore that claim is based on Northampton Gateway serving 4 trains per day, and not the planned 16 intermodal/bulk freight and 2 express freight trains per day. No consideration has been given to the growth of rail passenger services in the future; this oversight is not acceptable. Network Rail’s own conclusion that *“without significant infrastructure improvements a choice must be made between maximising freight paths and creation of additional passenger paths”* has been overlooked. The detailed capacity studies which Network Rail proposed in 2016 and August 2018 do not appear to have been carried out.

The bottom line is that Network Rail has not provided an unqualified assurance that Northampton Gateway can be accommodated within the rail network.