

## Review of written answers provided by Roxhill

| Written question | Roxhill answer  | My response  |
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| 1.0.9            | <p>While 'saved' (in 2007), policy EV8 is clearly out of date, and the policy approach of seeking to identify the area of landscape south/west of the M1 for preservation has not been carried forward or updated through subsequent Local Planning policies since 1997.</p> <p>EV8 is therefore considered contrary to strategic policies of the now adopted Joint Core Strategy.....</p> <p>It is relevant to note also that the 'important local gap' approach is not being proposed for inclusion by SNC in their emerging Part 2 Local Plan.</p> | <p>The West Northants Joint Core Strategy covers numerous planning policies for Daventry District Council, Northampton Borough Council as well as South Northants Council (SNC). Sitting alongside those policies is the South Northants Council Local Plan Part 2. The saved policies of the SNC Local Plan Part 2 are still in effect and that includes policy EV8. A new SNC Local Plan Part 2 is currently going through its statutory consultation. This has been explained in detail my written representation paragraphs 38 to 40 and 58 to 61.</p> <p>The emerging policies (Local Plan Part 2) are relevant and are a material consideration. The corresponding new policy will be SS2 (General Development Principles) which states the following:<br/> <i>"1. Planning permission will be granted where the proposed development:</i><br/> <i>a. maintains the individual identity of towns and villages and does not contribute to any significant reduction of open countryside between settlements or their distinct parts;</i><br/> <i>and</i><br/> <i>b. does not result in the unacceptable loss of undeveloped land, open spaces and locally important views of particular significance to the form and character of a settlement;</i><br/> <i>and"</i></p> <p>The West Northants Joint Core Strategy is also titled as the Local Plan Part 1. Therefore it does not replace the SNC Local Plan Part 2 (current or proposed).</p> <p>The "Local Gap" may no longer be categorised as such in the emerging Local Plan Part 2, but new policy SS2 listed above is its direct equivalent.</p> |
| 1.0.19           | <p>It concludes that the existing concentration of SRFI's in the Midlands is not surprising and is wholly consistent with the concentration of logistics within</p>   | <p>Roxhill's response reflects road based logistics distribution thinking, which is not applicable to rail based distribution. Please see my written representation paragraph 83.</p>  |

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|                  | <p>this area generally and, importantly, the concentration of National Distribution Centres.</p> <p>Section 8 of the Report identifies a strong logistics market in the immediate catchment area around Northampton Gateway, which is not currently well-served by DIRFT or other SRFI's.</p> <p>Northampton Gateway has the potential to expand the network of existing SRFI's in the Midlands to address markets which are currently not served by existing terminals as well as to help meet the anticipated growth in rail freight.</p>   | <p>There is nothing in the NPSNN to suggest that there is a shortage of SRFIs in the Midlands. On the contrary, the suggestion is that they are needed elsewhere. See NPSNN paragraphs 2.57 and 2.58.</p> <p>DIRFT is the largest SRFI in the country. In Roxhill's Transportation Appendix 7, there is a map (Figure 1) showing HGV distribution at regional level. This is drawn with a 25 mile radius and includes the location of DIRFT. So it is incorrect to say that Northampton is not well-served by DIRFT.</p> <p>The Midlands is better served by SRFIs than any other part of the country. It would be better to build a new SRFI in the North West or Yorkshire. The projected growth figures for rail freight provided by Roxhill are very optimistic. Domestic intermodal rail freight has been growing at 1.1% per year since 2011/12 (ORR data) as detailed in my written representation paragraph 194.</p> |
| 1.0.25           | <p>.....which have resulted in the concentration of logistics activity in the centre of the Country. i.e. these are the drivers for where business want to locate their warehouses. This is particularly true of large National Distribution facilities located in the Midlands Distribution Heartlands, .....</p> <p>Importantly, these types of facilities are more likely to utilise rail as part of their logistics operation.</p> <p>The example works as follows:<br/> 1. Containerised Goods imported to a UK Sea Port<br/> 2. Containers transported by rail to Northampton Gateway SRFI.....</p> | <p>This demonstrates road based logistics distribution thinking, not rail based. Please see my written representation paragraph 83.</p> <p>Approximately 90% of goods transported in this country travel by road. The vast majority of warehouses in the Midlands are not rail connected. Therefore there is no sound basis to support this statement.</p> <p>The main UK container ports are Felixstowe, Southampton and London. Each of these ports is believed to be too close to Northampton Gateway to provide economically viable journeys by rail.</p>  |
| 1.0.28           | Section 7.0 and 8.0 of the Market Analysis Report seeks to explain the markets that will be served by the   | Figure 12 in Section 7 shows a considerable amount of overlap between the areas covered by the SRFIs, and does not demonstrate the need for Northampton  |

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|                  | Northampton Gateway Rail Freight terminal. This explains that some of the Northampton Gateway core and secondary market areas are not currently well served by an existing SRFI and therefore without Northampton Gateway the use of rail freight in this market area will be constrained. | Gateway in addition to DIRFT. The applicant appears to have overlooked the NPSNN paragraphs 2.50, 2.54, 2.56, 2.57 and 2.58, which illustrate the government's aim of a <b>national</b> network of SRFIs. The East Midlands is already well supplied with SRFIs in contrast to the North West, Yorkshire and West Midlands.  |
| 1.0.30           | The point being made at paragraph 8.3 about drive times is simply an explanation of why demand for logistic warehouse space is expected to be strong at Northampton Gateway.   | I disagree with Roxhill's response. It demonstrates road-based logistics thinking which is inappropriate for a SRFI. Relevant NSPNN paragraphs are 2.44, 2.45 and 2.56. I also draw attention to my written representation paragraph 3.  |
| 1.1.14           | The 92 million miles refers to the estimated reduction in HDV miles due to rail-freight replacing HGV/HDV trips from the key ports.  | <p>Whilst Roxhill has created a forecast to show the potential reduction in mileage for commercial vehicles, the developer does not appear to have calculated the additional mileage generated by Northampton Gateway employees travelling to and from work. My written representation indicates this employee mileage will exceed the forecast reduction in commercial vehicle mileage (my paragraphs 259 to 266).</p> <p>In the context of air quality, Roxhill also does not appear to have considered that approximately half the locomotives hauling trains to Northampton Gateway would not subject to any air quality legislation (for diesel locomotives), due to their age. Please see my written representation paragraphs 287 to 289.</p> |
| 1.9.1            | It is not known why that assessment has not already been updated and submitted as part of the Rail Central application given that the Northampton Gateway information required for the exercise has been available since June 2018.  | It is appropriate to point out the Northamptonshire County Council included the following remarks in their response to Rail Central's statutory consultation in April 2018: <i>"The only meaningful cumulative assessment would be obtained from combining the separate impacts which each developer has used for assessing their own sites. NCC was willing to facilitate such an assessment, and where appropriate act as a neutral party to ensure confidentiality of input of information, and has made this</i>   |

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|                  |  | <p><i>offer to both parties, but this approach has not been successful to date”.</i></p> <p>It is not necessarily appropriate to solely blame Ashfield Land. It is also my understanding that NCC’s offer has still not be taken up.</p> <p>The response made by Roxhill concerning the cumulative impact of Rail Central with Northampton Gateway concerns road traffic. The cumulative effect on rail/trains needs to be considered too.</p>   |
| 1.11.6           | (ii) The enforcement regime will comprise fines levied against occupiers found to have HGV drivers in breach of the HGV Route Restriction. Paragraph 8.2 of Schedule 2 of the S106 details the requirements to maintain the HGV Monitoring System. | This suggests the enforcement will only happen regarding drivers of HGVs being employed by occupiers of Northampton Gateway. There will be many HGV drivers accessing this SRFI who are not based at Northampton Gateway.  |
| 1.11.11          | These reports corroborate each other and establish that there is ample capacity for freight trains to arrive and depart Northampton Gateway over a 24-hour period.   | <p>Network Rail stated in their relevant representation on 1<sup>st</sup> August 2018 that further capacity studies needed to be carried out.</p> <p>The Network Rail Roxhill Statement of Common Ground (paragraph 24) states: <i>“This statement is, however, subject to the following caveats:</i></p> <p><i>(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”.</i></p> <p>There is not a sound basis for Roxhill to claim that there is ample capacity and to imply that no further studies are needed.</p> |
| 1.11.12          | HS2 Phase 1 is the greater enabler for additional West Coast Main Line freight capacity out of London and through Northamptonshire to Rugby.   | HS2 will release some paths on the fast tracks. Freight travels on the “slow” tracks. Furthermore HS2 will not release any train paths on the North London Line, East London Line and Great Eastern Line which are more crowded than the West Coast Main Line and would be used by trains from London or Felixstowe ports.   |

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|                  |  | <p>Network Rail said In its Northampton Loop Capacity report (part of the Network Rail Statement of Common Ground with Roxhill) that post HS2 implementation, <i>“the slow line south of rugby are likely to see a higher utilisation than today”</i>.</p>   |
| 1.11.15          | <p>The Rail Reports referred to in that response (Document 6.7 – APP-377) explain why the proposed development will not impact the function, speed and capacity for passenger services, as they operate now or in future growth scenarios.</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>. Roxhill has provided no evidence to indicate that any such studies have been conducted since 1<sup>st</sup> August 2018.</p> <p>I draw attention to Network Rail’s Northampton Loop Capacity report of September 2017 (included in the Statement of Common Ground between Network Rail and Roxhill) which contained the following in its introduction: <i>“The analysis shows without significant infrastructure improvements a choice must be made between maximising freight paths and creation of additional passenger paths”</i>.</p> <p>I draw attention to the Statement of Common Ground between Network Rail and Roxhill. <i>“24. 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. 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”</i>.</p> <p>That does not provide confirmation that there is sufficient capacity to provide the freight paths that Northampton Gateway is forecasting being used.</p> |

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|                  |                | <p>I note from the Statement of Common Ground referred to above, that neither Roxhill nor Network Rail have made use of the West Coast Main Line Capacity Plus document. If they had done so, they would have been better informed.</p> <p>Northamptonshire County Council's (NCC) view was as follows:</p> <p><i>"4.12 However, in their emerging West Coast Capacity Plus Study, Network Rail identified a significant future constraint in capacity between Denbigh Hall North Junction and Milton Keynes Central in particular, but also over the entirety of the Northampton Loop, such that increasing freight services over the Loop might require a reduction in the passenger service to Northampton".</i></p> <p>NCC went on to say:</p> <p><i>"4.20 However, the applicant has not demonstrated, as far as the County Council can determine, that these paths be used to serve the proposed Rail Freight Interchange without conflict to other services. In particular:</i></p> <ul style="list-style-type: none"> <li>• <i>That there is time available with the headway of appropriate paths for services to slow down to enter or accelerate to depart from the site without delaying following trains.</i></li> <li>• <i>That it there are paths available which allow northbound ('down') trains to enter and depart the site, without conflicting with paths on the southbound ('up') line which they must cross to access the rail freight terminal".</i></li> </ul> <p>I note also the Northamptonshire Rail Capacity Study produced for the Northamptonshire Enterprise Partnership in April 2016 which said:</p> <p><i>"WEST COAST MAIN LINE - pressure for capacity between Willesden and Northampton will be significant, and is likely to require investment at pinch points. The most significant consequences of this will be</i></p> |

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|                  | <p>The Application therefore includes due consideration to the potential for effects on passenger rail services, and users of such services.</p>                         | <p><i>a need for investment in additional track capacity between Bletchley and Milton Keynes, and dynamic freight loops on the Northampton Loop. This will be particularly important if enhanced passenger services between Northampton and London are to be introduced once HS2 Phase 1 opens in 2026”.</i></p> <p>I referred to this report in my written representation paragraphs 163 to 165.</p> <p>Several separate sources have indicated that either further studies need to take place or additional infrastructure work is needed before additional freight paths can be accommodated. So Roxhill’s claim to the contrary appears to be ill founded.</p> <p>I disagree and stand by paragraphs 170 to 172 of my written representation.</p>         |
| 1.11.16          | <p>In reality there is still some way to go before the SFN is considered fully capable of accommodating 775m length trains ....</p>                                      | <p>Roxhill’s response does not directly answer the question raised by the Planning Inspectorate. Freight train lengths of up to 1000 metres have been considered (please see my written representation paragraphs 105 to 107).</p>  |
| 1.11.23          | <p>The traffic impact of the Proposed Development therefore already considers the cumulative traffic impact of the committed and planned growth in Northamptonshire.</p> | <p>This is not correct. The traffic modelling has not been run with the developers’ own data for Northampton Gateway and Rail Central simultaneously. Northamptonshire County council commented as follows in their written representation:<br/> <i>“3.7 The County Council does, however, remain concerned about the potential cumulative impact should both the Northampton Gateway and Rail Central Strategic Rail Freight Interchange proposals be consented. We do not believe that the two proposals are compatible from a highways perspective .....</i>”</p> <p>The traffic model will also understate employee traffic movements as they will have to travel further distances than Roxhill expects due the lack of locally available workforce.</p> |

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|                  |  | <p>In addition, the traffic model only takes account of planned developments in Northamptonshire. Planned growth for Milton Keynes, Bedford and other adjacent areas have not been included for traffic modelling purposes. These points were covered in my written representation paragraphs 236 to 245.</p> <p>Lastly, as Andrew Gough indicated at the Open Floor Hearing on 10<sup>th</sup> October, the Northampton University campus has been moved to Bedford Road, which is less than one mile from the A45. With 13,000 people travelling to the campus every day, this will significantly affect the traffic modelling which has been carried out so far.</p> |
| 1.11.25          | ..... The Applicant has been prepared to restrict departing HGVs to accessing the Proposed Development to and from the north only. | There appears to be nothing stopping a HGV driver from departing Northampton Gateway to the north, taking a circuit of M1 junction 15 and then heading south on the A508 towards Roade and Stony Stratford.   |
| 1.11.31          | (ii) The assumption of 16 trains is made for all purposes in the ES.   | Referencing Roxhill's Rail Report (Document 6.7) Figure 1, this suggests that no allowance has been made for express freight trains.  |

### Conclusions

Roxhill has not always directly answered the questions raised by the Planning Inspectorate. There are occasions when their answers seem to be misleading.