

Responses to Roxhill’s Document 8.7

Paragraph	Roxhill’s comments	My response
2	The responses have therefore focused on issues thought to be of most assistance to the ExA.	This comment appears to be questionable in view of my response to Roxhill’s point immediately below. This suggests that Roxhill’s remarks are included more for their own benefit than for the benefit of the Examining Authority.
	South Northamptonshire Council	
	Response to Written Representation	
47	“The available evidence concerning the impacts leads the LPA to conclude that the Northampton Gateway proposal would be preferable to the Rail Central and that for both to be imposed would have significant and long-lasting adverse impacts on a substantial number of people and across a wide area.”	<p>This statement has been extracted from the draft written representation prepared prior to the South Northants Council (SNC) Planning Committee meeting on 1st November 2018. The SNC Planning Committee decided to amend their written representation before it was submitted in accordance with Deadline 1 on 6th November. It included the following statements:</p> <p><i>“1. The proposed Northampton Gateway development in terms of the scale of development and the location has the potential to undermine local economy and local planning policy. The proposal represents a significant increase in employment provision which would lead to increased pressure on housing over and above provision identified in the Development Plan. The harm that will arise from the contradiction with the Development Plan in terms of the distribution of development and the balance of land uses will not be mitigated through the development proposal.. The Council as the Local Planning Authority is opposed to this proposal.</i></p> <p><i>36. The Council is not convinced the assessment demonstrates the existence of the ‘available and economic local workforce’ which is identified as being an important consideration in paragraph 4.87 of the National Policy Statement for National Networks 2014.</i></p>

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		<p data-bbox="890 271 1374 483"><i>49. The cumulative impact of the proposal, together with other developments either existing, permitted or that can reasonably be foreseen, is also matter of concern. These are fully not assessed within the ES.</i></p> <p data-bbox="890 521 1366 801"><i>50. The overall impact in terms of the adverse effect on the landscape character, visual impact and for the separate identity of settlements of Milton Malsor & Blisworth of the simultaneous development of two RFIs on adjoining sites would be devastating and unacceptable.</i></p> <p data-bbox="890 840 1390 1016"><i>51. A full review of the cumulative impact of the two proposed SRFI sites is essential to a robust assessment of either proposal this must be a priority for the Examining Authority.</i></p> <p data-bbox="890 1055 1390 1767"><i>55. Given the proximity of the proposal to the existing SRFI at DIRFT, where the capacity to accommodate further 7.86 million sqft of rail served warehousing exists through the permitted expansion of Phase 3 alongside with new larger intermodal freight terminal. The priority for a further terminal so close to this existing SRFI is very questionable. This would undermine the expressed purpose of the NSPNN to deliver the expanded geographical national network that is so compellingly needed. The simultaneous proposal of two similar RFI facilities on adjoining land is clearly not envisaged within the NSPNN. This is therefore unacceptable not only in policy terms but also for the overwhelming impacts this would have for the existing infrastructure, settlements and people.</i></p> <p data-bbox="890 1805 1390 2016"><i>56. Over provision within in a geographic location is likely to result in potentially harmful impacts contrary to the intention of the policy guidance. If effective use cannot, or is not, made of the railway to move freight this could lead to</i></p>

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		<p><i>warehousing being road served with consequential adverse impacts for national objectives concerning climate change and for the local area if the effects assessed in the Environmental Statement and Transport Assessment are exceeded. This is a significant concern for the West Coast Mail line where the demand for train paths is already high and this demand is expected to increase due to pressure for new passenger services to Northampton and the new station proposal at Rugby. The strategic highway network in the locality experiences use beyond design capacity with consequential impacts for the local highway network which is evidenced in the congestion experienced at peak hours.</i></p> <p><i>62. This proposed development has the potential to undermine the adopted WNJCS in terms of both the scale and the distribution of development. The proposal represents a significant increase in employment provision which would lead to increased pressure on housing over and above provision identified in the JCS. The harm that will arise from the contradiction with the Development Plan in terms of the distribution of development and the balance of land uses will not be mitigated through the development proposal. For this reason the Council as the Local Planning Authority is opposed to this proposal”.</i></p> <p>All of the comments that I have extracted from the SNC Written representation submitted to the Planning Inspectorate are more relevant than the statement that Roxhill chose to extract because they reflect the outcome of the SNC Planning Committee meeting. They were available in terms of timing for Roxhill to comment on in their Document 8.7. Instead Roxhill chose to pick up a comment which does not even reflect the current SNC position. SNC does not state a preference between the</p>

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		two SRFIs in the written representation that it submitted to the Planning Inspectorate.
	Northampton Borough Council	
	Response to Written Representation	
(Page 5)	The response of Network Rail to ExQ1.11.15 (REP1-050) is also of direct relevance in confirming that new freight trains would not be at the expense of passenger trains – it states that “any freight services which are added to the network will not be at the expense of passenger services and, accordingly, Network Rail confirms that the Proposed Development will not affect passengers.”	<p>That is a non-typical comment from Network Rail. Elsewhere Network Rail have either indicated further surveys need to be performed or have added significant caveats to any such statement. For instance:</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> <p>Roxhill has provided no evidence to indicate that any such studies have been conducted since 1st 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:</i></p>

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		<p><i>(a) that trains can enter and exit the SRFI at a speed of not less than 40 mph (Network Rail is considering the results of work produced by the Applicant regarding connectiuon speeds); and (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> <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. 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"> <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> <i>• That it there are paths available which allow northbound ('down')</i>

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		<p><i>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></p> <p>Roxhill's inclusion of Network Rail's response to the Planning Inspectorate written question 1.11.15 without reference to any of the statements that I have listed immediately above appears to be an attempt to mislead.</p> <p>Roxhill has repeated the Network Rail answer to question 1.11.15 for other written representations. My response above applies equally to each instance of Roxhill's use of this statement.</p>
	Addleshaw Goddard LLP on behalf of Network Rail	
	Response to Written Representation	
(Page 10)	It is noted that Network Rail have no objection in principle to the development (paragraph 1.4 WR).	<p>Roxhill has not included the following comments from Network Rail's written representation:</p> <p><i>1.9 Appendix 1 to the SoCG explains the process involved in the identification and allocation of capacity on the national rail network.</i></p> <p><i>2.4 The issue of whether or not trains entering and operating from the Proposed Development can connect to and from the railway network at an acceptable speed is being considered further by Network Rail following receipt of studies produced by the Applicant and Network rail will update the ExA at the next appropriate Deadline once the studies have been considered and validated.</i></p> <p>In the Northampton Gateway SRFI Feasibility Report (GHD) (July 2018) supplied as part of the Statement of Common Ground between Network Rail and Roxhill, the following statement is made in the Summary and Conclusions section: <i>"For reasons outlined within the report, the entry and exits speeds adopted are 40mph from the south and</i></p>

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		<p><i>20mph from the north. The proposals are achieved with the alterations to the existing infrastructure minimised where possible”.</i></p> <p>This suggests that the design does not meet the Network Rail minimum speed requirement of 40 mph.</p> <p>I refer also to the response I made above in connection with Northampton Borough Council.</p>
	<p>Stop Roxhill Northampton Gateway Action Group</p>	
	<p>Response to Written Representation</p>	
<p>3.3 and 3.5</p>	<p>The site access roundabout was included in the visualisation shown at the Stage 2 Consultation exhibitions. The VISSIM modelling demonstrates that there would be sufficient gaps in development traffic arriving at the site for northbound traffic using the A508 to enter the roundabout.</p>	<p>Any traffic model has to contain certain assumptions. When it comes to driver behaviour, some drivers are naturally cautious. There would be two lanes of traffic on the roundabout approaching from the right at the rate of one vehicle approximately every 4 seconds at peak times. Some drivers will inevitably wait longer than they need to select a suitable gap in the traffic flow before pulling onto the roundabout. There will also be HGVs travelling from Roade towards M1 junction 15. These vehicles have poorer acceleration from a standstill than a car and their drivers will have to wait longer before finding a suitable gap in the traffic to join the roundabout. I remain unconvinced that the model will necessarily represent the reality.</p>
<p>6.5, 6.6 and 6.8</p>	<p>The strategic transport modelling undertaken as part of the TA (ES Appendix 12.1) demonstrates that the overall effect of the proposed highway mitigation works (with the development in place) is a reduction in two-way traffic passing through Blisworth village.</p>	<p>During the Rail Central statutory consultation in March 2018, Michelle Berrington, Ashfield Land’s senior transport consultant, expressed concerns regarding the accuracy of forecast traffic volumes on minor roads, although she was not anxious about the forecasts for major roads. Ashfield Land would be using the same Northamptonshire Strategic Transport Model base data as Roxhill. The traffic flows through minor roads such as those through Blisworth are small in comparison to those on the A508 or A45. This raises question marks as to how well</p>

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		the traffic modelling can be relied on for these smaller roads. I suggest some of the forecast usage on smaller roads may turn out to be lower than what eventually occurs.
	Andrew Gough	
	Response to Written Representation	
(Page 31)	The Applicant's case in relation to the market considerations is set out in the Market Analysis Report (Document 6.8A, REP1-004) and	Roxhill's reliance on its Market Analysis Report (Document 6.8A) caused me to revisit this document and my comments on it will be found later.
(Page 33)	Dr Gough includes a section on Alternatives in which he utilises an assessment methodology undertaken by Aecom to present his 'Independent Assessment of Alternative Sites'..... It did not cover Northamptonshire and therefore is not relevant to the application.	<p>It is ironic that Roxhill's response contains several paragraphs criticising Andrew Gough's analysis of alternative sites and in particular the proposed Hinckley SRFI. It is ironic because with a proposal such as Northampton Gateway, Roxhill has a statutory obligation to evaluate alternative sites and to determine which has the least environmental impact. This has been an exercise which Roxhill has been reluctant to perform satisfactorily as I indicated in my written representation paragraphs 125 to 134.</p> <p>Roxhill's "review" of alternative sites included a passing reference to a site at M1 junction 13. This junction is in Bedfordshire although the suggested site is probably in Buckinghamshire. Therefore there is nothing wrong with Andrew Gough's suggestion of a site at Hinckley (Leicestershire) just because it is not in Northamptonshire. It is Roxhill's apparent narrowness of vision which has stopped it from looking at the need for a national network of SRFIs. The East Midlands does not need any more.</p> <p>Dr Gough chose to introduce the Aecom study as it was an independent organisation that had developed a methodology for assessing and comparing potential SRFI sites. Roxhill does not have an effective methodology of its own. It was not introduced by Andrew Gough because of the geographical area that it encompassed.</p>

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(Pages 34, 35)	In this section Dr Gough also refers to improvements to the freight network up to 2024 on the Felixstowe to Nuneaton route and the route from the West Midlands to Southampton..... These are part of the ongoing improvements to the network generally, they are in no way 'bypassing' Northampton Gateway.	Roxhill appears to be in denial. The biggest planned investments on the rail network for the benefit of freight movements between now and 2024 are on the Felixstowe to Nuneaton route. Please see my written representation paragraphs 86 to 89. When completed, a greater proportion of freight trains from Felixstowe will use this route to reach the West Midlands, the North West and Yorkshire. In doing so they will avoid travelling past Northampton.

Conclusions on Roxhill Document 8.7

In several cases Roxhill appears to have set out to mislead including repeating some statements multiple times. I remain unconvinced by some of the conclusions drawn from the traffic modelling work. In attempting to pick fault with some of Andrew Gough's findings, Roxhill has drawn attention to its own lack of a satisfactory alternative sites assessment.

Roxhill's Document 6.8A Market Analysis Report

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		My attention was drawn to the Market Analysis Report during Roxhill's response to Andrew Gough's written representation. I have reread this document and consider it be frequently very misleading. My responses to this document follow below.
1.4	There is an existing concentration of Strategic Rail Freight Interchanges in the Midlands which reflects the concentration of logistics activity in this area. This network will need to be reinforced and expanded if the growth in rail freight is to be achieved and demand met. A lack of SRFI's has undoubtedly constrained the growth of rail freight and, unless new SRFI's are provided in locations which address market requirement, logistics operations will continue to be developed but will be road-based.	<p>A concentration of SRFIs in the Midlands does not indicate that more are needed in this area. The NPSNN states: <i>2.58 This means that SRFI capacity needs to be provided at a wide range of locations</i></p> <p>A further clue may lie in the title: National Policy Statement for National Networks.</p> <p>The Midlands is an attractive location for road-based logistics distribution, particularly for national distribution centres. I refer again to the NPSNN with regard to SRFIs:</p>

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		<p><i>2.56 It is important that SRFIs are located near the business markets they will serve – major urban centres, or groups of centres –.....</i></p> <p>Northampton and Milton Keynes are not major urban centres in the way that Manchester and Leeds are, and these East Midland towns are both already well served by DIRFT.</p>
4.13	<p>Whilst take-up on rail served sites has been a relatively small proportion of overall take-up, this is a reflection of the availability of suitable sites rather than underlying demand.</p>	<p>No justification has been provided for this point of view. It is much more likely to reflect the fact that approximately 90% of the goods transported in the UK travel by road. If there was a pressing need for more SRFI capacity in the East Midlands, then DIRFT would have been expanded more quickly. The site has been operational for 21 years and has an ability to expand until 2031. This particular document is about market demand; the first half of Roxhill's sentence is very significant.</p>
4.15	<p>The drivers of locational choice have resulted in a concentration of occupier activity in the centre of the country. The attractiveness of this area relative to other locations, relates to the following intrinsic characteristics:</p> <ul style="list-style-type: none"> • the geographic central location in the UK providing access to all parts of the UK within a reasonable drive time. Drive time connections are crucial to the logistics industry. • the physical location, being at the population-weighted centre of the country and broadly central to the major UK container ports and key domestic manufacturing areas. • the transport connectivity, particularly road, with the country's two most significant motorways – the M1 and M6 – running through this area as do major trunk roads including the A14. These provide the key routes which link the region to the UK's main urban centres and larger container port. • the good supply of appropriately-skilled staff. 	<p>Two of these reasons relate to the transport of goods by road rather than rail. These "justifications" ignore the SRFI requirement of being located close to major urban centres to minimise road journey length and maximise rail journey length.</p> <p>There is not a good supply of appropriately-skilled staff. I pointed out in my written representation that any trip to DIRFT or Brackmills (in Northampton) will always provide many examples of companies looking for HGV drivers or warehouse operatives (see my written representation paragraphs 254 and 268)</p>
4.17	<p>Northampton is in the southern part of this Midlands Heartland area. This</p>	<p>The "very strong demand" has not been qualified; is this for road-based</p>

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	particular area has seen very strong demand over recent years, driven by demand from food and internet retailers partly as a result of its access to London markets.	distribution warehouses or rail-based? I would suggest that it is almost certainly road-based. If access to London markets is a "justification" then that should be served by SRFIs positioned close to London, not a site more than 60 miles away.
4.18	The Northampton Gateway site has excellent transport links. Around 87% of the UK population is within a 4.5 hour HGV drive time (a day's round trip) and 77% within a 2.5 hour HGV drive time.	That justification fits entirely with road-based distribution, not rail-based. A 4.5 hour HGV drive time implies a national distribution centre. It does not fit with the SRFI ethos of maximising rail journey distance and minimising road journey distance.
4.19	As well as Northampton Gateway's good access to London there are a number of major urban centres within a 90 minute drive time to which the site will provide good access, including Birmingham, Coventry, Nottingham, Leicester and Derby. However the site will also serve major urban centres not currently well served by an SRFI, including Northampton, Milton Keynes and Oxford.	Roxhill has elsewhere pointed out the existence of Hams Hall and Birch Coppice SRFIs, the Freightliner terminal in the centre of Birmingham and the East Midlands Gateway, the latter being under construction. Between them they currently or will in future serve Birmingham, Coventry, Nottingham, Leicester and Derby. Northampton Gateway would only represent a marginal journey saving to Oxford compared to DIRFT. Neither Northampton, Milton Keynes or Oxford are considered to be major urban centres.
6.2	Figure 5 indicates a forecast growth rate of 11.9% per year for domestic intermodal rail freight between 2011 and 2033. (Comment: other forecasts later in this chapter also show high values).	That is very misleading. Domestic intermodal rail freight has been growing at an average rate of 1.1% per year for the last six years. That data is available from the Office of Rail and Road and was included in my written representation paragraph 194. The fact that Roxhill has not updated its report to reflect this lower actual growth rate is significant.
6.18	Given the time it takes to plan, secure consent and then to develop SRFI's, the forecasts to 2033 and even 2043 are also relevant. In addition to the 4.3million sqm by 2023 it forecasts need on top of this for an additional 3.7 million sqm by 2033 and the further 3.7 million sqm forecast by 2043. These	That does not make a case for positioning another SRFI in the East Midlands. It may make the case for further road-based logistics warehouses in this region.

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	growth assumptions indicate that the study is taking a positive view of the ability of the market, including the planning system, to provide new sites.	
7.13	Given the economics of rail freight and the dynamics of the logistics market, SRFIs will inevitably need be concentrated, albeit not exclusively, in the centre of the UK where locations have greatest access to UK markets and where a large number of NDC and major RDC's are located and will want to continue to be located.	Long journey lengths are needed to make rail freight viable. Even then, three out of four major rail freight operating companies made a financial loss last year (my written representation paragraphs 192 and 193). Unfortunately this is another repetition of the road-based distribution argument.
7.22	Despite this concentration, each RFI operates commercially successful rail freight operations. (see also Figure 12)	East Midlands Gateway is not operational yet. Northampton Gateway has not yet been approved. So how can it be claimed that each RFI operates commercially successfully? Furthermore the area defined for Northampton Gateway is served perfectly well by DIRFT.
7.25	The proposed Rail Central scheme located immediately west of the Northampton Gateway site emphasises the strength of the market in the Northampton area.	There is no justification for that claim. It appears to be nothing more than wishful thinking.
7.26	The concentration of SRFI's in this area is not surprising and wholly consistent with the concentration of logistics within this area generally, and importantly the concentration of National Distribution Centres. It is also a clear reflection of the economics of rail freight, as explained elsewhere in this Report.	No, this statement is totally misleading. There is a concentration of road-based logistics centres in the East Midlands, many of which are national distribution centres. Approximately 90% of goods in this country are distributed by road. A valid justification for another SRFI in the East Midlands has not been made.
9.1	In addition to traditional bulk intermodal the scheme is designed to accommodate an aggregates terminal and is future proofed so it is capable of accommodating a rapid rail freight terminal should such a model prove feasible at some time in the future.	After 38 pages of explanation of the "market demand" for an SRFI just south of Northampton, with its multiplicity of different uses, we find in the following paragraph there is only one company so far that wishes to make uses of these facilities and that company doesn't even operate in the intermodal market.
Appendix A2, paragraph 46	Based on this size threshold, a total of 192 existing warehouse units have been identified totalling 4.87 million sqm.	This is a totally theoretical exercise. It takes no account of whether or not goods arrive at or depart from these warehouses in containers. It takes no account of the journey distances involved or the commonality of journeys. It takes no account of the

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		required speed of order turnaround. If rail is such a suitable means of transport for these companies, why haven't they located their operations at DIRFT? The latter has been operational for more than 20 years.

Conclusion on Market Analysis report

A market analysis report for a strategic rail freight interchange would be expected to propose a site where there is known demand to handle significant quantities of shipping containers. This would most likely to be in the North West, West Midlands or Yorkshire region. Two of our three busiest container ports (Felixstowe and Southampton) send more than 80% of their freight trains to these three regions (see my written representation paragraphs 195 and 196). In relation to the population of those regions, the numbers of SRFIs (existing/approved/planned) is small. The distance of any such rail journey from Felixstowe or Southampton is sufficient to be economically viable. Siting a SRFI in the North West or Yorkshire would help in the government's aim of achieving a national network. The Greater Manchester and West Yorkshire urban areas are the second and fourth most populous urban areas in the country. The quantity of the population is an indirect guide to the consumption of goods.

Region	Population (2011 census)	Total SRFIs (including planned)
North West	7,052,177	1
West Midlands	5,601,847	3
Yorkshire	5,283,733	2
East Midlands	4,533,222	6

Instead Roxhill proposes another SRFI in the East Midlands. Counting those in operation, approved or proposed, the East Midlands would have 6 SRFIs if all the ones proposed are approved. This is despite the fact that the East Midlands has 64% of the population of the North West. Its largest urban area is Nottingham which has 29% of the population of Greater Manchester. The East Midlands is considered to be too close to Felixstowe and Southampton to provide economically viable journeys by rail. That view is backed up by the fact that only one freight train per day serves DIRFT from Southampton and there are none from Felixstowe which have an end destination of DIRFT. Northampton Gateway is not needed as DIRFT is only 18 miles away and has an expansion capability until 2031.

Roxhill has found just one company that wishes to move to Northampton Gateway, GRS Roadstone. It is not even a company that moves goods by shipping containers. The most significant statement made by Roxhill in their market analysis report was:

"4.13 Whilst take-up on rail served sites has been a relatively small proportion of overall take-up"

I am aware that Roxhill provided an explanation for that situation, but in my view its explanation was not well founded.

Roxhill's market analysis report repeats many arguments to make the case for a road-based logistics centre in the East Midlands. It absolutely fails to make the case for a SRFI in this region as, amongst many others, it overlooks the need to minimise the road journeys and to be situated close to major urban centres. It also overlooks the government's aim of establishing a national network of SRFIs.