

National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

2nd January 2019

Dear Sir or Madam,

TR050006 Northampton Gateway Rail Freight Interchange – Deadline 4 Submission

I write as an Interested Party in regard of the above application. I wish to respond to oral statements made during the second Issue Specific Hearing (ISH2) and to comments on my earlier Written Representation submitted by the Applicant at Deadline 3.

During ISH2, the Applicants representatives were asked about their assumptions on population growth within the development's catchment area. They responded by stating that their calculations had been based on the national average for people of working age.

I do not believe that the use of a central forecast is appropriate for the location in question, since none of the relevant local authority areas is forecast to change in line with the national average. I offer a brief extract of the relevant statistical publication in Table 1.

South Northamptonshire is expected to see a fall in people of working age, despite an overall increase in population. The working population of Northampton is forecast to rise, but not by a sufficiently large amount to provide all of the jobs created, except by relocation and/or substitution. The nearest pool of available labour is in Milton Keynes.

If the Applicant has indeed used a central forecast of 2% growth in working population by 2041, then their assumptions on available labour in South Northamptonshire will be too high, whilst being too low in Northampton and Milton Keynes.

Every workstream that uses these figures, from junction modelling to staff parking, will need to be revisited.

The Applicant's comments on my Written Representation are a matter of record. I wish to clarify two aspects of my submission.

The Applicant has stated that prior work that they themselves relied upon to gain development consent at East Midlands Gateway is not relevant to this application. This position confuses Methodology with Geography.

By accepting the output of the AECOM study that justified the EMG site, Roxhill are implicitly accepting the methodology behind that study.

Almost every aspect of this application uses accepted methodology: trip generation, job creation, flood mitigation and parking standards would be four examples. It does not matter *where* the methodology was first used – the geography is irrelevant.

To make a simple point: Northampton Gateway is not in Rochdale, but the principles of the Rochdale Envelope will still apply.

The Applicant has not followed the same methodology that underpinned their successful application at East Midlands Gateway. We are therefore unable to judge the quality of the current application against the “made” DCO for EMG to justify the site selection, site parameters, need and alternatives, etc., etc.

Secondly, the Applicant challenged my comparison of the floorspace provided by their scheme against the forecast provided by Network Rail for rail-connected warehousing in 2033. The proposed scheme is substantially in excess of the unconstrained assumptions made by Network Rail for that date.

The choice of 2033 was a simple one – it is the forecast closest to the proposed completion of construction. By pointing out that the 2043 forecast is larger, and closer to their proposed footprint, are we to assume that the Applicant envisages a 20-year construction period? Is demand for their product so weak that they need over 20 years to find their tenants?

The Applicant has not put forward a properly-constructed case for a development of this scale, in this location, at this time, including a full assessment of alternative sites within a national strategic context.

As others have already noted, many of the Applicant’s responses to Written Questions and Representations suggest an over-familiarity with justifying road-based solutions, not rail.

Remarking that “Hinckley is no closer to the A14 than is Northampton Gateway” shows little grasp of the importance of origins and destinations in SRFI network design. Hinckley is on the preferred rail corridor from Felixstowe to the North West, whilst Northampton Gateway is not.

I will continue to press for a different arrangement of SRFI in the East Midlands.

I note that England’s Economic Heartland has commissioned WSP to undertake a strategic review of rail freight options within the Milton Keynes/Cambridge corridor. This review will include the Ridgemon/ J13 proposal I put forward in my Written Representation.

Hinckley NRFI is already at the pre-application stage. The combination of these two SRFI, offering new connectivity to the deep-water ports and taking up new rail freight capacity, is a far superior addition to a national network than Northampton Gateway.

Yours faithfully,

A redacted signature block consisting of two solid black rectangular bars. The top bar is shorter and positioned above the bottom bar, which is longer and extends further to the right.

Dr Andrew Gough

2016-based subnational population projections			(EXTRACT)														
Table 1: Local authorities and higher administrative areas within England																	
Five year age groups, persons			https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2														
Figures in thousands (to one decimal place)																	
CODE	AREA	AGE GROUP	2016		2021		2026		2031		2036		2041	25yr Growth			
E06000042	Milton Keynes	All ages	266.2	5.3%	280.2	4.0%	291.3	2.8%	299.4	2.5%	306.8	2.3%	314.0	47.8	18%		
E06000042	Milton Keynes	Working Age (20-59)	145.5	1.9%	148.2	0.7%	149.2	1.5%	151.5	1.7%	154.1	0.3%	154.5	9.0	6%		
E07000154	Northampton	All ages	224.5	4.3%	234.2	3.3%	241.9	2.7%	248.5	2.2%	253.9	2.1%	259.2	34.7	15%		
E07000154	Northampton	Working Age (20-59)	122.6	1.7%	124.7	-0.6%	124.0	1.2%	125.5	1.4%	127.3	0.7%	128.2	5.6	5%		
E07000155	South Northamptonshire	All ages	89.9	4.0%	93.5	3.6%	96.9	2.7%	99.5	2.1%	101.6	1.9%	103.5	13.6	15%		
E07000155	South Northamptonshire	Working Age (20-59)	45.0	0.0%	45.0	-1.8%	44.2	-1.4%	43.6	0.5%	43.8	0.9%	44.2	-0.8	-2%		
E92000001	England	All ages	55268	3.2%	57031	2.6%	58506	2.2%	59790	1.9%	60906	1.7%	61952	6,684	12%		
E92000001	England	Working Age (20-59)	29347	0.6%	29509	-1.4%	29083	0.0%	29091	1.5%	29535	1.1%	29854	506.6	2%		

2016-based subnational population projections

(EXTRACT)

Table 2: Local authorities and higher administrative areas within England

Five year age groups, persons

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/lauthoritiesinenglandtable2>

Figures in thousands (to one decimal place)

CODE	AREA	AGE GROUP	2016		2021		2026		2031		2036		2041		25yr Growth	
E06000042	Milton Keynes	All ages	266.2	5.3%	280.2	4.0%	291.3	2.8%	299.4	2.5%	306.8	2.3%	314.0	47.8	18%	
E06000042	Milton Keynes	Working Age (20-59)	145.5	1.9%	148.2	0.7%	149.2	1.5%	151.5	1.7%	154.1	0.3%	154.5	9.0	6%	
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E07000154	Northampton	Working Age (20-59)	122.6	1.7%	124.7	-0.6%	124.0	1.2%	125.5	1.4%	127.3	0.7%	128.2	5.6	5%	
E07000155	South Northamptonshire	All ages	89.9	4.0%	93.5	3.6%	96.9	2.7%	99.5	2.1%	101.6	1.9%	103.5	13.6	15%	
E07000155	South Northamptonshire	Working Age (20-59)	45.0	0.0%	45.0	-1.8%	44.2	-1.4%	43.6	0.5%	43.8	0.9%	44.2	-0.8	-2%	
E92000001	England	All ages	55268	3.2%	57031	2.6%	58506	2.2%	59790	1.9%	60906	1.7%	61952	6,684.0	12%	
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2016-based subnational population projections

(EXTRACT)

Table 2: Local authorities and higher administrative areas within England
Five year age groups, persons

Figures in thousands (to one decimal place)

CODE	AREA	AGE GROUP	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	
E06000042	Milton Keynes	0-4	20.1	19.7	19.5	19.4	19.2	18.9	18.8	18.7	18.6	18.5	18.4	18.3	18.2	18.1	18.1	18.1	18.1	18.1	18.1	18.1	18.2	18.3	18.4	18.6	18.8	18.9	
E06000042	Milton Keynes	5-9	20.9	21.4	21.5	21.5	21.4	21.2	20.8	20.6	20.4	20.3	20.0	19.8	19.7	19.6	19.6	19.5	19.4	19.3	19.3	19.2	19.2	19.2	19.2	19.2	19.3	19.3	
E06000042	Milton Keynes	10-14	16.9	17.7	18.4	19.4	20.3	20.9	21.4	21.5	21.4	21.2	20.8	20.6	20.5	20.3	20.1	20.1	20.0	19.9	19.8	19.7	19.6	19.5	19.4	19.6	19.6	19.4	
E06000042	Milton Keynes	15-19	14.8	14.6	14.6	14.8	15.0	15.6	16.4	17.2	17.9	18.6	19.1	19.5	19.6	19.5	19.4	19.3	19.0	18.8	18.7	18.5	18.4	18.3	18.2	18.2	18.1	18.0	
E06000042	Milton Keynes	20-24	13.2	13.0	12.8	12.5	12.3	12.1	11.9	11.8	11.8	11.9	12.3	12.8	13.3	13.8	14.2	14.6	14.9	15.0	15.0	15.0	15.0	14.7	14.6	14.5	14.4	14.3	
E06000042	Milton Keynes	25-29	17.3	17.3	17.2	17.2	17.2	17.1	16.9	16.7	16.4	16.1	15.8	15.5	15.4	15.4	15.5	15.9	16.4	17.0	17.5	18.0	18.4	18.8	18.9	19.0	19.0	18.9	
E06000042	Milton Keynes	30-34	21.3	20.8	20.6	20.3	19.9	19.6	19.7	19.5	19.5	19.4	19.2	19.0	18.8	18.5	18.3	17.9	17.6	17.4	17.4	17.5	17.9	18.5	19.1	19.6	20.1	20.6	
E06000042	Milton Keynes	35-39	22.1	22.5	22.8	22.7	22.7	22.6	22.2	22.1	21.9	21.6	21.4	21.4	21.4	21.2	21.0	20.8	20.6	20.4	20.1	19.8	19.5	19.1	18.9	18.9	19.0	19.4	
E06000042	Milton Keynes	40-44	19.9	20.2	20.4	21.0	21.5	22.2	22.6	22.8	22.8	22.8	22.7	22.4	22.4	22.2	22.0	21.8	21.8	21.6	21.6	21.6	21.5	21.0	20.8	20.5	20.2	19.8	
E06000042	Milton Keynes	45-49	16.8	16.9	19.0	19.2	19.4	19.6	19.8	20.3	20.8	21.5	21.8	22.1	22.1	22.1	22.1	21.8	21.8	21.8	21.5	21.3	21.4	21.2	21.0	20.5	20.1	20.0	
E06000042	Milton Keynes	50-54	17.5	18.0	18.1	18.2	18.2	18.3	18.3	18.4	18.5	18.7	18.7	18.8	19.0	19.4	19.9	20.5	20.9	21.2	21.2	21.2	21.2	21.0	20.9	20.9	20.7	20.6	
E06000042	Milton Keynes	55-59	15.4	15.7	16.0	16.4	16.6	16.9	17.3	17.5	17.5	17.5	17.6	17.7	17.8	17.9	17.9	18.0	18.1	18.5	19.0	19.6	19.9	20.2	20.2	20.3	20.2		
E06000042	Milton Keynes	60-64	13.4	13.5	13.7	14.0	14.4	14.6	14.9	15.3	15.6	15.9	16.2	16.6	16.7	16.8	16.8	16.8	16.9	16.9	17.1	17.0	17.1	17.0	17.1	17.2	17.6	18.0	18.6
E06000042	Milton Keynes	65-69	12.3	12.1	12.2	12.2	12.3	12.4	12.5	12.7	13.0	13.4	13.6	13.9	14.2	14.6	14.9	15.2	15.5	15.6	15.7	15.7	15.7	15.7	15.7	15.8	15.8	15.9	15.9
E06000042	Milton Keynes	70-74	8.3	9.3	9.9	10.4	10.9	11.3	11.4	11.1	11.2	11.3	11.4	11.5	11.7	12.0	12.3	12.6	12.9	13.2	13.5	13.8	14.1	14.4	14.5	14.6	14.6	14.7	
E06000042	Milton Keynes	75-79	6.0	6.1	6.4	6.7	7.0	7.5	8.4	9.0	9.4	9.9	10.2	10.0	10.1	10.1	10.2	10.3	10.5	10.7	11.0	11.2	11.5	11.8	12.1	12.4	12.7	13.0	
E06000042	Milton Keynes	80-84	4.0	4.2	4.4	4.7	4.8	4.9	5.1	5.3	5.6	5.9	6.3	7.1	7.6	7.9	8.3	8.6	8.5	8.5	8.7	8.8	8.8	8.9	9.1	9.4	9.7	9.9	
E06000042	Milton Keynes	85-89	2.6	2.6	2.7	2.7	2.8	2.9	3.0	3.2	3.4	3.5	3.6	3.7	3.9	4.2	4.4	4.7	5.3	5.7	6.0	6.3	6.5	6.4	6.4	6.5	6.6	6.7	
E06000042	Milton Keynes	90+	1.5	1.5	1.6	1.6	1.7	1.8	1.8	1.9	2.0	2.2	2.3	2.4	2.5	2.6	2.7	2.9	3.2	3.3	3.6	4.0	4.3	4.6	4.8	5.0			
E06000042	Milton Keynes	All ages	266.2	269.1	271.9	274.8	277.5	280.2	282.7	285.0	287.3	289.3	291.3	293.0	294.7	296.4	297.9	299.4	300.9	302.4	303.9	305.3	306.8	308.2	309.7	311.1	312.5	314.0	
E06000042	Milton Keynes	Working Age (20-59)	145.5	146.4	146.9	147.5	147.8	148.2	148.5	148.6	148.7	148.8	149.2	149.3	149.9	150.4	150.9	151.5	152.0	152.5	153.0	153.4	154.1	154.4	154.6	154.7	154.7	154.5	
E07000154	Northampton	0-4	16.5	16.3	16.1	16.0	15.8	15.6	15.5	15.4	15.3	15.2	15.1	15.0	15.0	15.0	15.0	15.0	15.0	15.0	15.1	15.2	15.2	15.3	15.6	15.7	15.8		
E07000154	Northampton	5-9	15.7	16.1	16.2	16.3	16.3	16.3	16.1	15.9	15.8	15.7	15.5	15.4	15.3	15.2	15.2	15.1	15.0	15.0	14.9	14.9	14.9	14.9	14.9	15.0	15.1	15.1	
E07000154	Northampton	10-14	12.8	13.3	14.0	14.6	15.1	15.4	15.8	15.9	15.9	15.9	15.9	15.9	15.7	15.6	15.5	15.3	15.1	15.1	15.0	14.9	14.9	14.8	14.8	14.7	14.7	14.6	
E07000154	Northampton	15-19	13.0	13.0	12.9	13.0	13.2	13.6	14.1	14.8	15.3	15.8	16.1	16.4	16.6	16.6	16.7	16.7	16.4	16.3	16.2	16.1	15.9	15.9	15.8	15.7	15.7	15.6	
E07000154	Northampton	20-24	10.5	10.3	10.2	10.1	10.0	9.9	9.8	9.7	9.6	9.5	9.4	9.3	9.2	9.1	9.0	8.9	8.8	8.7	8.6	8.5	8.4	8.3	8.2	8.1	8.0	7.9	
E07000154	Northampton	25-29	15.5	15.5	15.3	15.3	15.2	15.1	14.9	14.8	14.6	14.3	14.2	14.2	14.2	14.2	14.1	14.1	14.2	14.2	14.2	14.2	14.2	14.2	14.2	14.2	14.2	14.2	
E07000154	Northampton	30-34	17.4	17.3	17.0	16.8	16.6	16.4	16.3	16.1	16.2	16.1	16.0	15.9	15.7	15.5	15.4	15.2	14.9	14.8	14.7	14.8	15.1	15.5	16.0	16.4	16.8	17.1	
E07000154	Northampton	35-39	16.2	16.6	17.2	17.2	17.1	17.1	16.9	16.8	16.6	16.4	16.3	16.1	16.1	16.0	15.9	15.8	15.6	15.5	15.3	15.1	14.8	14.7	14.6	14.7	15.0		
E07000154	Northampton	40-44	15.5	15.2	15.0	15.1	15.6	15.9	16.3	16.9	16.8	16.7	16.6	16.5	16.4	16.3	16.2	16.1	16.0	16.0	15.9	15.8	15.6	15.5	15.3	15.1	14.9		
E07000154	Northampton	45-49	15.0	15.1	15.3	15.4	15.4	15.3	14.9	14.7	14.8	15.2	15.6	16.0	16.4	16.4	16.3	16.3	16.2	16.1	16.0	15.9	15.8	15.5	15.8	15.7	15.5		
E07000154	Northampton	50-54	15.2	15.3	15.2	15.1	14.9	14.9	15.0	15.1	15.1	15.2	15.0	14.6	14.4	14.5	14.9	15.2	15.6	16.1	16.1	16.0	16.0	15.9	15.8	15.7	15.7		
E07000154	Northampton	55-59	12.5	12.9	13.5	14.0	14.4	14.8	14.9	14.8	14.6	14.6	14.6	14.7	14.7	14.8	14.8	14.6	14.5	14.4	14.1	14.1	14.5	14.8	15.2	15.6	15.7		
E07000154	Northampton	60-64	10.7	10.9	11.1	11.4	11.7	12.0	12.5	13.0	13.5	13.9	14.2	14.3	14.3	14.2	14.1	14.1	14.2	14.2	14.2	14.2	14.2	14.2	14.2	14.2	14.2		
E07000154	Northampton	65-69	10.9	10.6	10.3	10.3	10.1	10.2	10.3	10.5	10.8	11.1	11.4	11.8	12.3	12.7	13.1	13.5	13.6	13.6	13.5	13.4	13.4	13.4	13.5	13.5	13.5		
E07000154	Northampton	70-74	7.9	8.7	9.3	9.6	9.9	10.1	9.8	9.5	9.5	9.4	9.4	9.6	9.8	10.0	10.3	10.6	11.0	11.4	11.9	12.2	12.6	12.7	12.6	12.5	12.5		
E07000154	Northampton	75-79	5.7	5.9	6.0	6.3	6.7	7.1	7.8	8.4	8.6	8.9	9.1	8.8	8.6	8.5	8.6	8.7	8.9	9.1	9.4	9.7	10.0	10.4	10.9	11.2			
E07000154	Northampton	80-84	4.3	4.3	4.5	4.6	4.7	4.8	4.9	5.1	5.3	5.6	6.0	6.6	7.1	7.3	7.6	7.7	7.5	7.3	7.3	7.4	7.5	7.7	7.9	8.2			
E07000154	Northampton	85-89	2.7	2.7	2.8	2.8	2.9	2.9	3.1	3.2	3.3	3.4	3.5	3.6	3.9	4.1	4.3	4.9	5.3	5.4	5.6	5.7	5.6	5.5	5.5	5.5			
E07000154	Northampton	90+	1.6	1.6	1.6	1.6	1.6	1.7	1.7	1.8	1.8	1.8	1.9	2.0	2.2	2.3	2.3	2.4	2.6	2.8	3.0	3.1	3.5	3.8	4.0	4.2			
E07000154	Northampton	All ages	224.5	226.6	228.7	230.7	232.5	234.2	236.0	237.8	239.0	240.5	241.9	243.4	245.0	246.7	248.0	249.6	251.0	252									