

ISH2 Meeting 19th December 2018

The prepared statement that I provided initially at the meeting

1. In Network Rail's input to the Scoping Opinion document, dated 15 December 2016, the company sought a *detailed assessment of the impact of the proposal on the rail network*
2. Eighteen months or so later, and Network Rail's relevant representation, dated 1/8/2018, contained the following:
"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".
3. I am not aware of any further capacity studies having been carried out since August 2018.
4. The statement of common ground between Network Rail and Roxhill dated 6th November 2018 contains Network Rail's Northampton Loop Capacity report of September 2017 which included the following in its introduction:
"The analysis shows without significant infrastructure improvements a choice must be made between maximising freight paths and creation of additional passenger paths".
5. That view is supported by Northamptonshire County Council which said in their written representation:
"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".
6. NCC expressed further concerns about the impacts of the additional freight trains in its paragraph 4.20
7. Neither Roxhill nor Network Rail have indicated how they expect Northampton Gateway's freight train paths to be accommodated alongside a forecast doubling of Northampton rail passengers by 2043. That forecast increase was contained within the Northamptonshire Rail Capacity Study produced for the Northamptonshire Enterprise Partnership.
8. We see in Roxhill's Road Freight to Rail Freight Modal Shift document (Transportation Appendix 34) that more than three quarters of the tonnage forecast to be transported from the ports to Northampton Gateway by rail, would be from Felixstowe and London Gateway. To reach Northampton Gateway, such trains would have to use the North London Line and East London Line. These two lines contain three of Network Rail's seven worst bottlenecks [1].
9. Furthermore the southern part of the West Coast Main Line is between 5 and 6 times busier than the Northampton Loop line when comparing passenger train movements [2]. Therefore simply studying the capacity of the Northampton Loop does not provide a

sufficient analysis of the rail network's ability to accommodate the additional freight paths envisaged for Northampton Gateway. In this context we should be considering the 16 intermodal and bulk trains per day plus the unspecified number of express freight trains.

10. Nor should we overlook the fact that Northampton Gateway has only reached GRIP level 2 in the Network Rail process. As the Planning Inspectorate indicated in a communication dated 21st February 2017, this suggests that there is a much higher level of risk in assessing the potential impacts of the scheme. I believe that the Planning Inspectorate would prefer the project to have reached GRIP level 4 ^[3].

11. Finally, my understanding of the planning process for strategic rail freight interchanges is that full preparations must be made in advance. Roxhill do not appear to have developed their plans fully in conjunction with Network Rail. If they had done so, they would have reached GRIP level 4.

References

1. MDS Transmodal Rail Freight Forecasts

<https://cdn.networkrail.co.uk/wp-content/uploads/2018/10/Rail-freight-forecasts-final-report.pdf>

See pages 61 to 63. Relevant bottlenecks on North London and East London Lines are Camden Road, Forest Gate Junction and Woodgrange Park.

2. Using current timetables, comparison were made between passenger trains serving Northampton and trains using the southern-most part of West Coast Main Line (WCML) which are London Northwestern, Virgin, Southern and London Overground at both peak and off peak times. If we exclude London Overground (for north of Watford Junction), we still have a ratio of between 4 and almost 6 times the usage of the WCML on this southern part with double the number of tracks compared to the Northampton Loop. In other words each WCML line immediately north of Watford Junction is at least twice and approaching three times as busy as each line on the Northampton Loop. This also ties in with the illustration I provided at the end of paragraph 177 of my written representation.

3. Planning Inspectorate advice regarding GRIP status expected

<https://infrastructure.planninginspectorate.gov.uk/projects/east-midlands/rail-central-strategic-rail-freight-interchange/?ipcsection=advice&ipcadvice=fa85cd29e0>

Review of rail capacity discussion

12. I consider that during the ISH2 meeting, Roxhill frequently did not directly address the points I raised in my statement. Some might infer that if Roxhill did not directly address specific points raised, then it suggests that they simply didn't have a good answer to those issues. On a number of occasions views were expressed or claims were made without supporting evidence being provided. Therefore many of the issues I raised remain

outstanding. As was pointed out at the beginning of the meeting, this was not an occasion to cross examine witnesses.

13. One statement that was relied upon heavily was the written answer by Addleshaw Goddard LLP on behalf of Network Rail (dated 17th October 2018) in response to the examiners' question 1.11.15. Elsewhere within this document at answer to question 1.11.35, we find the listing of documents used by Addleshaw Goddard to determine the capacity of the rail network. The listing provided omits the following documents which I consider to be important and very relevant reference sources:

- Network Rail West Coast Main Line Capacity Plus (referred to by Northamptonshire County Council in their written representation paragraphs 4.12 and 4.20)
- Northamptonshire Rail Capacity Study (produced for Northamptonshire Enterprise Partnership and referred to in my written representation paragraphs 151 to 152, 163 to 165 and 176)
- Network Rail Northampton Loop Capacity Report of September 2017 (see my paragraph 4 above)

It would also have been useful for Addleshaw Goddard to have seen the written representations from Northamptonshire County Council and Northampton Rail User Group, although these documents were not published until 8th November 2018. Had these reports been examined, it is quite possible that a more cautious conclusion would have been reached in the response to question 1.11.15.

14. Also in response to 1.11.35 Addleshaw Goddard indicates that there is capacity for eight freight trains per day subject to two caveats. Eight trains per day is no more than half the planned capacity of Northampton Gateway. The available capacity has been assessed in relation to current usage rather than future usage, when passenger and freight demand is expected to increase (my written representation paragraphs 144 to 154). The focus of the studies appears to have been more in relation to the West Coast Main Line than the full rail network.

15. If you look at the statement of common ground between Roxhill and Network Rail dated 6/11/18 which was produced some twenty days after the Addleshaw Goddard written answer, it provides significant caveats to its main statement about the capacity of the Northampton Loop.

16. This would suggest that the 1.11.15 response by Addleshaw Goddard is inconsistent with other views that it has expressed. Addleshaw Goddard might be considered to have a less cautious approach than that of Network Rail. Furthermore as this Statement of Common Ground was produced approximately three weeks after Addleshaw Goddard's answers to the Planning Inspectorate's written questions, it surely reflects more recent thinking.

17. During the response provided by Roxhill at the ISH2 meeting on 19th December, the applicant volunteered that its capacity investigations had extended as far south as Wembley and had been based on current network utilisation.

18. When I suggested that such a study had not included the North London and East London Lines with three of Network Rail's worst seven bottlenecks, Roxhill then moved their position to say that section was included as well. So why did Roxhill initially say as far south as Wembley? I am not totally convinced. Has Network Rail verified the results of this study?

19. The North London and East London Lines are largely two track and face the conflicting requirements of passenger trains and freight trains which have very different usage patterns as the former stop frequently and the latter do not. Furthermore London Overground has been one of the fastest growing train operation companies over the last six years (253%) and future growth needs to be taken into considerations. Please also see my written representation paragraphs 140, 158 to 159, 179 and 181.

20. Both Roxhill and Addleshaw Goddard indicate that their studies relate to existing usage of the rail network and take no account of anticipated or planned future growth of services.

21. Addleshaw Goddard was not present at the ISH2 meeting to confirm or otherwise any claims being made.

22. There was discussion on the GRIP level required. I pointed out that GRIP level 4 was expected by the Planning Inspectorate which can be confirmed through reference link 3 provided above. Roxhill suggested GRIP level 2 would suffice which does not accord with the view of the Planning Inspectorate.

Review of other discussions

Air Quality

23. There seemed to be a bit of confusion between clean air zones, low emission zones and air quality management areas (AQMAs) in the Northampton area. I provide as a separate file the listing of the AQMAs in the Northampton Borough area which was downloaded on 20th December 2018.. Northampton currently has no clean air zones or low emission zones.

24. I was surprised by the representative of Northampton Borough Council indicating that at least one of the AQMAs within its area might be revoked. That view is at odds with the position provided to me in a letter from the Borough Council dated 21 November 2017. Please see my written representation paragraph 272 and link to a scanned copy of that letter.

25. In my written representation I commented on the significant reduction (47%) in emissions forecast as a result of using DEFRA's revised methodology (my paragraphs 282 to 284). Whilst it is probably outside the scope of this inquiry to question DEFRA's revised methodology, I would suggest that question's would have been raised if the revised methodology had brought about a 47% increase in forecast emissions.

26. It was acknowledged that some HGVs entering Northampton Gateway would not be Euro 6 compliant.

Socio Economic Effects

27. Discussion was made concerning the views put forward by Dr Gough regarding working age population forecasts. He was not present to defend his point of view. Roxhill applied a standard (national) percentage of working age population. Dr Gough used forecast data applicable to South Northamptonshire which suggested that there would be a higher than average proportion of people over 65 (i.e. not of working age). The source of this forecast may be found through my written representation paragraph 255. Therefore Dr Gough's comments appear to be perfectly valid and more relevant as his comments are area specific rather than making use of a national average.

28. Whatever forecast is used, it doesn't change the fact that the claimant count in the South Northamptonshire constituency is one of the lowest in the country and the claimant counts in the surrounding constituencies are below the national average. Distribution companies at DIRFT and Brackmills are always looking for drivers or warehouse operatives which shows that there is a shortage of people with such skills available for work in this area. This has been covered more fully in my written representation paragraphs 246 to 258 and 268.

Conclusions

29. Yet again Roxhill has failed to address the specific issues raised on multiple occasions. The majority of points that I made in my opening statement were simply not addressed by Roxhill. One can only conclude that Roxhill do not have satisfactory answers to many of the specific points raised, otherwise they would have provided them.

30. One cannot expect Roxhill and objectors to agree on all matters, but not answering specific questions does not move the debate forward.

What areas have been declared as Air Quality Management Areas (AQMAs) in Northampton?

These areas have been declared as Air Quality Management Areas (AQMAs) and they are as follows:

1. [ZONE 1 - The M1 corridor](#) (between Junctions 15 and 16)
2. [ZONE 2 - Victoria Promenade](#) (an area encompassing a number of properties along Bridge Street, Victoria Promenade and Victoria Gardens)
3. [ZONE 3 - St James](#) (an area encompassing a number of properties along St James Road, Weedon Road, Harlestone Road and adjoining streets)
4. [ZONE 4 - Harborough Road](#) (an area encompassing roads and properties fronting parts of Kingsthorpe Grove, Harborough Road, Cranford Terrace, Alexandra Terrace and Boughton Green Road)
5. [ZONE 5 - A45 London Road](#) (An area encompassing a number of properties overlooking the northbound and southbound carriageways of the A45, extending from Woodland Road to the Queen Eleanor interchange)
6. [ZONE 6 - Campbell Square](#) (An area encompassing a number of properties located at the junction of Grafton Street, Campbell Street, Regent Square and Barrack Road)
7. ~~ZONE 7 - Barrack Road (An area encompassing a number of properties fronting Barrack Road extending from Adelaide Street to Monarch Road)~~
8. [ZONE 8 - St Michael's Road](#) (An area encompassing all properties fronting St Michael's Road)
9. ~~ZONE 9 - Park Avenue North (An area encompassing a number of properties adjacent to the roundabout at the junction of Kettering Road and Park Avenue North)~~
10. ~~ZONE 10 - A43 Lumbertubs Way (An area encompassing a number of properties overlooking the southbound carriageway of the A43 at the slip road adjoining Standens Barn Road)~~
11. ~~ZONE 11 - Nene Valley Way A45 (An area encompassing a number of properties overlooking the eastbound carriageway of the A45 located at the Riverside interchange)~~

Areas 7, 9, 10 and 11 were revoked in 2011