

Responses to Roxhill's Document 8.9

Paragraph	Roxhill's comment	My response
	South Northamptonshire Council	
ExQ1.0.9	The Applicant considers this to be misleading. Policy EV8 specifically identified 'important local gaps' whereas the emerging Local Plan Part 2 does not specifically identify any local gaps (as acknowledged by SNC in its response). Emerging policy SS2 relates to general principles and therefore cannot be said to carry forward the principles of a previously specifically identified local gaps.	<p>I disagree with the applicant. Emerging policy SS2 does carry forward the principles contained within existing policy EV8. It is agreed that SS2 does not list specific areas. However SS2 does contain the following:</p> <ol style="list-style-type: none"> 1. <i>Planning permission will be granted where the proposed development:</i> <ol style="list-style-type: none"> a. <i>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; and</i> b. <i>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; and</i> <p>Roxhill has not explained how its Northampton Gateway proposal is compliant with the section of SS2 of SNC's emerging Local Plan Part 2 that I have reproduced above.</p> <p>Furthermore Policy EV8 will be in effect until at least September 2019. The Planning Inspectorate is expected to make its recommendation before then.</p>
ExQ1.0.19	SNC, Stop Roxhill Northampton Gateway and others have asserted that the economics of rail freight differ significantly to the economics of road based distribution in relation to the locational requirements of logistics businesses. No explanation is given as to how the locational requirements differ. It is the Applicant's position that there is no significant differences in the	<p>Yet again Roxhill have overlooked key arguments. The NSPNN states:</p> <ol style="list-style-type: none"> 2.44 <i>The aim of a strategic rail freight interchange (SRFI) is to optimise the use of rail in the freight journey by maximising rail trunk haul and minimising some elements of the secondary distribution leg by road.....</i> 2.45 <i>This requires the logistics industry to develop new facilities</i>

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	<p>locational requirements because both road based and rail based freight distribution form part of the same logistics supply chain.</p>	<p><i>that need to be located as well as near to the conurbations that consume the goods.</i></p> <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><i>2.58 This means that SRFI capacity needs to be provided at a wide range of locations</i></p> <p>Several SRFIs are being proposed for the Midlands (in particular the East Midlands) because it suits a road based distribution model.</p> <p>Ashfield Land have indicated that 90% of the containers that the Rail Central SRFI is forecast to handle will be transported by road. Roxhill have not indicated a comparable figure for Northampton Gateway, but I would suggest that it will be in the order of 80%. In other words the rail element of Northampton Gateway is likely to be minor. I (and others) contend that Northampton Gateway is planned to operate primarily as a national distribution centre for road based logistics.</p> <p>Roxhill have disregarded the sections of the NPSNN I have referred to above. They have also disregarded the fact that more than 80% of the freight trains from the major container ports of Felixstowe and Southampton have end destinations in the North West, West Midlands or Yorkshire as indicated in my written representation paragraphs 195 and 196.</p> <p>Northamptonshire is already well served by DIRFT and will continue to be in the future. It does not need another SRFI.</p>
ExQ1.0.22	<p>Network Rail confirms that it is supportive in principle of additional SRFI provision at Northampton and has not identified the need for any network capacity enhancements.</p>	<p>Roxhill has simply not addressed the points made by South Northants Council. These included the need for Northampton Loop enhancements costing up to £550m for which no delivery commitment has been made.</p>

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		<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) 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: <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</i></p>

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		<p><i>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: <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’) 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>The Northamptonshire Rail Capacity Study also contained the following remarks in the context of freight: <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 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>The last paragraph is taken from my written representation paragraph 163.</p> <p>I have made the above comments previously, but Roxhill have yet to take them on board.</p>

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ExQ1.0.28	Please see above in response to ExQ1.0.22.	The points raised by South Northants Council in ExQ1.0.28 are not the same as those raised in ExQ1.0.22. Therefore Roxhill should not be relying on their response to different issues.
	Stop Roxhill Northampton Gateway (SRNG)	
ExQ1.0.6	The incorporation of the aggregates terminal into the scheme took place after the Stage 2 Consultation which included the aggregates terminal.	This sentence makes no sense. I suggest the word "included" be changed to "did not include".
ExQ1.10.6	This is dealt with in paragraphs 3.3.6 and 3.3.7 of Chapter 3 of the Environmental Statement (Document 5.2) and in the Applicant's response to this ExQ1.	Roxhill has not adequately addressed the issue that has been raised. In Chapter 3 of their Environmental Statement, Roxhill acknowledged that there was a lower than national average claimant count in all the nearby local authority areas (Table 3.5). However the applicant has not indicated where its required new workforce will come from bearing in mind the existing known shortage of suitable drivers and warehouse operatives in this area. Roxhill talks about the planned build of additional new homes in the area. However it fails to acknowledge the small increase in population of working age as distinct to those over 65. Please see my written representation paragraph 255.
ExQ1.11.31	The situation is that the 16 trains per day includes any trains being used by the aggregate terminal, but does not include any trains connected with any rapid rail freight operation which may come forward in due course.	For Network Rail to determine whether the network has the capacity to accommodate the trains planned to serve Northampton Gateway, it needs as a minimum the total number of all the trains expected. While the draft environmental statement included a figure of 12 rapid rail freight trains per day, the environmental statement omitted any such figure. Roxhill need to quantify the number of rapid rail freight trains that are expected to eventually serve this SRFI.
	Blisworth Parish Council	
ExQ1.0.19	i) Please see response to SNC above. Please also refer to the Applicant's response to Andrew Gough's written representation (REP1-065) (Document 8.7, REP2-10).	Several parties hold a different opinion to that of Roxhill. In some cases this is a consequence of Roxhill not satisfactorily addressing the specific points raised by interested parties. I have documented my own views on Roxhill's response to ExQ1.0.19 in my

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	<p>ii) It is considered that the Application fully accords with these paragraphs, particularly when they are considered as part of the objectives and requirements of the NPSNN when read as a whole.</p>	<p>comments under the heading of South Northamptonshire Council earlier in this document.</p> <p>Roxhill has yet to satisfactorily address the specific points raised by interested parties in this context. Roxhill is effectively acknowledging that it has no answer for the specific issues raised. There is no justification to support Roxhill's statement.</p>
ExQ1.0.21	<p>Please also refer to the Applicant's response to ExQ1.0.33 (Document 8.2, REP1-020 and REP1-021), and particularly the letter from Maritime Transport Limited (Appendix 6 to Document 8.2).</p>	<p>The letter from Maritime Transport Ltd is somewhat generalised. No mention is made of the Daventry International Rail Freight Terminal which is 18 miles away and has an expansion capability until 2031. Little consideration has been given to the closeness of Northampton Gateway to the main container ports which would result in uneconomic journey distances by rail. This letter does not adequately justify a specific need for Northampton Gateway when whatever demand is discussed can be served by the existing DIRFT facility. If it succeeds in making any justification for a logistics distribution facility in the East Midlands, then it is for a road-based operation.</p>
ExQ1.0.22	<p>The proposal is justified by the NPSNN and explained in the Market Analysis Report (Document 6.8A, REP1-004).</p>	<p>Unfortunately Northampton Gateway is not justified by the NPSNN. Roxhill repeatedly ignore the areas where its proposal non-compliant with the NPSNN. Relevant areas were listed in my written representation paragraphs 1 to 18 in summarised form. More details were provided elsewhere within that document.</p> <p>My views on the shortcomings of Document 6.8A were made clear in my response to Document 8.7 supplied for Deadline 3.</p>
ExQ1.0.28	<p>The reasons for the reduction in growth forecasts is explained in paragraphs 6.6 and 6.7 of the Market Analysis Report (Document 6.8A, REP1-004).</p>	<p>Roxhill continue to ignore reality. Since 2011/12 domestic intermodal rail freight growth has increased at an average rate of 1.1% per year according to ORR data. This was noted in my written representation paragraph 194. Roxhill's document 6.8A was revised as recently as 6th November 2018, but still fails to reflect the much smaller growth experienced in this sector over the last six years compared to their forecasts.</p>

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	Please also refer to the Applicant's response to RR-041 (Document 8.3, REP1-022).	In this response, Roxhill indicated that international rail freight traffic had increased by 23%. Seeing as international comprises less than 3% of total rail freight movements, the 23% increase is of very little significance. Roxhill then said that analysing changes of freight usage by quarters (of a year) did not provide a reliable trend. However as has been pointed out on several occasions, I would argue that the trend over a six year period cannot be ignored. I would also argue that Network Rail has been consistently optimistic in its rail freight forecasting over a number of years. Actuals have much more meaning than forecasts.
ExQ1.10.1	The Applicant considers that given this is baseline information, it cannot be considered to be misleading.	Blisworth Parish Council points out that the projected increase of the working age population in South Northamptonshire is small in relation to the overall population increase in this area. This is another example of Roxhill not addressing the specific point that has been raised.
ExQ1.11.13	This paragraph refers to Eurohub Corby and EMDC.	Incorrect. The Parish Council also referred to East Midlands Gateway and DIRFT. Roxhill has no explanation regarding the most recent warehouses being built at DIRFT not being rail connected. Roxhill does not know the reason why Marks and Spencer is not using the rail connection available at the East Midlands Distribution Centre. Marks and Spencer opened this distribution centre more than 5 years ago. It is situated in the East Midlands which Roxhill and other developers suggest is an ideal area for distribution centres. If rail was/is such a compelling means of transport for freight, one might have expected Marks and Spencer to be using its rail facilities by now. They are not using their rail facilities.
Appendix 3 Table 1 item 1 d)	Please see paragraphs 2.4.16 – 2.4.18 of Chapter 2 of the Environmental Statement (Document 5.2) which explain clearly the reasons for the conclusion that the site at junction 13 of the M1 is not a reasonable alternative.	Yet again Roxhill ignore the point being made. In this case that the applicant had not conducted a proper study of alternative sites before selecting the one which would have the least environmental impact. This is a regulatory requirement and cannot simply be brushed aside.

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	Andrew Bodman	
		I will not be repeating the responses I made earlier in this document regarding the same paragraphs/examiners' questions.
ExQ1.10.19	Please see response to SNC above.	Roxhill has not addressed the point I made in my penultimate paragraph.
ExQ1.1.14	Logistics will be located in areas such as this due to the locational advantages. Without the rail opportunity then that logistics development will still take place but will be road based only and will still result in employees travelling to and from work.	<p>Roxhill is missing the point. Northampton Gateway is being proposed in an area which already has an above average proportion of its workforce working in the logistics industry. It is also an area which has very low unemployment. See my written representation paragraphs 247 to 252. Consequently there has been and still is a shortage of warehouse operatives and drivers for logistics companies in this area. (My paragraphs 254 and 268). This will result in employees having to drive further to work than if the SRFI was being proposed in area of high unemployment. I still contend that the mileage accumulated by employees going to and from work at Northampton Gateway will exceed the HGV mileage saved; see my written representation paragraphs 259 to 266. My mileage comparisons were based on 16 trains per day serving Northampton Gateway. Roxhill indicates that DIRFT handles 9 to 10 trains per day and that rail interchange has been operating for in excess of 20 years. If Northampton Gateway operates with less than 16 trains per day, then the mileage comparison that I originally made becomes even less favourable for Northampton Gateway.</p> <p>I have previously made the case for the locational disadvantages of Northampton Gateway (my paragraphs 64 to 116).</p> <p>The Office of Rail and Road publishes data on Freight Moved (Table 13.7) and Freight Lifted (Table 13.6); see Freight Rail Usage within their Data Portal. The first Table is measured in billion net tonne kilometres and the latter in million tonnes. Taking the data for 2017-18 and dividing the former by the latter indicates that the average freight rail journey was 226 km or 140 miles.</p>

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		<p>Bearing in mind that three of the four largest rail freight operating companies in the UK made financial losses last year (my written representation paragraph 192 and associated reference) it is safe to say that a 140 mile rail freight journey is too short to be economically viable.</p> <p>The distances between the three largest UK container ports and Northampton (by road) are: Felixstowe – Northampton 122 miles Southampton – Northampton 109 miles London Gateway – Northampton 94 miles Therefore Northampton Gateway would be too close to these container ports to provide economically viable rail freight journeys. Thus Northampton Gateway would not have a locational advantage.</p> <p>I note that Asda believes the minimum distance for an economically viable rail freight journey is 350 miles according to Rail Central's Rail Operations Report (TR050004-003956, Table 2).</p> <p>Roxhill has not responded to my point about the use of diesel locomotives. At least 49% of them are not subject to any air quality regulations.</p>
ExQ1.9.1	Therefore, at the time when the cumulative impact assessment was required to be undertaken for the purposes of submission with the Northampton Gateway Application, the necessary input from Rail Central was not available.	<p>I understand the situation from the remarks Roxhill has made. However, Roxhill still has an obligation under Environmental Impact Assessment regulations to provide a cumulative impact assessment in respect of known or expected developments. It appears that Ashfield Land has been the reluctant party in this exercise. Now that their application is in the public domain, there should be nothing to prevent the Northamptonshire Strategic Model from being simultaneously being run with the full data sets being provided by both Roxhill and Ashfield Land. NCC has already made its position very clear on this situation (My paragraphs 244 to 245).</p> <p>The Northamptonshire Strategic Model needs to be run with both sets of data and Roxhill then needs to assess what additional highways improvements are required to</p>

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		cater for such traffic levels in the event that both SRFIs are granted approval. Until such an assessment is carried out, the application is surely incomplete.
ExQ1.11.23	<p>The NSTM2 is not limited to Northamptonshire (TA Appendix 22, Figures 3.1 and 3.2). Traffic growth for Milton Keynes, Bedford and other adjacent areas are included within the model via TEMPro growth. WSP's Local Model Validation Report (TA Appendix 22) confirms that the NSTM2 conforms with appropriate calibration and validation criteria. This includes the links to and from the surrounding areas.</p> <p>The moving of the Northamptonshire University Campus has been taken into account in the Transport Assessment. This is referred to as 'University Nunn Mills' at Table 7 of WSP's Reference Case Report (Appendix 23 of the Transport Assessment (Appendix 12.1 of the Environmental Statement (Document 5.2)).</p>	<p>I accept that the NSTM2 model includes areas outside Northamptonshire such as Milton Keynes. I recognise that TEMPro has been used to build the base (current) data for this traffic model. I note for instance references to TEMPro in TA Appendix 22 Table 7.3 (page 23) and Table 5 (page 110).</p> <p>However that was not my point. My issue is that future traffic modelling depends on the data input regarding future development for both housing and business. In the main Transportation chapter of the ES for Northampton Gateway, we find the following:</p> <p><i>"12.8.1 NCC's NSTM2 includes all committed development and allocated sites within the Northamptonshire area.Full details of the committed and allocated development and infrastructure schemes included in each of the NSTM2 assessment scenarios are detailed at TA Appendix 36."</i></p> <p>[My emphasis]</p> <p>Close examination of Appendix 36 shows that every listed development in this appendix is confined within the county of Northamptonshire. Therefore while NSTM2 traffic modelling includes Milton Keynes it takes no account of the planned growth of housing and businesses in that area. Therefore the views expressed in my written representation paragraphs 236 to 240 remain absolutely valid despite the comments Roxhill has just made.</p> <p>Additional traffic movements for future business developments are based on the number of employees for each business. In the case of a university this will give a misleading forecast. A figure of 1806 employees has been used for the University Nunn Mills (adjacent to the Bedford Road) which is the new campus for Northampton University. However, including students, there will be a total of 13,000 people travelling to Northampton University on a</p>

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		regular basis as Andrew Gough advised. While I am not suggesting each student will drive a car to Northampton University, I am suggesting that there will be considerably more vehicle movements to the new campus each day than those suggested by 1806 employees.

Conclusions

Yet again I find Roxhill chooses not to address specific points raised or attempts to mislead. As an example of the latter, I highlight the applicant's response to Q1.11.23 which is the last question listed in this document. TEMPro is one of the elements has been used to build a traffic model which relates to the current period of time. Future traffic movements have been forecast using known development plans for housing and businesses, but exclude any planned developments outside Northamptonshire. Roxhill have attempted to mislead by answering in the way that they did.

I provided another example of Roxhill's attempt to mislead in my response to their Document 8.7 (submitted for Deadline 3). Within that document, Roxhill had referred to the draft written representation of South Northants Council even though the final written representation of this Council was considerably different and also available at the time Roxhill was preparing its Document 8.7.

There are other examples of misleading responses being provided by the applicant. By repeatedly attempting to mislead the Planning Inspectorate, the applicant appears to undermine its own credibility and trustworthiness.