



NORTHAMPTON
GATEWAY
STRATEGIC RAIL FREIGHT INTERCHANGE

**APPLICANT'S RESPONSES TO RAIL CENTRAL
DEADLINE 3 SUBMISSIONS**

DOCUMENT 8.8B

The Northampton Gateway Rail Freight Interchange Order 201X

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DEADLINE 3 SUBMISSION | 8 JANUARY 2019

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THE NORTHAMPTON GATEWAY RAILWAY FREIGHT INTERCHANGE ORDER 201X

Applicant's Response to Rail Central's Deadline 3 Submissions – Document 8.8B

1. Introduction

- 1.1 This document responds to the **Deadline 3** submissions submitted on behalf of Ashfield Land Management Limited and Gazeley GLP Northampton s.à.r.l ("**Rail Central**") (REP3-016).
- 1.2 The submissions of Rail Central are responses of Rail Central to the Applicant's **Deadline 2** submissions. This response is brief since it does not seek to repeat responses previously made in respect of the same points in other submissions (whether in writing or at ISH).

2. Applicant's response to response of Rail Central to Deadline 2 Submissions

Interrelationship between Northampton Gateway and Rail Central (Section 2)

- 2.1 Rail Central enclosed within its submission, at Appendix 4, referred to in paragraph 2.7, some suggested protective provisions in relation to the interrelationship of the footpath and bunding adjacent to the railway.
- 2.2 The Applicant has previously indicated to the ExA that the interrelationship can be dealt with by requirements and appropriate requirements are contained within the dDCO submitted for **Deadline 4 (Document 3.1C)**.
- 2.3 The protective provisions submitted by Rail Central demonstrate how inappropriate it is to take the approach in the protective provisions advocated by Rail Central. The PP, as drafted;
- are not contingent upon Rail Central being approved;
 - give Rail Central control over the commencement of development, requiring Northampton Gateway to enter into a Property Agreement of uncertain content with Rail Central prior to commencement of the development (para 4);
 - give Rail Central power over changes to phasing of Works Nos. 1 (rail infrastructure), 6 (structural landscaping) and 11 (J15A) (para 9);
 - give Rail Central right to approve details of Works Nos. 1, 6 and 11 (para 11);
 - require the Applicant to give Rail Central extensive notice of commencement and start of Works Nos. 1, 6, and 11 (paras 8 & 12); and
 - include obligations to "make good" and provision for compensation payable to Rail Central if there is "detriment" to Rail Central, all of which is vague and non-specific (paras 15 and 20).
- 2.4 The extent of control given to Rail Central in the draft PP is completely inappropriate for a commercial competitor. The approach of the Applicant, as per the requirements in the dDCO (**Document 3.1C**), is to identify the relevant planning authority as the appropriate body to deal with any planning issues arising out of the interrelationship between the two projects. That is clearly the correct approach. If both DCO's are

approved then the relevant planning authority will have regard to the need to facilitate both schemes coming forward in taking decisions required of it under the requirements.

- 2.5 Reference is made by Rail Central (in paragraphs 2.7 and 2.8) to Junction 15a and a meeting between the respective transport consultants. That meeting took place on 12 December 2018. The concerns of the Applicant's transport consultants regarding the Rail Central proposals for J15a were communicated to Rail Central in advance of the meeting (see **Appendix 1**). A note of the meeting is attached at **Appendix 2**.
- 2.6 It will be apparent from the meeting note that Rail Central have been unable to provide any further information or comfort in respect of the modelling problems associated with the Rail Central proposals for J15a. It remains the position of the Applicant that, based on the information submitted as part of the Rail Central application the proposals for J15a will not satisfactorily accommodate the traffic movements associated with the Rail Central development and, therefore, will not accommodate the movements associated with both developments.
- 2.6 In paragraphs 2.10 and 2.11 Rail Central refer to a broader SoCG and a draft is attached at Appendix 2 of their document. The draft attached is a version of SoCG which the Applicant had already made clear to Rail Central was unacceptable, not least because it has errors of fact and is positively misleading.
- 2.7 The SoCG requested by the ExA has been provided (**Document 7.17**, REP3-006). The Applicant does not consider a further SoCG, addressing matters beyond the remit identified by the ExA, would serve any purpose and advised Rail Central of this prior to Rail Central submitting the draft SoCG to the ExA. To the extent that such a document would be capable of being agreed it would simply restate what has been stated by the parties previously and provide the ExA with no further information. It would divert the Applicant unnecessarily from dealing with essential tasks set by the ExA.

Rail Operational Compatibility (Section 3)

- 2.8 The Applicant has nothing further to add regarding Rail Operational Compatibility over and above that already said in documentation or at ISH.

Cumulative Impact Assessment (Section 4)

- 2.9 A revised CIA based on the Rail Central scheme accepted for Examination, has been provided to the ExA (**Document 8.13**).
- 2.10 The points 1 to 4 referred to in the Rail Central response are, in so far as a response is needed, either dealt with in previous responses, at the ISH2, or in the revised CIA.

Compulsory Acquisition (Section 5)

- 2.11 At the CA hearing Rail Central confirmed that the only reason for its CA objection was to safeguard the ability for Rail Central to be developed alongside Northampton Gateway.
- 2.12 Rail Central also confirmed that, whilst it had put forward protective provisions to address this, it noted that requirements were going to be suggested and Rail Central

was "open-minded" as to how the issue was addressed. The relevant requirement has been included in the dDCO submitted for **Deadline 4 (Document 3.1C)**.

Northampton Gateway Development Consent Order (Section 6)

- 2.13 Rail Central comment only on issues in relation to protective provisions relating to Rail Central.
- 2.14 In paragraph 6.6 of its submission Rail Central proposed to provide the Applicant with draft protective provisions in respect of rail connections and highways (J15a). No such draft protective provisions have been received.

Appendix 1

Note provided by Applicant's transport consultant on issues with Rail Central Junction 15a proposals provided to Rail Central in advance of meeting held on 12 December 2018

The Rail Central TA presents both detailed LinSig modelling and VISSIM microsimulation modelling of the final Rail Central M1J15A scheme. The LinSig modelling provided at Appendix T, and summarised in Table 9.3, shows that, with Rail Central in place, there would be mean maximum queues of 138 pcus (2021) and 177 pcus (2031) on the A43 approach in the PM peak hour. The stated mean maximum queue lengths would equate to circa 830 metres and 1060 metres.

It is noted that the LinSig model is incorrect and over estimates the capacity of the A43 approach to J15A, as it shows 2 left turn lanes when the scheme proposes only 1. When this is corrected, the queuing would increase further. We have recreated the Rail Central LinSig model, and our modelling, with a single left turn lane, shows that this queue would be 220 pcus long (or circa. 1,320 metres) in the PM peak hour. The proposed Rail Central Grade Separated Junction site access is located approximately 1700 metres south of J15A. Therefore, during the PM peak hour the maximum queue length would reach back as far as the site access junction (reported queue lengths are averages of the max queue over multiple cycles so, for oversaturation arms such as is the case here, the actual max queue would be twice as long during some cycles).

The VISSIM assessment report, at Appendix W of the Rail Central TA, states, at para 6.4.3, that, during the 2021 and 2031 PM peak periods, not all demand traffic can enter the network on the A43 and Rail Central site access approaches. No queue length data or screenshots are provided within the VISSIM report. However, it must be assumed that vehicles are prevented from entering the network due to queueing on the A43 approach to J15A, as suggested by the LinSig modelling.

The VISSIM report (Table 12) states that there would be 9,621 unreleased vehicles in the 2031 with mitigation PM peak model. This suggests that there is significant congestion on all routes into the network. For reference, the VISSIM assessment undertaken for Northampton Gateway shows almost zero unreleased vehicles.

VISSIM and LinSig models are detailed models and therefore give a better representation of capacity and queueing than strategic models. This suggests that the strategic modelling undertaken by Rail Central overestimates the capacity at M1J15A. The strategic modelling is therefore showing more traffic drawn into the junction than the junction could in reality cope with. Therefore, whilst the proposed improvements to M1J15A may provide a nil detriment improvement compared to the Rail Central 'do nothing' scenario, it would result in significant queueing on the A43 which would deter vehicles from using this corridor and could prevent vehicles exiting the Rail Central site access.

Fundamentally, this raises the question of whether the Rail Central mitigation strategy to draw traffic onto the A43 in order to avoid impacts on the surrounding local roads and villages could be achieved. Hence our conclusion that there is a disconnect between the Rail Central strategic and detailed models.

Appendix 2

Note of meeting between Applicant's transport consultants and Rail Central's transport consultants – 12 December 2018

J15 NORTHAMPTON GATEWAY SRFI RAIL CENTRAL MEETING NOTES

Date: 12 December 2018 (1500 to 1630 hrs)

Venue: Segro PLC
Lumonics House
Valley Drive
Swift Valley Park
Rugby
CV21 1TQ

Attendees:	Anthony Tugwell (AT)	Vectos
	James Edwards (JE)	Vectos
	Stuart Dunhill (SD)	ADC Infrastructure Ltd
	Mark Higgins (MH)	ADC Infrastructure Ltd
	Keith Gamblen (KG)	ADC Infrastructure Ltd

Item	
1	Introductions were made. SD opened the meeting noting it was unusual. AT noted that there was no agenda. SD said the purpose of the meeting was for Vectos to respond to ADC's observations (as set out in the email from Morag Thomson to John Webster dated 30.11.18) regarding the forecast operation of the proposed Rail Central (RC) M1J15A highway mitigation scheme. AT suggested that the purpose was for ADC to seek clarity on the issues raised.
2	SD sought to clarify Vectos' role in the RC DCO, asking whether they had been brought in to address problems with the submission.
3	AT responded stating that Vectos have been brought in to provide advice on the DCO process. They have been appointed relatively recently but did also provide advice on the Stage 2 consultation. AT explained that Vectos have experience of DCO's from DIRFT and Hinckley. TPA and Systra are still involved, but in the background. AT said that Vectos are still getting up to speed with three years' worth of work undertaken by TPA and Systra. Vectos will provide the lead transport advice throughout the remainder of the RC DCO.
4	AT asked how long ADC have been involved in the Northampton Gateway (NG) DCO. SD explained around 2.5 years, with the first Transport Working Group meeting held in summer 2016.
5	SD commented that it looked to him as though the RC submission had been rushed and therefore there were omissions. AT in response said he could not comment on the matter, but that the ExA had now accepted the DCO application.
6	With reference to ADC's observations in the email dated 30.11.18, SD asked Vectos to provide insight regarding the modelling submitted with the RC DCO for M1J15A, noting that there is little detail in the VISSIM reporting included in the submission; for example, no queue data is provided.
7	AT admitted that the modelling presented in the RC submission could have been presented better, but that was not to say the outputs are incorrect.
8	AT stated that at present Vectos are in the process of reviewing the RC submission and identifying areas where information could be presented more clearly, or more additional outputs presented. AT agreed that an example of the information that could be presented better was the VISSIM outputs.
9	With reference to the email of 30.11.18 (see item 1), AT wanted to stress that they did not consider there to be 'difficulties' with the modelling included in the RC submission, but confirmed 'differences' were apparent in the RC modelling which would require further analysis.
10	SD asked Vectos whether they have any information that they could release now to assist with the NG CIA, notably any revised modelling to explain the modelling differences, or more clearly presented outputs. If not available now, SD asked when such information would be available.

11	AT inferred that their timescales were aligned with the RC DCO process rather than the NG DCO process and therefore whilst work was ongoing, there was no additional information that could be shared at this time.
12	SD asked what work was ongoing.
13	AT said that revised VISSIM modelling was being undertaken, to take account of the M1 SMP works which were not included in the 2021 VISSIM modelling submitted as part of the RC DCO. Vectos want to understand the impact of this prior to sharing information. Systra are undertaking the VISSIM modelling not Vectos. But Vectos are responsible for approving the revised modelling.
14	SD asked when the revised modelling would be released.
15	JE responded by saying a sensible base scenario needs to be developed as currently the 2021 scenario is worse than the 2031 scenario. Detailed queueing also needs to be reviewed. JE confirmed that Vectos were originally hopeful of releasing information before Christmas. However, due to the work being undertaken by a third party (Systra), an end of January 2019 timescale would be more realistic, to allow Vectos enough time to review and approve the updated modelling.
16	SD and MH noted that this was an example of the lack of clarity in the RC submission which is misleading as it states that committed development and infrastructure is included. It is not apparent from the RC submission that the 2021 VISSIM scenario did not include the SMP works.
17	AT commented that Vectos are in process of understanding TPA methodologies. JE states that the RC modelling is mostly agreed with Highways England.
18	SD says that his understanding was that the inputs are agreed but that the outputs are not.
19	JE reaffirms that their understanding is that the outputs are mostly agreed.
20	SD raised another example of inconsistency with the RC DCO submission; the left turn on the A43 northbound at J15A, which is: <ul style="list-style-type: none"> • labelled as a segregated left turn on the parameters plan; • a signal controlled left turn with two lanes in the LinSig assessment; • a signal controlled left turn with one lane in the drawing on which the VISSIM modelling is based; • shown as a single lane without a stop line or giveaway line on the general arrangement drawing. SD asked if the proposed arrangement could be confirmed.
21	AT responded saying that it is intended to be signal controlled with one lane.
22	MH noted that the VISSIM model was based on the LinSig model, which overestimates the capacity of the left turn. MH asked how the signal timings have been modelled in VISSIM, whether fixed signal timing are used or whether other signal timings are used?
23	JE was not able to provide a definitive answer.
24	SD asked whether Vectos were intending to amend the junction layout for M1J15A.
25	AT responded by saying that signal timing and mitigation measures are been reviewed, but that changes would only be minor and would not materially affect the existing outputs.
26	SD said the LinSig modelling included within the RC DCO submission indicated significant queueing on the A43 northbound approach to M1J15A in the evening peak hour. SD's view was that this was an unacceptable impact.
27	AT responded by stating that was based on the LinSig modelling and that the appropriate assessment tool was the VISSIM modelling.
28	SD explained that as the VISSIM outputs presented in the RC submission doesn't include queue data, ADC has to place weight on the LinSig modelling. However, SD also noted that the VISSIM modelling included in the RC DCO submission shows a significant number of unreleased vehicles, even with the RC mitigation in place, with traffic unable to enter the highway network from range of locations, including RC site access. This suggests a congested network.
29	AT reiterated that they were working on this point, by ensuring the outputs are presented better. However, they did not have any new outputs to share at this time. AT said that the journey times of the overall network would change for the better, regardless of the A43 and the submitted RC modelling delivers what it sets out to achieve. AT explained that the RC VISSIM modelling outputs demonstrate that more traffic is released into the highway network

	with the RC and highway mitigation in place than in the future scenario without RC and its highway mitigation. Therefore, overall, the proposals provide betterment. AT said that this approach has been agreed with Highways England.
30	JE said that although he cannot say with full confidence, he believed completed trips would be an important parameter to consider in the RC VISSIM modelling.
31	SD noted that in comparison to the RC VISSIM modelling there was very few unreleased vehicles in the NG VISSIM modelling, which was strange given both models have the same starting point.
32	In response, JE said that the models were not the same. The RC VISSIM model use VISSIM 5.4, whereas the NG VISSIM model uses VISSIM 9.0. They have also undergone different local model validation. JE explained that Vectos are in the process of comparing the modelling to understand the potential differences. They are awaiting Aecom's Local Model Validation Report to understand differences between the respective base models. Initial assessment suggested that the models have different base flows.
33	SD commented that base flows are somewhat irrelevant once the models are validated as the assessment is based on traffic flow sets output from the NSTM2.
34	JE responded by stating demand in peak hour periods are similar but further analysis is required for the 'warm up/cool down periods' to determine whether there are any discrepancies in the data.
35	A query was also raised by MH whether MOVA was implemented at M1J15 within the RC VISSIM modelling, the NG VISSIM modelling includes PC-MOVA at M1J15.
36	Vectos were unable to provide a definitive answer.
37	SD explained the revised RC highway mitigation strategy of encouraging traffic to use the A43 corridor was at odds with the findings of the detailed junction modelling. The queuing on the A43 would mean that traffic would not be encouraged to use the A43 and therefore the traffic relief for the villages to the east and west of the A43, which is forecast in the RC strategic modelling, would not be realised. Hence there is a disconnect between the detailed and strategic modelling for RC.
38	AT said that combined impact of both NG and RC may result in a different impact on the A43 corridor.
39	SD noted that in the CIA work updated as part of the NG DCO, it was shown that to the south of the M1 there was little interaction between the two sites. But noted that this information should be available from the updated CIA work that is currently being undertaken by RC? SD noted that the Rail Central updated CIA work was originally due to be available at the end of November, but the latest he understood was that this would not be until Christmas, or possibly longer.
40	SD asked for confirmation as to when the updated CIA work would be available.
41	AT could not advise but agreed to take an action to find out.
42	AT sought clarity from ADC on the assumptions used in the submitted NG CIA. SD explained that this included all of the NG highway mitigation (other than the NG M1J15A scheme), the RC scheme and the RC highway mitigation that was in the public domain at the time of undertaking the NG CIA. This was the grade separated site access junction on the A43, the more comprehensive RC improvement scheme at M1J15A and the improvement to Trove Roundabout. SD explained that at the Stage 2 consultation, RC release a revised highway mitigation strategy, and that this strategy was revised again as part of the RC DCO submission.
43	AT sought to clarify that the M1J15A layout had not altered since the RC Stage 2 consultation.
44	SD confirmed that this was his understanding.
45	AT stated Vectos want to be helpful but accepts that they are not in a position to provide definitive answers. AT asks what ADC need for the updated NG CIA, as the focus of the meeting should be on what information needs to be provided.
46	SD responded by asking if there is any additional information that can be released to ADC at this time.
47	AT confirmed there is not.
48	SD summarised his understanding of the RC position:

	<ul style="list-style-type: none"> • Vectos are reviewing the submitted RC modelling to seek to clarify certain aspects and better present outputs. • This may include changes to the proposed M1J15A scheme or changes to signal timings, but these would not be significant and would not materially alter the outputs, or the forecast operation of the junction. • Vectos will not be amending the traffic flow sets used in the DCO submission.
49	AT reaffirmed that the RC DCO has been accepted but cannot say what changes are required to the initial modelling work. The objective for Vectos, through minor amendments to the mitigation and better presentation of the results, is to seek to clarify the RC modelling. However, any changes to the proposed scheme at M1J15A would not delay RC DCO process or require a material amendment to the proposed scheme.
50	SD restated that clarification on the RC VISSIM modelling and outputs are required as all ADC have at present is LinSig assessments and that in the absence of new or additional information to be provided, they would need to continue to place weight on that modelling.
51	JE responds by reiterating that this work cannot be released until Vectos have approved it, which is likely to towards the end of January 2019.
52	SD asked how the updated RC CIA modelling work is been undertaken, is it been run by Systra?
53	JE confirmed that WSP are running the updated RC CIA strategic modelling not Systra.
54	SD asked whether the cordon NSTM2 model for RC has been put back into the whole NSTM and checked by WSP.
55	JE confirmed he did not know the methodology.
56	AT asked whether the methodology progressed by NG for updating the CIA was agreed with NCC and HE.
57	SD advised that it was.
58	SD asked whether Vectos considered that the proposed J15A/A43 improvements will mitigate impact of RC scheme without amendments. SD noted that the larger M1J15A scheme examined as part of the NG CIA appeared to mitigate the impact of the RC development, with a significantly better outcome for traffic using the A43. Hence, it appeared to him that the proposed scheme for M1J15A had been reduced too much in scale and did not now deliver a suitable outcome. SD asked whether Vectos considered the small gyratory with yellow box markings within the southern junction to be a suitable arrangement for a major junction on the SRN.
59	AT responded by stating Vectos are working within the confines of the submitted DCO and will not make wholesale changes to the M1J15A proposals. Minor tweaks may be required but they would be non-material.
60	SD confirmed that Vectos expectation was that they may make minor changes to the proposed junction layout but that these changes would not materially impact the forecast operation of junction nor the A43. Hence the RC position would be reliance on overall betterment cross the network.
61	AT confirmed that this was the case.
62	SD asked if the strategic model would be rerun.
63	AT confirmed that it would not.
64	SD concluded that any new or updated RC modelling would therefore use the same traffic flow data sets as the RC DCO submission.
65	AT confirmed that it would.
66	MH stated signal timing inputs for J15A are missing and queries whether they are available. JE to review and provide ASAP.
67	It was agreed that little more could be achieved, and the meeting was brought to a close.
68	<p>Actions from meeting:</p> <ul style="list-style-type: none"> • Vectos to confirm timescale for updated VISSIM outputs • Vectos to confirm timescales for RC CIA assessment • Vectos to confirm signal timings used in VISSIM for M1J15A.