

BLISWORTH PARISH COUNCIL

Response to the Examining Authority's Further Written Questions

Issued 5th February 2019

Deadline 5: 26th February 2019

2.0.1 *As the date for Britain's (probable) departure from the European Union draws near (Brexit), the ExA would welcome views on its possible impact in terms of the Proposed Development with regards the scheme's underlying economic/commercial justification, ports and domestic intermodal movement of goods, employment levels and funding implications.*

Well in excess of 60% of the staff working in the logistics industry in Northamptonshire are foreign nationals and the majority originate in the European Union. The percentage of foreign agency staff is even higher. The uncertainty around their future in the UK may further detract from the limited labour pool available to staff this and numerous other logistics developments in the Applicant's identified study area. As detailed in our original written representation the Applicant has already over-stated the local availability of labour.

The volume of warehouse space being brought forward by this and other competing SRFI proposals, and more traditional road-based facilities, is in excess of what is required in the region and what is catered for in the local development plans. A contraction of trade that may result from our EU departure could cast further doubt on the ability to operate the full train loads that are required for rail freight to offer economic competition to road haulage.

We have no doubt that the Applicant will talk Brexit up as an opportunity rather than a threat, despite many commentators casting a cloud over our economic future, but the truth is nobody can be sure. The risks associated with building vast amounts of warehousing on top of the existing and already consented additional space and new intermodal facilities in the Midlands are surely too great in the current climate.

2.0.2 *The Applicant's 'Statement of Common Ground Update and Statement of Commonality' submitted for Deadline 4 (Doc 8.4A [REP4-009]) notes that the Statement of Common Ground (SoCG) between it and Rail Central and that between it and Rail Central and Network Rail are agreed but not signed, with no outstanding issues. For Deadline 3 Rail Central refers to a broader SoCG between it and the Applicant [REP3-016] but the Applicant suggests (Doc 8.8B [REP4 -010]) that such a further SoCG would not serve any purpose. However, to assist the ExA, as there will no doubt be further submissions made to the Examination, particularly in relation to cumulative and interaction impacts, the ExA would welcome the submission of updated and signed-off SoCG by Deadline 6 (19 March 2019) which take into account the positions reached following the Issue Specific Hearing to be held on 13 March.*

The failure of the three parties: Network Rail; Roxhill and Gazeley/Ashfield Land to alight on any common ground stems from a universal reluctance to undertake any worthwhile or meaningful studies on the technical feasibility and wider capacity issues on the UK rail network. This is not a new issue. On the 8th November 2013 in a meeting with Network Rail*, Ashfield Land were asked to:

- Investigate the potential effects of delay that their operation might cause
- Investigate the effects of perturbation at an early stage

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- Assure that the additional freight traffic will not have a detrimental impact on the journeys of millions of passengers and also other freight services.
- Provide evidence the proposed freight traffic will fit onto the network beyond the scoped study area. [*Ashfield Land only scoped the network between Wembley and Nuneaton. Since 2013 the only further studies have been even more limited in scope (the Northampton loop in isolation)*]
- Undertake a performance study for WCML and prove that a degraded WCML operation will work by simulating and evaluating perturbed situations
- Assure the novel 'synchronised' train arrival / departure will function in a real world operation.
- Verify assumptions which may need further investigation/updating; including: East West Rail (2010 information – out of date); DIRFT forecast train paths following DIRFT expansion; and ecs moves to / from Kings Heath train depot

Over 5 years on from the original request by Network Rail there remains no clarity on the ability of the network to effectively service one SRFI at this location, let alone two, and seemingly no desire to provide such clarification.

2.0.4 It has been suggested that the Proposed Development would in part serve a London market. The Applicant's Market Analysis Report (Doc 6.8 [APP378]) notes at section 7 that a combined core catchment area of around 15km and a secondary catchment of about 50km would be likely to incorporate the majority of logistics users who would use a SRFI (a matter which is supported by analysis of outbound lorries from DIRFT). Figure 12 of the report shows a secondary catchment of 50km from the proposed development which doesn't extend as far as the M25. Could the Applicant please comment?

Ignoring the factual inaccuracy of the Applicant's catchment area, the following is of particular relevance. In claiming that their SRFI will serve the London market the Applicant is blatantly ignoring one of the primary policy objectives of a strategic national freight network; that of **[2.44] 'maximising rail trunk haul and minimising some elements of the secondary distribution leg by road'** and **[2.47] 'reducing trip mileage of freight movements on the national and local road networks'**. Radlett has been consented to serve the London market. Why would you ship containers from the London/southern ports to the Midlands only to drive the goods back to London? The twin objectives of removing HGVs from the roads and reducing carbon will not be achieved by blatantly disregarding the fundamental objectives of the policy. The Applicant continues to justify their development as a road-based logistics facility ignoring the underlying objectives of a strategic network.

In developing a rail freight network and maximising the available finite paths on the rail network we would suggest that in excess of 15 miles is required between the largest SRFI in the country and what could be become the largest SRFI in the country. Significantly over-lapping catchment areas is not the best allocation of resources. Furthermore, it would not be feasible for users within the Applicant's stated 15 km radius to move freight economically by road and then transfer to rail (even if there were users of a sufficient size to do so). Northampton is too close to the ports to make this a viable option.

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2.9.1 and 2.92. In light of our observations above (2.0.2) and our repeated calls for clarity on this issue (over the last three years), we would like to register our dismay that neither Developer or public body has thought it necessary to prove (at the outset) the primary fundamental issue on which the success of a SRFI depends: that of sufficient rail capacity to effect a worthwhile modal shift.

2.12.4 Comments on Deadline 1 – Responses on behalf of Ashfield Management Ltd and Gazeley GLP Northampton s.a.r.l Appendix 1 [REP2-016]. *Rail Central states that it considers it is unclear if the potentially varying bund height would fully mitigate any proposed gantry cranes and floodlighting. Please could the Applicant confirm whether the bund heights would fully mitigate such lighting?*

At the start of the examination process it was made clear that Northampton Gateway would be examined in isolation from Rail Central yet at every hearing the legal counsel for the latter has been given significant latitude to raise what appear to be very spurious (and unclear) objections to the Northampton Gateway proposal (outside of the obvious cumulative impacts). In a number of instances this has greatly extended the duration of the hearings and possibly resulted in a number of more important issues not being given the time they deserve.

We would therefore seek to understand why Rail Central are questioning the height of the bund when, if Rail Central were also consented, any visual mitigation that the Applicant is seeking to provide would be completely obliterated by the presence of Rail Central's massive warehousing, intermodal platform, flood lighting and 30 metre high cranes (all fully visible from Courtenhall road and other sensitive receptors). Whilst both developments would be visually intrusive at least the Applicant is making an effort to partially hide theirs from one side of the site.

* Appendix 3 SCOPING OPINION Proposed Rail Central Strategic Rail Freight Interchange January 2016