



NORTHAMPTON  
**GATEWAY**  
STRATEGIC RAIL FREIGHT INTERCHANGE

**APPLICANT'S RESPONSES TO OTHER PARTIES'  
DEADLINE 4 SUBMISSIONS**

**DOCUMENT 8.18**

The Northampton Gateway Rail Freight Interchange Order 201X

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DEADLINE 4 SUBMISSIONS | 26 FEBRUARY 2019

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## THE NORTHAMPTON GATEWAY RAIL FREIGHT INTERCHANGE ORDER 201X

### Applicant's Responses to Other Parties' Deadline 4 Submissions – Document 8.18

1. This document sets out the Applicant's responses to other parties' submissions to the ExA made at **Deadline 4**.
2. No attempt has been made to respond to every single submission. The responses have focused on issues thought to be of most assistance to the ExA. Where points have been raised by various parties, the Applicant has responded only to one particular party, but the responses are applicable to all parties who have made the same point.
3. The Applicant does not seek to respond to all the points made where the Applicant's response is already contained within:
  - a. the Application; or
  - b. submissions made since the Application was accepted, including:
    - i. the Applicant's Response to Relevant Representations (**Document 8.3**, REP1-022);
    - ii. the Applicant's Responses to the ExA's first written questions (**Document 8.2**, REP1-020 and REP1-021) submitted at **Deadline 1**;
    - iii. the Applicant's Responses to Local Impact Reports (**Document 8.6**, REP2-009);
    - iv. the Applicant's Responses to written representations and other parties' responses to the ExA's first written questions (**Document 8.7**, REP2-010);
    - v. the Applicant's Responses to the various submissions made by Ashfield Land Management Limited and Gazeley GLP Northampton s.a.r.l. in respect of Rail Central at **Deadline 1 (Document 8.8**, REP2-011), **Deadline 2 (Document 8.8A**, REP3-008) or **Deadline 3 (Document 8.8B**, REP4-010); or
    - vi. the Applicant's Responses to other parties' **Deadline 2** submissions (**Document 8.9**, REP3-009) or **Deadline 3** submissions (**Document 8.11**, REP4-012).

save where it is thought helpful to repeat or cross refer to the information contained in the above documentation.

4. The Applicant's responses to submissions made by Ashfield Land Management Limited and Gazeley GLP Northampton s.a.r.l. in respect of Rail Central at **Deadline 4** (REP4-020) are dealt with separately in **Document 8.8C**.



Identity and PINS Reference	Deadline 4 submission (summary)	Applicant's Response
	<p>Requirement rather than a S106 item, and also a suggestion that the <i>Community Fund Contribution</i> might be secured differently.</p> <p>Regarding <b>the draft DCO</b>, SNC raise the following:</p> <p>b) Consistent with the comments made by NBC's submission (below), SNC also suggests that approval of details submitted to meet Requirements of the DCO should also include consultation and comment by NBC.</p> <p>c) SNC refer to some of the requirements containing tailpieces.</p>	<p>11 February 2019 along with the latest s.106 agreement, the latest draft agreement has now been agreed with SNC.</p> <p>b) The points raised in the submission regarding consultation with NBC on agreeing details in response to DCO Requirements 3, 8, 10, 12 and 15 have since been discussed directly between the Applicant and NBC, and the dDCO has been revised accordingly (please see <b>Document 3.1D</b> submitted for <b>Deadline 5</b>) which now incorporates the requirement for consultation with NBC as part of the determination process.</p> <p>c) The use of tailpieces has been discussed at Examination and the Applicant has explained article 45 (<i>governance of requirements and governance of protective provisions relating to highway works</i>) ensures that the requirements, including any tailpieces, are restricted so that the approval of any details under the requirements must not be given if that approval would permit a change to the development which would give rise to any significant adverse effects on the environment. Article 4 of the DCO also ensures that the authorised development must be carried out in accordance with the parameters plan, which is an</p>

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	<p>d) SNC also seek an extension to the time period proposed in the draft DCO for determination of applications to discharge Requirements, suggesting that the 42 day period (6 weeks) is inadequate.</p>	<p>absolute requirement not capable of being relaxed without amendment to the DCO. The Applicant has suggested some amendments to the articles and these are included in the dDCO submitted for <b>Deadline 5 (Document 3.1D)</b>.</p> <p>d) The proposed time periods follow AN15. The Applicant does not propose to amend those time periods. However, please see the Applicant's response to DCO:31 (<b>Document 8.19</b>).</p>
<p><b>Northampton Borough Council (NBC)</b>  <b>REP4-024</b></p>	<p>The submissions refer to discussions at <b>ISH3</b> on the <b>draft DCO</b> on 20<sup>th</sup> December 2018, and refer to a number of detailed issues which were not raised at the time due to time constraints. This includes drafting queries, as well as a request that provision also be made for NBC to be consulted during the agreement of details submitted in due course to satisfy DCO Requirements. NBC's suggestion is that in particular Requirements 3, 8, 10, 12, and 15 should be written to allow comment by NBC.</p>	<p>The points raised in the submission regarding consultation with NBC on agreeing details in response to DCO Requirements 3, 8, 10, 12 and 15 have since been discussed with NBC, and the dDCO has been revised accordingly (please see <b>Document 3.1D</b> submitted for <b>Deadline 5</b>) which now incorporates the requirement for consultation with NBC as part of the determination process.</p> <p>The proposed time periods follow AN15. The Applicant does not propose to amend those time periods. However, please see the Applicant's response to DCO:31 (<b>Document 8.19</b>).</p>

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<p><b>Stop Roxhill Action Group (SRNG)</b></p> <p><b>REP4-023</b></p>	<p>The submission by SRNG at Deadline 4 refers to answers provided by the Applicant to a number of the ExA's first written questions, and to representations and responses made by the SRNG and other respondees to those questions.</p> <p>In regard to many issues the most recent submission does not raise any substantive new points, and in the view of the Applicant those do not require an additional response.</p>	<p>While the majority of the issues raised cover very similar or the same ground as past responses (see below), there are some detailed points where some additional expansion may assist the ExA:</p> <p><b>Aggregates terminal</b> – the Applicant has responded to the substantive points in the context of ExQ1.0.6, ExQ1.11.31 (see <b>Document 8.2</b> [REP1-020 and REP1-021]), and representation PINS Ref: REP3-015 (see <b>Document 8.11</b> [REP4-12]). However, in further response it is hoped helpful to emphasise that there is a difference between the transfer of existing freight <i>paths</i> as distinct from existing freight <i>trains</i>. The aggregates occupier (GRS) who will relocate to Northampton Gateway (if approved) currently has access to a number of rail freight paths, not all of which they currently use. As explained in the letter at Appendix 3 of the Planning Statement (<b>Document 6.6</b> [APP-376]), their intention is to expand the operation following relocation. This expansion is likely to include take up of existing un-used freight paths, and to make a further contribution to the shift of freight from road to rail as part of the SRFI.</p> <p><b>1997 saved planning policy EV8</b> – the Applicant has provided a response to this issue in response to ExQ1.0.9.</p> <p><b>Mezzanines</b> – the Applicant has nothing further to add to its responses already given to ExQ1.0.11 (see <b>Document 8.2</b> [REP1-020 and REP1-021]), and in response to</p>

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		<p>representations from SRNG (PINS Ref: REP2-020) (see <b>Document 8.9</b> [REP3-009]).</p> <p><b>Bund heights</b> – please the Parameters Plan – Minor Amendments Document (<b>Document 8.15</b>) submitted at <b>Deadline 5</b> which provides more certainty in respect of the height of the strategic bunding in response to concerns raised.</p> <p><b>Railway rolling stock noise mitigation</b> - the Applicant has nothing further to add to the responses already given to ExQ1.8.20 (see <b>Document 8.2</b> [REP1-020 and REP1-021]), and in response to SNC's Deadline 3 submissions (PINS Ref: REP3-014) (see <b>Document 8.11</b> [REP4-12]).</p> <p><b>Local employment and labour supply</b> - the Applicant has nothing further to add to the responses already given to ExQ1.10.6 (see <b>Document 8.2</b> [REP1-020 and REP1-021]), and the cross-reference at Deadline 2 (<b>Document 8.9</b> [REP3-009]).</p> <p><b>ANPR to enforce the 'no right turn' site exit for HGVs</b> - the Applicant has nothing further to add to the responses already given to ExQ1.11.6 (see <b>Document 8.2</b> [REP1-020 and REP1-021]) which confirms that ANPR technology is well established, and known to be effective. The obligation to provide the monitoring system is now included in the dDCO as opposed to the s106 Agreement, as discussed at ISH3 (see Requirement 4, <b>Document</b></p>



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		<p><b>3.1D).</b> This provides that the details of the monitoring scheme must be agreed with the local highway authority, and the system implemented before any occupation. These details will include the enforcement provisions which will be based on fines to be levied. The details of the height barrier, including how it is to be maintained, are to be provided under Requirement 8(2)(l).</p> <p><b>Compliance with NPSNN regarding modal shift</b> - the Applicant has nothing further to add to the responses already given to ExQ1.11.19 (see <b>Document 8.2</b> [REP1-020 and REP1-021]), as well as in response to a number of relevant representations (see <b>Document 8.3</b> [REP1-022]).</p> <p>The submission also includes a number of points following <b>ISH2</b> in December 2018. These are focused on <b>highways and accessibility</b> issues, with the exception of one point regarding progress through the rail industry's <b>GRIP</b> process. This latter issue was discussed at ISH2. The Northampton Gateway project is progressing through the multi-stage and highly structured GRIP process, and the work has been undertaken to GRIP 2 – this is currently with Network Rail. It is not accepted that GRIP stage 4 is either required or common practice at this stage in the life of an SRFI project. GRIP stage 2 is the level required to 'prove' feasibility, and to ensure all major issues have been identified and any associated risks understood. Please</p>

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		<p>also see the Applicant's response to ExQ2.9.4 (<b>Document 8.17</b>).</p> <p>Regarding the various points made regarding <b>Highways</b>, the Applicant wishes to add to previous responses with the following:</p> <p><b>SRFI access</b> roundabout issues - ExQ11.11.19 - see Applicant's response to the SNC Local Impact Report at (page 6 of <b>Document 8.6</b> (REP2-009), regarding '<i>Assessment at busiest times</i>').</p> <p><b>Knock Lane</b> - SRNG are mistaken. Neither Mr Booth, nor any of the Applicant's representatives made the statement referred to by SRNG regarding the timing of the SRNG traffic count on Knock Lane. In response to a question from the ExA regarding a query by Mr Whitburn, not relating to Knock Lane but concerning the timing of NSTM2 traffic counts and roadworks at the Stoney Stratford Roundabout, Mr Booth did provide a reference to the Applicant's response on this point (which was to direct the ExA to the Applicant's response to RR-256 in its Responses to Relevant Representations (<b>Document 8.3</b> [REP1-022])). The Applicant assumes that perhaps SRNG have misunderstood that. Also see the Applicant's responses contained with Applicant's Response to other parties Deadline 3 Submissions (<b>Document 8.11</b>) [REP4-012] to</p>

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		<p>the points that have been raised previously by SRNG on this topic.</p> <p><b>VISSIM modelling</b> - see Applicant's response contained with <b>Document 8.11</b> [REP4-012] to points raised previously by SRNG on this topic.</p> <p><b>Highways safety close to Woodleys Nursery</b> - The layout of the highway works has been agreed with Northamptonshire County Council as documented in the Statement of Common Ground (<b>Documents 7.1A</b> [REP1-005] and <b>7.1B</b> [REP1-006]).</p> <p>Prior to any highway construction work taking place the detailed design of those works, which will include design of items such as signs and markings including any vehicle activated speed signs as appropriate, will be submitted to and agreed by the local highway authority. Furthermore, the detailed design will be subject to an independent road safety audit prior to construction.</p> <p><b>Footpath RZ3</b> - The right of way will cross the A508 'at grade' and a central island (refuge) will be provided to allow footpath users to cross traffic from both directions at different times. The crossing is shown on the highway plans (<b>Document 2.4E</b> [APP-031]) and it is a common type of crossing for such a location. The Applicant disagrees that it would not be safe, or that the impact of the bypass on this path is unmitigated.</p>

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<p><b>Rod Sellers (for Stop Roxhill Action Group)</b></p> <p><b>REP4-018</b></p>	<p>The submission focuses on <b>air quality</b> issues, and follows on from comments and issues raised in submissions made earlier in the Examination process.</p> <p>The focus of the submission is on concerns about the scope and quality of air quality monitoring by the Local Authorities (NBC and SNC), and general commentary questioning the legitimacy of EIAs prepared by any applicant or promoter of a development scheme.</p>	<p>Please see the Applicants response to ExQ1.1.3 (<b>Document 8.2</b> [REP1-020 and REP1-021]), and the responses provided to Mr Sellers and SRAG submissions to <b>Deadline 2 (Document 8.9</b> [REP3-009]) on air quality issues. Also see the Applicant's Air Quality Position Statement at <b>Appendix 2</b> to the Applicants Response to the ExQ2 (<b>Document 8.17</b>).</p> <p>It is not appropriate for the Applicant to comment on the resourcing of, or priority given to, local authority monitoring or air quality. However, NBCs representative gave an overview of the Council's approach and resourcing regarding monitoring at ISH2.</p> <p>The premise of part of the submissions is that all of Collingtree currently experiences poor or inadequate air quality. This is not supported by the existing baseline evidence base. As referred to in <b>Document 8.9</b> ([REP3-009]) in response to Mr Sellers/SRAG's earlier submissions, the Applicant has held extensive dialogue with NBC and paragraph 7.18 of NBC's Local Impact Report (REP1-089) confirms that the Applicant and NBC have an agreed position regarding Air Quality and appropriate mitigation measures.</p>

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<p><b>Mr Bodman</b></p> <p><b>REP4-021 and REP4-022</b></p>	<p>Mr Bodman's provided two submissions at Deadline 4 which include a full version of the statement from which he read at ISH2.</p> <p>The focus of the statement is on rail issues, including many points made earlier in the Examination process with a retained focus in particular on <b>rail capacity</b> issues. Some of the content relates to the submissions made by Network Rail (Addleshaw Goddard) rather than submissions by the Applicant.</p> <p>In addition, the statement also refers in brief to <b>air quality</b> and responds to contributions made by NBC (rather than the Applicant) at ISH2, including the suggestion that some AQMAs in Northampton may soon be revoked in light of improving air quality. With regard to <b>socio-economic</b> issues, the statement repeats earlier comments regarding low levels of unemployment in South Northamptonshire.</p> <p>Mr Bodman's submission at Deadline 4 also includes a table with reference to a number of the Applicant's written responses to the ExA's first written questions (<b>Document 8.2</b>). The submission refers to a number of the Applicant earlier responses - these include (with reference to the relevant ExA's questions):</p> <ul style="list-style-type: none"> <li>• The relevance of locally 'saved' planning policy EV8 from the 1997 local plan (ExQ 1.0.9);</li> <li>• Whether rail freight is viable in this location (ExQ 1.0.19, ExQ 1.0.22), alternative SRFI sites in the Midlands, and questions regarding compliance with the NPSNN (ExQ 1.0.22);</li> </ul>	<p>The Applicant has provided written responses to the ExQ1 (see <b>Document 8.2</b> [REP1-020 and REP1-021]). The Applicant has also provided responses to other earlier submissions by Mr Bodman on many of these same issues (see <b>Document 8.11</b> [REP4-102] regarding Deadline 3 submissions). For example, please see earlier responses to representations by Mr Bodman, references PINS Ref: REP2-013 regarding local planning policies, and PINS Ref: REP3-019, with regard to alternative sites, and highways modelling.</p> <p>It is clear that Mr Bodman does not accept many of the Applicant's explanations or responses, and no further responses are considered helpful – the Applicant refers the ExA and Mr Bodman to the earlier responses and cross-referenced Application documents including the Market Analysis Report (<b>Document 6.8A</b> [REP1-004]), and various Rail Reports (<b>Document 6.7</b> [APP-377]).</p> <p>References to local economic and employment issues include reference to submissions by Dr Gough – please see the response below.</p> <p>With regard to the cumulative impacts with Rail Central, an updated <b>Cumulative Impact Assessment</b> was submitted by the Applicant on 11 January 2019 (<b>Document 8.13</b> [AS-040]). As set out within that assessment, it was not possible within the timescales available to rerun the NSTM2 as part of that work. However, as explained in the updated CIA,</p>

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	<ul style="list-style-type: none"> <li>• Rail capacity and infrastructure investment (ExQ 1.0.22, and 1.11.31));</li> <li>• Local employment and labour issues (ExQ 1.10.1 and 1.10.6)</li> <li>• Cumulative impacts with the Rail Central proposals (ExQ 1.9.1)</li> <li>• Questions regarding the Transport Assessment and traffic modelling (ExQ 1.11.23), and queries over perceptions that committed development is focused only in Northamptonshire.</li> </ul>	<p>based on the information submitted by Rail Central for their examination, it is the Applicant's conclusion that that the Rail Central scheme would have a severe impact on the operation of the A43 approach to J15A and hence the works proposed by Rail Central at Junction 15A are insufficient to accommodate the impact arising from the Rail Central scheme and are therefore necessarily insufficient to accommodate both schemes.</p> <p>With regard to <b>highways modelling</b> issues, Mr Bodman asserts that no account of planned growth beyond Northamptonshire is made within the future year NSTM2 forecasts. This is not correct. In addition, Mr Bodman concludes that the Applicant has attempted to mislead the ExA. This is unfounded. The points made arise from Mr Bodman's incorrect understanding of the function and application of TEMPro growth within the NSTM2 modelling:</p> <p>For areas outside Northamptonshire, including Milton Keynes, future traffic growth in the NSTM2 is forecast using TEMPro. TEMPro is the DfT's approved dataset for forecasting traffic growth. The current version of TEMPro provides forecast growth up to 2051. The forecasts take into account, amongst other factors, projections of population, employment, housing, car ownership, and are based on the planned growth derived from local authorities. Therefore, the future year NSTM2 scenarios include for growth due to planned growth in all areas</p>

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		outside Northamptonshire, along with growth within Northamptonshire.
<p><b>Dr. Andrew Gough</b> <b>REP4-019</b></p>	<p>Mr Gough explains that he understands that, the Applicants representatives, when asked about their assumptions on population growth within the development's catchment area, responded by stating that their calculations had been based on the national average for people of working age. He goes on to say that he does 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.</p> <p>Mr Gough makes reference to the AECOM study and suggest that 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. He believes that this position confuses Methodology with Geography.</p>	<p>Mr Gough is incorrect. Calculations have not been based on national average. <b>Appendix 9</b> of the Applicants Post Hearing Submissions (<b>Document 8.10</b>, REP4-011) refers at the 4th paragraph to the Study Area comprising 6 LPAs. The population age structure is based on the projections for the Study Area.</p> <p>The Applicant can confirm that a central forecast was not used in ES Chapter 3. To identify the change in labour force as the scheme is developed, the assessment used figures for housing growth in the study area (6 LPAS), and applied 65% for working age people in the population within the Study Area (16-64yrs).</p> <p>This matter was dealt with in the Applicant's Responses to Written Representations (<b>Document 8.7</b> [REP2-010]) – response to Mr Gough ref REP1-065. In relation to this particular matter it is the Applicant's view that the AECOM study was a specific piece of work, with both its methodology and geographic scope, specific to its particular objectives. It is considered therefore that the methodology used would not be appropriate to the assessment of this application.</p>

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	<p>Mr Gough reiterates his previous comments in relation to forecast provided by Network Rail for rail-connected warehousing in 2033. He states that the proposed scheme is substantially in excess of the unconstrained assumptions made by Network Rail for that date.</p>	<p>This matter was dealt with in the Applicant's response to Written Representations (<b>Document 8.7</b> [REP2-010]) – response to Mr Gough ref REP1-065.</p>
	<p>Mr Gough makes reference to the proposed Hinckley SRFI and suggest it is superior because Hinckley is on the preferred rail corridor from Felixstowe to the North West, whilst Northampton Gateway is not.</p>	<p>This point has been made by others previously and the Applicant has responded on this matter. Please see <b>Document 8.9</b> [REP3-009] - Responses to other Parties' Deadline 2 submissions, particularly the response to SNC, and ExQ1.0.19 &amp; ExQ1.0.22 (<b>Document 8.2</b> [REP1-020 and REP1-021]).</p>
<p><b>Blisworth Parish Council</b>  <b>REP4-017</b></p>	<p>Blisworth PC explain that investment in SRFIs need to take account of corresponding investment in the rail network, of which there is none committed to on the West Coast mainline. The SRFI proposed at Hinckley would take advantage of such committed investment on the F2N route into the midlands and beyond. Hinckley and DIRFT would more than satisfy the requirement for rail served warehousing in the Midlands (as stated in MDS Transmodal's GBFM).</p>	<p>This point has been made by others previously and the Applicant has responded on this matter. Please see <b>Document 8.9</b> [REP3-009] - Responses to other Parties' Deadline 2 submissions, particularly the response to SNC, and ExQ1.0.19 &amp; ExQ1.0.22 (<b>Document 8.2</b> [REP1-020 and REP1-021]).</p>
	<p>Blisworth PC say there will be intense competition for workers that the Applicant assumes will travel to Northampton Gateway despite there being job opportunities far closer to home.</p>	<p>The Applicant has responded to these matters previously, please see Post Hearing Submissions (<b>Document 8.10</b> [REP4-011]), paragraph 2.71 and <b>Appendix 9</b>.</p>



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	Blisworth PC raise the issue of the impact of the application proposal, together with the Rail Central proposal, on passenger services.	This matter is covered in the Applicant's Post Hearing Submission ( <b>Document 8.10</b> [REP4-011]), paragraph 2.26.
<p><b>Stephen Blyth</b></p> <p><b>AS-041</b></p>	<p>Mr Blyth focuses on two issues:</p> <p><b>Cumulative impacts</b> alongside Rail Central, and DIRFT, with regard to the likely 'over-supply' of SRFI capacity, as well as local environmental impacts regarding traffic and congestion, landscape, loss of green and agricultural land.</p> <p>The lack of emphasis on <b>localism</b> and the importance of local influence over decision-making.</p>	<p>In response to earlier discussions and questions from the ExA, the Applicant has prepared and submitted an updated Cumulative Impact Assessment (CIA) of Northampton Gateway with Rail Central (<b>Document 8.13</b> [AS-040]). However, the ES as submitted, and the revised CIA, include consideration of the likely cumulative impacts of an agreed list of other committed developments, as well as with the Rail Central proposal. The Transport Assessment considers the cumulative impacts with a much wider range of other developments across Northamptonshire, agreed with the Highways Authority and Transport Working Group.</p> <p>With regard to localism, the Applicant has engaged throughout the process with local communities and their representatives, and as referred to in Mr Hargreaves' submission, many local people and bodies have engaged fully with the Examination process to date to ensure that the ExA understands the views and concerns of the local community.</p>

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<p><b>Mr A. Hargreaves</b>  <b>REP4-016</b></p>	<p>Mr Hargreaves refers to the discussion at <b>ISH2</b>, focused on the discussion regarding the <b>rail industry GRIP process</b>, and the progress made with Network Rail. Reference is made in the submission to advice provided by the Planning Inspectorate to Rail Central in 2017 regarding different stages in the GRIP process, and the submission seeks clarification that the ExA will ensure they are familiar with the GRIP process. Mr Hargreaves refers to comments made by others that NSIP applications should be supported by GRIP stage 3 or 4 assessments at Examination.</p>	<p>The issue of GRIP was raised at ISH2 in December 2018, and the Applicant provided a verbal response. The Northampton Gateway project is progressing through the multi-stage and highly structured GRIP process, and the work has been undertaken to GRIP 2 – this is currently with Network Rail. It is not accepted that GRIP stage 4 is either required or common practice at this stage in the life of an SRFI project. GRIP stage 2 is the level required to 'prove' feasibility, and to ensure all major issues have been identified and any associated risks understood.</p> <p>The GRIP process was discussed at ISH2 in December 2018, and the Applicant's Post Hearing Submissions (<b>Document 8.10 [REP4-011]</b>) provides a response under the heading '<i>Rail Access and Capacity</i>'.</p> <p>Please also see the Applicants response to ExQ2.9.4 (<b>Document 8.17</b>).</p>
<p><b>Mrs Lyn Bird</b>  <b>REP4-025</b></p>	<p>Mrs Bird's submissions include a full version of the statement from which she read at ISH2, and is focused on <b>air quality</b> issues. It also includes an article (editorial) from Railway Magazine which raises questions about the presence of existing and newly proposed SRFIs in the Midlands.</p>	<p>Mrs Bird and others including SRNG, refer to an editorial article published in Railway Magazine.</p> <p>The article raises questions about the presence of existing and proposed SRFI's in the Midlands. The Applicant does not agree with the opinion set out in the article which appears to be written without an understanding of the role of Strategic Rail Freight Interchanges in facilitating the transfer of goods from road to rail. The article also appears</p>

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		<p>to fail to understand Government's Policy on rail freight interchanges, in particular, the conclusion in the NPSNN that there is a compelling need for an expanded network of strategic rail freight interchanges.</p> <p>Please see the Applicant's response to ExQ2.9.13 (<b>Document 8.17</b>) and <b>Appendix 7</b> of that Document, being a letter from the Rail Freight Group to the Editor of Railway Magazine.</p>