

**Stop Roxhill Northampton Gateway (SRNG) response to
Examining Authority's written questions and requests for information (ExQ2)**
PINS doc TR050006-001061 - Issued on 5 February 2019 SRNG ID 20011012

2.0.1 Impact of Brexit. It is likely that the drain of logistics labour back to the EU will continue, resulting in increasing competition between, and disruption of, existing local logistics businesses, let alone any proposed new businesses on Northampton Gateway. This is also likely to impact on DIRFT and result in demand for labour from greater distances, adding to long distance commuting and the attendant additional pollution.

2.1.23 Framework Travel Plan – Car sharing. 20% car sharing is a laudable ambition, but the ExA example highlights the fact that the target is unrealistic in practice. Neither the Employer nor the Local Authority can force anyone to car share. An enforcement fine does not achieve car sharing; its application would be a cost burden to local taxpayers, via the Local Authority, and the employer. Consequently, using the FTP to reduce travel statistics should not be used as mitigation for the traffic impact of the development.

2.9.3 Likely impact of cancellation of HS2: Recent publicity around the future of HS2 since the ExA raised this question has indicated that cancellation of HS2 is more likely than not. In the circumstances both the Applicant and Network Rail should be required to indicate the impact of such an eventuality as this potentially would give no future increase in rail freight paths travelling in either direction.

2.9.5 Number of trains handled. The NPSNN policy calls for a minimum 4 trains per day of up to 775 metres. By inference this refers to freight trains, typically of around 650 metres length currently, carrying containers which would otherwise be carried by road, i.e. achieving intermodal transfer. The Applicant has consistently referred to achieving 16 trains per day plus 12 Rapid Rail Freight trains and endeavoured to 'sell' the proposal to the public on this basis, producing forecasts of the amount of pollution reduction achieved by millions of road miles saved. Since the end of Consultation 2, five Aggregates trains have been substituted, that achieve no intermodal transfer, and the Rapid Rail Freight trains have been shelved, leaving a potential of 11 intermodal trains instead of 28.

Unsubstantiated claims such as: *this is shown to deliver reductions of over 100 annual average daily total (AADT) movements in or adjacent to at least 57 AQMAs across the UK, mostly located on the strategic road network and close to key Ports* (TR050006-000559-Doc 6.5B - Short Explanatory Document (Oct 2017), para 4.52) and *the proposed development could remove over 92 million HGV miles per year from the highway network.*(para 4.64) become meaningless when the target keeps reducing.