

From: MARK REDDING <[REDACTED]>
Sent: 14 March 2019 12:56
To: NorthamptonGateway@pins.gsi.gov.uk
Cc: Viv Hartley <blisworthparishcouncil@gmail.com>; June Hawkins <june.hawkins@btopenworld.com>
Subject: Northampton Gateway Cumulative Impact Hearing 12th March 2019

Dear Sirs / Madam,

Please find attached Blisworth Parish Council's written submission following the cumulative impact hearing on the 14th March. It was not possible to verbalise all of the points made in the attached, due in part to the domination of the hearing by two competing Developers arguing over the validity of each other's applications. However, it was possible to make some of the representations and those left unsaid remain relevant to the cumulative impact debate and are therefore submitted herewith.

Yours sincerely,

Mark Redding
On behalf of Blisworth Parish Council

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BLISWORTH PARISH COUNCIL

Northampton Gateway Cumulative Impact Hearing

Submission on behalf of Blisworth Parish Council

12th March 2019

1. Cumulative Impacts on a Strategic Network

Paragraph 1.6 of Advice Note 17 *Cumulative Impacts Assessment* requires developers to give “due consideration” to other NSIPs within their region. We do not believe that any meaningful consideration has been given to the cumulative impacts that the concurrent development of Northampton Gateway, Rail Central, DIRFT, East Midlands Gateway and Hinckley in the East Midlands will have on the efficacy of a strategic national freight network. Furthermore we do not believe that any consideration has been given to the implications that the concurrent development of the West Midlands Interchange (along with three of the aforementioned SRFIs on the same rail line) will have on passenger services or even the ability of all four to function as Strategic RFIs.

In the absence of a strategic assessment of the national landscape, the risks of failure of Government objectives and the consequent detrimental impacts on the community are unacceptably high. Both Applicants have intentionally avoided any reference to a strategic network as neither are strategically located nor will they enhance a network.

2. Cumulative Impact on [rail-served] Warehouse Supply

Contrary to Paragraph 1.6 of Advice Note 17 *Cumulative Impacts Assessment* it appears that insufficient consideration has been given to the oversupply of rail-served warehousing that will result from the concurrent development of DIRFT and East Midlands Gateway and, potentially, Northampton Gateway, Rail Central, West Midlands Interchange and Hinckley^[1]. The resulting supply of rail-served warehousing will be far in excess of the figures that have been accepted as robust and used in Government forecasting^[2]. Consenting all these developments is therefore contrary to Government policy. Furthermore, the statistics from the Office of Road and Rail show that in 2017 to 2018 all measures of rail freight fell compared to the previous year^[3]. There is absolutely no evidence of sufficient demand to warrant all the SRFIs being concurrently developed or proposed. Five years after gaining consent DIRFT 3 has seen no rail-connected development suggesting no current demand. If demand was to increase it is far more likely that tenants new to rail would be attracted to an established facility rather than one unproven and undeveloped. In terms of a strategic network and allocation of scarce resources (train paths), increased competition is not a favourable factor in this instance.

This divergence from high level strategic objectives and accepted projections is unjustified and contrary to Government policy.

3. Demand in the Current Climate

Data from the Office of Road and Rail shows that in 2017-18, contrary to Developers’ assertions that there has been an unprecedented rise in the demand for rail freight, all measures of freight

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transport including freight moved, freight lifted, kilometres travelled and freight train movements, fell between 1% and 5.6% on the figures from the previous year^[3] (even excluding the impact of reduced coal movements). In Q2 2018-19 intermodal freight lifted decreased by 1% on the same quarter the previous year and is the lowest amount of freight lifted since the start of the time series in 1996. The predictions of the 2013 freight market study of 182% growth to 18.1 bn tonnes in 2023 (from 2011) and 42.9 bn tonnes (570%) by 2043 seem unlikely based on current trajectories. Were such trajectories accurate, 2019 would be seeing in the region of 15 billion tonne kilometres travelled rather than the (circa) 6.8 billion.

Nick Gallup (Rail Central) again claimed a growing market for express freight (parcels). Current evidence would indicate that this is not the case: *Rail Magazine March 2019*^[7]

There is absolutely no strategic or market justification for building any more than that currently in the pipeline. Neither EMG or DRIFT 3 have yet constructed their promised rail connections

4. Cumulative Impacts on Air Quality

The Examining Authority have posed a large number of questions to the Applicant regarding air quality so it is clearly an important topic which requires careful examination. We would therefore pose the question as to why neither Developer has given due consideration to the cumulative effects that doubling the emissions would have on AQMAs and sensitive receptors in the area. To dismiss the issue stating that there will be none because the two sites have different access points is an irrelevance as the majority of the cumulative traffic will be adding to the problems on the M1, A45, A43 and A508 (not to mention village roads).

It is unacceptable to take a gamble on the health of our communities: further (validated) assessment is not optional, it is an environmental necessity.

5. Cumulative Impact on Highways

In 2013 Network Rail requested that Rail Central “Investigate the effects of perturbation [on the rail network] at an early stage”. This request was made on the basis of only a single development being proposed. We would question why no similar requirement has been made to model a perturbed highways network given the vast increases in traffic on a small section of the M1 and the regularity with which accidents occur and traffic comes to halt. Whilst it may not be normal procedure to do so for a single massive NSIP development surely it must be considered essential in this unprecedented situation when two such closely associated proposals are on the table and so many local communities will be affected.

It is unacceptable for the significant safety implications of routine perturbation not to be fully assessed.

6. Inadequacy of Cumulative Impact Assessments

The cumulative impact assessments presented by both developers are incomplete, conflicting and provide little clarity on any of a wide range of potential cumulative effects^[5]. Furthermore, neither Developer provided any credible assessment of the cumulative impact at the stage when they were

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supposedly meant to be consulting with the public, both choosing to take the stance that the other did not exist or claiming that they had insufficient information to make such an assessment. Given the massive implications of concurrent developments we, as a community, consider such an omission to be unacceptable. Even at this incredibly late stage in the examination process we still have no clarity on fundamental issues such as impact on rail capacity; traffic on the local roads and the cumulative impact on air quality and other forms of pollution. The failure to concede that there just might be some negative impacts associated with dropping Europe's largest warehouse park on agricultural land in the middle of four historic villages and on the busiest sections of the strategic road and rail networks in the country raises many questions over the integrity of those seeking to exploit Government policy and ride roughshod over local interest for their own financial gains.

The absence of a credible cumulative impact assessment at this late stage in the examination process shows a flagrant disregard for due process and for Government policy

7. Cumulative Impact on Power Networks

Northampton is recognised as a growth area with the need for significant investment in the electricity supply infrastructure. Northampton and the surrounding areas are fed via three, 132kV overhead lines from the National Grid Substation at Grendon, 12 miles to the East of Northampton. Due to existing demand growth parts of this group are predicted to be outside of their firm capacity* by 2020 and all of the group by 2025. Investment is required to meet demand requirements including an additional circuit into Northampton. The proposed rail freight developments will add considerably to the electrical demand in Northampton and exacerbate the problems noted in the document produced by WPD in June 2017 which highlighted these problems^[6].

To supply the sites, there will be a significant impact which will trigger major reinforcement work including adding a fourth circuit from Grendon to Northampton, upgrading of the other circuits including tower replacements and replacement of some electric switchgear. Apart for the general Northampton area problems, the local work to provide electricity will have a major disruption to roads caused by the laying of cables. As far as we can tell Roxhill have not addressed these concerns in their application and almost certainly not in any cumulative impact assessment.

It is not clear whether both Applicants have an offer to supply from Western Power. Neither Developer has explained the implications of physically providing power to both sites (which will require considerable infrastructure and road works)?

**Firm capacity is the ability to be able to continue to meet the electricity demand after the failure of a single item of equipment*

8. Impact on Rail Capacity

Between 2011 and 2013 the Office of Road and Rail turned down applications from Alliance Rail, Grand Central Railway, London Midland and Virgin West Coast to run additional services. This was because the performance risk of, effectively, filling the Fast Lines from the start of the morning peak until after the end of the evening peak was considered to be too great, as the service would never have the opportunity to recover from any perturbation. So it is clear that the ORR have a procedure

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for assessing the viability of additional train paths. We would therefore pose the question as to why neither Developer has, even at this very late stage, managed to come up with a more definitive view on potential capacity over the network as a whole (for all competing users).

The Developers were specifically requested to commission a study on the operational compatibility of their two proposals. Both have ignored this request leaving the examination in disarray. This is completely unacceptable: they have had years to complete this essential piece of work and have negligently failed to do so.

9. Climate Change

Both Applicants have submitted copious amount of information on various topics based on theoretical modelling, speculation and professional opinion. However, we have not managed to find any meaningful assessment of what is, without doubt, the most important issue of all; that of the climate impacts of the two developments. There is, in the public domain, vast amounts of evidence of the impacts that global warming is already having and masses of published scientific research on the indisputable consequences of our continued inability to act to stem the current trajectory, none of which appears to have been referenced. There will be no carbon reductions from either development; they will both involve additional human activity and consequent increases in carbon emissions. The failure of both Applicants to individually or collectively provide a realistic assessment of their true carbon footprint and how this aligns with Global commitments to carbon reduction is a significant and unacceptable omission. Also unacceptable is the obscuration of the true facts in misleading sustainability assessments quoting only reductions with no mention of the inevitable additional emissions. It is also noted that their declared "potential" reductions relate to a far higher usage of rail than the four trains upon which they are basing their application and also ignores completely the travel distances of the remote workforce upon which the developments will ultimately rely.

One of the four NPS policy objectives is that of a low carbon economy and I don't believe that either Applicant has discharged their responsibilities by providing us with an honest assessment of the impacts. For a topic so important this is not acceptable.

References

[1] NPS 2.49 'These forecasts, and the method used to produce them, are considered robust and the Government has accepted them for planning purposes'.

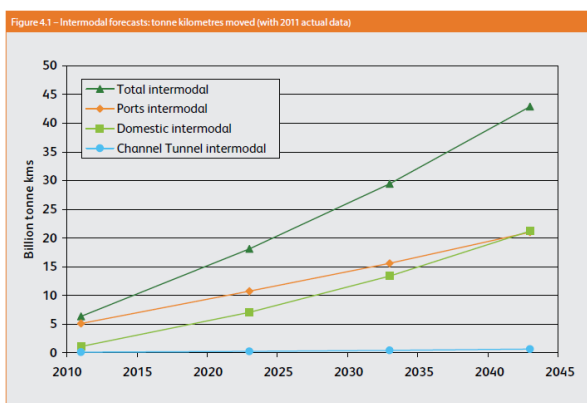
[2]. GBFM published forecasts that are accepted by Government for planning purposes assume that 179,000 m² of rail served warehousing will be brought forward in South Northamptonshire by 2023/4, in addition to the expansion of DIRFT. This figure is projected to rise to 322,000 m² by 2033/4. Rail Central and Northampton Gateway would result in 1,170,000 sq ms of rail served warehousing by 2033, an oversupply of over three and half times the requirement. Also, the GBFM model does not take into account the emergence of Hinckley, a development likely to be competing for the same catchment area in terms of both markets and labour. This would add a further 650,000 sq ms into the supply chain. An oversupply of five and half times the requirement.

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[3]. Office of Road and Rail Freight Statistics

Year	Total Freight Moved (billion net tonne kilometres)	Freight Moved (Domestic Intermodal)	Freight Km (millions)	Freight lifted (million tonnes)	Freight Lifted (excl Coal)	Freight train movements
2012-13	21.5	6.30	40.36	113.1	61.1	275,827
2013-14	22.7	6.19	42.00	116.6	65.1	288,371
2014-15	22.2 (-2%)	6.49	41.00	110.2 (-5%)	67.0	282,304
2015-16	17.8 (-20%)	6.42	34.88 (-14.9%)	86.0 (-22%)	66.3	236,290
2016-17	17.2 (-3%)	6.81	33.98 (-3%)	79.4 (-8%)	67.4	223,751*
2017-18	17.0 (-1.7%)	6.72 (-1%)	32.88 (-3.2)	75.0 (-5.6%)	65.3 (-3%)	215,826 (-3.5%)

[4]. Freight market Study 2013



*The predictions of the 2013 freight market study of 182% growth to 18.1 bn tonnes in 2023 (from 2011) and 42.9 bn tonnes (570%) by 2043 seem unlikely based on current trajectories. **Were such trajectories accurate 2019 would be seeing in the region of 15 billion tonne kilometres rather than the (circa) 6.7 billion**

N.B. The Office of Road and Rail do not differentiate between Ports intermodal and domestic intermodal (they are collectively referred to as domestic intermodal). Only domestic intermodal and international freight (which remains static and relatively insignificant) are split out.

The Draft Freight Market Study put out for consultation in April 2013 was released as a final version in October 2013. Both versions are on the Network Rail website. For some reason, the forecasts of domestic intermodal freight double between the draft and the final versions. The forecast of domestic intermodal traffic contained in the final version of Network Rail’s Freight Strategy (7.1bn tonne km in 2023) is more than double that contained within the draft version (3.4bn tonne km in 2023). Documents in the public domain show that a director of Ashfield Land lobbied for the revision of the forecasts. Without this uplift, especially in traffic from Scotland, the commercial viability of Rail Central is even more questionable. Also, of particular concern, is the involvement of MDS Transmodal, a firm of consultants that were working for both Rail Central and the Department for Transport at the time this study was issued. There is an apparent conflict of interest in a relationship where (unqualified) increased forecasts are of benefit to a paying client.

[5] Conflicting Cumulative Impact Assessments [Examples]

i) Both Applicants’ Transport Consultants appear to have been unable to work together to produce a cumulative transport assessment; Roxhill claiming that the other side’s transport modelling is

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incomplete or flawed and Ashfield presenting contrary views (though now admitting their error and consequently throwing the examination into disarray). The conclusion reached by Roxhill is that there would be significant adverse and unacceptable cumulative effects. Rail Central, being behind in the process, are naturally more reticent to make such bold statements.

ii) There is no common ground on the rail aspect with Rail Central maintaining that both can operate concurrently, Roxhill stating they cannot and Network Rail saying more comprehensive studies are required before they can pass comment (which no party appears willing to commit to, or pay for). Neither Developer even mentions rail in their cumulative impacts assessment.

iii) Roxhill consider landscape and visual effects (including impact on heritage) to be significant and unacceptable whilst Rail Central state significant cumulative effect will be experienced only at one viewpoint (at most) by Year 15.

iv) Roxhill state lighting impacts to be significant; Rail Central state no significant inter-project cumulative effects.

v) Roxhill predict a greater number of noise effects and additional potential significant adverse effects could occur as a result of night-time railway noise arising from the additional freight train movements. Rail Central state no significant inter-project cumulative effects.

vi) Roxhill state that Rail Central's transport impacts make it hard to reach a definitive view on the cumulative air quality impacts. They state that if there are significant changes to congestion and queuing as a result of the RC proposals there could be additional implications for AQMAs in Northampton. Rail Central state no significant inter-project cumulative effects.

vii) Roxhill state that the Rail Central scheme as currently proposed would on its own result in unacceptable environmental impacts; most notably in relation to transport and landscape and visual effects (including lighting) and consequently that the cumulative effects of the two schemes would also be unacceptable. Rail Central appear to be saying that they will not, though their stance is still not totally clear.

viii) Neither Applicant makes any reference to the national landscape and the impact that an oversupply of SRFs in the region will have on Government policy objectives.

[6] <https://www.westernpower.co.uk/docs/About-us/Our-business/Our-network/Strategic-network-investment/East-Midlands/Shaping-subtransmission-to-2030-East-Midlands-2017.aspx>

[7] Rail Magazine March 2019

Network

Armitt: no economic case for carrying parcels by rail

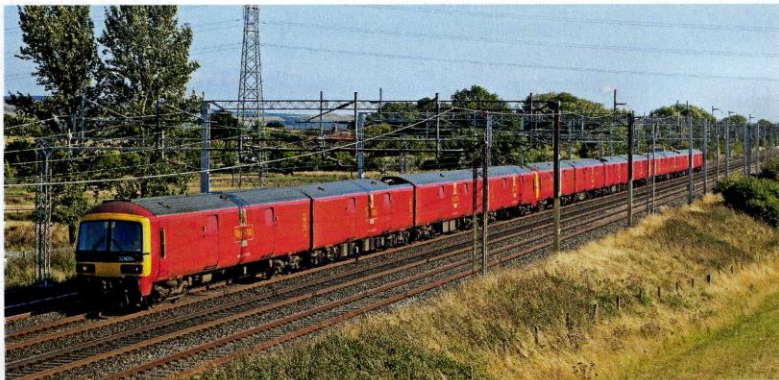


RAIL freight's downturn cannot be eased by carrying parcels traffic to meet the growing needs of delivery companies.

That's the verdict of the man tasked with producing a report advising the Government on its future freight strategies.

Speaking exclusively to *RAIL*, National Infrastructure Commission Chairman Sir John Armitt CBE claimed the rail freight industry "is up against it" and that "everything is going against rail freight" at present.

The former Railtrack and Network Rail Chief Executive explained: "Freight traffic hasn't been increasing in recent years. It has been decreasing thanks to



Operated by DB Cargo, Royal Mail 325006/004/009 pass Ledburn Junction (between Hemel Hempstead and Milton Keynes) on August 21 2018, with the 1622 Willesden PRDC-Shieldmuir. These are all that remains of the vast mail and postal services lost by EWS in 2004. Despite plans by GB Railfreight and Rail Operations Group to return this type of traffic to the main line, former Network Rail Chief Executive John Armitt believes there is no money in the work. PAUL BIGGS.



Armitt: "It would be very surprising if rail carries parcels in the future."

the reduction in coal-powered fire stations, and any decreases we see in the car industry is going to have an impact. The reduction in heavy industry is also going to have an impact.

"I think it would be very surprising if rail carries parcels in the future. I was at Network Rail when EWS [now DB Cargo] lost the contract for carrying Royal Mail traffic. Why did they lose it? Well, because the lorry was something like £45 per tonne and rail's lowest offering was £75 per tonne. You come up against those hard realities and I think that is going to continue to be a challenge for rail freight."

Armitt's comments will represent

a blow to those seeking to procure off-lease passenger trains (including otherwise redundant HST sets) and turn them into 'express parcels' trains, in order to take advantage of the boom in online shopping and the faster paths that can be afforded to ex-passenger trains compared with a conventional freight train.

Echoing comments made last year by Direct Rail Services Managing Director Debbie Francis, Armitt said the problem is exacerbated because Network Rail is being pressurised to prioritise passenger traffic over freight services, because "parcels don't tweet".

He explained: "Network Rail is going to feel the pressure from disgruntled passengers more than disgruntled boxes. I don't think that anyone is in any doubt that people trying to run passenger services don't actually look upon rail freight in a kind way.

"In an ideal world you'd have a dual system. But when you have to run them on the same system, freight is going to inevitably become what is regarded by the passenger boys as something that is a bit of a nuisance."

An interim *Future of Freight* report was published in December 2018 (*RAIL* 870), with the full report due out in the spring with recommendations for the industry and Government to consider.

Armitt told *RAIL* the report will focus on suggestions to help the Government to reduce congestion on the roads and railways, as well as ideas to help it meet its carbon-reduction targets by urging ministers to push freight up the priority list and "give it more attention in the future".

"The trouble is rail freight doesn't give you door-to-door. It has its advantages in transporting heavy goods, but it is difficult to see why it is likely to have any great advantage in carrying light goods.

"Can you make an economic case for rail freight to carry Amazon parcels compared with vans and lorries? I suspect you will struggle," he concluded.

Freight Group seeks EC assurances on freight moves

The European Commission has been urged by the Rail Freight Group to uphold current industry standards and agreed directives.

The RFG wants the EC to give railway undertakings to have a 12-month transitional period following Brexit, to allow for sufficient time for concluding the necessary licensing requirements. It warns there is a risk of severe disruption to freight services should the UK leave the European Union in a 'no-deal' scenario.

The EC has come up with contingency proposals, but the RFG warns these focus exclusively

on the validity of safety licences for cross-border rail infrastructure managers.

RFG Director General Maggie Simpson said: "Although we hope that the UK Government and the EU will avoid a no-deal exit, we must have the necessary provisions in place to ensure that vital rail freight trains can continue to operate.

"We welcome the move from the Commission to start establishing this framework, but this must be concluded as a matter of urgency and include all the necessary provisions to keep

trains moving."

The RFG said in a statement that its proposal would also ensure that contingency measures for rail are equivalent to those for road and air transport.

For road, it explained that the EC's contingency measures would allow UK-licensed lorries and coaches to continue to provide basic road services to and from the EU for nine months. For air transport, the contingency measures would allow air carriers licensed in the UK to continue to provide basic services between nine and 12 months.