

National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

15th March 2019

Dear Sir or Madam,

TR050006 Northampton Gateway Rail Freight Interchange – OF2 Submission: Cumulative Impacts on the Existing SRFI Network and Modal Shift

I write to confirm my oral submission made during Open Floor Hearing 2.

The goal of the National Planning Statement for National Networks (NPSNN) is to create “a national network of SRFIs across the regions”. Developers’ proposals for SRFIs should therefore be judged within a network context, considering whether the specific proposal advances the network solution within the relevant policy context.

Restricting the assessment of cumulative impacts to adjacent, or otherwise geographically close, NSIPs is not sufficient if the impact on the wider network is to be fully assessed.

Northampton Gateway lies on the same section of the WCML as DIRFT and has precisely the same connectivity to ports and markets. The Northampton Gateway proposal places the potential success of DIRFT’s expansion at risk, by creating a competitor for precisely the same trains as DIRFT.

The suggestion that Rail Central can be consented in addition to Northampton Gateway is wholly implausible, since the competition for trains would then increase still further.

The likely outcome of the competition between SRFIs for the same trains is the emergence of a Less Than Trainload (LTT) service on the WCML, servicing the various SRFIs in the East Midlands in a liner or Y-train format¹. This scenario was briefly discussed by Rail Central’s rail consultant during ISH4.

Whilst such a service is likely to find favour amongst shippers, the clear implication is that (a) many fewer containers will be moved to and from Northampton Gateway for each train path taken up and (b) that many more train paths will be needed to achieve the stated levels of modal shift than the sixteen that are proposed.

¹ http://www.intermodal-cosmos.eu/content/intermodal-transport-in-south-east-europe/intermodal-basics/intermodal-production-systems/index_eng.html

Northampton Gateway anticipates that it will save 964 HGV trips when operating at full rail terminal capacity of 16 trains per day, whilst generating 4245 external HGV trips, a modal share for rail of less than 18%².

This figure falls well short of the 25% - 35% routinely achieved by port operators, providing further evidence of the value of a port-centric alternative, but also even further short of the challenging targets of 30% - 50% set for future performance by the European Parliament³.

During ISH4, Network Rail was not able to provide any confirmation that anything other than the minimum 4 trains a day can be guaranteed. I note that neither developer has yet entered into the required contract with Network Rail to prove otherwise.

Given the four train paths that are confirmed as available, only 241 HGV movements can be expected to be moved to rail, one quarter of the planned number.

It is therefore disingenuous of the Applicant to place their claim that “the proposed development could remove over 92 million HGV miles per year” so prominently in their Transport Assessment. Such an eventuality is a maximum, not an expected value based on the balance of probabilities.

I do not accept that the studies prepared by the Applicant’s consultants have equivalent weight to an independent confirmation by Network Rail of the availability of sufficient rail paths to service Northampton Gateway, Rail Central and DIRFT.

I would like to see the Applicant engage with Network Rail to produce a range of operating scenarios for the Scheme, combining direct intermodal and liner services with Rapid Rail Freight and aggregates shipments, so that all parties can be clear on the true number of rail paths required and their availability.

This study should also address the caveat applied by Network Rail at section 24(b) of the SoCG [REP1-016], namely that the confirmation of path availability is subject to “the origin and destination of each train movement (which, as stated in the SoCG, cannot be known until the SRFI is operational).”

I disagree with the last statement in parentheses.

If the Applicant’s Market Study has any merit at all, it should be possible for the Applicant to advise Network Rail of the likely origins and destinations of their anticipated rail operations. If they cannot, what confidence should we place in the Market Report?

To comply with the aims of NPSNN, the Applicant should be targeting principal freight flows with the intention of transferring that activity from road to rail. I do not think this is their strategy at all.

I cannot accept that a development on this scale is speculative. Given the past planning history of the site, and recent interest in large-scale warehousing from Travis Perkins and

² Application Document 5.2 Environmental Statement Appendix 12.1 Transport Assessment Appendix 34 Road to Rail Modal Shift calculations.

³ [http://www.europarl.europa.eu/RegData/etudes/STUD/2015/540350/IPOL_STU\(2015\)540350_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/STUD/2015/540350/IPOL_STU(2015)540350_EN.pdf)

Howdens (amongst others), I believe it to be highly probable that the developer has an anchor tenant in the background.

I note that interest in operating the terminal has been expressed by Maritime Transport, who currently operate a road-based container operation in Brackmills. This serves to confirm my view that the site is attractive for relocation and expansion, from which we conclude that the Applicant's job creation figures are overstated.

To a first approximation, the Applicant's scheme is between 82% and 95% road-based. The Applicant has shown no ambition to achieve credible levels of modal shift; every stage of the development is predicated on a cautious approach towards rail freight.

Recent decisions by the Secretary of State concerning SRFI proposals (e.g. Radlett) have included an assessment of the balance of benefit and harm. Whilst most cumulative impacts are normally treated as increasing harm, I contend that it is also valid to consider any *absence* of cumulative *benefits* as a factor that will unbalance the assessment of the developers' proposal in favour of rejection.

Northampton Gateway adds nothing to the national network of SRFIs in terms of port connectivity, is constrained in terms of achieving modal shift by the shortage of confirmed train paths and risks the success of other consented schemes, especially at DIRFT.

With such limited cumulative benefit to the national SRFI network, Northampton Gateway should be rejected in favour of other alternatives, notably at Hinckley, that are free from such concerns.

Yours faithfully,

A solid black rectangular box used to redact the signature of Dr Andrew Gough.

Dr Andrew Gough