

# BLISWORTH PARISH COUNCIL

Open Floor Hearing 14<sup>th</sup> March 2019

Copy of Verbal Submission

Mark Redding on behalf of Blisworth PC

## Strategic Argument

Throughout this examination there appears to have been very little discussion around the “strategic” element of this proposal and very little evidence presented by the Applicant that demonstrates they are able to justify their proposal based on the benefit it will bring to a national rail freight network; though there is probably very good reason for this. The absence of an alternative sites assessment and the failure to give due consideration to the cumulative impact of other NSIPs in the regions have significantly hampered any meaningful debate on the strategic element. We should not need reminding at this stage that the main purpose of this examination is not to assess whether the benefits of the proposal outweigh the harmful impacts; it is to judge whether or not the proposal justifies the “strategic” tag and whether it can, beyond reasonable doubt, make a significant contribution to modal shift and carbon reduction, two of the four primary objectives of the policy<sup>[1]</sup>. This assessment can only be made by giving due consideration to what is already in existence and other potential alternatives.

Over the last three years we, as an affected community, have digested almost every relevant rail freight report, strategy, policy document and planning precedent published in the last 10 years and nowhere have we found even a hint that the current clustering of SRFIs in the Midlands is in alignment with the intent of the policy. In fact the opposite is arguably true. We believe, therefore, that the Applicant should be requested to guide us to the specific references that indicate such an emerging landscape is appropriate. It is also important to remember that the strategic significance of the Applicant’s proposal site seemed only to become apparent to them when local planning avenues became too challenging. Their declaration to four members of Stop Rail Central Ltd at a meeting in May 2016 that they would never develop another SRFI following their experience with East Midlands Gateway now has a poignantly hollow ring and stands as concrete evidence that this is not the best site for a SRFI and that they **are** in fact dressing up a warehouse park as an SRFI purely to obtain planning consent via the back door. When combined with the absence of an alternative sites assessment this abuse of Government policy is a significant material fact that should not be over-looked.

Of particular concern to the successful implementation of Government’s SRFI policy is the absence of any review mechanism. Hence 10 years on from the Planning Act 2008 the powers that be continue to plough the same furrow with nobody looking for evidence as to whether the policy is actually working as intended. The flurry of SRFI applications in the East Midlands and an unsightly rush to be first past the finishing post is an indication that Developers have realised that they might need to make hay while the sun is shining. We can quote myriad evidence that shows a reticence within the logistics industry to move to rail: the Castle Donnington rail head remains unused; Wakefield SRFI has 5 train movements after 20 years of operation; Prologis Park in Coventry has a rail connection that has not been used; Telford International rail freight park has one MOD train per

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week; Willesden Euroterminal intended for channel tunnel freight fell into disuse in 2005; Markham Vale markets a rail head that has not been developed and the rail connection at Eurohub Corby that was removed has never re-materialised. The only units built at DIRFT 3 in the five years since it was consented are not rail connected and remain empty; and there is still no sign of a new rail head. Roxhill are building their maximum permitted floor area at East Midlands Gateway before even completing the rail head indicating a less than pressing demand for the rail facility. And dozens of paths out of ports and RFIs continue to be cancelled on a daily basis<sup>[2]</sup> with Government figures evidencing a descent of intermodal rail freight from its recent plateau<sup>[3]</sup>. It should now be clear to everyone that just building warehouses will not move freight onto rail: a slightly more strategic, integrated and coherent approach to the logistics landscape as a whole might. Given the current surfeit of applications for SRFIs it is clear that we have just one chance and less than 2 years to get this right. We will not get it right by ignoring the current economic environment and overwhelming evidence; and we will certainly fail if we ignore the bigger picture and continue to consider applications in isolation.

## References

### ***[1] Government Policy for Strategic Rail Freight Interchanges (2.1 Summary)***

1. Reduce road congestion
2. Reduce carbon emissions
3. Support long term development of effective rail freight logistics distribution
4. Support growth and create employment

***[2] The European Parliament Study 2015 Freight on Road Why shippers prefer truck to train*** clearly shows that the proportion of freight actually carried by rail is decreasing. **Only 40% of train paths are actually used in the UK**. An interrogation of the timetable on the 9<sup>th</sup> August 2016 (***Source Real Time Trains***) revealed the following: Hams Hall in Birmingham (which commenced operation in 1997) had 8 scheduled trains, 36% of which were cancelled (a picture that was relatively consistent with other days). Birch Coppice, also in the West Midlands, was built circa 2006 with the capacity to receive 6 trains per day. In August 2016 only one train was arriving at the terminal and a further three paths were cancelled every day. Of the six trains destined to leave on pre-arranged freight paths only three actually ran. A similar pattern can be seen at the Scottish terminals. At the Coatbridge terminal between Glasgow and Edinburgh, of the 15 trains scheduled to arrive at the terminal, circa five were cancelled on a daily basis. At Southampton docks 36% of the 11 train paths leaving every day were cancelled and one third of those destined to arrive. At Felixstowe, arguably the busiest rail freight port, of the 42 departing train paths 11 were cancelled daily and 6 of those due to arrive. At Trafford Park Euro Terminal up to 50% of the train paths were cancelled and at Trafford Park FLT 25% of daily train paths. These unused paths remain despite the Freight Operating Companies recently relinquishing, by industry agreement, 1700 paths to free up capacity (***Source Freight Network Study 2016 Draft***).

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## [3] Office of Road and Rail Freight Statistics

Year	Freight Moved (billion net tonne kilometres) Total	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%)