

## Deadline 6: Cumulative Impact ISH 12<sup>th</sup> March 2019

### Mark Redding

I refer to a comment made by Morag Thompson of Eversheds during the debate around cumulative rail capacity. In an attempt to gloss over the fact that a credible feasibility and operational study had not been completed on the rail network, Ms Thompson seemed to suggest that this was not necessary because further SRFI development in Northamptonshire already had the support of Network Rail. To back up this contention she then quoted from the *Freight & National Passenger Operators Route Strategic Plan February 2018* (Appendix B Geographical Route Summaries). I feel it necessary to point out that the document to which she referred only refers to the building of “terminals” in areas such as Daventry, West Midlands, Parkside and Northampton, not SRFIs. The reference to terminals can be found in point 2 of the table on page 121 (2. *Domestic & Deep Sea Intermodal Growth: Facilitate new terminal developments at Daventry, Northampton, West Midlands and Parkside*). Section 9 of the same table on page 122 refers to SRFI Development on the WCML where it states the aims of “Securing of sufficient capacity to support SRFI developments through planning and into use” and “Offer NR support to proposals when adequate strategic fit and capacity”.

The Applicant’s lawyer is misquoting the study. Terminals are not SRFIs and this distinction is made clear by specific reference to SRFIs in another section of the table. Terminal developments are not NSIPs and would be controlled through the normal local planning process. In no way has Network Rail endorsed or committed to the development of further SRFIs in Northampton. Any offer of support is conditional on there being “adequate strategic fit and capacity”, neither of which has been proven by the Applicants due to their failure to engage with Network Rail to perform the requisite studies.

Furthermore, there is no committed investment planned in the appropriate parts of the network to provide sufficient capacity. None of the rail enhancements detailed in the document have been committed to in the current control period.