

## Review of Network Rail’s response to Examining Authority’s second set of questions

Examining Authority Question	Network Rail Response	My comments
2.9.2	<p>(i)(b): NR is unable to confirm the feasibility of the connection to the rail network of the Proposed Development in combination with the Rail Central proposal for the reasons given in answer to ExQ2-2.9.1 above.</p> <p>(ii)(a):NR can confirm there is network capacity for the Proposed Development to support terminal operations for 4 paths/day, subject to the caveat at section 24(b) of the SoCG [REP1-016], namely the origin and destination of each train movement (which, as stated in the SoCG, cannot be known until the SRFI is operational).</p> <p>(iii): NR notes that, save for the connection speed work referred to above, no further assessment has been undertaken by NR. In relation to each of the documents referred to at point (iii) NR notes:</p> <ul style="list-style-type: none"> <li>• <b>Network Rail West Coast Main Line Capacity Plus</b> [unpublished document] NR produced this draft document but it was not completed or formally published.</li> <li>• <b>Northamptonshire Rail Capacity Study</b> Please can the ExA confirm whether this document is the document entitled</li> </ul>	<p>In other words, a cumulative impact assessment of the two adjacent SRFIs has not been provided from a physical layout perspective.</p> <p>In other words, at this time, Network Rail is unable to advise whether the rail network can accommodate 4 train paths per day for the reason stated here.</p> <p>The Network Rail West Coast Main Line Capacity Plus is categorised as “unpublished”. Nonetheless it was circulated in draft form to organisations such as Northamptonshire County Council. I see no reason to doubt the conclusions reached by this council which reported as follows: <i>“We also note that in the emerging West Coast Capacity Plus Study referred to above, Network Rail have identified a significant future constraint in capacity between Denbigh Hall North Junction and Milton Keynes Central in particular, but also over the entirety of the Northampton Loop, such that increasing freight services over the Loop might require a reduction in the passenger service to Northampton.”</i></p> <p>Network Rail has not referred to the document listed. The Northamptonshire Rail Capacity Study was published in April 2016 and was produced for the</p>

Examining Authority Question	Network Rail Response	My comments
	<p>"Northamptonshire Rail Strategy - Fit for Purpose dated January 2013" produced by Northamptonshire County Council?</p>	<p>Northamptonshire Enterprise Partnership. I referred to this document in my written representation paragraphs 151 and 152. I also provided scanned copies of two relevant pages from this document as part of my written representation.</p>
2.9.4	<p>In answer to the ExA's question regarding the necessity/desirability of assessment to a later GRIP stage (the Governance for Railway Investment Projects) and the implications for the ExA's assessment of the Proposed Development, NR notes that the higher the GRIP Stage that is reached the more detail there is at NR's disposal to enable detailed conclusions to be reached regarding the design of the scheme and how it will operate.</p>	<p>The examiners have asked the Applicant and NR to comment on the necessity/desirability of assessment to a later GRIP stage and the implications for the ExA's assessment of the Proposed Development.</p> <p>Network Rail has not answered that question.</p> <p>Therefore I consider that the specific PINS advice provided in February 2017 is still valid. Part of that advice stated:</p> <p><i>"if an ExA was unable to do this there would be a high risk that they could not recommend that consent be granted for that scheme."</i></p> <p>That referred to a project not having reached GRIP level 4. In this case Northampton Gateway has only reached GRIP level 2, a long way short. Please see paragraphs 208 and 209 from my written representation.</p>
2.9.5	<p>Any freight services which are added to the network will not be at the expense of passenger services and, accordingly, Network Rail confirms that the Proposed Development will not affect passengers.</p>	<p>In September 2017, Network Rail carried out a study of the Northampton Loop. In its introduction to this study, it stated the following:</p> <p><i>"The analysis shows without significant infrastructure improvements a choice must be made between maximising freight paths and creation of additional passenger paths."</i></p> <p>In my comments above regarding question 2.9.2, Northamptonshire County Council quoting from Network Rail's West Coast Main Line Capacity Plus document noted that:</p>

Examining Authority Question	Network Rail Response	My comments
	<p>(ii) In theory, the granting of additional rights for the Applicant's Proposed Development will potentially constrain passenger growth. However the addition of 4 paths/day would not, in NR's view, be a considerable restriction. Furthermore, NR is unable to confirm future capacity on the rail network or the need for further passenger or freight paths to enable it to make a judgement regarding the level of constraint/growth of passenger services.</p>	<p><i>"...increasing freight services over the Loop might require a reduction in the passenger service to Northampton."</i></p> <p>Network Rail provided a relevant representation to the Planning Inspectorate concerning Northampton Gateway on 1st August 2018. It included the following:  <i>"The ability of the RFI to realise its optimal rail service throughput will require detailed capacity studies to be undertaken and, until further capacity studies have been carried out, Network Rail's position on the DCO application is neutral in this regard."</i></p> <p>To my knowledge no such capacity study has taken place since August 2018.</p> <p>All of the above documents, whose source information can be traced back to Network Rail, raise doubts about the ability of the rail network to accommodate additional freight train paths. I therefore question the validity of their response to question 2.9.5</p> <p>Here we have an acknowledgement by Network Rail that their capacity assessments are based on existing usage of the network. So they are not taking into account the additional usage of the West Coast Main Line as a result of the opening of the western section of East West Rail, additional freight train path usage for DIRFT III or the anticipated increase of services as a result of the expected doubling of rail passenger demand at Northampton station by 2043 (my written representation paragraphs 144 to 155).</p>

Examining Authority Question	Network Rail Response	My comments
		While Network Rail has been considering an additional 4 train paths per day for Northampton Gateway, they should be considering the full planned usage of this SRFI which is 16 intermodal trains per day plus an unspecified number of express freight trains.
2.9.7	<p>NR can confirm that the West Coast Capacity Plus Study identifies a number of constraints on the WCML and WCML Northampton Loop. Whilst the Study is incomplete and unpublished, NR can confirm that:</p> <ul style="list-style-type: none"> <li>• the railway network is being operated within the constraints that are identified in the Study; and</li> <li>• when confirming that 4 paths/day are feasible, NR is taking those identified constraints into account.</li> </ul>	<p>I cannot agree with Network Rail's latest claim that it is taking these constraints into account.</p> <p>Please see my response to question 2.9.2 above which states Network Rail's own identified constraint.</p>

# Northampton Gateway

## Introduction

Roxhill has submitted a draft DCO application to create a strategic rail freight interchange (SRFI) called Northampton Gateway. This would be situated adjacent to the Northampton loop of the West Coast Main Line and junction 15 of the M1 on a greenfield site.

Daventry International Rail Freight Terminal (DIRFT) which was established in 1997 is situated 18 miles away. This is the largest SRFI in the country and is expected to remain the largest. DIRFT III was approved in 2014 and provides for significant expansion through to a planned date of 2031. This means that conurbations such as Northampton, Milton Keynes and Rugby are already well served by DIRFT and will continue to be without any additional SRFIs nearby.

This document sets out to summarise the key issues associated with the proposed Northampton Gateway SRFI and provide several new updates.

## Planning Non-Compliance

The proposed Northampton Gateway SRFI would be non-compliant with a significant number of planning regulations and requirements. These were detailed in my written representation paragraphs 1 to 46 and 58 to 63. The instances of non-compliance can be summarised as follows:

- 28 paragraphs National Policy Statement for National Networks (NPSNN)
- 14 paragraphs National Planning Policy Framework (NPPF)
- 4 paragraphs West Northamptonshire Joint Core Strategy (WNJCS)
- 3 paragraphs South Northamptonshire Local Plan

One of the aims of the National Policy Statement for National Networks is to create a national network of SRFIs. Another aim is to maximise the distance of rail journeys for freight and minimise the road distance for the remainder of the journey. To achieve this, SRFIs should be situated very close to major conurbations. Example NPSNN statements:

*“2.54 To facilitate this modal transfer, a network of SRFIs is needed across the regions, to serve regional, sub-regional and cross-regional markets.*

*2.58 This means that SRFI capacity needs to be provided at a wide range of locations ....*

*2.44 The aim of a strategic rail freight interchange (SRFI) is to optimise the use of rail in the freight journey by maximising rail trunk haul and minimising some elements of the secondary distribution leg by road, through co-location of other distribution and freight activities.*

*2.56 It is important that SRFIs are located near the business markets they will serve – major urban centres, or groups of centres –.....*

*2.47 A network of SRFIs is a key element in aiding the transfer of freight from road to rail.....”*

However developers appear to be intent on creating a concentration of SRFIs in the East Midlands region as indicated below:

Daventry International Rail freight Terminal	In use
East Midlands Gateway	Under construction
Northampton Gateway	Examination
Rail Central	Pre Examination
Hinckley	Pre Application
East Midlands Intermodal Park	Pre Application

The focus on the East Midlands reflects road-based logistics thinking (“The Golden Triangle”) and overlooks the aims of the National Policy Statement for National Networks listed above. If you ignore rail freight interchanges based at ports, most other regions in this country have one or at the most two SRFIs per region. The focus on the East Midlands also indirectly highlights that most containers entering or leaving a SRFI will be transported by road rather than rail. However that does not justify overlooking NPSNN policy.

The question to be addressed is, are we going to have a national network of SRFIs, situated adjacent to major conurbations and maximising rail journey distance? Or are the requirements of the NPSNN to be overlooked, such that we have a cluster of SRFIs in the East Midlands with very few across the remainder of the country?

## Lack of Council Support

South Northants Council’s written representation (REP1-039) made clear their lack of support for the proposed Northampton Gateway SRFI. Here are a few examples of their views:

*“1. The proposed Northampton Gateway development in terms of the scale of development and the location has the potential to undermine local economy and local planning policy. The proposal represents a significant increase in employment provision which would lead to increased pressure on housing over and above provision identified in the Development Plan. The harm that will arise from the contradiction with the Development Plan in terms of the distribution of development and the balance of land uses will not be mitigated through the development proposal.. The Council as the Local Planning Authority is opposed to this proposal.*

*50. The overall impact in terms of the adverse effect on the landscape character, visual impact and for the separate identity of settlements of Milton Malsor & Blisworth of the simultaneous development of two RFI’s on adjoining sites would be devastating and unacceptable.*

*51. A full review of the cumulative impact of the two proposed SRFI sites is essential to a robust assessment of either proposal this must be a priority for the Examining Authority.”*

Much more recently (28<sup>th</sup> February 2019) a proposal <sup>[1]</sup> was put forward at a full council meeting of Northamptonshire County Council.

*“This Council notes that it is the aim of Government to encourage a recalibration of the means of freight delivery in this country, from road haulage to rail freight, in order to reduce pressure on our road networks and deliver reductions in carbon emissions and other environmental damage. In pursuit of these objectives the Government is seeking to establish a system of Strategic Rail Freight Interchanges (SRFI’s) across the country. Two such sites have been proposed in close proximity to one another in Bugbrooke Division and Towcester & Roade Division, namely Northampton Gateway near Milton Malsor; and Rail Central near Blisworth and Roade.*

*This Council does not seek to question the validity of SRFI's per se, but expresses deep concern regarding the suitability of the sites in question and the potential impact of the proposals on local residents. The local road network is already far too congested to accommodate these schemes and cannot be improved sufficiently to mitigate their impact. Northamptonshire is already home to a successful and expanding SRFI, namely DIRFT near Daventry, calling into question the ability of the proposed sites to fulfil a strategic need. Over 1150 acres of agricultural land would be lost as a result of the two proposals and local villages would be seriously affected by air, noise and light pollution that cannot be adequately mitigated against.*

*This Council, therefore, resolves to write to the Secretary of State for Transport to formally express its opposition to the two proposals. This council also expresses its support for local campaigners involved in the Stop Roxhill and Stop Rail Central groups who have worked tirelessly to protect their communities."*

The motion was passed by the NCC council with only one vote against.

## **Rail Capacity**

For the Northampton Gateway SRFI application to be approved, Network Rail needs to give a clear and unqualified statement that there is sufficient capacity on the network for all the additional trains associated with this rail interchange to be accommodated.

The closest Network Rail appear to have reached is in the original Statement of Common Ground with Roxhill which indicated that up to 4 train paths per day could be accommodated. However this was subject to the origin and destination of each train movement. This information will not be known until the SRFI is operational and therefore whether a path from the SRFI can be matched to a path at the origin/destination. So this statement is qualified such that it has no real value at this time.

However, we should also recognize the following:

- Northampton Gateway is planned to have up to 16 intermodal/bulk freight trains per day plus an unspecified number of express freight trains. The total number of trains forecast to be run per day is the important number, not the minimum to satisfy SRFI eligibility requirements. If only the minimum number was used in assessments at the planning stage, we could finish up in the situation where several SRFIs are built and each operates with the minimum number of trains per day and no more, because any additional paths needed have been taken by the other SRFIs. That would be very inefficient from a SRFI perspective and would also make a mockery of the planning system.
- An analysis carried out by Network Rail has focused on the capacity of the Northampton Loop. In its study published in September 2017, it stated that  
*"The analysis shows without significant infrastructure improvements a choice must be made between maximising freight paths and creation of additional passenger paths."*

Northamptonshire County Council's studying of the West Coast Main Line Capacity Plus document provided the following:

*"We also note that in the emerging West Coast Capacity Plus Study referred to above, Network Rail have identified a significant future constraint in capacity between Denbigh Hall North Junction and Milton Keynes Central in particular, but*

*also over the entirety of the Northampton Loop, such that increasing freight services over the Loop might require a reduction in the passenger service to Northampton.”*

- So we already know that Network Rail has identified capacity issues on the Northampton Loop. Yet the Northampton Loop lines are less busy than other sections of the West Coast Main Line. Each line immediately north of Watford Junction is between two and three times busier than each line on the Northampton Loop (assessed by passenger train usage); please see my report on the ISH2 meeting, references paragraph 2. See also paragraph 177 of my written representation together with an illustration from West Coast Main Line Route Utilisation Study.
- It should also be noted that all trains serving Northampton Gateway from Felixstowe or the London ports (the vast majority of planned incoming trains for Northampton Gateway) would travel through three of Network Rail’s seven worst congestion bottlenecks; please see my ISH2 report paragraph 8.
- It is evident from Network Rail’s responses that it carries out assessments of capacity based on existing demand; please see Network Rail’s response to the EA’s written question 2.9.5. Therefore it would not take into account, for example, that passenger usage of Northampton rail station is expected to double by 2043; my written representation paragraphs 151 to 153. Such an increase in demand would necessitate a significant increase in passenger trains. Similarly it is likely that Network Rail would also not take into account trains joining the West Coast Main Line from East West Rail when that opens in the early 2020s. The way in which Network Rail operates appears to make the job of the Planning Inspectorate much harder. It also does not contribute to efficient strategic planning in the opinion of the author.

Network Rail made the following statement to Northampton Gateway on 1<sup>st</sup> August 2018.

*“The ability of the RFI to realise its optimal rail service throughput will require detailed capacity studies to be undertaken and, until further capacity studies have been carried out, Network Rail’s position on the DCO application is neutral in this regard.”*

Roxhill could have asked Network Rail to proceed with such capacity studies. In the absence of the publication of such studies, one can only conclude that Roxhill chose not to proceed with them. This might suggest a lack of commitment on Roxhill’s part.

It should be noted that Network Rail has given a clear undertaking to provide extra train paths for DIRFT III; see my written representation paragraph 150. It has given no such undertaking for Northampton Gateway.

It is my understanding that Network Rail needs to give a clear and unambiguous view to the Planning Inspectorate on whether Northampton Gateway’s maximum number of freight trains can be accommodated within the network. Network Rail have provided a view on 4 trains per day and even that is heavily qualified.

## **London Mayor’s Transport Strategy**

Having come across the London Mayor’s Transport Strategy (2018) <sup>[2]</sup> on 17<sup>th</sup> March 2019, I make no apology for its late inclusion. The document states:

*Improvements to the rail network outside London would mean that freight trains could avoid using the London Overground network, as much of the rail freight that currently travels through London is not bound for the capital, with a large proportion of that freight being transported from the Port of Felixstowe to the Midlands and beyond. In the first instance,*

*using the existing unfilled rail paths on the Felixstowe to Nuneaton corridor would help London. In addition, an upgrade and electrification of the Felixstowe to Nuneaton corridor would allow more freight services to avoid London. A new line linking the ports around Tilbury with the Great Eastern Main Line would allow freight traffic from the Essex Thameside route to access the Felixstowe to Nuneaton corridor without needing to pass through the city. These upgrades could release much-needed capacity and improve reliability across the London Overground network, as well as providing more room to move London-bound road freight onto rail, and thereby releasing freight capacity for London's major infrastructure projects.*

**Proposal 18**

*The Mayor, through TfL, will work to encourage the DfT and Network Rail to upgrade rail freight routes outside London so that non-London rail freight can be taken around London, thereby freeing up rail paths through the capital for additional passenger services and freight trains that serve London.*

It is very encouraging that the London Mayor has identified this solution which would be of benefit to both people and businesses in London, and freight movements from the East of England. It is unfortunate that Network Rail has lacked the strategic vision to implement such a sound idea many years ago.

The London Mayor also has very sound reasons for proposing such a solution. London Overground usage has increased by 253% in the last six years. The North London and East London lines contain 3 of Network Rail's seven worst congestion bottlenecks. There is already tension between the conflicting demands of passenger and freight trains on this route. Getting rid of through freight trains is an extremely practical solution.

The strategy of the Mayor has fully vindicated the views I expressed in my written representation concerning how crowded the North London Line is; please see my paragraphs 89, 140, 158, 159, 179 to 181. In other words, the London Mayor wants to get rid of through freight trains from the North London Line while Roxhill wants to make greater use of the North London Line for through freight trains. As I previously indicated, Roxhill forecast that that more than three quarters of the tonnage to be transported from the ports to Northampton Gateway by rail, would be from Felixstowe and London Gateway; please see my ISH2 meeting report paragraph 8.

Looking at the Northampton Gateway Scoping Opinion document, it appears that neither the London Mayor nor the Greater London Authority were consulted at the Scoping Report stage.

Let us suppose that London Mayor is successful in bringing about his Proposal 18 listed above. This would make a lot of sense as we know that 87% of rail freight movements leaving Felixstowe have end destinations in the North West, Yorkshire and the West Midlands; my written representation paragraph 195. We also know that 42% of freight trains leaving Felixstowe are routed through the North London Line to reach the West Coast Main Line; my written representation paragraph 139. Let us also suppose that Northampton Gateway has been built, although that is not my wish. Freight trains from the ports of Felixstowe and London would reach Nuneaton where they would need to head south on joining the West Coast Main Line to serve Northampton Gateway. However there is no chord between the line from Leicester (Felixstowe) and the West Coast Main Line southbound. So the locomotive would have to decouple from its freight train after joining the West Coast Main Line, and then rejoin at the other end of the freight train to haul its containers in the opposite direction on the West Coast Main Line. This very issue was discussed at the ISH2 meeting on the 19<sup>th</sup> December 2018. Such a journey still overlooks the expert opinion that Northampton Gateway is too

close to Felixstowe and the London ports to provide an economically viable journey distance by rail. So we would have an awkward journey where the locomotive has to swap to the opposite end of its train, and for which there is questionable demand (if any) as the real demand is already known to be in the North West, Yorkshire and the West Midlands.

In summary, additional through freight trains are clearly not welcome on the North London Line by the London Mayor or users of London Overground services.

## **Environmental Impact Assessment Regulations**

Under environmental impact assessment regulations, developers are required to carry out cumulative impact assessments. Roxhill should have considered the impact of additional freight trains serving other proposed SRFIs as well as its own proposal, and how these might impact current and future rail (passenger and freight) services. Roxhill has not done so and it appears not to have asked Network Rail to do so.

Rail Central is expected to serve up to 13 intermodal trains per day plus an unspecified number of express freight trains. The proposed West Midlands Interchange, which would be situated (if approved) on the West Coast Main Line north of Wolverhampton, is expected to serve up to 10 trains per day. The proposed SRFI at Hinckley would not be situated on the West Coast Main Line. However it could well serve trains to/from Liverpool or Scotland which would use the West Coast Main Line.

High Speed 2 will run in a twin bore tunnel from Euston to Ruislip, a distance of 14 miles. A lot of spoil will be generated by the boring of these tunnels which will be transported by road to the Willesden Euro Terminal. From there it will be transported by rail on the West Coast Main Line according to an article in Modern Railways (March 2019, page 92).

Roxhill appear to be in contravention of EIA regulations by not carrying out cumulative assessments in respect of the freight traffic generated by three other proposed SRFIs and freight train movements related to HS2 construction. In the same vein, Roxhill has not considered the impact of all of its planned freight trains on existing or future passenger rail services.

## **Project Readiness**

A communication from the Planning Inspectorate on 21st February 2017 indicated the stage that the developer should have reached with Network Rail by the time the examining authority has to make a decision.

*“With the above in mind, the critical consideration for a developer is to seek to provide an Examining Authority (ExA) with sufficient information and detail for them to be able to understand and assess the impacts of a scheme; if an ExA was unable to do this there would be a high risk that they could not recommend that consent be granted for that scheme. GRIP stage 3 relates to option selection, and GRIP stage 4 relates to single option development. If a developer had not reached a conclusion with Network Rail on a single option development (GRIP stage 4) this could present a greater high risk approach, as it could complicate the ExA’s ability to assess the potential impacts of the scheme.”*

It is my understanding that the Northampton Gateway project has only reached GRIP stage 2. In other words the application has been made to the Planning Inspectorate before its development had reached a suitably mature stage of project development. The above response from the Planning Inspectorate is clear and should be respected.

## **Transport and Highways**

Roxhill's Future traffic forecasts for its Northampton Gateway SRFI application appear to have been understated for a number of reasons.

Future traffic usage to 2031 has been based on known developments (housing and business) solely in Northamptonshire. This limitation is made clear in the Roxhill Transportation chapter, paragraph 12.8.1; please also see my written representation paragraphs 236 to 240. For further confirmation, Northampton Gateway Transportation Appendix 36 indicates clearly that the list of developments are confined solely to Northamptonshire. Therefore the traffic produced by the expansion of nearby conurbations such as Milton Keynes and Bedford for example are not reflected in the traffic modelling for 2031, so understating future traffic flows.

On a smaller scale, another factor causing understatement of future traffic movement is the moving of Northampton University to its new Nuns Mills campus adjacent to the Bedford Road in the autumn of 2018. Additional traffic movements for future business developments are based on the number of employees for each business. In the case of a university this will give a misleading forecast. A figure of 1,806 employees has been used for the new Northampton University campus. However, including students, there will be a total of 13,000 people travelling to Northampton University on a regular basis. While I am not suggesting each student will drive a car to Northampton University, I am suggesting that there will be considerably more vehicle movements to the new campus each day than those suggested by 1,806 employees.

Roxhill has not taken into account the particularly low levels of unemployment in South Northamptonshire and surrounding areas; my written representation paragraph 247. With so much logistics based activity in Northamptonshire there is a shortage of unemployed people to work as warehouse operatives or drivers; please see my written representation paragraphs 254 and 268. Roxhill is expecting many employees to travel short distances to work at Northampton Gateway. I and others think that they have misread the situation; consequently many employees are likely to travel considerably further than the developer has estimated. This is yet another factor which suggests that Roxhill's traffic forecasts are understated.

HS2 Ltd will be siting a major construction compound by the A43 immediately north east of Brackley. Workers will be travelling to and from this on a daily basis in the early 2020s. The construction of HS2 through the southern part of Northamptonshire will lead to the movement of many commercial vehicles bringing in construction materials and removing spoil. HGV traffic is expected to increase by over one quarter on the A43. The vehicle movements associated with HS2 have been omitted from Roxhill's traffic forecasts for Northampton Gateway; see my written representation paragraph 241.

So there are several reasons why the Northamptonshire Strategic Transport Model will have produced low traffic forecasts although this is not the fault of Northamptonshire County Council.

In the context of road traffic, it is my understanding that Roxhill has an obligation to carry out a full cumulative impact assessment of the effects of both Northampton Gateway and Rail Central being

operational to comply with Environmental Impact Assessment regulations, and that the data used for such modelling should be the full data sets from both developers; see my written representation paragraphs 244. Northamptonshire County Council (NCC) Highways Department offered to run its model with both developers' data simultaneously approximately one year ago:

*"The only meaningful cumulative assessment would be obtained from combining the separate impacts which each developer has used for assessing their own sites. NCC was willing to facilitate such an assessment, and where appropriate act as a neutral party to ensure confidentiality of input of information, and has made this offer to both parties, but this approach has not been successful to date.*

*Even with such a cumulative assessment undertaken by NCC, there does not appear to be an obligation through the DCO process to secure any mitigation to accommodate the cumulative impacts of more than one DCO application.*

*It would be unacceptable in highways terms therefore to permit both sites without such an assessment having been undertaken, and the appropriate mitigation being secured to mitigate the cumulative impacts. In particular we are concerned that there are a number of junctions where both developers are proposing improvements to support their own applications, but were both to be permitted a larger scheme than that contained within either DCO would almost certainly be required."*

I am fully in agreement with the views expressed by Northamptonshire County Council Highways Department.

Although Roxhill has had one year in which to take up the offer made by NCC to run both developer supplied data sets simultaneously on their Strategic Transport Model, the company has elected not to do so. That unchanged position was confirmed to me by NCC on 11<sup>th</sup> March 2019. That suggests a lack of commitment as well as being in breach of the Environmental Impact Assessment Regulations. Some might suggest that this cumulative impact assessment is no longer required as Ashfield Land has sought to place their application on hold until November 2019. That is irrelevant as the application for Rail Central is still within the Planning Inspectorate system. Furthermore Roxhill could not have predicted that Ashfield Land would take the action that it did on 11<sup>th</sup> March to place its Rail Central project on hold. Therefore Roxhill should have asked NCC to proceed with running both full sets of developer data in the Northamptonshire Strategic Transport Model during the last 12 months, but did not do so.

This means that all the pages and pages of traffic modelling in the Northampton Gateway documentation are largely meaningless as Roxhill's own traffic forecasts are understated as well as the cumulative impact assessment being unsatisfactory for the reasons already expressed above.

## **Alternative Sites Assessment**

Roxhill's alternative sites assessment is both inadequate and unsatisfactory. The application is therefore non-compliant with several elements of legislation as listed in my written representation paragraphs 117 to 120.

## Conclusions

The reason that this application to build a strategic rail freight interchange is being processed by the Planning Inspectorate is because the intention is to have a rail connection rather than it simply be a road-based group of warehouses. Therefore it is crucial that Network Rail is able to confirm that sufficient capacity exists to meet the needs of this proposed group of logistics warehouses.

From the information already reviewed above, Network Rail has advised that four trains per day could be accommodated on the network subject to a significant caveat. It needs to know the origin/destination of the train paths before it can be sure. Network Rail has made its assessment based solely on the Northampton Loop line, and has considered existing usage rather than future usage. Network Rail has not considered whether 16 bulk freight/intermodal trains plus an unspecified number of express freight trains per day can be accommodated.

Network Rail did carry out a particular study of the Northampton Loop line in 2017 and included the statement:

*“The analysis shows without significant infrastructure improvements a choice must be made between maximising freight paths and creation of additional passenger paths.”*

Network Rail also said at the beginning of August 2018:

*“The ability of the RFI to realise its optimal rail service throughput will require detailed capacity studies to be undertaken and, until further capacity studies have been carried out, Network Rail's position on the DCO application is neutral in this regard.”*

It appears that Roxhill has not taken Network Rail up on its offer, nor has it accepted Network Rail's offer to consider the cumulative impact on the rail network of Northampton Gateway and Rail Central both being operational. This might suggest a lack of commitment on Roxhill's part. It also overlooks the proposed West Midlands Interchange and Hinckley SRFs.

Lastly we should not overlook the fact that Northampton Gateway has not reached GRIP stage 4 in the Network Rail project planning process.

With so much unknown and uncertain, it appears Network Rail cannot confirm that there will be suitable capacity available on the rail network to enable the full planned quota of 16 bulk freight/intermodal trains to run per day, even ignoring the express freight trains for the time being as they have yet to be quantified. This may suggest that it would be more appropriate for this application to be processed as a road-based logistics warehouse site which would need to be dealt with by South Northamptonshire Council.

There are many other arguments against the proposed Northampton Gateway. I have endeavored to list some of these in this document, my written representation and the other documents that I have submitted to the Planning Inspectorate.

## References

1. Northamptonshire County Council Meeting 28<sup>th</sup> February 2019  
<https://cmis.northamptonshire.gov.uk/cm5live/Document.ashx?czJKcaeAi5tUFL1DTL2UE4zNRBcoShgo=UhUnhKKtsKa0cGnK4DqPDK9EarO0pRWuhj6Lp6rflDvYxePFliBLA%3d%3d&rUzwRPf%2bZ3zd4E7lkn8Lyw%3d%3d=pwRE6AGJFLDNih225F5QMaQWctPHwdhUfCZ%2fLUQzgA2uL5jNRG4jdQ%3d%3d&mCTIbCubSFfXsDGW9IXnlG%3d%3d=hFflUdN3100%3d&kCx1AnS9%2fpWZQ40DXFvdEw%3d%3d=hFflUdN3100%3d&uJovDxwdjMPoYv%2bAJvYtyA%3d%3d=ctNJFf55vVA%3d&FgPIIEJYlotS%2bYGoBi5o>

[IA%3d%3d=NHdURQburHA%3d&d9Qjj0ag1Pd993jsyOJqFvmyB7X0CSQK=ctNJFf55vVA%3d&WGewmoAfeNR9xqBuxOr1Q8Za60lavYmz=ctNJFf55vVA%3d&WGewmoAfeNQ16B2MHuCpMRKZMwaG1PaO=ctNJFf55vVA%3d](https://www.northamptonchron.co.uk/news/county-council-to-oppose-rail-interchange-projects-in-letter-to-secretary-of-state-1-8831502?fbclid=IwAR0tnCre8Snt-0ZFZnBeO4gzRgqCAZhHcH6ZJfdqGe4jL6ab3IWT0xZTVlk)

Agenda item 6

Northamptonshire Chronicle and Echo reports on the outcome of the above meeting

<https://www.northamptonchron.co.uk/news/county-council-to-oppose-rail-interchange-projects-in-letter-to-secretary-of-state-1-8831502?fbclid=IwAR0tnCre8Snt-0ZFZnBeO4gzRgqCAZhHcH6ZJfdqGe4jL6ab3IWT0xZTVlk>

2. London Mayor's Transport Strategy

<https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf>

See pages numbered 86 and 87