

Comment on Late Submission - Written Statement of Oral Case ISH4 (Appendix D – Market Need Note)

Tritax continue to cite the Leicester and Leicestershire Strategic Distribution Sector Study (November 2014) as the instigation of their search for a site.

However, this report assumed a 'high replacement scenario' to determine future freight needs. This is based (as per paragraph 2.36) on the assumption of:

1. The obsolescence of older buildings
2. The need for larger distribution centres
3. The need for warehouses to be located at rail-served sites.

Paragraph 2.40 goes on to state that most existing sites are not and cannot be rail-linked

As I stated at ISH4, it was decided subsequent to this report by Harborough District Council that putting in a short road freight shuttle between Magna Park and DIRFT would provide rail linkage for Magna Park, and Magna Park was allowed to expand significantly. This scenario was clearly not foreseen in the 2014 report.

The possibility of demolishing existing warehouses and rebuilding them to modern specifications is also not included within the high replacement scenario. A significant proportion of these older warehouses are at Magna Park (which was first opened in the 1980's.) It is unlikely that operators such as Gazeley will just abandon obsolete warehousing and far more likely that they will demolish them and rebuild.

The report also fails to provide any evidence to support the contention that most existing sites cannot be rail-linked. I have sought independent advice confirming that a rail link between Magna Park and WCML would be prima facie viable. (I cannot provide the document as it was prepared specifically for my personal use.)

I therefore do not believe that the 2014 study bears any relevance to the current market need case.

I would also have expected that Tritax would have carried out their own research and investigation of sites rather than relying on a report which was not prepared for this purpose. Had this been the case, Tritax might have identified more appropriate sites for their stated Coventry market in Warwickshire.

Tritax also cite the GL Hearn report 'Warehousing and Logistics in Leicestershire and Leicestershire: managing growth and change (April 2021 amended March 2022). However, as stated in my earlier representation and as discussed at ISH4, this report cannot have any real credibility in the current examination, given that Tritax and their advisors were major consultees. The various councils have agreed to the contents of this report in their Statements of Common Ground, but having commissioned and paid for the report, (unaware that GL Hearn would consult Tritax and their advisors, as I understand it) they are left with little option but to do so.

Tritax state in paragraph 1.22 of their note that Leicestershire County Council accepts the need for a SRFI to be located in South Leicestershire, but this does not mean that it should be HNRFI. A far more sensible option would be to create a SRFI in South Leicestershire by rail-linking Magna Park.

Tritax state in paragraph 1.65 of their note that:

'HNRFI will serve Coventry through to Leicester South, including Magna Park for deep sea / east coast, west coast and domestic time sensitive flows.'

'DIRFT will serve Northants Fast Moving Consumer Goods National Distribution Centres and Magna Park for short sea, domestic and Channel Tunnel flows.'

The Examiners' Report prepared by PINS on 7 April 2014 for DIRFT III states 'A range of the country's most significant deep sea container ports - Felixstowe, Southampton, Tilbury, and Liverpool – can access DIRFT by rail on W10 cleared routes.' (Paragraph 4.11). It is also evident from looking at the website for the DIRFT freight operator (Malcolm Group) that this is the case.

It is therefore clearly incorrect for Tritax to say that DIRFT can only serve Magna Park for short sea, domestic and Channel Tunnel flows.

DIRFT uses the all-electric railway line round London to bring in freight from Felixstowe, which is far more environmentally friendly than the diesel Felixstowe to Nuneaton Line on which HNRFI is situated. It also avoids the constraints around Water Orton, which Tritax cite as a major obstacle.

Tritax also state that 'Northampton Gateway will serve a similar market to DIRFT' but they have made no attempt to clarify DIRFT's existing geographical market. Given the location of DIRFT, it seems far more likely that it serves areas such as Coventry and South Leicester.

At ISH4, Tritax stated that their key market was the automotive industry, but other than Caterpillar in Desford, I am not aware of any motor manufacturers in Coventry or South Leicester. This also flies in the face of Tritax's contention at ISH4 that HNRFI's situation on an East / West axis would work best for the motor industry.

In paragraph 1.63 of their note, Tritax state that HNRFI is not being developed to take market share from other terminals or SRFI developments, but they have still not provided any hard data to support this. It seems highly likely that there will be significant overlap between DIRFT and HNRFI.