Northampton Gateway Strategic Rail Freight Interchange (TR050006)

This is a summary of the written representation of Andrew Bodman (20011120)

Planning Compliance
The Northampton Gateway proposal is non-compliant with at least 28 paragraphs of the National Policy Statement for National Networks. It is also non-compliant with at least 14 paragraphs of the National Planning Policy Framework.

Northampton Gateway would be non-compliant with many policies of the West Northants Joint Core Strategy (WNJCS) including where strategic rail freight interchanges should be situated. The WNJCS was reviewed and approved by the Planning Inspectorate. The proposal is also non-compliant with at least three policies of South Northants Council.

Validity of Site Selection
Northamptonshire is over supplied with logistics distribution centres. It also contains the Daventry International Rail Freight Terminal (DIRFT) which is the largest strategic rail freight interchange (SRFI) in the country and has an expansion capability until 2031. Therefore Northampton (and Milton Keynes) have no need for a further SRFI as they are already very well supplied through DIRFT.

The government wishes for a national network of SRFIs to be created. Therefore new ones need to be located in areas where there is a shortage of them at present such as the North West, Yorkshire and West Midlands. Such destinations are well suited to be served by rail from our main container ports at Felixstowe and Southampton. Northampton is too close to these ports to provide economically viable rail journeys.

Northampton Gateway would be situated very close to houses in several nearby villages and the inhabitants would be impacted by increased noise, air pollution, dust and traffic congestion. The site of this SRFI is not capable of significant expansion so undermining its sustainability. The cumulative impact of Northampton Gateway alongside other developments has not been fully explored by the developer, which is in contravention of Environmental Impact Assessment regulations.

Alternative Sites
It is a legal requirement for a developer to consider several alternative sites and its choice should take into account the site which generates the least environmental effects. Roxhill has clearly failed to follow this course at the commencement of the planning process, which is the point in time at which the analysis must be carried out.

When eventually it chose to consider Rail Central as an alternative, its analysis was inadequate and incomplete; one of Northampton Gateway's claimed environmental benefits was quite the opposite. Furthermore the developer did not consider a sufficient number of alternatives.

Rail

It is well known that the West Coast Main Line (WCML) is an extremely busy rail line. DIRFT III, an approved scheme, will take significantly more rail paths, as will East West Rail and the forecast additional demand of rail passengers at Northampton in future years. That makes it all the more difficult to provide freight train paths for Northampton Gateway. It should be noted that the WCML is considerably busier closer to London e.g. south of Watford Junction than on the Northampton Loop line.

It is unclear how many train paths will be released by the opening of High Speed Two (HS2). However that has very little relevance. Consider a freight train from Felixstowe to Northampton for example; it has to use the Great Eastern Line, East London Line and North London Line before it reaches the West Coast Main Line. These other listed lines are all virtually full and so any train paths released by the opening of HS2 will not be of help on the remainder of the route from Felixstowe.

Roxhill has not considered the impact of additional freight services on existing and future rail passenger services. That contravenes the Environmental Impact Assessment regulations. Northamptonshire County Council has considered the effects and has concluded that Northampton Gateway is likely to adversely affect the availability of existing or future passenger rail services.

A SRFI needs to have the capability of serving four freight trains per day. However there would be no point in approving such an application if the rail network was not capable of serving the planned capacity of the site. Roxhill has indicated that Northampton Gateway would eventually serve 16 container trains per day and has previously indicated it would serve up to 12 express freight trains per day. Added to this would be the aggregate trains. Network Rail has not confirmed the availability of the planned additional train paths for Northampton Gateway.

Last year the government made a 21% reduction in the Mode Shift Revenue Support Scheme. It has been suggested that charges to freight operators for the use of the tracks may increase. It is also noted that three of the four largest rail freight operators in the UK made a loss last year. Therefore the sustainability of rail freight in the future may be called into question. Official data shows that the growth of container rail freight traffic has averaged just 1.1% for the last six years.

The cumulative effects on the rail network of Northampton Gateway and Rail Central being operational at the same time has not been considered. Also the cumulative effects of Northampton Gateway, HS2 and East West Rail have not been considered.

Traffic Assessment

At peak times, the A508 is already a heavily congested road as it approached M1 junction 15. With Northampton Gateway in operation, an additional 838 vehicles would enter the site during the peak hour. The vast majority of these would approach from M1 J15 and

would have priority over northbound traffic on the roundabout at the site entrance. This will create even worse congestion than already exists for northbound traffic.

Northampton Gateway would add significant extra traffic to two Active Red Routes. Roxhill has not addressed several of the traffic concerns raised in the scoping opinion document. The traffic forecasts for some of the minor roads do not seem to make sense. Using the Department for Transport's own National Transport Model, we see that Northampton Gateway would feed into what is forecast to be the most congested part of the M1 by 2040.

The Northamptonshire Strategic Transport Model has produced understated forecasts for several reasons. It has excluded future development plans for places such as Milton Keynes and Bedford. It also excludes the extra traffic to be generated by HS2 construction, e.g. there will be a main construction compound at Brackley. Employees will have to travel considerably further to work than forecast because of the very limited availability of labour locally.

Then we have the situation that the Northamptonshire Strategic Transport Model has not been run with the developers' forecast traffic data for Northampton Gateway and Rail Central simultaneously. The developers have declined Northamptonshire County Council's (NCC) offer to do so. NCC considers that the lack of such modelling to be unacceptable.

Employment

There is a very high level of employment in the surrounding area which means it will be difficult to recruit the number of staff required. Visits to local logistics sites show the large number of companies regularly seeking to recruit staff such as drivers or warehouse operatives. The ever increasing number of logistics operations in Northamptonshire and surrounding area will make it increasing hard to fill vacancies at Northampton Gateway.

Due to the considerably greater distances that employees will have to travel than has been forecast, the journey savings created by the reduced HGV journeys will be more than wiped out by the additional employee journeys.

Air Quality

Northampton Gateway would be situated within 1 mile of two air quality management areas (AQMA). Almost two thirds of the additional traffic movements generated by this SRFI would pass through one or other of these two AQMAs. Roxhill would have no control over the emission levels of vehicles delivering to this SRFI.

Roxhill's latest forecasting of NO_2 at selected points uses the revised DEFRA forecasting methodology. This has lowered overall forecast levels by 47% compared to those previously produced. The magnitude of such a change is astonishing.

More than three quarters of the UK rail freight locomotives are non-compliant with the latest emission legislation and approximately half may not be compliant with any emission legislation at all.

Crime

Data obtained from Northamptonshire Police shows significantly increased levels of crime in the areas surrounding the Daventry International Rail Freight Terminal between 2007-08 and 2015-16. These increases apply to a wide range of crimes in both the Barby & Kilsby ward and also the Crick ward.

There is much concern that villages adjacent to Northampton Gateway SRFI will experience similar increases in crime in the event that this SRFI is built.

An analysis of the application by Roxhill (Junction 15) Ltd for an order granting development consent for the Northampton Gateway strategic rail freight interchange (TR050006) provided by Andrew Bodman (20011120)

October 2018

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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.

Northampton Gateway would be located too close to the major container ports of Felixstowe, Southampton and London to provide economically viable rail journeyse. The availability of a suitable number of train paths to serve this SRFI has not been confirmed.

The lack of cumulative impact assessments on a number of topics is most concerning. Northampton Gateway appears to be non-compliant with numerous paragraphs of the National Policy Statement for National Networks and the National Planning Policy Framework. This proposed SRFI is also non-compliant with the West Northants Joint Core Strategy which itself was reviewed by a planning inspector.

I strongly object to the proposed Northampton Gateway SRFI.

PLANNING COMPLIANCE

National Policy Statement for National Networks

1 The National Policy Statement for National Networks sets out the policies of the Department for Transport concerning strategic rail freight interchanges (SRFIs) as well as other kinds of infrastructure. I initially summarise areas of non-compliance with these policies and provide more detail in subsequent chapters:

National Network of SRFIs

2.50 While the forecasts in themselves, do not provide sufficient granularity to allow site-specific need cases to be demonstrated, they confirm the need for an expanded network of large SRFIs across the regions to accommodate the long-term growth in rail freight. They also indicate that new rail freight interchanges, especially in areas poorly served by such facilities at present, are likely to attract substantial business, generally new to rail.

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.

2.56 The Government has concluded that there is a compelling need for an expanded network of SRFIs.

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

2 So, a national network of SRFIs is needed. Locating Northampton Gateway a mere 18 miles from Daventry International Rail Freight Terminal (DIRFT), the largest SRFI in the country, would help create a local cluster not a national network. It would also appear from the above statement that Northampton Gateway is less likely to attract substantial business due to its closeness to DIRFT and hence would be less likely to achieve modal shift from road transport.

Near to Major Markets

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. SRFIs are a key element in reducing the cost to users of moving freight by rail and are important in facilitating the transfer of freight from road to rail, thereby reducing trip mileage of freight movements on both the national and local road networks.

2.45 This requires the logistics industry to develop new facilities that need to be located alongside the major rail routes, close to major trunk roads as well as near to the conurbations that consume the goods.

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

3 The town of Northampton ranks 37th in the list of urban areas and 30th in the list of primary urban areas. Milton Keynes located some 15 miles away is ranked 35th and 31st respectively. In other words, both Northampton and Milton Keynes are significantly smaller than cities such as Manchester or Leeds, and both are already served by the Daventry International Rail Freight Terminal. Furthermore Northampton has less manufacturing industry than it previously had which means there is no need for two SRFIs (DIRFT and Northampton Gateway) to be situated nearby. DIRFT is quite

sufficient on its own to supply Northampton and Milton Keynes, particularly as it has an expansion capability until 2031.

Brownfield Sites

5.168 Where possible, developments should be on previously developed (brownfield) sites provided that it is not of high environmental value.

4 The proposed Northampton Gateway site would be a greenfield not a brownfield site.

Alternative Sites Consideration

4.26. Applicants should comply with all legal requirements and any policy requirements set out in this NPS on the assessment of alternatives. In particular:

- *The EIA Directive requires projects with significant environmental effects to include an outline of the main alternatives studied by the applicant and an indication of the main reasons for the applicant's choice, taking into account the environmental effects.*

5 Roxhill has given full consideration to one alternative site which is that proposed for Rail Central. One alternative is not considered adequate to comply with the EIA Directive.

Available Local Workforce

2.52 The availability of a suitable workforce will therefore be an important consideration.

4.87 The existence of an available and economic local workforce will therefore be an important consideration for the applicant.

6 The South Northamptonshire constituency has one of the lowest claimant counts in the country and most of the adjacent constituencies have lower than average claimant counts. Numerous logistics centres in Northampton and nearby have a shortage of drivers and warehouse operatives as indicated by the banners and signs regularly on display at these centres. So contrary to the view of Roxhill, there is not a ready supply of an available workforce. Nor will the situation change much in the future as the biggest growth of population in this area will be those over the age of 65, i.e. not of working age.

Sustainability

2.47 A network of SRFIs is a key element in aiding the transfer of freight from road to rail, supporting sustainable distribution and rail freight growth and meeting the changing needs of the logistics industry, especially the ports and retail sector.
The siting of many existing rail freight interchanges in traditional urban locations means that there is no opportunity to expand, that they lack warehousing and they are not conveniently located for the modern logistics and supply chain industry.

4.29 Visual appearance should be a key factor in considering the design of new infrastructure, as well as functionality, fitness for purpose, sustainability and cost. Applying "good design" to national network projects should therefore produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction, matched by an appearance that demonstrates good aesthetics as far as possible.

7 The proposed Northampton Gateway is immediately bounded on three sides by roads or rail. The possible expansion capability to the south is small. In addition the site has been designed to cater for 775 metre length trains. In the longer term, consideration is being given within the rail industry for even longer freight train lengths such as 1000 metres. Northampton Gateway would not be sustainable in the future through its very limited site expansion capability and its inability to cater for longer trains. There is also no certainty that the West Coast Main Line will be capable of handling the 16 additional trains (plus express freight trains) each way per day that Roxhill have forecast.

Air Quality

5.10 The Secretary of State should consider air quality impacts over the wider area likely to be affected, as well as in the near vicinity of the scheme. In all cases the Secretary of State must take account of relevant statutory air quality thresholds set out in domestic and European legislation. Where a project is likely to lead to a breach of the air quality thresholds, the applicant should work with the relevant authorities to secure appropriate mitigation measures with a view to ensuring so far as possible that those thresholds are not breached.

5.11 Air quality considerations are likely to be particularly relevant where schemes are proposed:

- *within or adjacent to Air Quality Management Areas (AQMA); roads identified as being above Limit Values or nature conservation sites (including Natura 2000 sites and SSSIs, including those outside England); and*
- *where changes are sufficient to bring about the need for a new AQMA or change the size of an existing AQMA; or bring about changes to exceedences of the Limit Values, or where they may have the potential to impact on nature conservation sites.*

5.12 The Secretary of State must give air quality considerations substantial weight where, after taking into account mitigation, a project would lead to a significant air quality impact in relation to EIA and / or where they lead to a deterioration in air quality in a zone/agglomeration.

5.13 The Secretary of State should refuse consent where, after taking into account mitigation, the air quality impacts of the scheme will:

- *result in a zone/agglomeration which is currently reported as being compliant with the Air Quality Directive becoming non-compliant; or*
- *affect the ability of a non-compliant area to achieve compliance within the most recent timescales reported to the European Commission at the time of the decision.*

8 Northampton Gateway would be located within 1 mile of two existing Air Quality Management Areas (AQMAs). One is on the A45 north of M1 junction 15 as it approaches the Queen Eleanor roundabout and the other is on the M1 between junctions 15 and 16. Almost two thirds of the additional HGV trips generated by Northampton Gateway would pass through one of these two AQMAs. There is a further AQMA on the A5 through Towcester which is likely to be affected by additional HGV movements generated by this SRFI.

9 The environmental statement gives little indication of the mitigation measures proposed to deal with air quality issues. One suggestion is that all site-based HGVs should be Euro 6 compliant, although the means of enforcing such a requirement is unclear. However there will be a significant proportion of HGVs delivering to the site which are not based at Northampton Gateway and this suggestion will have no effect on them.

Adjacent to Residential Areas

4.86 SRFIs tend to be large scale commercial operations, which are most likely to need continuous working arrangements (up to 24 hours). By necessity they involve large structures, buildings and the operation of heavy machinery. In terms of location therefore, they often may not be considered suitable adjacent to residential areas or environmentally sensitive areas such as National Parks, the Broads and AONBs, which may be sensitive to the impact of noise and movements.

10 The application site is within 200 metres of the closest houses in Milton Malsor and Collingtree. There are implications in terms of noise, light, traffic and visual impact for the residents of Collingtree, Milton Malsor, Roade, Blisworth and Grange Park.

Local Green Space

5.170 The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances. Applicants should therefore determine whether their proposal, or any part of it, is within an established Green Belt and, if so, whether their proposal may be considered inappropriate development within the meaning of Green Belt policy. Metropolitan Open Land, and land designated as Local Green Space in a local or neighbourhood plan, are subject to the same policies of protection as Green Belt, and

inappropriate development should not be approved except in very special circumstances. 5.172 Promoters of strategic rail freight interchanges may find that the only viable sites for meeting the need for regional strategic rail freight interchanges are on Green Belt land. Promoters need to recognise the special protection given to Green Belt land. The Secretary of State would have to be convinced, and promoters would need to demonstrate, very special circumstances to justify planning consent for inappropriate development in the Green Belt (see 5.178).

11 The South Northamptonshire Local Plan (1997) contains Policy EV8 which designates a band of land to the south of Northampton as a "Local Gap", which means a local green space. In some other parts of the country this would be known as a "Green Belt". This Local Gap area is protected from building development. Therefore the building of Northampton Gateway would be in contravention of NPSNN 5.170 and 5.172 as well as Policy EV8 of the Local Plan.

Road Congestion

2.2 There is a critical need to improve the national networks to address road congestion……. and to provide a transport network that is capable of stimulating and supporting economic growth.

2.16 Traffic congestion constrains the economy and impacts negatively on quality of life by:

- *constraining existing economic activity as well as economic growth, by increasing costs to businesses, damaging their competitiveness and making it harder for them to access export markets. Businesses regularly consider access to good roads and other transport connections as key criteria in making decisions about where to locate.*
- *leading to a marked deterioration in the experience of road users. For some, particularly those with time-pressured journeys, congestion can cause frustration and stress, as well as inconvenience, reducing quality of life.*
- *constraining job opportunities as workers have more difficulty accessing labour markets.*
- *causing more environmental problems, with more emissions per vehicle and greater problems of blight and intrusion for people nearby. This is especially true where traffic is routed through small communities or sensitive environmental areas.*

2.17…… in 2010 the direct costs of congestion on the Strategic Road Network in England were estimated at £1.9 billion per annum.

12 This represents a view that there is a need to reduce road congestion or minimise its increase. Yet in Annex A of the NPSNN document it can be seen that on the M1 between junctions 15 and 17 severe congestion is expected by the year 2040. This is expected to be longest section of severe congestion on the M1 north of the M25. Yet Roxhill propose building a SRFI immediately next to this section which is expected to suffer severe congestion by 2040.

Road Safety

4.66 The Secretary of State should not grant development consent unless satisfied that all reasonable steps have been taken and will be taken to:

- *minimise the risk of road casualties arising from the scheme; and*

- *contribute to an overall improvement in the safety of the Strategic Road Network.*

13 The Northampton Gateway SRFI would add significant additional traffic to the A508 and A45, both of which are Active Red Routes (car/motorcycle and motorcycle respectively) as a consequence of their accident rates. In addition, the junction on the A43 where northbound traffic for Blisworth would turn right to join the Towcester Road has been the scene of many serious accidents such that Highways England and South Northants Council have been monitoring this junction for several years. As some employees are likely to use this route as a "rat run" to reach Northampton Gateway, this can only increase the risk of further accidents at this junction.

Quality of Life

3.2 The Government recognises that for development of the national road and rail networks to be sustainable these should be designed to minimise social and environmental impacts and improve quality of life.

14 Since the A43 was rerouted to avoid Blisworth and Milton Malsor twenty seven years ago, these villages have become much more peaceful places to live. However, if adequate measures are not taken to prevent all employee traffic (at times of shift changes) from using these roads, then residents' sleep patterns (particularly childrens') will be badly disturbed e.g. at 06:00 and 22:00.

Cumulative Impact

4.3 In considering any proposed development, and in particular, when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State should take into account:

- *its potential benefits, including the facilitation of economic development, including job creation, housing and environmental improvement, and any long-term or wider benefits;*
- *its potential adverse impacts, including any longer-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.*

4.16 When considering significant cumulative effects, any environmental statement should provide information on how the effects of the applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been granted, as well as those already in existence).

15 Roxhill has not considered the impact that would be created if both Northampton Gateway and Rail Central are approved. In terms of traffic forecasting, Northamptonshire County Council Highways Department considers this omission to be unacceptable. Nor has Roxhill considered the impacts that the construction of HS2 will have on the operation of Northampton Gateway. Roxhill has also overlooked the impact of future development in adjacent districts (outside Northamptonshire) which means the traffic forecasts have been underestimated.

Historic Environment

5.122 Those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called 'heritage assets'. Heritage assets may be buildings, monuments, sites, places, areas or landscapes. The sum of the heritage interests that a heritage asset holds is referred to as its significance. Significance derives not only from a heritage asset's physical presence, but also from its setting.

16 Northampton Gateway, if built, would impact on the setting of Courteenhall, which has a registered park and garden, and Collingtree's conservation area.

Health

4.82 The applicant should identify measures to avoid, reduce or compensate for adverse health impacts as appropriate. These impacts may affect people simultaneously, so the

applicant, and the Secretary of State (in determining an application for development consent) should consider the cumulative impact on health.

17 Northampton Gateway would lead to increased air, noise and light pollution in the surrounding areas. Little consideration appears to have been given to the effects on human health and some of the mitigation measures considered are unlikely to be effective.

18 The issues raised above are covered in more detail in subsequent chapters. However, with such a substantial amount of non-compliance in relation to National Policy Statements, it is difficult to comprehend how Northampton Gateway can be acceptable as a strategic rail freight interchange.

National Planning Policy Framework

19 The revised National Planning Policy Framework [3] (NPPF) has various paragraphs which are relevant to the Northampton Gateway application.

109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

20 The traffic effects of this development will be severe at peak times where northbound traffic on the A508 meets Northampton Gateway traffic entering the site, as the former has to give way to the latter. The planned improvements to M1 Junction 15 will have reached their design capacity by 2022 even without the additional traffic generated by Northampton Gateway. The cumulative impacts of developments on traffic modelling data cannot be fully assessed because Rail Central has been excluded, as has development activity in adjacent counties outside Northamptonshire. It would be better for the applicant to return after such traffic modelling has been completed, so that a more informed assessment can be made. Northampton Gateway would also be adding significant extra traffic to two active Red Routes.

127. Planning policies and decisions should ensure that developments:
a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

21 Northampton Gateway will not add to the overall quality of the area; it will be an eyesore. It will not respond to local character and history nor reflect the identity of the local surroundings. Crime is likely to increase in the surrounding areas based on the experiences of the villages adjacent to the Daventry International Rail Freight Terminal. I do not consider that the intrusion of giant warehouses and crane gantries can be overcome by landscaping.

101. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.
143. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

146. Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:
a) mineral extraction;
b) engineering operations;
c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;
d) the re-use of buildings provided that the buildings are of permanent and substantial construction;
e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
f) development brought forward under a Community Right to Build Order or Neighbourhood Development Order.

22 Northampton Gateway, if approved, would be situated on land designated by South Northants Council as a Local Gap. This provides protection from development which is largely equivalent to that provided by a Green Belt. 146 c) is not an appropriate exception as the project is a national one and there is no requirement for a green belt location for this proposed SRFI. The area has appropriate protection, but this is being overlooked by the applicant.

175. When determining planning applications, local planning authorities should apply the following principles:
b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

23 The proposed Roade bypass would have to cross the Roade Cutting which contains the West Coast Main Line. The bypass would require a bridge to be built whose footings would be in the Roade Cutting. The latter is a Site of Special Scientific Interest.

181. Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

24 Northampton Gateway would be within 1 mile of two Air Quality Management Areas (AQMAs). Almost two thirds of the additional HGV trips forecast to be generated by Northampton Gateway would pass through one or other of these two AQMAs.

180. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:
c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

25 At present, the area of the proposed site is largely dark at night as are nearby villages such as Blisworth, Milton Malsor and Courteenhall. Northampton Gateway will generate a large amount of light at night (through its 24 hour operation) based on observation of the Daventry International Rail Freight Terminal which is visible at night from at least two miles away.

> *193. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*
> *194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*
> *a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
> *b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*
> *195. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*
> *a) the nature of the heritage asset prevents all reasonable uses of the site; and*
> *b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
> *c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
> *d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

26 The site of the proposed Northampton Gateway would be immediately adjacent to Courteenhall Park which is a Grade II registered park and garden [1]. Within the park are the following Grade II listed buildings [2]:

- Church of St Peter and St Paul
- Courteenhall House and Attached Offices
- Courteenhall House, Stable Block, and Attached Coach Houses, Stables and Barn
- The Old Rectory and Attached Stable Block and Outbuildings
- The School and School House

27 Immediately outside the west entrance, by the A508, will be found the Grade II listed Courteenhall war memorial and bench. Construction of Northampton Gateway would significantly affect the setting of the Park, the above listed buildings and war memorial.
Construction of the proposed Roade bypass would also significantly affect the setting of the following Grade II listed buildings:

- Roade aqueduct
- Hyde Farmhouse
- Remains of Dovecote at Hyde Farm

> *84. Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling*

or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

28 The proposed Northampton Gateway SRFI would cover approximately 210 hectares of countryside with a series of warehouses up to 21.5 metres in height. Bunding and vegetation will not hide this unsightly and unwelcome change to the countryside. Roxhill forecast that approximately 16,500 additional vehicle trips per day will be generated by Northampton Gateway. This will significantly affect the A508 and A45 which are already heavily congested at peak periods. In the case of the former, all northbound traffic will have to give way to vehicles entering the Northampton Gateway site. I would suggest this impact is unacceptable as will be the effects on minor roads of both "rat running" and the ban on right turns at the Courteenhall Road/A508 junction. Furthermore the proposed land is not brownfield.

104. Planning policies should:
e) provide for any large scale transport facilities that need to be located in the area42, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements; and

29 The West Northants Joint Core Strategy (WNJCS) indicates that new large warehousing developments (in excess of 40,000 sqm) are expected to be located at DIRFT. The applicant appears to be overlooking this section of the WNJCS.

108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:
c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

30 As indicated above in my response to paragraph 84 of the revised NPPF document, I believe that the impacts on traffic and congestion created by Northampton Gateway will be unacceptable.

Local Planning Compliance

West Northamptonshire Joint Core Strategy

31 The West Northamptonshire Joint Planning Unit is comprised of local government officials. Its Joint Strategic Planning Committee comprises elected Councillors from Daventry District Council, Northampton Borough Council, South Northamptonshire Council and Northamptonshire County Council who were required to produce a Joint Local Development Scheme. The West Northamptonshire Joint Core Strategy Local Plan (Part 1) [4] was adopted in December 2014. It covers the period up to 2029.

32 This document makes several references to warehouses and rail freight interchanges. Reference is made to the Daventry International Rail Freight Terminal (DIRFT).

5.71 New large warehousing developments (in excess of 40,000 sqm) will normally be expected to be provided for at DIRFT.

5.72 Consequently it is considered that new rail freight interchanges in West Northamptonshire, in addition to DIRFT, would not be deliverable within this plan period.

8.43 Development associated with maximising the economic advantages of Northampton is proposed in a manner that simultaneously reflects the direction of large scale strategic

distribution activities towards DIRFT. This will be achieved by means of a size restriction within the policy as permission for units over 40,000 sqm will not be granted. This allocation is provided specifically to meet the needs of existing companies within Northampton where there are insufficient sites of adequate size to meet their needs. Within the plan support for larger units is provided at DIRFT, so unless justified by exceptional circumstances other occupiers requiring development of over 40,000 sqm and with no existing connection to the area will be directed towards that location.

33 So the only site that the West Northamptonshire Joint Planning Unit expects to see used as a Strategic Rail Freight Interchange is at DIRFT. It has specifically ruled out the establishment of a Strategic Rail Freight Interchange anywhere else within these three districts.

34 Further details of West Northamptonshire Joint Core Strategy may be found in Appendix A later in this chapter.

35 A written submission was made to the West Northamptonshire Joint Planning Unit in February 2014 by Oxalis Planning on behalf of Roxhill [5]. The proposal was that land south of M1 junction 15 should be included as a new employment site in preference to that already included for land adjacent to M1 junction 16. This particular area of land is almost identical to that now being proposed for Northampton Gateway, except that the 2014 proposal retained a narrow band of unused land adjacent to the Northampton Loop rail line.

In particular, key constraints facing the proposed employment allocation at Junction 16 appear to have been downplayed or entirely ignored, producing an unreasonable and unjustified set of conclusions. It is clear that an unfair and inaccurate comparison has been made between the proposed strategic employment site and the alternative potential employment site at Junction 15 (site reference SA49).

Although not reflected in the scoring of the site, the JPU's evidence base acknowledges that the site at Junction 15 has clearer and more defensible boundaries than the site at Junction 16, and has fewer landscape and visual constraints. Well defined established physical features contain the site, including the railway line to the south-west, and remove any risks of the allocation of this site leading to unrestricted 'sprawl' into land west /south of the M1.

The proposed alternative strategic employment site at Junction 15 is available for development. It is controlled under option by a single active and willing developer who is keen to bring the site forward, and positive representations indicating as such were made to the JPU at the previous stage of consultation during 2013.

36 Later in 2015, an examination of the West Northants Joint Core Strategy was carried out by the Planning Inspectorate prior to its adoption. The Planning Inspector's report made some specific comments about the area of land to the south west of M1 junction 15 [6]:

79. Although various alternatives have been put forward, including in relation to J15 and J15A of the M1, none is a realistic or more sustainable location for this plan period, given doubts over deliverability, including regarding transport implications, especially for the strategic road network as advised by the HA and NCC. Additionally, some are of insufficient size to be properly considered as strategic scale allocations, whilst others are less well linked to existing communities and would represent an even greater intrusion of built development into the otherwise largely rural countryside around the town.

37 It is evident that the Planning Inspector had concerns about the future capacity of the M1 and other major roads in this area. He was also concerned about the impact of such an industrial development into a largely rural area. Therefore this area was specifically omitted from being a development site within the West Northants Joint Core Strategy which is valid through to 2029.

South Northamptonshire Local Plan

38 The South Northamptonshire Local Plan (1997) contains Policy EV8 which is also listed within saved policies 2007 [7]. Policy EV8 commences as follows:

> *In order to prevent the coalescence of settlements the council will not permit development which would significantly intrude into the following important local gaps as shown on the proposals maps:*
> *A) Between the Northampton Borough boundary and the nearby villages and hamlets of Harpole, Kislingbury, Rothersthorpe, Courteenhall, Milton Malsor, Preston Deanery, Little Houghton and Cogenhoe:*

39 This local gap area is indicated with blue dots on the local plan index proposal map [7]. To build Northampton Gateway would be in contravention of Local Plan policy EV8. Roxhill has acknowledged that Northampton Gateway would fall largely within the area defined as a "Local Gap" in its document: Chapter 4 Landscape and Visual Effects Figure 4.1. Unfortunately it has overlooked the associated requirements of the Local Gap as laid out in policy EV8.

40 South Northamptonshire Council has listed those saved policies which continue to apply after the adoption of the West Northants Joint Core Strategy [8]. They include EV8, EV24 and EV28.

41 The Local Plan also contains Policy EV24 which is reproduced below:

> *Planning permission will only be granted for development where it will not lead to the loss of, or cause significant harm to, regionally important geological and geomorphological sites and county wildlife sites. Where development is permitted the retention and protection and enhancement of such sites may be secured through planning conditions and obligations.*

42 According to research conducted by the Northamptonshire branch of the Wildlife Trust, there is a potential wildlife site within the land proposed for Northampton Gateway. It is designated with number 236 on the map provided by the Wildlife Trust [9]. It may be classified as a "potential" wildlife site, but it must have special features for it to be so classified. The masterplan for Northampton Gateway issued in December 2017, indicates that most of this wildlife site will remain after the development takes place. Nonetheless, the northwestern corner will be removed to make space for train tracks. In addition, this wooded area will be not far from the lorry park and the rail locomotives at least 90% of which will be polluting the air with their diesel fumes. There is every likelihood that the special characteristics of this site will be lost.

43 There is a further potential wildlife site south of the Hilton Hotel near Collingtree, between the M1 southbound exit slip road and the A45. The proposed changes to the M1 junction 15 will remove some of this potential wildlife site. See Transportation Appendix 10, page 22 for revised plan of this junction. The Wildlife Trust map referred to in the previous paragraph also shows this potential wildlife site. This is a second example of a contravention of Policy EV24.

44 There is another policy in the Local Plan which needs to be noted. Policy EV28 states:

> *Planning permission will not be granted for development which would have a seriously adverse effect on the character or setting of an historic parkland, garden or battlefield.*

45 Courteenhall House (grade II listed) has a park which is registered as a Historic Park and Garden. Northampton Gateway would be immediately adjacent to this park. Please see red dotted area in local plan index proposal map [7]. Northampton Gateway would adversely affect the setting of this Historic Park and Garden, and as such would be in contravention of Policy EV28.

46 South Northamptonshire Council's Local Plan (Part 2) is expected to be replaced by a new

Local Plan (Part 2) in September 2019 [10]. Details of the equivalent policies in the new Local Plan (Part 2) will be found in Appendix B later in this chapter.

Site of Special Scientific Interest

47 The proposed Roade bypass would traverse the Roade Cutting Site of Special Scientific Interest [11]. It is an offence to disturb such a site.

Northamptonshire County Council Highways Department

48 Northamptonshire County Council (NCC) Highways Department has raised two very significant concerns. It has pointed out that neither Roxhill nor Ashfield Land were prepared for the NCC Highways Department to run its Strategic Transport Model using the original data supplied by both developers at the same time [12]. As has already been pointed out under the heading of Cumulative Impact, the Highways Department is of the view that a lack of such traffic modelling is unacceptable.

49 NCC Highways Department has also indicated that there is a risk that the additional freight train paths associated with Northampton Gateway could result in fewer passenger rail services. With the Northamptonshire Rail Capacity Study forecasting that that rail passenger numbers at Northampton station are likely to double by 2043, such a constriction being imposed by Northampton Gateway would be unacceptable for rail passengers. This topic is covered in more detail in the rail chapter.

Scoping Opinion

50 Councils in this area have responded to the Environmental Statement Scoping Report [13] produced for Northampton Gateway. They have included the following responses.

51 Buckinghamshire County Council was concerned about the effects Northampton Gateway would have on the road and rail networks.

52 Collingtree Parish Council raised many issues including non-compliance with the West Northants Joint Core Strategy and local plans, traffic issues and increased noise, light and air pollution.

53 Milton Keynes Council was concerned about the effects Northampton Gateway would have on the road and rail networks and its socio-economic impacts.

54 Milton Malsor Parish Council also raised a number of issues. These included being too close to a sand extraction site, the effects on the water table, light noise and air pollution, and a questioning of the availability of train paths.

55 Northampton Borough Council raised concerns about air quality, noise and vibration, lighting, transport and cumulative impacts.

56 South Northamptonshire Council raised a considerable number of concerns.

Summary of planning compliance issues

a) The proposed Northampton Gateway strategic rail freight interchange does not comply with numerous policies within the National Policy Statement for National Networks and the National Planning Policy Framework.

b) The proposed Northampton Gateway rail freight interchange clearly does not conform with the West Northamptonshire Joint Core Strategy. Such rail freight interchange expansion is required to

take place only at Daventry International Rail Freight Terminal. There are numerous other ways that the proposed Northampton Gateway development does not conform with the West Northamptonshire Joint Core Strategy including three policy requirements. These have been highlighted in Appendix A.

c) The West Northamptonshire Joint Planning Unit was specifically asked to make a change to their planning policy prior to its adoption to accommodate an employment site south of M1 Junction 15. The Planning Unit declined this request.

d) There are three South Northamptonshire Council saved policies with which the proposed Northampton Gateway does not conform.

e) Northamptonshire County Council Highways Department has raised two very significant issues regarding the lack of a full cumulative impact traffic assessment and the likely detrimental effect on rail passenger services.

f) Several councils from this area have identified a very wide variety of issues which have been listed in the Northampton Gateway Scoping Report.

Appendix A

57 Extracts from West Northamptonshire Joint Core Strategy. **The parts pertinent to Roxhill's proposal are in bold and underlined below.**

The Joint Core Strategy Vision

*4.61 Our rural areas will support a network of vibrant rural communities. **Villages will retain their local distinctiveness and character, providing affordable homes for local people set within a beautiful landscape.** The countryside will support a diverse rural economy including leisure and tourism through its waterways, country houses, parks and woodlands.*

Infrastructure and Development

*4.45 Historically the provision of infrastructure within West Northamptonshire has failed to keep pace with and fully support a growing population. **Elements of the existing infrastructure in the area are already at or close to capacity.***

*4.46 Accommodating planned development in the area will require an increase in the capacity of the existing infrastructure. **Significant investment is needed in public transport, new roads, utilities (including trunk sewer improvements and increasing the capacity of water treatment facilities), health, education and emergency services**. There is also a requirement for investment in social infrastructure such as cultural and community facilities, children's play spaces and libraries, in order to build sustainable communities. It is critical that necessary infrastructure is provided in a timely manner.*

5.95 Achieving sustainability is a core objective in all proposals for development and this approach will underpin the commitments made by partner Councils to tackling climate change (for example, as outlined in the Northamptonshire Climate Change Strategy[15], the South Northamptonshire Climate Change Strategy[16], and the Sustainable Community Strategies). This JCS sets out the strategic spatial planning policy framework needed to:

- *make the places where we live, shop and work more accessible by means that minimise the environmental burden of travel;*
- *make such places resilient to future flood events;*
- *protect, enhance and reconnect natural habitats;*

- *minimise the use of energy and water;*
- *manage the water environment; and*
- *ensure natural resources are used prudently - including those used in construction.*

Policy BN5 - The historic environment and landscape

Designated and non-designated heritage assets and their settings and landscapes will be conserved and enhanced in recognition of their individual and cumulative significance and contribution to west Northamptonshire's local distinctiveness and sense of place. In environments where valued heritage assets are at risk, the asset and its setting will be appropriately conserved and managed.

In order to secure and enhance the significance of the area's heritage assets and their settings and landscapes, development in areas of landscape sensitivity and/ or known historic or heritage significance will be required to:

*1. **Sustain and enhance the heritage and landscape features which contribute to the character of the area including**:*
*a) **conservation areas**;*
*b) **significant historic landscapes including historic parkland**, battlefields and ridge and furrow;*
*c) **the skyline and landscape settings of towns and villages**;*
*d) **sites of known or potential heritage or historic significance**;*
e) locally and nationally important buildings, structures and monuments

*2. **Demonstrate an appreciation and understanding of the impact of development on surrounding heritage assets and their setting in order to minimise harm to these assets**; where loss of historic features or archaeological remains is unavoidable and justified, provision should be made for recording and the production of a suitable archive and report*

Policy R1 - Spatial strategy for the rural areas

*The rural hierarchy in the part 2 local **plans will have regard to** but not exclusively, the following:*
1) the presence of services and facilities to meet the day to day needs of residents, including those from surrounding settlements;
2) opportunities to retain and improve the provision and enhancement of services critical to the sustainability of settlements;
3) accessibility, particularly by public transport, to the main towns and sustainable employment opportunities;
4) evidence of local needs for housing (including market and affordable housing), employment and services;
*5) **the role, scale and character of the settlement**;*
*6) **the capacity of settlements to accommodate development in terms of physical, environmental, infrastructure and other constraints**;*
*7) **the availability of deliverable sites including previously developed land in sustainable locations**;*
8) sustaining the rural economy by retaining existing employment sites where possible, by enabling small scale economic development, including tourism, through rural diversification and by supporting appropriate agricultural and forestry development;
*9) **protect and enhance the character and quality of the rural areas' historic buildings and areas of historic or environmental importance**; and*
10) enabling local communities to identify and meet their own local needs.

Policy R2 - Rural economy

Proposals which sustain and enhance the rural economy by creating or safeguarding jobs and businesses will be supported where they are of an appropriate scale for their location*, respect the environmental quality and character of the rural area and protect the best and most versatile agricultural land. The following types of development are considered to be acceptable:*

a) the re-use of rural buildings;

b) schemes for farm diversification involving small-scale business and commercial development that contribute to the operation and viability of the farm holding;

c) small-scale tourism proposals, including visitor accommodation;

d) proposals that recognise the economic benefits of the natural and historic environment as an asset to be valued, conserved and enhanced;

e) the expansion of businesses in their existing locations, dependent upon the nature of the activities involved, the character of the site and its accessibility;

f) ***small scale employment development to meet local needs****; and*

g) ***the use of land for agriculture, forestry and equestrian activity****.*

Policy S1 The distribution of development

D New development in the rural areas will be limited with the emphasis being on:

1) ***enhancing and maintaining the distinctive character and vitality of rural communities****;*

2) ***shortening journeys and facilitating access to jobs and services****;*

3) strengthening rural enterprise and linkages between settlements and their hinterlands; and

4) ***respecting the quality of tranquility****.*

In assessing the suitability of sites for development ***priority will be given to making best use of previously developed land*** *and vacant and under-used buildings in urban or other sustainable locations contributing to the achievement of a west Northamptonshire target of 30% of additional dwellings on previously developed land or through conversions.*

Employment areas

8.5 ***The plan area already has a considerable amount of employment floorspace in the planning pipeline in sustainable locations already consented through planning applications.*** **DIRFT, Junction 16, Swan Valley**

M1 Junction 16 Employment Site.

8.43 The scale of the allocation represents a level of provision that compliments the economic objectives for the Plan as a whole. Development associated with maximising the economic advantages of Northampton is proposed ***in a manner that simultaneously reflects the direction of large scale strategic distribution activities towards DIRFT****.*

8.44 The scale and extent of B8 (Storage or Distribution) uses will be carefully controlled. This site is specifically allocated to meet the needs of Northampton, and is not intended to provide a strategic distribution park. Overall, B8 uses should be no more than 50% of the total floorspace on the site, subject to the provision for the relocation of existing Northampton based employers. ***This is in recognition of the provision that has been made for large scale storage and distribution in more appropriate locations within the plan area, particularly at DIRFT****. This provision also intends to ensure that floorspace remains available for B2 manufacturing occupiers to continue to build on the strategic advantages for this sector within the local economy. Any B1(a) office provision will be restricted to no individual unit exceeding 1,000 sqm as new office development should concentrate at Northampton Town Centre.*

Appendix B

58 South Northamptonshire Council (SNC) is in the course of creating a new Local Plan (Part 2) [14]. According to SNC's schedule, it is planned that the new Local Plan (Part 2) will be adopted during September 2019. Earlier references within this chapter relate to the existing (at the time of writing) Local Plan (Part 2).

59 I now list the new policies which are expected to come into effect when the new Local Plan (Part 2) is adopted, preceded by their corresponding old policy designations.

Old policy EV8 – Local Gap

60 The corresponding new policy will be SS2 (General Development Principles) which states the following:

> *1. Planning permission will be granted where the proposed development:*
> *a. maintains the individual identity of towns and villages and does not contribute to any significant reduction of open countryside between settlements or their distinct parts; and*
> *b. does not result in the unacceptable loss of undeveloped land, open spaces and locally important views of particular significance to the form and character of a settlement; and*

61 Also within the new Local Plan (Part 2) there is the following statement:

> *Objective 10*
> *To protect the setting and separate identity of settlements by avoiding their coalescence and retaining the openness and character of the land around existing settlements.*

Old policy EV24 – Wildlife sites

62 While the new Local Plan (Part 2) does not appear to have an exact corresponding new policy, the following policy in the new document is relevant in this context:

> *POLICY NE5 – BIODIVERSITY AND GEODIVERSITY*
>
> *4. Development proposals will not be permitted where they would result in significant harm to biodiversity or geodiversity, including protected species and sites of international, national and local significance, ancient woodland, and species and habitats of principal importance identified in the united kingdom Post-2010 Biodiversity Framework.*

Old policy EV28 – Historic Parks and Gardens

63 New Local Plan (Part 2) contains the following:

> *10.3.2 The main purpose of this Register is to recognise important designed landscapes of note, and encourage their appropriate protection. Parks and gardens are registered as either Grade I, II* or II and registration is a 'material consideration' in the planning process. Of the 1,600 nationally registered parks and gardens seven are located within South Northamptonshire. These are:*
> - *Castle Ashby*
> - *Aynho Park*
> - *Courteenhall*
> - *Easton Neston*
> - *Horton Hall Park*

- *Stoke Park*
- *Sulgrave Manor*
- *Wakefield Park*

10.3.4 In addition to the historic parks and gardens identified on the national register other parks and gardens of local importance exist and are considered to be non-designated heritage assets. New development should not detract from the enjoyment, layout, design, character, appearance or setting of a park or garden. Neither should development cause harm to key views within, from or towards the assets or, where appropriate, prejudice their future restoration.

POLICY HE3: Historic Parks and Gardens. (Extract)

1. Applications must seek to protect original or significant designed landscapes, their components, built features and setting.

2. Proposals which are considered to cause harm to a park or garden require clear and convincing justification and will not be supported unless clear public benefits can be demonstrated that outweigh that harm. Where harm is considered to be substantial those benefits must be exceptional.

References

1. Courteenhall Park and Garden
https://historicengland.org.uk/listing/the-list/list-entry/1001029

2. Grade II listed buildings in Northamptonshire
https://www.britishlistedbuildings.co.uk/england/northamptonshire#.WvvdAC-ZPq3

3. Revised National Planning Policy Framework
https://www.gov.uk/government/publications/national-planning-policy-framework--2

4. West Northamptonshire Joint Core Strategy Local Plan (Part 1)
http://www.westnorthamptonshirejpu.org/connect.ti/website/view?objectId=5130832#5130832

5. Representation to West Northamptonshire Joint Core Strategy, Proposed Modifications, Oxalis Planning

6. Inspector's report for examination of West Northamptonshire Joint Core Strategy
http://modgov.southnorthants.gov.uk/documents/s10017/Agenda%20Item%206%20Appendix%201%20WN%20JCS%20Inspectors%20Report.pdf

7. South Northamptonshire Local Plan 1997
https://www.southnorthants.gov.uk/downloads/39/1997-local-plan
See Local plan saved policies 2007 (revised December 2014)
See local plan index proposal map

8. South Northamptonshire Local Plan Part 2
https://www.southnorthants.gov.uk/downloads/65/local-plan-part-2-and-evidence
See Local Plan Issues Paper October 2013, page 48

9. Northamptonshire Biodiversity Records Centre. Area of woodland marked with number 236.

10. South Northamptonshire Council Local Plan Part 2

https://www.southnorthants.gov.uk/downloads/download/636/part-2-local-plan-submission-draft-regulation-19
Part 2 Local Plan Submission Draft, Table 1

11. Map of Roade Cutting SSSI
http://magic.defra.gov.uk/MagicMap.aspx?startTopic=Designations&activelayer=sssiIndex&query=HYPERLINK%3D%271002811%27

12. Northamptonshire County Council Highways Department response to Rail Central consultation May 2018.
See final page

13. Scoping Opinion Proposed Northampton Gateway Strategic Rail Freight Interchange
https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050006/TR050006-000012-Scoping%20Opinion.pdf

14. South Northamptonshire Council Local Plan Part 2
https://www.southnorthants.gov.uk/downloads/download/636/part-2-local-plan-submission-draft-regulation-19
Part 2 Local Plan Submission Draft

VALIDITY OF SITE SELECTION

Suitability of location

Northamptonshire over supply

64 Northamptonshire already contains a large amount of warehousing. It is highly questionable whether it needs a significant increase outside the areas already earmarked for development.

65 The Planning Inspectorate recently made a decision at the planning appeal for Travis Perkins who wished to build a warehouse approximately 2 miles from the site proposed by Roxhill. The planning inspector made the following remarks in his report [1]:

> *44. The JCS [Joint Core Strategy] is clear that the area has a large supply of existing warehouse developments and that delivering new space to cater for the warehousing sector on a trend-based trajectory would not be desirable nor sustainable in the long term in order to achieve a balanced economy. It is for this reason, that strategic distribution sites are identified across the West Northamptonshire area, to ensure an appropriate balance between the provision of housing and employment.*
>
> *48. Although Policy S8 does not preclude warehouse development at locations other than those specified in its criteria, I am not persuaded that there is an exceptional or justified need for Travis Perkins to locate the proposed development at the appeal site and so this matter does not outweigh the significant harm that I have identified with regards to the first main issue.*
>
> *53. ……..However, these physical environmental benefits are far outweighed by the landscape and visual harm that I have identified and the conflict with the development plan.*

66 So, a planning inspector does not see the need to approve a development that does not fit with the Joint Core Strategy.

67 The application for expansion of the Daventry International Rail Freight Terminal, known as DIRFT III, considered the suitability of several alternative sites. Amongst those shortlisted was the site now being put forward for Northampton Gateway although at the time it was referred to as Northampton Highgate. The following was found in the concluding remarks about this site [2]:

> *8.207 As such, the Highgate site does not provide any sort of alternative to DIRFT III, but in contrast, it has the potential to offer more of a subregional facility.*

68 This is not a recommendation for a site to be considered suitable for a National Significant Infrastructure Project.

69 Real estate advisors GVA produced an employment land study for South Northamptonshire Council (SNC) in 2013 [3].

> *6.13 In identifying the strategy for logistics land the following sites are likely to be the most attractive to the market.*

Table 6.2 – Assessed Supply Potential

Site	Quantum	
	Floorspace	Land
Prologis Pineham (J15)	56,000sqm	17ha
Roxhill (J15)	280,000sqm	170ha
Grange Park (J15a)		8.4ha
Midway Pk (J16)	430,000sqm	117ha

Source: GVA, Experian, South Northamptonshire Council 2013

6.14 It is clear that even by focusing on a small number of strategically important sites with current market interest the potential oversupply is significant, providing almost seven times the identified requirement.

70 GVA reported again for SNC in 2017 identifying additional potential logistics floorspace in this district. Hence the oversupply is likely to have increased and may well be greater than seven times the identified requirement.

71 The West Northamptonshire Joint Core Strategy [4] expresses concerns about the over-reliance on a single industry or business type:

4.53 The area is attractive to the warehouse and storage industry due to the excellent road and rail connections. However, it is important that the area does not become over-reliant on one employment sector and continues to provide diverse employment opportunities for its residents.

72 I share the concerns expressed in the Joint Core Strategy that over-reliance on one industry is undesirable.

73 The expansion of the Daventry International Rail Freight Terminal to create DIRFT III was granted by the Planning Inspectorate in 2014. That provides for an additional 7.5 million sq ft. At the time, it was estimated that the development of this site to reach its full potential would take 17 years [5].

74 MDS Transmodal is a consultancy which advises on freight transport and logistics issues; its data and forecasts are often used by government departments. It was commissioned by Network Rail to produce rail freight forecasts for 2023/4, 2033/4 and 2043/4 as well as providing data for a base year of 2011/2. This report was published in April 2013 [6]. Its table on page 24 lists rail connected warehousing sites or possible sites in the UK together with their expected warehousing area in each of the four-year periods. For each of the four years DIRFT is expected to be the largest rail connected warehouse; it is forecast to be between 56% and 105% larger than the second largest UK rail freight interchange (depending on the forecast year selected).

75 I hold the view that there is absolutely no logical planning reason to build Northampton Gateway, a strategic rail freight interchange 18 miles away, when DIRFT (by far the largest SRFI in the country) has expansion capability until 2031. In the context of SRFIs, Northampton and Milton Keynes are already well served by DIRFT and will continue to be for many years.

Need for National Network of SRFIs

76 The National Policy Statement for National Networks (NPSNN) provides a clear indication on how SRFIs should be located [7].

2.50 While the forecasts in themselves, do not provide sufficient granularity to allow site-specific need cases to be demonstrated, they confirm the need for an expanded network of

large SRFIs across the regions to accommodate the long-term growth in rail freight. They also indicate that new rail freight interchanges, especially in areas poorly served by such facilities at present, are likely to attract substantial business, generally new to rail.

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.

2.56 The Government has concluded that there is a compelling need for an expanded network of SRFIs.

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

77 This clearly indicates a need for a national network of SRFIs. If Northampton Gateway is to be situated 18 miles from DIRFT, that would not be contributing to a national network of strategic rail freight interchanges.

78 Besides Northampton Gateway being close to DIRFT, the latter would be adding to a plethora of SRFIs (in use, under construction or planned) in the Midlands and in particular the East Midlands. Already existing in the Midlands we have the following SRFIs either in use or under construction

- DIRFT EM (East Midlands)
- East Midlands Gateway EM
- Hams Hall WM (West Midlands)
- Birch Coppice WM

79 In the planning process there are the following SRFIs

- Northampton Gateway EM
- Rail Central EM
- East Midlands Intermodal Park EM
- Hinckley EM
- West Midlands Interchange WM

80 By contrast, if you ignore ports, the East of England, London, South East, South West, Wales and North East struggle to muster more than one or two SRFIs between each of them. On that basis it is clear that new SRFIs are needed in regions other than the East Midlands if a **National** network is to be created.

81 The NPSNN also states:

2.45 This requires the logistics industry to develop new facilities that need to be located alongside the major rail routes, close to major trunk roads as well as near to the conurbations that consume the goods.
2.56 It is important that SRFIs are located near the business markets they will serve – major urban centres, or groups of centres – and are linked to key supply chain routes.

82 While Northampton Gateway would be located close to Northampton it is questionable whether it is a major urban centre. The town of Northampton ranks 37th in the list of urban areas and 30th in the list of primary urban areas [8]. Milton Keynes located some 15 miles away is ranked 35th and 31st respectively. I contend that Northampton Gateway would not be located close to a **major** urban centre. Therefore, HGVs would have to travel further to reach their end destinations, which is not in keeping with the following NPSNN statements.

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…..

2.45 This requires the logistics industry to develop new facilities that need to be located alongside the major rail routes, close to major trunk roads as well as near to the conurbations that consume the goods.

83 While Northampton falls within the so-called logistics "Golden Triangle", the latter has developed as a result of the needs of the road haulage industry. The needs of the rail freight industry are very different in as much as the rail journey distance needs to be maximised and the road journey minimised. Therefore, there is no golden triangle for strategic rail freight interchanges. While Northampton Gateway would fall within the (road) golden triangle, that argument has no relevance for a SRFI.

Container movement from Felixstowe and Southampton

84 The Department for Transport provided Professor Andrew Gough (University of Northampton) with sub-regional road freight data (NUTS 2) for the years 2006 and 2015. The overall level of road freight activity was almost identical for these two years. However, road freight traffic between East Anglia and the West Midlands increased by 115%, and between East Anglia and South Yorkshire by 113%. Traffic between East Anglia and Leicestershire/Northamptonshire decreased by 35%. On this basis there is absolutely no need for a further SRFI in the Northamptonshire area. The prime generator of freight traffic in East Anglia would have been Felixstowe docks. I understand Professor Gough has included his analysis of this road freight data with his written representation.

85 Analysis of freight train movements from Felixstowe on two separate days showed 87% had a destination in either the North West, Yorkshire or the West Midlands [9]. Similarly, from Southampton, the most common freight train destinations were the North West, Yorkshire or the West Midlands, collectively accounting for 82% of such journeys. Felixstowe and Southampton were the first and second most heavily used ports in the UK for containers in 2014 [10].

86 Network Rail has come to recognise the importance of providing suitable capacity on routes for trains carrying containers. The latter market sector is now the largest for Network Rail and accounts for 38% of their rail freight business [11]. Work is currently underway in Control Period 5 (2014 – 19) to permit an additional 10 trains per day on the Felixstowe branch line [12], this being the largest project (financially) for the strategic rail freight network during this control period.

87 The Network Rail Freight and National Passenger Operators Route Strategic Plan (February 2018) sets out its candidate freight schemes for Control Period 6 (2019 – 24). They relate to five key freight corridors and the first on the list was for the Felixstowe to West Midlands and the North [13]. It also had the most elements of work. Taking the median price for each element of work, the Felixstowe to West Midlands and the North project totals £448m which is 52% of the total for these five routes. The next most expensive route corridor proposed enhancements account for 18% of the total.

88 This planning clearly demonstrates the need and importance of moving more containers from Felixstowe to the West Midlands and North by rail. It is fully aligned with the research that Professor Gough carried out on HGV movements by particular routes, referred to earlier.

89 The prioritisation of these investments by Network Rail for the rail freight network indicate the North London Line is not at the top of their list and the West Coast Main Line is not in immediate need of investment for freight. Therefore Northampton Gateway, if approved, would not be taking advantage of Network Rail's investment priorities. In essence, Northampton Gateway would be situated in the wrong place to make use of Network Rail's planned investment priorities.

90 It further demonstrates the need for SRFIs in the West Midlands and North, not next to Northampton. It is notable what a small sum of money has been allocated to the Cross-London route which this author sees as one of the main bottlenecks on the rail route from Felixstowe/London ports to Northampton. SRFIs should be built where there is demand for them and where suitable rail capacity is being provided by Network Rail.

Economically viable journeys

91 It is known that short rail freight journeys are economically unviable and this has been illustrated by the earlier analysis of rail freight movements from Felixstowe and Southampton. Therefore, if one was a developer deciding on where to locate a new SRFI, it might be where recommended by the Department for Transport (e.g. in the vicinity of London) or where there is known potential for replacing road freight journeys by rail. This would direct a developer to the West Midlands, the North West or Yorkshire for example. It would not encourage a further SRFI in Northamptonshire.

92 Northampton is barely far enough from the main UK container ports (Felixstowe, London and Southampton) to provide economically viable rail journeys. Some experts would say that it is too close to these ports. Furthermore, it is already well provided for with DIRFT (including the growing DIRFT III) and in the future by East Midlands Gateway (south of Derby), the latter being currently under construction. The East Midlands is one of the smaller UK regions in population terms. If you compare the number of freight trains serving the SRFIs in each region with the associated population on a region by region basis, the East Midlands has a mid-way position. In other words, the East Midlands is not short of SRFIs.

93 Yet despite the arguments presented in the previous paragraphs, Roxhill have indicated that most of the locations that Northampton Gateway will serve will come from Felixstowe, London Gateway and Southampton [14]. The logic for such a view appears to be lacking.

94 In Roxhill's Transportation Appendix 7 there is a section on HGV trip distribution. By inference, the applicant is making a justification for the suitability of Northampton as a location for this SRFI. Yet in paragraphs 3.9 to 3.11 there is a discussion about distribution at a national level. Two of the main purposes of SRFIs are to minimize the final leg of the journey by road and for such distribution centres to be close to major conurbations. Plans for national distribution are not compatible with the purposes of SRFIs, unless this is an admission that the site is primarily a road based distribution centre with a nominal rail connection.

95 Roxhill's Transportation Appendix 5 (Appendix B) forecasts in Table 4 [15] that by 2051, Northampton Gateway will be handling 16 intermodal trains per day. In other words it will take 30 years to grow from 2 intermodal trains per day to 16 intermodal trains per day. That appears to be a rather unambitious growth rate. It also suggests that rail based transport plays a relatively insignificant part of this logistics operation. A number of people would argue that this will be a road based logistics hub with a thin veneer of rail transport added to make it appear to be a strategic rail freight operation.

96 The only evidence that Roxhill has provided regarding future occupiers of Northampton Gateway is that of an aggregates terminal operator. It has yet to provide any examples of expected logistics operators which would handle containers. That fails to demonstrate that there is a need for a SRFI at Northampton.

97 In conclusion Roxhill have clearly failed to make a valid case for siting a SRFI just south of Northampton.

Site Characteristics

98 Within a 1 mile radius of the proposed Northampton Gateway site there are six settlements: Blisworth, Collingtree, Courteenhall, Grange Park, Milton Malsor and Roade. Collectively they have a population of 11,604 people according to 2011 census data. With the exception of Grange Park, all the other settlements listed contain conservation areas. Therefore, the choice of the site proposed for Northampton Gateway is not compatible with the following element of the National Policy Statement for National Networks (NPSNN) [7]:

> *4.86 SRFIs tend to be large scale commercial operations, which are most likely to need continuous working arrangements (up to 24 hours). By necessity they involve large structures, buildings and the operation of heavy machinery. In terms of location therefore, they often may not be considered suitable adjacent to residential areas or environmentally sensitive areas such as National Parks, the Broads and AONBs, which may be sensitive to the impact of noise and movements.*

99 It is unacceptable to have existing homes very close to a strategic rail freight interchange when that contravenes the policy laid out in the NPSNN. If approved, Northampton Gateway would generate noise, air and light pollution on a 24-hour basis.

100 The National Planning Policy Framework sets out a number of key planning principles [16]. One of these is as follows:

> *111. Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.*

101 The site proposed for Northampton Gateway is not brownfield land.

102 The National Policy Statement for National Networks (NPSNN) [7] includes the following remarks with regard to SRFIs:

> *2.47 A network of SRFIs is a key element in aiding the transfer of freight from road to rail, supporting sustainable distribution and rail freight growth and meeting the changing needs of the logistics industry, especially the ports and retail sector.*
> *The siting of many existing rail freight interchanges in traditional urban locations means that there is no opportunity to expand, that they lack warehousing and they are not conveniently located for the modern logistics and supply chain industry.*

103 This indicates that SRFIs need to have the capability to expand. This was expressed even more explicitly in earlier documents produced by the Strategic Rail Authority on strategic rail freight interchange policy. Nonetheless the NPSNN makes repeated references to sustainable development, as does the National Planning Policy Framework.

104 It is difficult to see how the proposed Northampton Gateway site is capable of sustainable development. It would be bounded on its west side by rail lines. It would be bounded on its north side by Collingtree Road, and on its northeast and east sides by the M1 and A508 respectively. The only expansion area would be to the south of the site and that would not be substantial. It would appear that any further warehouse development, if it were possible, would not be rail connected. Therefore, without major expansion capability, it is questionable whether the site may be considered sustainable in the long term.

105 Furthermore, the site has been designed to be capable of handling trains up to a maximum length of 775 meters. A recent study conducted by MTRU on behalf of the Campaign for Better Transport [17] stated that freight trains of 1,000-meter length would provide several advantages to

generate further mode shift from road to rail. The Chartered Institute of Logistics and Transport recently responded to the National Infrastructure Commission's call for evidence on Freight [18].

> *Bigger Trains - longer trains (minimum 750m, with a target of 1000m - France is experimenting with 1500m trains) and heavier trains (3500t minimum, with a target of 4000t) allow better use of capacity and make rail more efficient and thus more competitive.*

106 This was in response to the question *How could new technologies be utilised to increase the efficiency and productivity of UK freight?* This is a second reason why the proposed Northampton Gateway site would not be sustainable, as it has not been designed with the capability to handle future trains 1,000 meters long.

107 It would be appropriate to point out that the warehouses which will be directly rail served will not be able to accommodate 775 metre length trains. The maximum length they will be able to handle will be 520 metres [19]. This will require trains to be split and handled separately, which is hardly the most efficient way to operate. Alternatively it may encourage the use of 520 metre length trains which is a less efficient use of the national rail network.

Cumulative Impact

108 The Planning Inspectorate Advice Note 17 contains the following statement:

> *1.2 Schedule 3 paragraph 14 of the EIA Regulations, which refers to the selection criteria for screening Schedule 2 development, states that 'the characteristics of the development must be considered having regard, in particular, to... ...(b) the cumulation with other development'.*

109 In response to an enquiry made by Alan Hargreaves on 19/1/18, the Planning Inspectorate advised as follows:

> *If a proposed development requires an Environmental Impact Assessment (EIA) to be submitted as part of the application, the EIA Regulations necessitate that the applicant undertakes an assessment of cumulative effects, and considers alternatives to the proposed development. The assessment of cumulative effects would take into account other reasonably foreseeable schemes including any other relevant Nationally Significant Infrastructure Projects (NSIP).*
>
> *It would be for the Applicant for each scheme to make the case for, and to assess the impacts of, their proposed development taking into consideration the cumulative effects of the relevant built, consented and/or proposed developments as appropriate at the time that their application is lodged.*
>
> *The impact of a proposal on existing uses and its compatibility with other developments is a matter that could be raised in submissions and could be capable of being relevant and important.*

110 There is a clear requirement for a developer to consider the cumulative impacts of his own proposed development alongside other developments in the area. Yet within Roxhill's West Coast Main Line Capacity Report, the following statement is made:

> *1.6 This report does not consider the incremental freight capacity demands that would be generated if the Rail Central Blisworth SRFI site were developed in addition to Northampton Gateway, though in principle the same capacity factors apply to both sites.*

111 If both Northampton Gateway and Rail Central were to be approved, it is quite probable that each site would find insufficient tenants to operate all the warehouses which will reduce the economic viability of both sites.

112 In May 2018, Northamptonshire County Council Highways Department made the following remarks in their consultation response regarding the proposed Rail Central SRFI [20]:

> *It would appear that through the DCO process both Rail Central and Northampton Gateway developments are required to undertake a cumulative assessment of the impacts of both sites.*
>
> *Being conducted independently by each developer these assessments will be based on different assumptions, and therefore will inevitably provide different results, neither of which will be likely to represent the true situation.*
>
> *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.*

113 It is therefore evident that Roxhill have declined to have traffic modelling performed using original data supplied by each developer. As NCC Highways Department has pointed out, it would be unacceptable to proceed with both sites without such traffic modelling having been carried out.

114 The lack of a cumulative assessment of the effects of Northampton Gateway and Rail Central both being in operation at the same time appears to be in breach of the Environmental Impact Assessment Regulations.

Late Addition

115 John Smith, Managing Director of GB Railfreight, said on 9th October [21] :

> *Changes to the UK economy and population shifts over the decades demonstrate the need for new rai freight terminals, with strategic thinking regarding where these terminals will be located to ensure that rail can deliver goods and materials to the major population centres.*

116 Strategic thinking about where to locate rail freight terminals is vitally important. Proposing a new SRFI 18 miles from DIRFT which has an expansion capability until 2031 does not represent strategic thinking.

Summary of site selection and site characteristics issues

a) There are risks involved in becoming over reliant on one type of business (warehousing)
b) DIRFT is the largest SRFI in the country, has an expansion capability until 2031 and is just 18 miles away

c) SRFIs should be located close to major urban centres, but Northampton is not one
d) There is definitely a greater need for SRFIs to be built in the West Midlands, North West and Yorkshire than at Northampton. Establishing more SRFIs in these named regions would help establish a national network, which Northampton Gateway does not assist in creating.
e) Northampton Gateway, if approved, would be close to existing settlements which is in contravention of NSPNN policy
f) The site selected is not brownfield and does not have the capability for significant further expansion, i.e. it is not sustainable.
g) A cumulative assessment of the impacts of Rail Central and Northampton Gateway has not been carried out so failing to comply with Environmental Impact Assessment regulations.

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See first two bullet points immediately after Table 4

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See final page

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ALTERNATIVE SITES

Legislation

117 The Town and Country Planning Act 2011 Schedule 4 requires the following in both Parts 1 and 2 [1]:

2. An outline of the main alternatives studied by the applicant and an indication of the main reasons for the choice made, taking into account the environmental effects.

118 The Infrastructure Planning Act (2009) contains very similar legislation [2]:

18. An outline of the main alternatives studied by the applicant and an indication of the main reasons for the applicant's choice, taking into account the environmental effects.

119 That requirement is reiterated in the National Policy Statement for National Networks [3].

4.26 The EIA Directive requires projects with significant environmental effects to include an outline of the main alternatives studied by the applicant and an indication of the main reasons for the applicant's choice, taking into account the environmental effects.

120 The European Union also has legislation on this topic [4].

(14) Where an assessment is required by this Directive, an environmental report should be prepared containing relevant information as set out in this Directive, identifying, describing and evaluating the likely significant environmental effects of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme;

121 The aim of all the legislation listed above is to get developers to consider a range of alternative locations and select the one which creates the least environmental impact. That exercise needs to be carried out at the commence of the project. To perform such an exercise retrospectively does not comply with purpose of the legislation.

122 At the first public consultation for Northampton Gateway in December 2016, Roxhill did not provide a listing of alternative sites that had been reviewed. Some consultees fed back on this absence of alternative sites.

123 For the second consultation in October 2017, Roxhill provided a draft environmental statement. There was a listing of one alternative site that had been considered, namely the adjacent (proposed) Rail Central SRFI. The Description of Development document for Northampton Gateway contained the following:

2.36 ……..At this stage in the process it is anticipated that our conclusions will be that Rail Central is an inferior alternative site because it is less able to serve key markets and logistics supply chains and would result in significantly greater environmental effects across a wide range of environmental factors.

124 It is my view that listing just one alternative site is non-compliant with the legislation referred to at the beginning of this chapter. That requires more than one alternative site to be reviewed. Furthermore, the environmental effects that have been considered during this evaluation have not been properly listed or quantified.

125 In Roxhill's application to the Planning Inspectorate, two alternative sites are considered in Chapter 2 of the Environmental Statement, paragraphs 2.4.12 to 2.4.33. Firstly it lists a site at Junction 13 of the M1. That is quickly dismissed as follows:

2.4.18 As a result of the above, no full comparative assessment has been undertaken. The site is not considered as a reasonable alternative because it is not available and less suitable in terms of environmental impact. In addition it will not meet the market area identified. It is therefore not treated as an alternative to the Proposed Development site.

126 In other words this site has not been seriously considered as an alternative. This is followed by a review of Rail Central as an alternative site. The following statement is considered to be misleading:

2.4.25 The Northampton Gateway Main Site is contained within these physical features and the existing topography and this together with the urban area to the east help to contain the site and provide an urban influence to the site and its character.

127 The land immediately to the east of Northampton Gateway is open countryside just north of the Courteenhall Estate, a Grade II registered park and garden. Grange Park may be found to the north east of Northampton Gateway, but this is separated from Northampton Gateway by the M1 and the A508/A45. Furthermore Grange Park contains a larger area of housing than industrial properties. So the references to urban are invalid.

2.4.32 Differences may therefore include a commitment at Northampton Gateway to early delivery of significant rail infrastructure, including an aggregates terminal to accommodate the relocation of GRS from the centre of Northampton.

128 This is one of the differences Roxhill has observed between the proposed Rail Central and Northampton Gateway operations. From an environmental perspective, this is a disbenefit for Northampton Gateway. An aggregates terminal will create a very substantial amount of noise and dust. It will also generate many extra HGV vehicle movements in what is currently a rural area.

129 Roxhill's comparison between Northampton Gateway and Rail Central fails to mention that Northampton Gateway would be situated in an area which South Northants Council has designated as a Local Gap. This is equivalent to a Green Belt, i.e. it is not an area to be built on. The purpose of the Local Gap is to maintain a band of land between the edge of Northampton and South Northamptonshire. Rail Central would not be located in the Local Gap.

130 In paragraph 2.4.20, Roxhill dismisses the alternative sites assessment which Ashfield Land performed in relation to Rail Central. Yet this is the very process which is required by the legislation listed at the beginning of this chapter and that Roxhill has failed to carry out.

131 Roxhill has previously been reluctant to fully evaluate alternative sites. In its application for East Midlands Gateway, just two alternative sites were listed but no comparison was carried out to justify why their proposed site was preferable to the other two [5].

132 Roxhill's approach contrasts markedly with that taken by other developers of SRFIs. During Ashfield Land's first consultation for Rail Central in 2016, that company listed 14 alternative sites [6]. During their second consultation in 2018, Ashfield Land listed 25 alternative sites that they had considered [7].

133 The Environmental Statement for DIRFT III listed 46 potential sites [8]. An evaluation was carried out on 7 alternative sites in a very thorough manner. An evaluation of each of these seven individual sites averaged almost five pages of A4.

134 Roxhill has not complied with the requirements of EU and UK legislation in as much as they have effectively considered just one alternative site. In making comparisons with Rail Central, Roxhill have been misleading and have omitted key environmental issues from their comparisons.

Summary

135 It is clear that Roxhill did not select the site for their proposed strategic rail freight interchange based on its environmental impacts in relation to other alternative sites. In failing to perform such an exercise, Roxhill has ignored the UK and EU legislation regarding the evaluation of alternative sites. This is important environmental legislation which cannot simply be brushed aside.

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Existing Situation

136 Northampton Gateway, if built, would be directly connected to the strategic rail freight network in the form of the West Coast Main Line. However, this line has a capacity issue which was outlined in the Strategic Case for HS2 [1].

> *16. The West Coast Main Line is under stress because there is more demand for train services than there are train paths available.*
>
> *23. Despite a major £9bn upgrade lasting 10 years, it [the West Coast Main Line] has reached its planned capacity.*
>
> *2.6.1 The West Coast Main Line is the busiest mixed-traffic corridor in Europe….*
>
> *2.6.6. In July this year, for example, the ORR [Office of Rail and Road] turned down an application by Virgin Trains to run two additional services a day from London to Blackpool and Shrewsbury.*
>
> *2.6.11 The West Coast Main Line is operating at a level of intensity that is making it extremely difficult to achieve target levels of performance and reliability.*

137 So HS2 Ltd (a government body) makes a clear case that the West Coast Main Line is operating at or near capacity.

138 Network Rail recognises the constraints it places on freight capacity. As an example, in its Value of Rail Freight report it included the following statements with relation to Felixstowe [2]:

> *Between 2001 and 2011 the number of containers passing through Felixstowe – the largest container port in the UK – has doubled to 750,000 equivalent units. Over the same period the number of trains serving the port daily has increased by 25%.*

139 If rail capacity was unconstrained, then the number of trains should have increased by 100% in the same period. The fact that freight trains from Felixstowe were only able to accommodate a 25% increase in that period highlights the bottlenecks that exist on several of the rail routes from Felixstowe. Analysis of freight trains with an origin of Felixstowe showed that 42% were routed via the southern part of the West Coast Main Line [3].

140 There are organisations who are concerned about the ability of the West Coast Main Line to accommodate additional train paths. A study by the Rail Freight Group and the Freight Transport Association forecast major shortfalls on many rail freight routes by 2030 [4]. The routes with the most capacity shortfall (up to 200 trains per day) were forecast as

- *West Coast Main Line between Crewe and London*
- *North London Line*
- *London, Tilbury and Southend lines*

141 The forecasts were created by MDS Transmodal. One of their reviews late in 2016 has considered the implications of the DFT's Central Constrained Forecast [5]:

> *However, the DfT's Central Constrained Forecast still anticipates a more than doubling of ports traffic from 15 million to 32 million tonnes lifted between 2011 and 2030. Given that the DfT study appears to have assumed no more capacity along the principal rail corridors (and in some cases less) it is difficult to see how this can be achieved; almost all this ports*

traffic uses the West Coast Main Line at some point in its journey.

142 The review continues with:

Given the market enthusiasm on the part of the major distribution centre developers for SRFIs, one can only arrive at the conclusion that the volume of rail freight volumes in the foreseeable future will be dictated by the relevant capacity that Network Rail is able to make available to freight operators, and that companies considering new rail freight terminals, traction or wagons will need to consider carefully whether such investments are worthwhile.

143 So, there are several sources that agree that the West Coast Main Line has little ability to accommodate further train paths.

Planned Additional Usage

144 When attending Roxhill's first consultation for Northampton Gateway in December 2016, their rail consultant Rupert Dyer advised that freight trains from Southampton would be joining the West Coast Main Line at Bletchley, once East West Rail has reopened the section of line between Bicester and Bletchley. At a consultation session for East West Rail on 17/7/17, I was advised that this section of track is due to be completed by 2022 or 2023. The purpose of freight trains using this revised route is to reduce the use of the single-track section of line between Leamington Spa and Coventry.

145 An analysis of freight trains currently using the Leamington Spa to Coventry section [6] shows that there are at least 6 freight trains each way per day to/from Southampton using this section of track, which would be transferred to the West Coast Main Line according to the view put forward by Mr Dyer.

146 East West Rail anticipate running two passenger trains per hour (each way) to/from Milton Keynes which would join the West Coast Main Line at Bletchley [7]. Assuming a service of 15 hours per day, that would be an additional 30 train paths each way per day on the West Coast Main Line. There are likely to be other long-distance passenger trains which use East West Rail, and some of these could then join the West Coast Main Line.

147 Therefore, an additional 36 train paths each way per day (at least) would need to be accommodated on the West Coast Main Line from 2022 as a result of the opening of East West Rail (Western Section Phase Two).

148 Phase three of the Daventry International Rail Freight Terminal (DIRFT III) was approved in 2014. The Rail Operations Report [8] for that proposal indicated that this SRFI would be expected to handle 32 freight trains per day (each way) by 2032.

6.3.1 …….The plan for 40 paths per day could accommodate the forecast 32 trains each day with spare capacity to reflect the difficulty of 'perfectly optimising' train movements across the national network. ……

149 Earlier in this report, it was indicated that there would be 12 trains per day (each way) serving DIRFT in 2015 and 18 trains per day (each way) serving this facility in 2020 [9]. Therefore, acknowledging the need for optimising freight paths, there will be a need for approximately an extra 20 freight paths each way per day to accommodate the needs of the expansion at DIRFT.

150 Network Rail has taken these requirements on board [10]:

*Other freight plans include expansion plans at DIRFT. Known as **DIRFT III**, ProLogis plans to*

replace the existing DIRFT1 Railport with a much larger facility which will cater for 775m length trains and include warehousing and storage facilities. The aspiration is to operate a significant increase in traffic in the future.

151 Northamptonshire Enterprise Partnership commissioned a report which was titled Northamptonshire Rail Capacity Study [11] and was completed in 2016. It envisaged significant economic growth across the county and that passenger usage would more than double at Northampton rail station by 2043. Extract from figure 6 of this report:

Station	Annual Usage	Annual Usage	Market Study Growth
	2013/14	2043	To 2043
Northampton	2,783,020	5,733,021	106%

152 This report also contains the following:

3.3.2 ……However, the service between Northampton and London remains at three semi-fast trains per hour operated by suburban regional rolling stock and with substandard journey times given the economic importance of commuting and business traffic between Northampton and the capital. The current service provision is therefore unsatisfactory to support the growth plans in the SEP. ……further illustrates the case for significantly enhanced services within and between the key economies on the WCML.

153 To address the existing unsatisfactory service provision and to support the anticipated growth in rail usage by Northamptonshire residents, a substantial increase in passenger services will be needed between Northampton and London during the next 25 years. Examination of the London Northwestern timetable (10/12/17 to 19/5/18) shows that there are 57 trains departing each day from Northampton to London Euston. If you assume an increase of 50% in the number of services between Northampton and Euston by 2043, the balance of the required additional demand being covered by longer trains, that would necessitate an extra 28 trains each way per day.

Summary of required additional train paths identified

Scheme	Additional train paths per day
East West Rail	36 each way
DIRFT III	20 each way
Increased Northampton rail passenger demand	28 each way
Total	**84 each way**

154 So, there will be a need for an additional 84 train paths each way per day without taking into account any paths for Northampton Gateway

155 The current plans for Northampton Gateway suggest that the SRFI first becomes operational in 2021 or 2022.

Effects of HS2 Opening

156 The Department for Transport indicated in 2016 that the West Midlands region has been the fastest growing rail region over the last eight years [12]. This region was primarily served at the time by the London Midland franchise. At a meeting with James Carter (Network Access Manager for London Midland) in July 2016, he indicated that the Northampton/Milton Keynes to London Euston route was the fastest growing route within the franchise. London Northwestern Railway, which has replaced London Midland, will undoubtedly wish to satisfy this expanding demand.

157 Organisations such as the Northampton Rail User Group will also be pressing for continued

growth of passenger services on the Northampton – Euston route.

158 HS2 is scheduled to open from London to the West Midlands by the end of 2026. The number of train paths to be released at that time is unclear. However the opening of HS2 will not create any additional paths on the North London or East London Lines. These lines are used by London Overground passenger services and by freight trains. The two services have conflicting needs with London Overground services stopping at most stations unlike freight services. Passenger numbers on London Overground have increased by 253% in the last six years [13], and that growth has to be accommodated. London Overground trains were lengthened from 4 to 5 carriages by 2016. The frequency of London Overground services was due to increase by 25% in May 2018 [14]. It was reported in Rail magazine that London Overground trains began running at night time between Dalston Junction and New Cross Gate on the East London Line from 15/16 December 2017 [15]. Both of these changes adversely affect the number of train paths available for freight usage.

159 Many parts of the North London Line are two track and hence passenger and freight services have to share the same lines. Freight services from London docks (including London Gateway) and almost half of freight services from Felixstowe are routed via the North London Line to access the southern end of the West Coast Main Line.

160 In the Network Rail Freight Network Study (April 2017), increasing the freight capacity for "Cross London" was classified as a "Highest priority" project [16]. However, elsewhere within the report, it suggests the timescale for such projects, if approved, is likely to be within ten years. So work to improve cross London freight capacity does not appear to have been scheduled yet. Therefore, any freight paths released on the West Coast Main Line by the opening of HS2 will be of largely academic interest until cross London freight capacity is increased.

161 More recently, Network Rail has published its Freight & National Passenger Operators Route Strategic Plan (February 2018) [17]. Appendix C of this document is a Summary of Investment Options. Cross London freight capacity is listed as a possible project for delivery in Control Period 7 (2024-29). However there is a significant caveat attached:

> *It should be noted that the list mentioned in Appendix C are choices for funders and none are committed schemes. Schemes will only progress from concept, through development, and into delivery, by passing joint, incremental funding decision points with the relevant funder(s). Schemes will also only progress to the next stage of the lifecycle, subject to an ongoing assessment of viability and affordability.*

162 Rail experts would argue that improvements to rail network capacity should precede the building of strategic rail freight interchanges.

Infrastructure considerations

163 Referring again to the Northamptonshire Rail Capacity Study, I observe the following in the context of freight [18]:

> *WEST COAST MAIN LINE - pressure for capacity between Willesden and Northampton will be significant, and is likely to require investment at pinch points. The most significant consequences of this will be a need for investment in additional track capacity between Bletchley and Milton Keynes, and dynamic freight loops on the Northampton Loop. This will be particularly important if enhanced passenger services between Northampton and London are to be introduced once HS2 Phase 1 opens in 2026.*

164 The report continues:

> *Conditional Output Freight-1. Provision of new freight capacity on WCML, MML, EastWest*

Rail and Felixstowe-North via Peterborough to serve Northamptonshire Intermodal Freight Growth, (as per Network Rail Freight Markets Study) without detriment to passenger Conditional Outputs

165 The Northamptonshire Rail Capacity Study finds the need for infrastructure investment on the West Coast Main Line. The report also points out that increased freight paths should not compromise the ability to provide significantly enhanced passenger services. Therefore, infrastructure improvements are needed locally on the West Coast Main Line before additional freight paths are granted to proposed strategic rail freight interchanges, not afterwards. It should be noted that this rail capacity study was written without any reference to the effects of either Rail Central or Northampton Gateway.

Environmental Impact Assessment Regulations 2009

166 The Secretary of State made the following statement in the Scoping Opinion for Northampton Gateway [19]:

3.77 The Applicant's attention is drawn to the comments in Appendix 3 on issues of particular concern that consultees wish to see included in the ES:

- *Impacts on the capacity of the West Coast main line (Leicestershire County Council, Milton Keynes Council, Milton Malsor Parish Council and Buckinghamshire County Council).*

167 At the time the Scoping Opinion was written, Network Rail's response had not been received. It subsequently contained the following [20]:

Considering that there is a need for further feasibility work, the scoping document is silent on the impact of the proposal on the rail network. Given that this is a key risk, Chapter 12 (Transportation) needs to be expanded to consider the full impact of the proposal on the existing and future rail network both in terms of capacity and timetabling, with a detailed study scope to be agreed with Network Rail.

Given that the location of the proposal is predicated on rail connectivity and the primary aim of the proposal is modal shift, detailed assessment of the impact of the proposal on the rail network at this early stage is crucial.

168 If the Network Rail response had been received earlier, the Scoping Opinion might have been different. For example, the Secretary of State made the following comments in the Scoping Opinion for the Rail Central proposal [21], a SRFI proposed to be situated on the opposite side of the Northampton Loop and with very similar requirements:

3.121 The applicant's attention is also drawn to the comments of Network Rail in respect of potential impacts on the existing and future railway network.

169 Network Rail's comments had been as follows:

Considering that there is a need for further feasibility work, the scoping document is silent on the impact of the proposal on the rail network. Given that this is a key risk, Chapter 17 (Highways and Transportation) needs to be expanded to consider the full impact of the proposal on the existing and future rail network both in terms of capacity and timetabling, with a detailed study scope to be agreed with Network Rail.

170 The context of the Secretary of State's comments falls within the Environmental Impact Assessment Regulations 2009. Furthermore, the Environmental Impact Assessment Regulations 2017 contain the following [22]:

4. (2) The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors—

(a) population and human health;

(d) material assets,

171 Rail passengers are the population and the railway network is a material asset.

172 Roxhill's relevant document is Document 6.7, West Coast Main Line Capacity Report. This document devotes just five paragraphs to passenger services on the West Coast Main Line (6.1.1. to 6.1.5.). Within this section no reference is made to how busy the West Coast Main Line is now nor how much busier it is likely to become as a result of already approved rail developments or the anticipated growth of passenger demand from Northampton rail station. Nor does Roxhill make any suggestion that that additional freight services may have an adverse impact on rail passenger services. It is my view that Roxhill has not complied with the statutory EIA regulations.

173 Northamptonshire County Council Highways Department recognized this omission in the draft environmental statement and responded accordingly to Roxhill's second consultation for Northampton Gateway [23]:

Northampton is one of the largest intermediate stations on the West Coast Main Line and yet is only served by the Slow Lines, so we are unclear how both these statements can be achieved without Northampton and Long Buckby alone receiving a poorer service.

What is the coincidence of available paths on up and down lines to allow down (northbound) trains to enter or leave the rail freight terminal. This is important to ensure that these trains do not cause delay to other services.

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.

174 It is noticeable that Warwickshire County Council rather than Northamptonshire County Council has been asked to produce a statement of common ground concerning rail. Northamptonshire County Council have clearly studied the effects of additional freight services on existing and future rail passenger services very thoroughly. Consequently they have found there is no common ground between their views and Roxhill's Northampton Gateway proposal. I consider it vital that Northamptonshire County Council's views on rail issues are fully taken on board.

175 So, there is a risk that existing rail passenger services may be reduced from Northampton and Roxhill chose not to include this possibility in its DCO application documentation for Northampton Gateway. Constrictions on rail passenger services are likely to result in additional car journeys which would create additional air pollution. So the omission of the impact of additional freight services on future rail passenger services is very significant in the context of the requirements of the Environmental Impact Assessment regulations.

176 This omission is even more significant in the context that the Northamptonshire Rail Capacity Study expects a doubling of the usage of Northampton rail station by passengers by 2043. Therefore, a possible reduction in existing passenger services would be totally unacceptable.

177 Roxhill's West Coast Main Line Capacity Report mostly looks at the capacity of the Northampton loop. A much more relevant section to examine would be further south as the West Coast Main Line becomes busier closer to London. This is best illustrated by reference to the Network Rail West Coast Main Line Route Utilisation Strategy document. While this example is eight years old,

the relative usage will be very similar [24].

Figure 3.10 – passenger demand on the West Coast Main Line in 2009/10

178 In paragraph 6.2.9 of Roxhill's West Coast Main Line Capacity Report, reference is made to a Network Rail report to the Office of Rail and Road, and more specifically Appendix A within that document [25]. If you ignore the Virgin and Cross Country trains (both coloured red in this chart) and focus on the remaining services, it is immediately evident how much busier the slow lines are south of Watford Junction than on the Northampton loop. Furthermore, this four year old chart

understates the situation as it omits London Overground services between London Euston and Watford Junction, which amount to three trains per hour in each direction.

179 As I have previously explained another important consideration is the usage of the North London Line which would serve trains from Felixstowe and London Gateway ports. Using data from Realtime Trains shows that 382 trains (passenger and freight) were scheduled through Hampstead Heath on 1/2/18 compared to 258 through Northampton on the same day, a 48% greater throughput. In both cases we are considering 2 track lines and differing demands in terms of stopping/non-stopping trains.

180 A very relevant comment was made in the October 2018 issue of Modern Railways [26] . The author of this article was Julian Worth, a consultant and acknowledged expert on rail freight .

With the Great Eastern main line at capacity, all growth from the Port of Felixstowe will need to be routed via F2N [Felixstowe to Nuneaton].

181 Yet we see in Roxhill's Road Freight to Rail Freight Modal Shift document (Transportation Appendix 34) that more than half of the tonnage forecast to be brought in from the ports would be from Felixstowe using the Great Eastern route. This will clearly prove to be extremely problematic. Containers from Felixstowe and the London Ports would need to use the North London Line which we have already explained is extremely crowded and faces mounting pressure from the major expansion of London Overground usage. Many of Roxhill's planned additional freight paths are unlikely to be accommodated and the issues relate more to the Great Eastern Route and North London Line, although Northampton Loop issues should not be overlooked.

182 Some of the discussion in this Roxhill document relates to theoretical capacity. However, train timetables usually have gaps built in at regular intervals. This allows recovery to scheduled times to take place more quickly after delays. Therefore, not all existing gaps are available in reality for use for new freight services.

183 Reference is made within the Roxhill West Coast Main Line Capacity Report to Network Rail's draft Freight Network Study of August 2016. See paragraphs 4.2.1 to 4.2.6. The forecasts in this latter document represent unconstrained growth and are therefore essentially meaningless.

184 Furthermore, when considering additional freight paths for Northampton Gateway, we are not considering simply four in each direction per day. Roxhill's West Coast Main Line Capacity Report (see figure 1) indicates that between 12 and 16 paths in each direction per day are forecast to be needed by 2043. These figures take no account of the express freight trains using Northampton Gateway. In the draft environmental statement these were listed as being between 6 and 12 trains per day by 2043. If Northampton Gateway is to be granted approval, then capacity of up to an additional 28 trains per day needs to be available on the West Coast Main Line. It is a surprise to note that Roxhill only envisage an increase of one aggregates train (at the most) per day for Northampton Gateway over the next 25 years. In which case why handle aggregates at all?

185 The proposed aggregates terminal operator is currently based in Northampton which is served typically by two trains per day according to an analysis of Realtime Trains data. However many train paths this operator currently has, these paths should not count towards the minimum requirement of being able to handle four freight trains per day. SRFIs are being created to bring about modal shift from road to rail, and the existing aggregates train paths being transferred to Northampton Gateway do not represent modal shift. See also NPSNN paragraph 2.50.

186 I contend that the additional freight trains paths planned for Northampton Gateway cannot be accommodated alongside the existing and additional train paths already planned for projects such as East West Rail, DIRFT III and the expected increase in rail passenger demand identified in the Northamptonshire Rail Capacity Study for the Northamptonshire Enterprise Partnership.

Economic Aspects

187 Reports early in 2017 indicated that the Government had made a 21% cut in the Mode Shift Revenue Support scheme. This is a government subsidy designed to encourage modal shift from road to rail and its value depends on the start and end points of the rail freight journey. The possible consequences of these reductions to the scheme were reported in the April 2017 edition of Modern Railways [27]:

> *"Not only are existing services now under review, but future expansion plans are also being called into question. This includes some new services to rail, including new routes in the North of England and the Midlands".*
> *"Scottish Transport Minister Humza Yousaf has warned that the cut threatens three of the six existing cross-border rail freight flows……..".*

188 An article in Modern Railways June 2017 [28] went further:

> *"The Mode Shift Revenue Support Grant , paid in recognition of the carbon reduction benefits offered by rail freight, is having to accommodate a £4 million reduction in funding allocation (p18 March issue). As a result, all the Anglo-Scottish domestic intermodal traffic (see box) is under threat".*

189 Using the Realtime Trains website, this suggests that approximately 50% of the existing freight trains serving DIRFT and Teesport are under threat by the reduction in the Mode Shift Revenue Support Grant. In turn this undermines the viability of these two sites to operate as rail freight interchanges and undermines the case for Northampton Gateway to operate as a SRFI.

190 The office of Rail and Road (ORR) has been reviewing the charges made to rail freight operators. Issue 826 of Rail magazine [29] contained the following:

> *"ORR talks about applying fixed cost mark-ups to all rail operators and removing price caps on charges those operators pay to run trains. Despite affirming support for rail freight, ORR Chief Executive Joanna Whittington's words gave me little comfort. Not least because road fuel duties look set to continue to be frozen while rail charges rise".*

191 Therefore, there is potentially a second form of cost increase facing rail freight operators, which is likely to favour road transport over rail which undermines the case for additional rail freight interchanges.

192 For rail freight to be a sustainable mode of transport in the long term its operators need to be profitable. It is therefore concerning to read that the majority of the largest freight train operators were recently loss making [30].

> *Financial results for 2017 have revealed that (taken together) rail freight operators had a revenue shortfall against costs of £113 million on a turnover of £790m. This was partly offset by the payment of £19m in Mode Shift Revenue Support (MSRS) grants from the Department for Transport but that still left a loss for the sector of £94m.*

193 With the best will in the world, modal shift cannot continue if the freight train operators continue to rack up losses.

194 It is also notable that the growth of domestic intermodal rail freight (measured in net tonne kilometers) since 2002-03 appeared to reach a plateau in 2011-12 and there has not been a substantial amount of growth since then [31]. Annual percentage growth of domestic intermodal freight was 10.4% per year between 2003-03 and 2011-12 but fell to 1.1% per year between 2011-12

and 2017-18. There was actually a fall of 1.4% in the year 2017-18. This may suggest that the rail network is also suffering from congestion. Or it may be that there are few remaining economically viable new rail freight journeys to be added. There are differing views on what constitutes an economically viable journey distance for rail freight, but the minimum is of the order of 160 miles.

195 The main type of freight handled by SRFIs is containers. The UK port handling the most container traffic is Felixstowe which handles more than the next two ports combined [32]. Analysis of existing rail freight journeys from Felixstowe shows that 87% of its journeys are to end destinations in the North West, Yorkshire and West Midlands regions. The shortest equivalent road journey is approximately 160 miles while more than 40% of these freight trains travel on a longer route through North London. None of Felixstowe's end destinations for freight trains are in the East Midlands.

196 A similar picture is painted by our second largest container port, Southampton. 82% of its journeys are to end destinations in the North West, Yorkshire and West Midlands regions. Just 6% of Southampton's rail freight journeys are to the East Midlands, a distance of just under 120 miles. For the purposes of this analysis, freight journeys between car production plants and Southampton have been ignored. This demonstrates clearly that short distance rail freight journeys are not viable as they generally do not occur.

Misleading Views

197 Roxhill's West Coast Main Line Capacity Report contains a number of misleading statements or views.

4.2.1 The growth forecast provided by Network Rail represents unconstrained growth and is therefore essentially meaningless. As I have indicated earlier, actual data from the Office of Rail and Road (ORR) shows intermodal rail freight growth at 1.1% per year between 2011-12 and 2017-18.

4.2.11 For other routes listed within this Network Rail report, several other SRFIs are listed. Rather than identifying Northampton as a *"priority action"* for additional terminal facilities, I would suggest this listing simply recognises new rail freight terminals that have just become operational, have recently been approved or are going through the planning process.

4.3.6 The Department for Transport's (constrained) forecasts are also optimistic. Their starting point is the year 2011. I have already ascertained that actual intermodal freight growth by rail has been increasing by 1.1% per year over the last 6 years according to the ORR. Therefore it is extremely likely that intermodal rail traffic will fall well short of the low constrained forecast by 2030.

5.4 This concept is completely meaningless as almost all passenger trains using the Northampton loop stop at Northampton station. Furthermore it is an essential part of train timetabling that gaps are left in the timetable every so often, to assist in recovery after significant delays. As I have previously indicated it is much more relevant to look at the capacity of the West Coast Main Line much closer to London where it is considerably busier and also the North London Line along which some freight trains from Felixstowe and the London ports have to travel.

198 Within this document there is an Appendix 3, GB Railfreight Capacity Report.

1.3 GB Railfreight have apparently not considered the additional usage of the WCML by trains from East West Rail, DIRFT III and the growth of rail passenger services. All of these need to be taken into account before consideration is given to train paths for Northampton Gateway.

199 There are many other misleading views within the Roxhill West Coast Main Line Capacity Report.

Cumulative Impacts

200 I have already highlighted that Roxhill have not considered the impact of additional freight train paths on the existing and future rail passenger services between Northampton and London Euston. Nor has the applicant considered the combined demand of both Northampton Gateway and Rail Central for freight paths and how that will impact existing and future rail passenger services. If both of these proposed SRFIs were to be approved, it is very probable that neither would be able to run the full complement of train paths that each is currently proposing.

201 Furthermore, Euston Station is going to be substantially changed to accommodate HS2 train services in addition to classic rail services. This will require the removal of spoil and other materials and the bringing in of new construction materials. This work will be ongoing until 2033 approximately. Some of this activity will take place by rail. While this is ongoing, Northampton Gateway (if approved) will be constructed and freight trains will start serving this SRFI. No consideration appears to have been made of the cumulative effect of train activity associated with the Euston reconstruction for HS2 and the train services associated with Northampton Gateway.

202 On a much smaller scale, the western section of East West Rail between Bletchley and Bicester is due to be reopened in 2023. Prior to its opening it will also require construction materials to be brought to this section, and some of these are likely to be delivered via the West Coast Main Line. Roxhill has also omitted consideration the cumulative impact of these additional train services.

203 This lack of consideration of cumulative impacts indicates a non-conformance with the National Policy Statement for National Networks:

> *4.3 In considering any proposed development, and in particular, when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State should take into account:*
>
> - *its potential benefits, including the facilitation of economic development, including job creation, housing and environmental improvement, and any long-term or wider benefits;*
> - *its potential adverse impacts, including any longer-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.*
>
> *4.16 When considering significant cumulative effects, any environmental statement should provide information on how the effects of the applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been granted, as well as those already in existence).*

204 For northbound trains to enter Northampton Gateway 3 sets of points will be required and a further 3 sets of points to rejoin the Northampton loop heading northwards. Similarly, a total of 6 sets of points will be needed for access to Rail Central.

205 Rupert Dyer, Roxhill's rail consultant, advised in December 2016 that each set of points required a total distance of 60 metres. Therefore the combined distance required for a total of 12 sets of points would be 720 metres. According to the maps provided (separately) by each developer, the entry and exit points to the Northampton loop would be directly opposite each other. That suggests that one or other needs to be repositioned so as to no longer be directly opposite the other one. If that is not possible, then it may necessitate shortening the distance between the incoming and outgoing points to one or both of the SRFIs. This could compromise that SRFI's ability to handle 775 metre length trains.

206 This potential contention has not been addressed in Roxhill's West Coast Main Line Capacity Report.

Other Points

207 SRFIs have an adverse effect on the punctuality of passenger services. Without any prompting, Tom Joyner, Passenger Services Director of London Midland, pointed out when attending a Northampton Rail User Group meeting in February 2017, that trains using DIRFT cause punctuality issues for following passenger trains. It seems very likely that freight trains using Northampton Gateway would create additional issues of this nature.

208 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 [33].

> *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.*

209 It is my understanding that Network Rail has reached GRIP stage 2 regarding the proposed Northampton Gateway SRFI [34]. This significantly increases the associated risk as the Planning Inspectorate has indicated. It also suggests that the application to the Planning Inspectorate is premature.

210 Network Rail provided a relevant representation to the Planning Inspectorate concerning Northampton Gateway on 1st August 2018. It included the following:

> *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.*

211 More than two months after Roxhill submitted their SRFI application to the Planning Inspectorate Network Rail indicate that detailed capacity studies are required. This would indicate that the application has been made before the appropriate studies have taken place.

212 It should be noted that when the applications for DIRFT III and East Midlands Gateway SRFIs were submitted to the Planning Inspectorate, each was accompanied by a Statement of Common Ground with Network Rail [35]. The application for Northampton Gateway has not been accompanied by a Statement of Common Ground with Network Rail. This also suggests that the timing of the application is premature or has been rushed.

213 Network Rail, after conducting their relevant studies, needs to confirm that the rail network (not just the Northampton Loop) can accommodate an additional 16 rail freight paths per day for container trains and 12 express freight trains per day for Northampton Gateway. If Network Rail is unable to do so, then presumably this application will have to be passed to the local planning authority for their approval as a road-based logistics site.

Summary of Rail Issues

a) The West Coast Main Line currently has extremely few spare train paths

b) There are already plans in place for additional usage of the West Coast Main Line as a result of East West Rail and DIRFT III. It has been anticipated that the number of rail passengers using Northampton rail station will have doubled between 2013/14 and 2043.

c) When HS2 opens in 2026, it will release some train paths. However, these will be of little help to freight as HS2 will not release any train paths on the North London Line, an existing bottleneck through which freight trains access the West Coast Main Line at its southern end on their way from Felixstowe and London Gateway ports.

d) Rail infrastructure improvements are needed on the West Coast Main Line and these should be delivered before additional freight paths are provided. However, appropriate improvements to infrastructure do not appear to have been scheduled.

e) Consideration should have been made on the impact the proposed SRFI will have on rail passengers using the West Coast Main Line, in accordance with Environmental Impact Assessment regulations. No such consideration appears to have been made.

f) The growth of rail freight is constrained by numerous bottlenecks in the rail network and is likely to be undermined by the reduced funding for the Mode Shift Revenue Support scheme and the possible increase in track access charges.

g) The growth of domestic intermodal rail freight has slowed down.

h) There is a greater need for additional SRFIs in the West Midlands and Yorkshire than in the East Midlands.

i) At this stage, Northampton Gateway's project is insufficiently advanced within the Network Rail GRIP planning process to offer a low level of risk.

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Northampton Gateway site entrance

214 Currently, at peak periods, there are significant queues on the A508 heading northwards towards M1 junction 15. On this section of road, Roxhill plan to build a roundabout to provide access to the Northampton Gateway site. Traffic heading south on the A508 intending to enter Northampton Gateway will have priority over northbound traffic on this road. The flows will not be controlled by traffic lights. Roxhill have forecast that 838 vehicles will enter Northampton Gateway during the peak hour, or one vehicle every 4 seconds. The vast majority of vehicles entering Northampton Gateway will approach from M1 junction 15. This will add substantially to the congestion already experienced by travellers heading northbound on the A508 at this point.

215 This issue appears to have similarities with junction 10 of the M40 when it was redesigned about 6 years ago. There northbound traffic on the A43 had to give way to all southbound traffic on this road joining the M40. The resultant difficulties forced a rethink and a costly reconstruction back to similar arrangements as originally designed.

Red Routes

216 The National Policy Statement for National Networks (NPSNN) [1] provides a clear directive as follows:

> *4.66 The Secretary of State should not grant development consent unless satisfied that all reasonable steps have been taken and will be taken to:*
>
> - *minimise the risk of road casualties arising from the scheme; and*
> - *contribute to an overall improvement in the safety of the Strategic Road Network.*

217 The A508 is classified as an Active Red Route by Northamptonshire County Council [2]. This road is divided into three sections

2014-16 accident data

Road number	RR Number	Description	KSI	Fatal
A508	15	M1 to Roade	4	1
A508	16	Roade to Stoke Bruerne	6	1
A508	74	Stoke Bruerne to Old Stratford	10	0

(KSI = Killed or seriously injured)

Active Motorcycle Red Route data for A508 and A45
2012-16 accident data

Road number	RR Number	Description	KSI	Fatal
A508	4	M1 to Old Stratford	5	1
A45	19	Wootton to Wellingborough	5	0

218 The Left-only turns at the Courteenhall Road junction will not prevent the current rat-running from the A43 via Blisworth. In fact, it will get worse if the development goes ahead. It is highly likely that some employees commuting to Northampton Gateway will use the A43 from the south and then cut through Blisworth to reach their place of work. To do so, they will have to turn right off the A43 into Towcester Road. This is a difficult at-grade road junction where several serious accidents have previously occurred. In fact, the Highways Agency, in conjunction with South Northants Council, has been monitoring junctions on the A43 for several years as a consequence of the serious accidents that have occurred [3]. Northampton Gateway will only add to the opportunities for further accidents to occur at this junction.

219 Contained within this report is the following in the section headed Conclusions:

- *The A43 Tiffield to Blisworth scheme be monitored to determine if collision numbers at Towcester Road and Northampton Road junctions are reduced. If collision numbers are not reduced then consideration should be given to further measures or consideration of closing these gaps.*

220 For the report to put forward the possibility of closing this junction indicates the concern that the Highways Authority has about the seriousness and frequency of past accidents at this location. Building Northampton Gateway would simply add to the usage of this junction by employees commuting to work.

221 With the A508 and part of the A45 remaining an Active Red Route (and/or for Motorcycles) and the A43 being under close scrutiny by Highways England and South Northants Council regarding its serious accident record, it appears likely that the creation of Northampton Gateway would add to the serious road accidents on these roads, due to the greatly increased volumes of traffic. That would cause Northampton Gateway to be in contravention of NPSNN 4.66.

Scoping Opinion

222 The Scoping Opinion for Northampton Gateway contains the following comments:

> *3.1 This section contains the Secretary of State's specific comments on the approach to the ES and topic areas as set out in the Scoping Report.*
>
> *3.77 The Applicant's attention is drawn to the comments in Appendix 3 on issues of particular concern that consultees wish to see included in the ES:*
>
> - *Traffic impacts on the M1 (junctions 13 to 15A), southbound traffic flows on the A5, A43 and A508 and the junction of the A508, A5 and A422 by Old Stratford (Milton Keynes Council).*
> - *Impacts on the A43 (Cherwell District Council).*
> - *Impacts on infrastructure within Buckinghamshire such as the A422 (Buckinghamshire County Council).*
> - *Impacts on the A43/A5 Tove roundabout and the A43 McDonalds roundabout in Towcester and the proposed Towcester A5 bypass (South Northamptonshire Council).*

223 The above is not a full listing of the points made in paragraph 3.77

224 So there is concern expressed by two councils about the junction of the A5, A508 and A422 or the roads feeding into it. This junction also falls within the Highways England A5 route study of problem road junctions for 2018/19 [4].

225 Anyone travelling into or out of Milton Keynes at peak times will know how crowded this junction becomes and the significant delays that can be expected. This is the primary road access to Milton Keynes for traffic approaching from the north or northwest. Northampton Gateway would only add to this congestion as some employees are very likely to use this roundabout as well as some HGVs. Yet Roxhill apparently have no plans to make any changes to this roundabout and do not appear to have reported on whatever assessment they have made of this junction.

226 Concerns have also been raised by three councils (listed above) about the effects of additional traffic on the A43. Again, Roxhill have apparently not included their assessment of Northampton Gateway generated vehicle movements on the A43 in general or at the specific locations mentioned.

227 It is surely not acceptable to ignore such specific requests for the impact of Northampton Gateway generated traffic at these locations.

Traffic Forecasts

228 In Traffic Appendix 13, in the figure at the end of paragraph 3.16, the changes in traffic volumes don't appear to stack up. For example, a reduction of 180 vehicles is shown for Blisworth bound traffic (westwards) on the Courteenhall Road. This would be the effect of a no right turn from the A508 into the Courteenhall Road. You would expect that this former traffic still needs to reach Blisworth. The vehicles might instead go through Collingtree (+46) or via Knock Lane (+40) to reach Blisworth. However the additional traffic on the latter two roads does not amount to the reduction in traffic on Courteenhall Road; approximately 100 vehicles appear to be unaccounted for. Also there are numerous places where you follow the traffic before and after a junction, and the numbers simply don't stack up. As this stands, it undermines the credibility of the traffic forecasting.

229 Alongside the consultations Roxhill ran in October 2017, they published Transportation Appendix 12-7 which covered trip generation [5]. In the table following paragraph 8.4, it was forecast that 16531 trips would be generated per day (with no travel plan). One of the documents submitted to the Planning Inspectorate in May 2018 is Transportation Appendix 5. Similarly, in the table following paragraph 8.4, it is forecast that 16531 trips would be generated per day (with no travel plan). Between these two publication dates, Roxhill decided to include an aggregates terminal. The latter will clearly generate movements of HGVs and also light vehicle movements for employees working at the aggregates terminal. Therefore the total trips generated by Northampton Gateway appears to be understated in the official documentation provided to the Planning Inspectorate as no allowance has been made for the additional vehicle movements generated by the aggregates terminal. This could be another example of rushed preparations.

Congestion

230 Although Northampton Gateway would be well connected to the strategic road network, the Department for Transport's own National Transport Model indicates the following roads are expected to experience severe congestion by 2040 (severe being the most serious level predicted) [6]:

- M1 Junctions 15 to 17
- A45 from M1 junction 15 to east of Northampton
- A5 at Milton Keynes
- A43 west of Towcester and also close to M40 junction 10

231 Incidentally this is the longest section of the M1 expected to experience severe congestion north of the M25, and the only other section of the M1 expected to experience severe congestion would be near Nottingham.

232 Northamptonshire County Council has previously recognised the high levels of congestion currently experienced on the A45 on the east side of Northampton. To address that it has conceived the A45/M1 Northampton Growth Management Scheme [7]. Nonetheless, the A45 remains congested at peak times as it passes the eastern side of Northampton. So does the A5076 to the south of the town.

233 By the DfT's own model, this clearly indicates the unsuitability of the proposed Northampton Gateway location with so much severe congestion on the neighbouring strategic road network forecast for the future, before the extra traffic generated by Northampton Gateway.

Quality of Life

234 Since the A43 was rerouted to avoid Blisworth and Milton Malsor twenty seven years ago, these villages have become much more peaceful places to live. However, if adequate measures are not taken to prevent all employee traffic (at times of shift changes) from using these roads, then residents' sleep patterns (particularly childrens') will be badly disturbed e.g. at 06:00 and 22:00. That would be incompatible with NPSNN which states:

> *3.2 The Government recognises that for development of the national road and rail networks to be sustainable these should be designed to minimise social and environmental impacts and improve quality of life.*

Roade Bypass

235 **P**art of Roxhill's proposal is to build a bypass for the village of Roade. The Transportation chapter (paragraph 12.7.8) indicates that this may not be completed until up to two years after first occupation of the site. There is a very real concern that the Roade bypass might not be built at all. There is no need for such a delay. HS2 Ltd has agreed to build a bypass for the village of Chipping Warden and this will be completed before a lot of the other construction takes place in this area. It also means that much of the HS2 construction traffic will avoid the village of Chipping Warden. On the same basis the Roade bypass should be built at the beginning of the construction timetable. I request that this be a requirement associated with the approval of this application, if Northampton Gateway is approved.

Cumulative Impacts

236 The latest version of the Northamptonshire Strategic Transport Model has been used to forecast future traffic in Northamptonshire (and some surrounding areas) in 2031 as detailed in Transportation Appendix 22 Part 1, figure 3.1. To enable future forecasting to be carried out satisfactorily, the Strategic Transport Model has to be provided with input in the form of planned new developments expected for that area, both homes and businesses.

237 However Transportation Appendix 36 advises that the only developments considered for the Strategic Transport Model are those within Northamptonshire.

> *COMMITTED DEVELOPMENTS IN NORTHAMPTONSHIRE. The table below lists all of the developments which have been included in the latest NSTM model for the year 2029/2031.*

This is confirmed by inspection of the data within this appendix.

238 Roxhill have suggested that regional distribution from Northampton Gateway is likely to take place within a 25 mile radius of this site. The developer provided a map of this area in Transportation Appendix 7, Figure 1. It is notable that at least 30% (my estimate) of this area falls outside of Northamptonshire and encompasses areas of Milton Keynes, Buckinghamshire, Oxfordshire, Warwickshire, Leicestershire, Bedford and Central Bedfordshire.

239 The most significant omissions from the traffic model are Milton Keynes followed by Bedford when assessed on their population size and proximity to the proposed Northampton Gateway site. Milton Keynes is also the third fastest growing town/city in the country [8]. Milton Keynes and Bedford are respectively 15 and 25 miles from the proposed Northampton Gateway site. So the Northamptonshire Strategic Transport Model includes future developments for places such as Deenethorpe, Oundle and Warmington each of which is more than 30 miles away in East Northants but excludes planned developments for Milton Keynes and Bedford.

240 To exclude the development plans for Milton Keynes and Bedford which would be so close to Northampton Gateway significantly undermines the validity of the Strategic Transport Model. The lack of inclusion of developments planned for the edges of the other districts listed in the first paragraph above also undermines the validity of the traffic forecasts. Quite simply, the traffic forecasts will be noticeably understated.

241 Also missing from the Northamptonshire Strategic Transport Model (NSTM) are the planned construction works for High Speed Two (HS2). This development features a major construction compound adjacent to the A43 just north east of Brackley. In addition to the workers travelling to and from the compound, there will be up to 1600 additional HGV movements per day on the A43 south of the A422 according to HS2 Ltd in 2015, representing a 26% increase in HGV traffic [9]. While the peak predicted by HS2 Ltd was forecast for 2021, this may occur a little later in time bearing in mind that Royal Assent for the HS2 Hybrid Bill was granted in the first quarter of 2017 which was two years later than originally scheduled. Additional traffic associated with the construction of HS2 will affect other parts of the county too.

242 My employment chapter makes it clear that there is likely to be a shortage of suitable employees living close to Northampton Gateway. Therefore employees will almost certainly have to travel further to work than has been forecast by Roxhill. This further undermines the validity of the Strategic Transport Model.

243 It should also be noted that as a starting point, the Northamptonshire Strategic Transport Model includes neither the Northampton Gateway nor Rail Central. Roxhill has had the NSTM model run with its own data and the publicly available data concerning Rail Central [10]. The publicly available data for Rail Central is a far less complete data set than that provided by Ashfield Land to Northamptonshire County Council Highways Department.

244 It is my view 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. Northamptonshire County Council (NCC) Highways Department offered to run its model with both developers' data simultaneously but the offer was declined by Roxhill and Ashfield Land. NCC Highways Department reaction was as follows [11]:

> *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.*

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

Summary

a) The design of the new roundabout to access Northampton Gateway appears to be unsuitable to handle the forecast additional traffic.

b) Significant extra volumes of traffic will be generated by Northampton Gateway which will pass through two Red Routes (A508 and A45) and a junction on the A43 being closely monitored by Highways England and South Northamptonshire Council. This appears to be in contravention of one of the NPSNN policies.

c) Peaceful villages are likely to become "rat runs" for employees travelling to/from work at times of shift changeover when children will be trying to sleep. This would contravene another NPSNN policy.

d) Traffic impact assessments were requested in the Scoping Opinion regarding certain junctions or roads. These do not appear to have been provided.

e) Northampton Gateway generated traffic would feed into what the Department for Transport forecast to be one of the most heavily congested section of M1 in 2040.

f) There appear to be shortcomings in the forecasting of traffic generated by Northampton Gateway and the overall growth of traffic in this area during the next 13 or so years. Both of these situations have led to future traffic forecasts being understated in my opinion.

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EMPLOYMENT

246 Strategic rail freight interchanges need to be situated where there is an availability of a suitable workforce; The NPSNN is quite specific about this.

2.52 The availability of a suitable workforce will therefore be an important consideration.

247 A very similar statement is made in paragraph 4.87 of the same document. Yet the South Northamptonshire constituency has one of the lowest claimant counts in the country; other constituencies nearby also have low claimant counts and have done for some time [1].

Claimant Rate by constituency

September 2018

	Rate %	**Number**
Buckingham	0.6	330
South Northamptonshire	0.7	440
Mid Bedfordshire	1.2	690
North East Bedfordshire	1.6	955
Daventry	2.1	1005
Northampton North	2.6	1145
Milton Keynes North	1.8	1245
Wellingborough	2.3	1260
Northampton South	2.8	1455
Total		8525

United Kingdom	2.9

248 As it is unlikely that more than 10% of the population will want to work in the logistics industry, there will be a significant shortfall locally in the number of staff needed for Northampton Gateway.

249 The Logistics Study commissioned by South Northants Council (SNC) indicates a lack of a surplus pool of labour [2]:

10.21 "…….. given the largely 'full employment' position in the District, could create some significant challenges".

Therefore, employees will have to travel in from further afield.

250 This study also indicated that Northamptonshire had almost twice as many people working in the logistics sector compared to the national average in 2016. See table 5.3 in this report.

251 The level of vacancies in this area remains stubbornly high, especially in regard to HGV drivers. Unemployment is low, but wages in the sector are not rising because margins are under pressure.

Referring again to the SNC commissioned Logistics Study, we can find the following:

7.5 "The shortage of HGV drivers is currently estimated at 45,000 and for every individual seeking a HGV role, there are up to 18 positions being advertised. In a survey of logistics firms, 75% said they faced difficulty when attempting to recruit for driving positions".

252 While this refers to the UK, it clearly demonstrates a significant shortage of HGV drivers.

253 In May 2018, Prologis had a portfolio of 4 warehouse developments in Northamptonshire with one more nearby in Warwickshire [3]. Similarly, db symmetry has seven warehouse developments either planned or approved in Northamptonshire and its immediately adjacent counties [4]. I am aware of a further warehouse site (SRFI) db symmetry are planning in Leicestershire which is not currently listed on its website, although it is at the pre application stage on the PINS website. With the ongoing expansion of road-based warehousing and distribution in this area, the availability of drivers and warehouse staff is likely to get worse rather than better in the next few years.

254 Visits to the Daventry International Rail Freight Terminal and Brackmills Industrial Estate (Northampton) indicated that more drivers and warehouse operatives were needed and had been for some time. There were permanent looking recruitment banners representing seven different organisations at DIRFT in August 2017 and five at Brackmills in September 2017. A subsequent visit to DIRFT in November 2017 found eight organisations looking for drivers and/or warehouse operatives, and five of these were the same organisations as in August. Similarly, at Brackmills, five organisations looking to recruit for logistics roles, and four of those were the same ones seeking to recruit in September. At Magna Park in Milton Keynes, two companies seeking to recruit drivers and/or warehouse operatives in November 2017. That represents half the employers at Magna Park. Further visits to DIRFT and Brackmills in September 2018 showed an increased number of companies at the former and no change in total number at the latter. At Grange Park there were three companies looking to recruit staff in January 2018. Further details will be found in Appendix A later in this chapter.

255 The environmental statement, chapter 3, for Northampton Gateway states:

Section 3.4.6 *"The forecast growth of the population in South Northamptonshire between 2011 and 2029 is an additional 15,890 people".*

That is very misleading as the more relevant data to consider is the growth of the working age population. The latter is expected to increase from 54,200 to 55,700 between 2011 and 2029, i.e. an increase of 1,500 [5]. So, there will not be a significant increase in local human resource to work in the warehouses or drive vehicles. It is the large increase of those of retirement age, which accounts for the major part of the expected overall population change in this district.

256 Some may expect that employees for Northampton Gateway will only be found further away in places such as Coventry, Leicester and Bedford. However, warehouse jobs are relatively low paid as are those for HGV drivers. Therefore, people living that far away may not find it financially worthwhile to drive such distances every day. That raises the question of where employees for this site will be found.

257 There is a further issue that needs to be considered which is the rise of automation in the warehousing sector. A recent survey by Localis titled the Automation Impact [6] analysed which parts of the country were most at risk from the implementation of higher levels of automation. The report reached the following conclusion:

We projected Northamptonshire to be the worst impacted of England's forty-seven strategic authority areas.

258 As has been mentioned in the Validity of Site Selection chapter, the West Northants Joint Core Strategy warns on the over-reliance on one employment sector. If Northampton Gateway is approved, the jobs created could disappear quickly if automation spreads through the logistics and warehousing sector in this county.

Non-existent Journey Savings

259 I have already indicated that Northampton is likely to provide a minority of the employees due to the high levels of employment in the town, and the existing shortages of warehouse operatives and drivers at current logistics parks in the nearby area. It therefore appears likely that

many employees will have to travel from further afield including places such as Wellingborough, Rushden, Milton Keynes, Buckingham, Brackley, Daventry, Kettering and Towcester. The average distance of these settlements from the proposed Northampton Gateway site is 15.8 miles. Let us work on an average commuting distance of 10 miles.

260 The travel plan provided by Roxhill forecasts 9871 single journeys per day (light vehicle usage). With a journey distance of 10 miles, that is 98,710 miles per day (commuting).
That equates to 98,710 x 7 = 690,970 miles per week
Or
690,970 x 52 = 35,930,440 miles per year.

261 This is at odds with the political argument for constructing SRFIs to reduce the traffic miles on the roads by transferring goods onto rail.

262 Roxhill claimed at an East Midlands Gateway presentation [7], that *"….. a container train can remove 43 heavy goods vehicles from our roads".*

263 Calculating HGV travel miles for this site:
16 trains per day each carrying 43 containers = 688 HGVs
Assuming an average HGV journey length of 115 miles = 79,120 miles per day
This equates to 553,840 miles per week
This equates to 28,799,680 miles per year

264 HGV journeys saved will be one way from container ports. On the basis that 50% of HGV journeys are "offset", then this equates to 14,399,840 miles per year.

265 Roxhill have not indicated how many HGVs will be taken off the road in respect of each express freight train. However, these express freight trains will almost certainly be shorter than container trains, and therefore each express train will relate to a smaller quantity of HGVs. In addition, there are forecast to be a maximum of 12 express freight trains per day compared to 16 container trains per day.

266 Therefore Northampton Gateway will not save road mileage which is a fundamental reason for creating a strategic rail freight interchange. The labour force required to service this SRFI will have to travel a greater distance than the travel distances saved by fewer HGV journeys.

Cumulative Impacts

267 If both Northampton Gateway and Rail Central were to be approved, it would be even more difficult to obtain the required number of employees as both SRFIs would be seeking recruits from a very limited pool of available labour. Therefore employees would be travelling even greater distances than planned, creating additional air pollution and congestion.

Summary of Employment Issues

a) It is clearly evident that there will be a shortage of staff to fill the forecast 7,500 staff roles anticipated for Northampton Gateway, which makes the choice of location unsuitable as far as the National Policy Statement for National Networks is concerned.
b) Also, the employees' commuting travel distances are likely to exceed the HGV journey distance savings.

Appendix A

268 Vacancies for drivers or warehouse operatives as indicated by banners and signs at local logistics centres

Daventry International Rail Freight Terminal. 26/11/17 and 3/12/17

- Logistics People
- Pertemps
- Tesco
- Eddie Stobart
- Extra Personnel
- Royal Mail
- Clipper
- Advance Logistics Support

Brackmills, Northampton. 26/11/17 and 3/12/17

- John Lewis
- Yodel
- Impact Recruitment Services
- WT Transport
- Omega
- DX Freight

Pineham, Northampton. 26/11/17

- EBC Brakes
- March Recruitment

Swan Valley, Northampton. 26/11/17

- Recruitment Solutions
- Staffline

Magna Park, Milton Keynes. 26/11/17

- Staffline
- PMP Recruitment

Marston Gate, Milton Keynes. 26/11/17

- XPO Logistics

Grange Park, Northampton. 4/1/18

- Single Resource
- Orbital Recruitment
- Clipper

Daventry International Rail Freight Terminal. 26/9/18

- Logistics People
- Blue Arrow
- Staffline
- Pertemps
- Tesco
- Eddie Stobart
- Angard Staffing
- Single Resource
- TW Network

Brackmills, Northampton. 27/9/18

- John Lewis
- R.B. Resourcing
- Impact Recruitment Services
- DHL
- Decathlon Logistics
- DX Freight

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4. db symmetry warehouses planned or approved
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Subnational population projections (2029 data)
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Use 2014 based

6. Localis: The Automation Impact
https://www.localis.org.uk/wp-content/uploads/2018/03/015_Automation_AWK.pdf
See end of page 4

7. Junction 24 Action Group response to East Midlands Gateway planning application
https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050002/TR050002-001326-Junction%2024%20Action%20Group.pdf
See paragraph 11.16 on page 45.

AIR QUALITY

269 The National Policy Statement for National Networks makes several statements with regard to air quality.

> *"5.10 The Secretary of State should consider air quality impacts over the wider area likely to be affected, as well as in the near vicinity of the scheme. In all cases the Secretary of State must take account of relevant statutory air quality thresholds set out in domestic and European legislation.*
>
> *5.11 Air quality considerations are likely to be particularly relevant where schemes are proposed:*
>
> - *within or adjacent to Air Quality Management Areas (AQMA); roads identified as being above Limit Values or nature conservation sites (including Natura 2000 sites and SSSIs, including those outside England); and*
> - *where changes are sufficient to bring about the need for a new AQMA or change the size of an existing AQMA; or bring about changes to exceedences of the Limit Values, or where they may have the potential to impact on nature conservation sites.*
>
> *5.13 The Secretary of State should refuse consent where, after taking into account mitigation, the air quality impacts of the scheme will:*
>
> - *result in a zone/agglomeration which is currently reported as being compliant with the Air Quality Directive becoming non-compliant; or*
> - *affect the ability of a non-compliant area to achieve compliance within the most recent timescales reported to the European Commission at the time of the decision".*

270 The proposed site of Northampton Gateway is no more than 1 mile from two Air Quality Management Areas (AQMA) administered by Northampton Borough Council [1]. In addition it is not far from one of the AQMAs administered by South Northants Council [2].

271 Roxhill forecast that 36% of the HGV movements generated by Northampton Gateway would depart from Junction 15 of the M1 northwards along the A45 [3]. Such vehicles will travel through AQMA Zone 5 from Wooldale Road to the Queen Eleanor roundabout. A Roxhill representative advised during the October 2017 consultations that this AQMA was likely to be declassified in future.

272 However that future "declassification" does not reflect current thinking from Northampton Borough Council. In a letter sent by Gavin Smith, Senior Environmental Health Officer, dated 21st November 2017, he states in response to an enquiry about AQMA Zones 1 and 5 [4]:

> *"Due to the number of large developments in the pipeline outside Northampton that could have a combined net increase of traffic flows through the AQMAs, from a cumulative perspective potential nominal increases in NO2 concentrations could feasibly occur within both AQMAs. Due to the above and the fact we have limited control ever increasing cars on our roads, we are retaining both AQMAs and are continuing to monitor NO2 concentrations with the AQMAs".*

273 So Roxhill need to reconsider the air pollution impacts they will create in this AQMA.

274 In addition, Roxhill's environmental statement on transportation contains the following [5]:
"12.3.49 .....there is no feasible and environmentally acceptable solution to accommodating potential peak period traffic demand through large scale capacity improvements to the A45 and its numerous junctions".

275 If there is no environmentally acceptable solution to the effects of increasing traffic on this

section of the A45, then it does not appear desirable to add to the existing air pollution issue by sending more than a third of Northampton Gateway's generated HGV movements along this road.

276 Roxhill forecast that 26% of the HGV movements generated by Northampton Gateway would depart from M1 Junction 15 northwestwards along this motorway. Such vehicles will travel through AQMA Zone 1 between M1 junctions 15 and 16. Therefore, in total, almost two thirds of the additional HGV movements generated by Northampton Gateway will pass through one or other of these two AQMAs.

277 Roxhill have acknowledged that the Smart motorway operation will adversely affect certain receptors in this area [6]:

> *"9.5.53 The Smart Motorway scheme will see traffic move closer to the receptors in Collingtree and the NSSUE; a sensitivity test was undertaken which showed that pollution concentrations increased with the Smart Motorway scheme at these locations, assuming no improvements to traffic flow".*

278 Roxhill has not released data to indicate what additional traffic is expected to use the A5 through Towcester which is an AQMA. However it is likely that there will be some additional traffic passing through Towcester if Northampton Gateway is approved which will not benefit this existing AQMA.

279 During the statutory consultation, Roxhill staff spoke of requiring all commercial vehicle fleets based at Northampton Gateway to be compliant with current Euro emission regulations (currently Euro 6). However such a requirement does not appear to have been included in the environmental statement, nor is it clear how such a requirement could be enforced.

280 It should also be noted that the majority of incoming goods would travel by road rather than rail. Using data provided by Roxhill, I would estimate that 80% of containers handled by Northampton Gateway would travel by road (inbound or outbound). Ashfield Land have already indicated that approximately 90% of the containers to be handled by Rail Central are expected to travel by road. Incoming goods will arrive by HGVs from across the UK and Europe. The operators of Northampton Gateway will have no say in what Euro emissions standards these vehicles will meet. Hence there appears to be no control over the air quality of the additional HGV vehicle movements associated with Northampton Gateway.

281 Other mitigation measures proposed by Roxhill include the provision of footways, cycle ways and bus routes to directly serve Northampton Gateway. These would be useful from an air quality perspective if a significant proportion of the employees lived locally. However, as has been discussed in the employment chapter, that is unlikely to be the case due the particularly low levels of unemployment in the surrounding areas. Therefore employee journeys will be greater in distance than those forecast and car sharing will be less easy. With an expected work force of 7,500 staff the impact of this greater travelling on air quality should not be underestimated.

282 Roxhill's draft environmental statement published in 2017 included Chapter 9 on air quality. Within this document Table 9.13 [7] covered predicted annual mean NO_2 concentrations at Collingtree and the NSSUE. It identified one receptor with moderate adverse effect and three receptors with slight adverse effect as a result of the proposed development as forecast for 2031. Three of these receptors were forecast to have NO_2 concentrations in excess of 40 $\mu g.m^3$.

283 In Roxhill's environmental statement submitted as part of the DCO application to the Planning Inspectorate, there is again a chapter 9 on air quality. The corresponding table is named as 9.15. Data for 2018 is used as a baseline rather than 2017 and the average baseline figure shows a decrease of 6.4%. The average forecast data for 2031 (with development) shows a 47.2% reduction compared to that published in Table 9.13 last year. There are apparently no adverse effects on any of the twenty listed receptors. The highest forecast value is 21.2 $\mu g.m^3$. If you compare 2031 forecast

data (without development) with that published in the draft environmental statement, there is a reduction of 47.0%.

284 These substantial reduction in emissions appear to be the result of the use of DEFRA's revised Emission factor Toolkit. Is DEFRA's latest forecasting methodology dependable if it brings about a reduction of 47% compared to its previous methodology? There would appear to be some heroically optimistic assumptions in the revised methodology. It takes a long time for the composition of the UK vehicle parc to change significantly. The magnitude of this change is astonishing.

285 Roxhill's Air Quality chapter also contains the following statement;
9.3.18 The Proposed Development is anticipated to remove more than 100 daily HGV movements, resulting in improvements to air quality…….

286 100 daily HGV movements represents about 2 train loads per day. More than 100 daily HGV movements might represent three trains per day. Does this suggest that 16 trains per day (intermodal and aggregates) plus an unspecified number of express freight trains per day is somewhat fanciful?

287 The "Rolling Stock Review 2018-2019" was published a few months ago and contains details of all the rail locomotives in use in the UK. I extracted details of those used by freight operating companies and excluded those used purely for shunting duties. The total number of locomotives so defined is 778, of which 88% are pure diesel (i.e. not including dual mode or electric). The 88% figure is close to that I have seen reported in the rail press.

288 Significantly more stringent emission regulations were introduced which came into effect from the beginning of 2015, after a period of grace had expired. Looking at the dates of when the various fleets were introduced, I would estimate 83% of the total UK locomotive fleet (778 locomotives as described above) is non-compliant with the latest emission legislation, which applies to non-road mobile machinery. At least 49%, and possibly as much as 65%, of the total locomotive fleet was built before any emission regulations came into effect.

289 Roxhill do not appear to have considered the emissions created by additional freight train movements.

Summary

a) Northampton Gateway, if approved, would adversely impact two immediately adjacent Air Quality Management Areas.

b) The measures proposed by Roxhill so far are unlikely to satisfactorily mitigate the additional local air pollution created by the operation of Northampton Gateway.

c) More than three quarters of the locomotives used by rail freight operators appear to be non-compliant with current emission legislation and approximately half may not be compliant with any emission legislation at all.

References

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https://www.northampton.gov.uk/downloads/download/513/air-quality-management-area-aqma

2. South Northants Air Quality Management Area

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Air quality annual status report 2017, Table 2.1

3. Roxhill environmental statement, Transportation, Appendix 7
http://www.northampton-gateway.co.uk/downloads/DCO_APPLICATION/Doc5/Doc%205.2%20-%20Environmental%20Statement/Doc%205.2%20-%20ES%20-%20Appendices/Doc%205.2%20-%20Chapter%2012%20(Transport)%20Appendices/ES%20TR%20App%2012.1%20-%20TA%20App%207%20-%20TN3%20HGV%20Trip%20Distribution.pdf
Figure 4

4. Scan of letter from Gavin Smith 21st November 2017

5. Roxhill environmental statement, Transportation
http://www.northampton-gateway.co.uk/downloads/DCO_APPLICATION/Doc5/Doc%205.2%20-%20Environmental%20Statement/Doc%205.2%20-%20ES/Doc%205.2%20-%20ES%20Chp%2012%20-%20Transportation.pdf

6. Roxhill environmental statement, Air Quality
http://www.northampton-gateway.co.uk/downloads/DCO_APPLICATION/Doc5/Doc%205.2%20-%20Environmental%20Statement/Doc%205.2%20-%20ES/Doc%205.2%20-%20ES%20Chp%209%20-%20Air%20Quality.pdf

7. Roxhill draft environmental statement, Air Quality
http://www.northampton-gateway.co.uk/downloads/2017/5_EIA/Chapters/Chapter9_Air_Quality.pdf

CRIME

290 The National Policy Statement for National Networks has two relevant paragraphs:

> *4.74 National security considerations apply across all national infrastructure sectors. The Department for Transport acts as the Sector Sponsor Department for the national networks and in this capacity has lead responsibility for security matters in that sector and for directing the security approach to be taken. The Department works closely with Government agencies including the Centre for the Protection of National Infrastructure (CPNI) to reduce the vulnerability of the most 'critical' infrastructure assets in the sector to terrorism and other national security threats.*
>
> *4.76 Where national security implications have been identified, the applicant should consult with relevant security experts from CPNI and the Department for Transport, to ensure that physical, procedural and personnel security measures have been adequately considered in the design process and that adequate consideration has been given to the management of security risks. If CPNI and the Department for Transport (as appropriate) are satisfied that security issues have been adequately addressed in the project when the application is submitted, they will provide confirmation of this to the Secretary of State, and the Examining Authority should not need to give any further consideration to the details of the security measures during the examination.*

291 There is growing evidence of increased crime related to warehouse developments where a large proportion of the workforce are not local residents. Of particular note is the Sports Direct development in Mansfield. Sports Direct employed up to 5000 migrant workers on the site and locals raised concerns about serious anti-social issues developing in the area. This seems to have culminated in a rape incident, reported in the Times.

292 The potential for racial tension is greatly increased with a huge transitory workforce moving into the area: ***[John Humphrey's Today programme 18th June 2016]*** "The small town of Shirebrook is dominated by the massive Sports Direct warehouse, which has attracted vast numbers of workers from eastern Europe, mostly Poland and Latvia. And the town is simply too small to accommodate them. The locals see it as an invasion. It began about two years ago and the police have conceded that they didn't act quickly enough to deal with the resulting tensions. At one stage the town centre was almost a no-go area for locals. That has changed, but people are seriously worried still about the pressure on local services".

293 In order to provide an objective view, we studied the crime statistics for the area surrounding the Daventry Rail Freight Interchange. This was chosen for comparison because it is the most similar in nature and size and, being only 18 miles away, similar in its geography. It is important to note that the crime figures within the Rail Freight Interchange itself have remained stable, it is the increases in the surrounding areas that paint a stark picture

294 DIRFT commenced operation around 1997. Crime statistics compiled for the area within which DIRFT was built show a marked increase over recent years, which can reasonably be attributed to the arrival of a massive logistics development in what used to be a rural environment. DIRFT falls into 2 wards: Barby & Kilsby and Crick wards and between 2000/2001 to 2015/16 crime in these areas rose by **176%.**

Crime Tree LV4 Desc	2007-2008	2008-2009	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	Total	Average	Percentage
ARSON	3	1			3		2	3	5	**17**	**2.83**	**0.65%**
CRIMINAL DAMAGE	26	26	39	32	38	28	16	33	29	**267**	**29.67**	**10.16%**
DRUG POSSESSION	5	7	6	8	13	12	11	8	6	**76**	**8.44**	**2.89%**
DRUG TRAFFICKING	9	4	8	6	6	8	6	2	3	**52**	**5.78**	**1.98%**
MISCELLANEOUS CRIMES AGAINST	4	12	5	10	8	29	16	26	43	**153**	**17.00**	**5.82%**
PUBLIC DISORDER	1	2	2	2	1	3	3	6	9	**29**	**3.22**	**1.10%**
OTHER SEXUAL OFFENCES	6	2	3	5	4	7	8	14	15	**64**	**7.11**	**2.44%**
RAPE		1	1			2	4	1	7	**16**	**2.67**	**0.61%**
ALL OTHER THEFT OFFENCES	7	26	36	52	76	40	41	48	30	**356**	**39.56**	**13.55%**
BICYCLE THEFT		1	2	1	6		1	1		**12**	**2.00**	**0.46%**
DOMESTIC BURGLARY	13	20	27	9	23	10	16	10	16	**144**	**16.00**	**5.48%**
NON-DOMESTIC BURGLARY	12	14	32	35	20	30	24	26	29	**222**	**24.67**	**8.45%**
THEFT FROM MOTOR VEHICLE	18	28	27	40	49	34	47	30	44	**317**	**35.22**	**12.07%**
THEFT OF MOTOR VEHICLE	8	5	13	9	4	9	3	4	5	**60**	**6.67**	**2.28%**
VIOLENCE WITH INJURY	25	26	21	35	42	39	86	110	104	**488**	**54.22**	**18.58%**
VIOLENCE WITHOUT INJURY	16	9	14	19	22	24	36	66	69	**275**	**30.56**	**10.47%**
POSSESSION OF WEAPONS	2		2	2					5	**11**	**2.75**	**0.42%**
ROBBERY OF PERSONAL		2	1	2			1	3	1	**10**	**1.67**	**0.38%**
VEHICLE INTERFERENCE	2		4	3	5	2	3	5	18	**42**	**5.25**	**1.60%**
SHOPLIFTING		2	1	1		2	1	2	2	**11**	**1.57**	**0.42%**
ROBBERY OF BUSINESS	2		1		1	1				**5**	**1.25**	**0.19%**
Total	**159**	**188**	**245**	**271**	**321**	**280**	**325**	**398**	**440**	**2627**	**291.889**	**100.00%**

Reference: C1507 Ian Kelly | Freedom of Information and Data Protection Team Leader; Information Unit; Tel: 101 Ext 346940; ian.kelly@northants.pnn.police.uk Force Headquarters, Wootton Hall, Northampton, NN4 0JQ

Description of Crime	Percentage increase in Crick/Barby & Kilsby Wards 2007/08 to 2015/16	Percentage increase Nationally 2004/05 to 2015
Arson	66	-55
Criminal damage	11	-55
Drug possession	20	2
Drug trafficking	-66	9
Misc crimes against society	975	-19
Public disorder	800	1
Other sexual offences	150	47
Rape	700*	148
All other theft offences	328	-41
Bicycle theft	0	-17
Domestic burglary	23	-40
Non-domestic burglary	141	-42
Theft from motor vehicle	144	-52
Theft of motor vehicle	-38	-67
Violence with injury	316	-19
Violence without injury	331	58
Robbery of personal property	100*	-45
Vehicle interference	800	-43
Shoplifting	200*	19
Robbery of business property	-200*	-31

Please note where these figures were 0 in 2007/2008 and an increase or decrease has been identified this has been classed as 100% for 1 crime, 200% for 2 crimes etc.

N.B the availability of crime statistics does not allow for exact comparisons by year

295 Only 4 out of 21 recorded crimes have decreased in the Crick/Barby and Kilsby wards in comparison to national figures. Miscellaneous crimes against society have increased 975% yet nationally decreased 19%. Public disorder has increased 800% in the local area, yet nationally only increased by 1%. Rape has increased 700% (please note there were 0 reported rapes in 2004/2005 and 7 in 2014/2015 which is how this figure is accounted for). It is noted that there has been an

increase nationally of 148% but a significant degree of variance is still evident. Perhaps most significant in relation to the proposed development is the increase in vehicle interference, which has increased 800% locally but nationally has decreased by 43%.

296 Daventry District Council completed a study in relation to Lorry Parks in 2008 [1]. The study found that there are issues around lorry parks being very expensive therefore drivers not using them, rather using local roads. This would have a severe detrimental impact on our local area as traffic is something we already have huge issues with. Within the study it was also highlighted that there have been difficulties in moving lorry drivers to more appropriate parking facilities due to language barriers.

297 It is evident that there is an increase in crime in the area surrounding DIRFT, but yet nationally the reported crime is going down. With their incredibly close proximity to the warehouse park Blisworth and Milton Malsor will suffer the most. This will not only make the villages less desirable (the majority of villagers have moved here for a quiet and peaceful way of life), but it will also impact upon other aspects such as car and household insurance premiums.

298 Whilst the crime within DIRFT is indeed decreasing, in the surrounding villages i.e. Crick, Barby and Kilsby, (which if Northampton Gateway is approved will be Roade, Collingtree, Blisworth and Milton Malsor) crime has increased significantly. The effects of this in our local villages will be exacerbated due to the higher than average proportion of elderly residents.

299 The previous Police and Crime Commissioner, Adam Simmonds, has stated that the budget is balanced until 2018 but if the government spending review goes ahead, the Police will have to cut costs by 20% which means they are likely to have to reduce the 1220 police we currently have serving Northamptonshire [2]. Therefore, if as predicted based on the information within this chart crime does increase, there are no mitigating factors in respect of having a more visible police presence to be able to minimise the impact on our local community.

300 One of the councillors for Kilsby reported that there have been ongoing problems of HGV parking in undesignated areas and laybys close to DIRFT. What gets left behind in these areas is litter, detritus and human excrement. That is not a welcome prospect for people living near to proposed Northampton Gateway, if it were to be approved.

References

1. Northamptonshire HGV Parking Study
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2. Northamptonshire Telegraph Article
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Response to the West Northamptonshire Core Strategy
Proposed Modifications

February 2014

ISSUE 5:

ii) Is new Policy E8, relating to the proposed new employment site adjacent to Junction 16 of the M1 reasonable, realistic and/or justified by clear and robust evidence?

Introduction

The policy aspirations of the Modified Core Strategy with regard to employment and economic development are welcomed and supported. However, there are fundamental questions over the consistency and robustness of the evidence base which has informed it. In particular, key constraints facing the proposed employment allocation at Junction 16 appear to have been downplayed or entirely ignored, producing an unreasonable and unjustified set of conclusions. It is clear that an unfair and inaccurate comparison has been made between the proposed strategic employment site and the alternative potential employment site at Junction 15 (site reference SA49) – a site location plan is attached as **Appendix 1**. For example, we note that for reasons not made clear in the assessment the JPU has erroneously indicated the site at Junction 15 may not be available. The assessment of sites should be revisited, particularly in light of the fundamental challenges relating to the availability and deliverability of the Junction 16 site, described below.

However, the need for an additional strategic site to "*provide a range and mix of employment opportunities to ensure the site responds to and satisfies the needs of the expanding town through this plan period*" is welcomed and supported. The alternative site at Junction 15 is deliverable, in a single land ownership, and has been identified as the preferred location to enable the continued growth of an existing major employer based in Northampton, and could provide space for around 4 million sq ft (approx.) of employment space.

The NPPF and planning for 'business'

Running throughout the NPPF is a clear policy that the planning system should plan positively for sustainable development and growth. Paragraphs 18 to 22 of the NPPF provide general policy guidance on building a strong and competitive economy. It is clear that the planning system should do

> "*everything it can to support sustainable economic growth….to encourage and not act as an impediment to sustainable growth*". (para 19)

The NPPF guidance requires local authorities to "*take full account of relevant market and economic signals*" (NPPF, para 158), and that plans are based on

> *…g of business needs within the economic markets operating in and …nd] understand both existing business needs and likely changes in the …160).*

…provide detailed guidance with regard to how to calculate or determine …policy within the NPPF makes clear reference to the importance of the …deration of:

…for land or floorspace, including quantitative and qualitative needs;

Planning Compliance 5

"A local planning authority should submit a plan for examination which it considers is 'sound' – namely:

***Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements……*

***Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*

***Effective** – the plan should be deliverable over its period……."*

(extract from para 182 of the NPPF).

As well as fundamental flaws relating to deliverability, the strategy is not properly justified, nor justifiable. It is not the most appropriate strategy when the site at Junction 16 is compared to the alternative site at Junction 15. The site at Junction 16 has obvious landscape, accessibility, and deliverability constraints, and there are significant inconsistencies and questionable elements of the JPUs assessment of both the preferred site, and the alternative site at Junction 15. Undue weight appears to have been attached to the location of the Junction 16 site to the east/north of the M1, despite the major challenges to its availability, deliverability and suitability.

In reality, the Junction 15 site is:

- closer to the town centre than the site at Junction 16;
- closer to existing employment areas than Junction 16;
- closer to proposed major residential development (SUE).

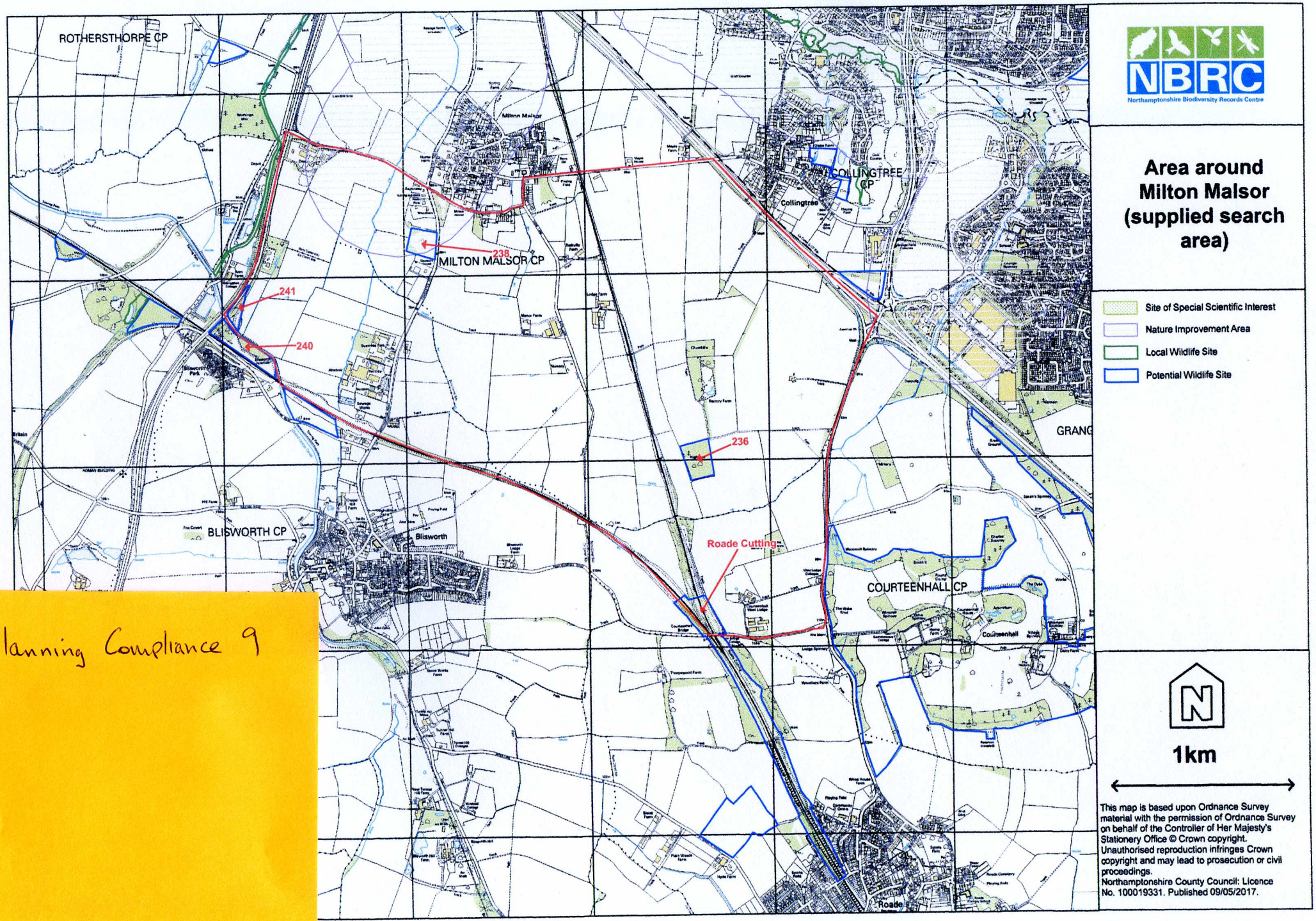
Although not reflected in the scoring of the site, the JPU's evidence base acknowledges that the site at Junction 15 has clearer and more defensible boundaries than the site at Junction 16, and has fewer landscape and visual constraints. Well defined established physical features contain the site, including the railway line to the south-west, and remove any risks of the allocation of this site leading to unrestricted 'sprawl' into land west/south of the M1. Given the separation of Junction 16 from the urban area by open countryside, there are higher risks of that site contributing to coalescence.

The proposed alternative strategic employment site at Junction 15 is available for development. It is controlled under option by a single active and willing developer who is keen to bring the site forward, and positive representations indicating as such were made to the JPU at the previous stage of consultation during 2013.

The proposed site at Junction 15 as a whole could provide around 4m sq.ft of employment space (including the floorspace required by Howdens), providing capacity in line with the JPU's aspirations for an appropriate land supply to support the wider economic strategy.

A planning application is being prepared for submission during the summer to progress Howdens requirement to expand and grow its presence in the town.

Planning Compliance 5



NBRC
Northamptonshire Biodiversity Records Centre

Area around Milton Malsor (supplied search area)

- Site of Special Scientific Interest
- Nature Improvement Area
- Local Wildlife Site
- Potential Wildlife Site

N

1km

Planning Compliance 9

Cumulative Assessment with Northampton Gateway

It would appear that through the DCO process both Rail Central and Northampton Gateway developments are required to undertake a cumulative assessment of the impacts of both sites.

Being conducted independently by each developer these assessments will be based on different assumptions, and therefore will inevitably provide different results, neither of which will be likely to represent the true situation.

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.

Summary

As many of the items above are subject to on-going work and discussions, the LHA shall comment further at the appropriate stage.

Rob Sim-Jones
Principal Engineer – (Principal Lead) Development Management

Planning Compliance 12

Cumulative Assessment with Northampton Gateway

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Rob Sim-Jones
Principal Engineer – (Principal Lead) Development Management

Validity of Site Selection 20

freight potential rests on political backing

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continue to do so if we see support," he said.

Smith spoke of the opportunities arising from such expenditure, highlighting how Port of Felixstowe's owner Hutchison Ports spent £100 million on new facilities at the Suffolk site as a result of improved rail services to the port.

He also described the political advantages of moving freight from road to rail, using the example of the A14 which runs from Felixstowe to the Midlands.

"If you set the target as 150,000 boxes on rail, then there is a massively positive story for getting trucks off the roads," he said.

Smith argued that investment decisions take too long, saying that the current doubling of sections of the Felixstowe branch had taken 15 years of lobbying. "While this will help current constraints, more needs to be done," he urged.

Smith said that while the freight sector is realistic, in recognising that resource pressures dictate that projects would have to be piecemeal, there was a need to look at the returns that can be delivered from investment to remove bottlenecks on the system. He said he was concerned that these potential gains weren't being assessed properly.

And he concluded that changes to the UK economy and population shifts over the decades demonstrate the need for new rail freight terminals, with strategic thinking regarding where these terminals will be located to ensure that rail can deliver goods and materials to the major population centres. He highlighted the importance of the Barking terminal to serving demand in London.

Smith also argued that rail freight could offer a solution to concerns about possible disruption of trade post-Brexit, given the volumes of goods that can be moved by trains and the potential for customs clearance away from the frontier for services originating in or arriving in the UK.

He said that there was huge potential from increased services using the Channel Tunnel.

@Clinnick1

■ See Wolmar, page 64-65.

GB Railfreight 60095 approaches West Bank Crossing, on the Drax Branch, with the 1200 Drax-Tyne biomass empties on October 10. GBRf Managing Director John Smith says freight can boost the UK economy if it is properly supported. NEIL HARVEY.

d with HS2

ailability of drivers, locomotives
d wagons to support HS2
ross the building phase.
Smith said: "The construction
HS2 will be reliant on rail
eight. If we are going to ensure
at capacity will be available
hen it is needed, HS2 and the
dustry need to continue to work
gether to build a more detailed
cture of the logistics of the
onstruction phase."

Route devolution threat to freight

Devolution of Network Rail's routes could present a problem for rail freight, according to GB Railfreight Managing Director John Smith.

Speaking on October 9, almost two months after Andrew Haines replaced Mark Carne as NR chief executive, Smith argued that while devolution appears to benefit passenger services, there is a risk that the importance of key freight routes that cross the new area boundaries would be ignored.

Haines was Smith's boss at FirstGroup, when it owned GBRf.

"The great thing about Andrew Haines when he was my boss at First was that he understood rail freight," said Smith.

He said that the sector needed to work together to ensure that the interests of rail freight weren't ignored under the new system.

Off-lease trains for city centre work?

Younger passenger trains being sent off-lease could be rail freight's answer to serving major city centres, according to retiring Rail Freight Group Chairman Lord Tony Berkeley.

Berkeley didn't name fleets, but stated: "We haven't sorted out how to serve city centres yet. The Department for Transport is happy to ditch young trains, and maybe if they can be used then that is the answer."

Under current DfT plans as a result of franchise changes, trains such as diesel Class 185s dating from 2005-206, electric Class 350/2s (2008-09), Class 360s (2003-04), Class 379s (2011), Class 458s (1999-2000) and Class 707s (2016-17) are all set to be discarded. These fleets could offer a total of 682 vehicles.

Validity of Site Selection
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FIGURE 6 – PRINCIPAL NORTHAMPTONSHIRE RAILWAY STATIONS – PATRONAGE UNDER NETWORK RAIL MARKET STUDIES 2023 AND 2043 GROWTH FORECASTS

Station	Annual Usage	Daily RTN PAX	Market Study % Growth	Annual usage	Daily RTN PAX	Market Study Growth	Annual Usage	Daily RTN PAX
	2013/14		To 2023	2023		To 2043	2043	
Northampton	2,783,020	4,335	32%	3,673,586	5,722	106%	5,733,021	8,930
Wellingborough	922,196	1,435	45%	1,383,294	2,081	62%	1,493,958	2,325
Kettering	1,004,406	1,560	45%	1,456,389	2,262	62%	1,627,138	2,527
Corby	255,834	400	52%	388,868	608	145%	626,793	980
TOTAL	4,965,456	7,730		6,902,137	10,673		9,480,910	14,762

As can be seen, on the basis of these forecast, Northampton Station would need to cater for nearly 1,400 more return passengers per day by 2023, and a substantial 4,000 more by 2043, Wellingborough and Kettering by 500 plus by 2032, and nearly 1,000 more by 2043, whilst Corby would see a doubling of volume to nearly 1,000 return passengers by 2043.

1.4.2 THE LONG TERM PLANNING RESPONSE TO FORECAST GROWTH

Following on from the Market Studies a series of regional/route based studies is now underway under the "Long Term Planning Process". The East Midlands Study was published in draft for consultation in February 2015, and in its final version in March 2016 (after the work undertaken for this Rail Investment Strategy was completed). A West Midlands Study is currently being developed, and a West Coast Main Line Study due to commence in Summer 2017.

The key messages from the Market Studies for Northamptonshire relate to the scale of growth forecast for passenger patronage on both the West Coast Main Line and the Midland Main Line, as well as that of 'cross boundary' east-west movements.

In addition, further studies relevant to this report are under way : -

- WCML CAPACITY PLUS – a Network Rail led study for the DfT which is looking at options use of capacity released on the WCML after the opening of HS2 Phase 1
- MIDLANDS CONNECT – a grouping of LEPs and transport authorities across the Midlands – has also produced important material, including a commissioned technical report from Atkins: "Economic Impact Study" – May 2015. Work is now moving towards more detailed work on specific corridors, including those directly affecting Northamptonshire
  - ıst West Consortium, involving Network Rail, is also undertaking
  - proposed new railway between the Bedford area and Cambridge.
  - work – by Atkins – looked at the priority origin and destinations
  - lands ("East West Rail Central Section – Conditional Outputs
  - 014), and the second phase of this work is looking at how the
  - for the line can be enhanced by through services from the radial
  - e West Coast route through Northampton

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Rail 11

3.3 CONDITIONAL OUTPUTS ANALYSIS

Each of these 6 conclusions is described and discussed i
reference to post-HS2 capacity at Euston Station and its W

3.3.1 CORBY, KETTERING AND WELLINGBOROUGH TO LONDON

It has been a long-standing aspiration of stakeholders t
between these Northamptonshire towns and London. Th
County and London is clear as it is for all major UK reg
south-east. The current standard pattern has two trains
Kettering, and only one at Corby to London St. Pancras.

The current plan referenced in the draft East Midlands Route Study is to introduce a sixth train per hour on the Midland Main Line which would run between London, Wellingborough, Kettering and Corby, crucially doubling the frequency for Corby.

We have assessed the GVA value of this additional service at £10.1m pa, stimulating the creation of 135 jobs. In order to introduce this train, significant infrastructure enhancements are required on the Midland Main Line and which are identified in the route study. These include platform works at Bedford, additional tracks between Bedford and Wellingborough and the doubling of the route which is currently single line between Kettering and Corby. The extended timescales now announced for the MML electrification project creates the opportunity to ensure that these capacity works are included in the specification.

In addition, and as the Route Study also says, a commitment to operate this additional train will need to be included in the specification for the East Midlands franchise, the ITT for which is expected to be issued in December 2016.

Conditional Output MML1: An additional train per hour between London, Wellingborough, Kettering and Corby

3.3.2 FAST SERVICES BETWEEN NORTHAMPTON, MILTON KEYNES AND LONDON EUSTON

Express services on the WCML were radically improved in December 2008 with the introduction of the Virgin West Coast Very High frequency (VHF) timetable. However, the service between Northampton and London remains at three semi-fast trains per hour operated by suburban regional rolling stock and with substandard journey times given the economic importance of commuting and business traffic between Northampton and the capital. The current service provision is therefore unsatisfactory to support the growth plans in the SEP. Again the critical relationship between the economies of Northampton and London is well understood; at the same time the prospective 16.5% growth of Milton Keynes between 2011-2021 to a population of 290,000 (*Source : Office of National Statistics*) further illustrates the case for significantly enhanced services within and between the key economies on the WCML.

Listen to your passengers, Gibb urges operators

Philip Haigh
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RAIL companies must work harder to discover what the public wants from them, according to Chris Gibb.

The former Virgin Trains boss and current Network Rail non-executive director was speaking independently at a conference about capacity and performance run by the Institution of Mechanical Engineers in London on November 14.

He said he doubted any passengers paid attention to posters displayed at stations detailing operator performance. "They're only interested in their train," he said.

While many managers were very good at talking to passengers, Gibb said that the railway must place more emphasis on the latter's views, and asked who was talking to London-Scotland airline passengers about what they wanted from rail.

Gibb went on to say that rail companies should also pay more attention to staff, and engage with them. "Don't just brief them, engage with them," was his message. He explained that if staff understood why timetables had changed, for example, they would be able to explain those changes to passengers.

Former Iarnrod Eireann Chairman Dick Fearn echoed Gibb's view. Now chairman of the Western Route Supervisory Board, Fearn argued for decisions to be taken at lower levels, noting that many winners of *RAIL*'s National Rail Awards Train Operator of the Year were smaller companies such as c2c, rather than larger ones.

Gibb also argued that railways should take a wider view by thinking about the whole rail system when making changes, so that trains, stabling and crews all matched.

His comments came as Network Rail prepares for what Capacity Planning Director Chris Rowley called the biggest change for many years, with next May's timetable featuring changes to 100,000 schedules (around 60% of the entire timetable). Rowley cited London Overground, where frequencies will increase by around 25%.

Northern passengers will witness the biggest change ever, said Planning and Performance Director Rob Warnes. Upgrades such as the recently completed Ordsall Chord and current work at Blackpool would contribute to the changes, as would extra trains cascaded as a result of electrification in Scotland and northern England. The first stage of major changes to GTR services following Thameslink's upgrade will also start in May 2018.

Delegates from across the rail industry heard Network Rail reveal plans to develop a whole-system model. Industry Performance Relationship Manager Simon Reay said the company was looking towards academia for help. Such a model would help reveal how performance might change when different services were changed.

Later in the conference, Paul Naylor from CPC Project Services showed how close examination of data from London Underground's Jubilee Line helped improve performance, by revealing where problems lay. He said that as LU looked more closely at delays from two minutes down to ten seconds, different problems became visible.

MTR Europe Operations Director Oliver Bratton provided a counter view to models, arguing that it was very difficult to specify what an actual point-to-point timing was because of the many variables that affect train performance.

He said it was possible to show how trains varied from their booked paths, but difficult to show how one train affected another. However, he said that better visualisation of train running could lead to better performance.

@philatrail

East Midlands Trains driver Shanker honoured for life-saving action

Rail Award by NRA
er 6. Also present are
Knight (Stagecoach
D), and Nigel Harris

East Midlands Trains driver Davinder Shanker was presented with a National Rail Award for Outstanding Personal Contribution (Workforce) on November 6, at a special ceremony at St Pancras International.

One of a 160-strong team of drivers based at Derby, Shanker (or 'Shanks' to his colleagues) was recognised by the judging panel for his life-saving actions on June 12 2016, while driving an empty stock train between Derby and Sheffield.

Having emerged from Clay Cross tunnel, he spotted a man running across the line. After he sounded the horn and made an emergency brake application, his train narrowly avoided hitting the man, who then climbed the embankment before attaching a noose to a tree and hanging himself from it.

With the assistance of a technician, Shanker cut the man down and placed him in the recovery position, while distracting him from making any further attempts to take his own life before police officers could arrive and take him to hospital.

Darren Ward, EMT's head of drivers, said: "Davinder is a role model for everyone here at East Midlands Trains and he is a great ambassador for the rail industry. It's great that such a popular and hardworking driver like Davinder has been recognised for his actions. He is thoroughly deserving of all the praise he gets."

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brave BTP officer Marques

terrorists on the night of June
earing screams and witnessing
leeing from the scene.
es (pictured) took centre stage
National Rail Awards ceremony
n's Grosvenor House Hotel on
er 21, when he and other staff
P's London Bridge team were
an NRA Judges Gold Award
and Special Team Award followed by an emotional standing ovation.

BTP Chief Constable Paul Crowther said: "I am extremely proud of Wayne for his bravery and his actions. He epitomises the finest traditions of policing."

The Pride of Britain Awards were televised live on November 7.

Overnight on the Overground

Night Overground trains began running on December 15/16 on the East London Line between Dalston Junction and New Cross Gate.

The night trains are part of the Mayor of London's draft Transport Strategy. They connect with Night Tube services on the Jubilee Line, and from next year on the Victoria Line.

Mayor of London Sadiq Khan said: "Londoners and visitors alike will be able to use the service to help them enjoy everything this buzzing part of the city has to offer."

TfL said stations would be staffed at all times that the trains are running, while specially trained Travel Safe Officers will also travel across the route.

Services will be extended to Highbury & Islington next year, although due to Crossrail works taking place LO trains will not call at Whitechapel until the summer.

Volunteer pastors on GA route

Ten volunteer rail pastors are travelling on Greater Anglia trains between Shenfield and Colchester. They will support passengers at stations and on the trains, said the operator.

Rail pastors already work in Barnet, Fife and Reading. The scheme is an initiative of Ascension Trust, supported by and in partnership with British Transport Police, Network Rail, train operators and the Samaritans.

Metro Tamper sold for Asian reuse

A Tamper used for 30 years on the Tyne & Wear Metro has been sold to Polish company Newag

Grayling backs Mid Che

Paul Stephen
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RAIL campaigners in mid-Cheshire are celebrating, after gaining ministerial support for their bid to reopen a freight line to regular passenger services.

The 8½-mile single-track line between Sandbach and Northwich was closed to passengers in 1960, but has been retained as a strategic diversionary route for services between Crewe and Chester and to connect freight flows with the West Coast Main Line.

In response to lobbying from the new Secretary of State for Work and Pensions and local MP Esther McVey (Conservative, Tatton), Rail Minister Paul Maynard has now instructed the Cheshire and Warrington Local Enterprise Partnership (LEP) to create a working group to examine proposals for reopening, including the construction of new stations at Middlewich and Gadbrook Park.

A business case published by the Mid Cheshire Rail Link Campaign in August 2017 estimated that reopening could cost as little as £5 million by upgrading existing infrastructure, representing a benefit:cost ratio of up to 5:1.

The campaign group received a further boost on November 30 when Secretary of State for Transport Chris Grayling said he was "sympathetic" to the idea of restoring scheduled passenger services, and that he had asked Transport for the North (TfN) to consider its inclusion in TfN's Strategic Transport Plan and long-term investment programme once it becomes a sub-national transport authority in April.

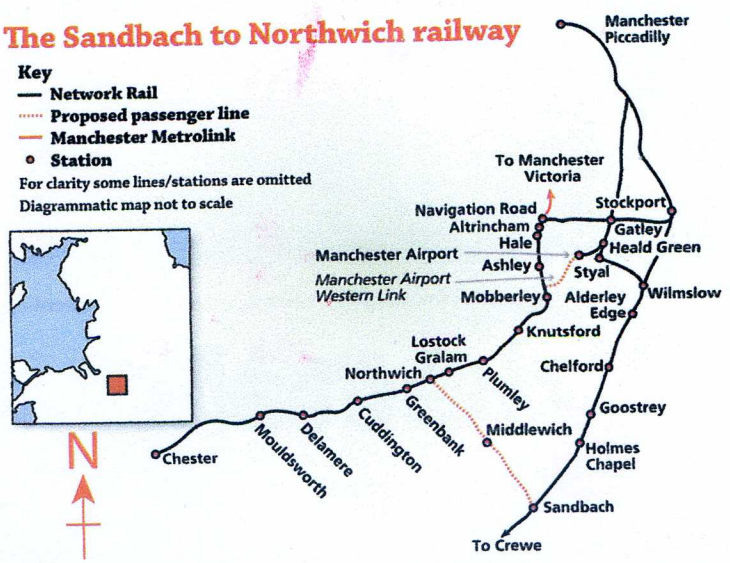
Responding to a question from MP Mike Amesbury (Labour, Weaver Vale) during a debate in the House of Commons, Grayling said: "As somebody who used to live very close to the Mid Cheshire rail link - indeed, I used to go walking alongside it - I am well aware of its potential.

"I have asked Transport for the North, which is taking a lead on making recommendations about new projects, to do work on this for me. But I would say to the Hon Gentleman that I am extremely sympathetic to the idea of trains running again on that railway line."

Mid Cheshire Rail Link Campaign Chairman Stephen Dent paid tribute to local MPs Esther McVey, Fiona Bruce and Mike Amesbury for applying cross-party political pressure on both Grayling and Maynard to make the proposal a higher priority.

He told *RAIL*: "We've had some difficulties in the last few years engaging with TfN, so having the Secretary of State asking them to work with the LEP is the best development possible. This is such a simple scheme to implement

The Sandbach to Northwich railway



Further reading

■ Here we are - stuck in the middle... *RAIL* 814.

Virgin Trains red-faced after 'incorrect' ticket decision

s apologised to a
was told she had
cket for her journey
original had
hotel when it
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still in the hotel
ellow guests
d. She said in
even though
f of purchase,
d to let her
e purchased a

r team had
ppreciate that
er, I'm afraid
that if you have Advance tickets then a new ticket would need to be purchased today."

Joanne Gubb @JoGubb
@VirginTrains thank you for being so helpful to my family who are trying to get home from Liverpool after the horrendous fire at Echo Arena! tickets in the hotel which has been evacuated but have proof of purchase but staff still refusing to let the travel!!! #disgrace

Virgin Trains @VirginTrains
@JoGubb Appreciate that Joanne, However, I'm afraid that if you have Advance tickets then a new ticket would need to be purchased to travel today ^MW

A VT spokesman told *RAIL* that the decision was "incorrect" and was immediately rectified, with Gubb's family able to travel on the next VT service from Liverpool Lime Street. He said that other passengers affected were advised to speak to staff at the station.

VT issued a statement on January 1 saying: "Our people at Liverpool station were aware of the unfortunate events of yesterday and assisted passengers on a case by case basis to help them get where they needed to go. For those who contacted us via social media, we dealt with most of these messages privately. With the case of *@jogubb*, our team resolved this as quickly as they could and she and her family travelled on the next train."

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For Northamptonshire there will be 2 principal implications : -

- WEST COAST MAIN LINE - pressure for capacity between Willesden and Northampton will be significant, and is likely to require investment at pinch points. The most significant consequences of this will be a need for investment in additional track capacity between Bletchley and Milton Keynes, and dynamic freight loops on the Northampton Loop. This will be particularly important if enhanced passenger services between Northampton and London are to be introduced once HS2 Phase 1 opens in 2026. It should be noted here that Network Rail does not propose to commence the West Coast Route Study until Summer 2017, providing Northamptonshire with a good period in which to prepare its 'asks' of the rail industry in respect of the WCML both in relation to freight and passenger services and supporting capacity

- MIDLAND MAIN LINE – additional capacity will be required on the MML north of Bedford, particularly at Leicester, potentially including more running lines, grade separation of Wigston Junction south of Leicester and improvements to the Syston North and South Chords to the north of the City; possible enhancement of the Burton – Leicester freight only route may also be required, which is subject to relatively low maximum speeds and limited signalling capacity (*n.b. these possible enhancements are as set out in the final East Midland Route Study published in March 2016 after the completion of the work for this Rail Investment Strategy*)

As such the principal Freight Conditional Output for Northamptonshire is necessarily focused on seeking the implementation of Network Rail's strategy to expand freight capacity on the WCML, MML and via the new East West Rail to accommodate the remarkable level of growth forecast to 2043 in intermodal traffic, both to the benefit of facilities such as DIRFT (and East Midlands Gateway even if outside of the County) and whilst avoiding detriment to the passenger service Conditional Outputs set out in this document.

Conditional Output Freight-1. Provision of new freight capacity on WCML, MML, EastWest Rail and Felixstowe-North via Peterborough to serve Northamptonshire Intermodal Freight Growth, (as per Network Rail Freight Markets Study) without detriment to passenger Conditional Outputs

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Rail Freight Proposals

The County Council, as local transport authority, has a duty to plan for transport, to, from and within its area, including rail. The County Council has therefore prepared the Northamptonshire Rail Strategy (January 2013).

https://www3.northamptonshire.gov.uk/councilservices/northamptonshire-highways/transport-plans-and-policies/Documents/Northamptonshire%20Rail%20Strategy.pdf

A key part of our strategy is an improvement in future passenger services to Northampton.

We are somewhat surprised that the draft Environmental Statement for Northampton Gateway does not include an analysis of the impacts of the proposal on the rail network, although we note that Draft Rail Operations and Rail Capacity Reports have been published as part of the consultation. We consider it important that the rail impacts of the development are included in the final Environmental Statement in order to demonstrate any impact on the rail network from the development.

We would point about that there is an apparent inconsistency in the conclusions drawn in Section 9 of the Draft Rail Capacity Report which states at 9.1 that the Department for Transport's intention post-HS2 is to create more capacity on the southern end of the West Coast Main Line for intermediate stations, and at 9.2 that this will create more capacity for freight services on the Slow Lines. Northampton is one of the largest intermediate stations on the West Coast Main Line and yet is only served by the Slow Lines, so we are unclear how both these statements can be achieved without Northampton and Long Buckby alone receiving a poorer service.

The County Council has been involved as a stakeholder in Network Rail's West Coast Capacity Plus Study, and we understand from this that the major constraint on performance of up freight trains is their ability to climb the approximately 1 in 200 gradient from Northampton to Roade following the speed restriction under West Bridge immediately south of Northampton station. An examination of Network Rail's working timetables shows a timing of 8 minutes from Northampton to Hanslope Junction of a passenger train stopping at Northampton, and at least 11 minutes for freight services. This is the section of line on which it is proposed that the rail freight interchange will be built.

While the Draft Rail Capacity Study makes reference to the general availability of paths for freight services it would be useful for more detail to be given of the specific impact of the proposed development.

In particular:

- What is the estimated running time for a train from the rail freight terminal to Hanslope Junction, as this will presumably be less than for a train passing Northampton this be a lesser constraint for pathing purposes.
- What is the coincidence of available paths on up and down lines to allow down (northbound) trains to enter or leave the rail freight terminal. This is important to ensure that these trains do not cause delay to other services.

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. We feel that this issue should be addressed in the ES, to ensure that the proposal does not make this more likely.

Summary

As many of the items above are subject to on-going work and discu
the appropriate stage.

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tracks removed in the 1980s, would pay significant dividends. The south end of York has seen some improvement, with additional parallel moves now possible, but the north end is still a mess, with too many trains attempting to use a single track out of the station past the National Railway Museum. Similarly, restoration of the centre road between the main Up and Down platforms, with associated crossovers, would give greater flexibility for Scarborough services, which are very restricted in the platforms they can currently use.

In all these cases, with a little imagination, more capacity can be extracted from existing routes without massive expenditure. On the Midland main line and ECML such an approach can help cater for growth until HS2 comes to the rescue in 2033, or whenever finances permit.

HS2 NEEDED

On the West Coast main line, let there be no doubt, HS2 is required – and urgently. Any idea that the existing infrastructure has significant reserves of capacity, particularly in the peak, borders on self-delusional. The challenge with the WCML will be how to handle trains north of Wigan where HS2 services rejoin the traditional route, the main problem being the wide disparity of speeds between 60mph Class 6 freights and the increasing number of Class 1 passenger trains.

The option is increasingly being used of routing loaded daytime Class 6 trains over the Settle and Carlisle and the Glasgow and South Western to avoid the long slow climbs over Shap and Beattock, which consume significant line capacity. There should, however, be no need to divert empty daytime Class 6s off the WCML, nor loaded trains at night, and any suggestion 75mph Class 4 intermodal trains should be routed away from the WCML must be firmly resisted, for reasons of gauge and transit time.

Ultimately, it may be that a dynamic loop will be required from Tebay to Shap Wells to allow Class 1s to overtake a freight on the move – the railway equivalent of a crawler lane. The topography is reasonably favourable and construction could take place close to, but clear of, the running lines, with construction materials coming from the nearby Shap quarries. A similar approach could apply on Beattock, albeit the topography is more challenging and construction costs would be higher.

Shap: DB Cargo loco No 66099 heads south on the West Coast main line with the 16.02 Carlisle to Margam working on 30 April 2018. Rob France

F2N route: GB Railfreight loco No 66765 emerges from the summer heat haze on 19 July 2018 with the 14.35 Hams Hall to Felixstowe South intermodal, as it takes the dip under the Burbage Common Lane road bridge, which formed part of the Peterborough to Birmingham line upgrade to W10 gauge in 2011 to accommodate hi-cube shipping containers. Graham Nuttall

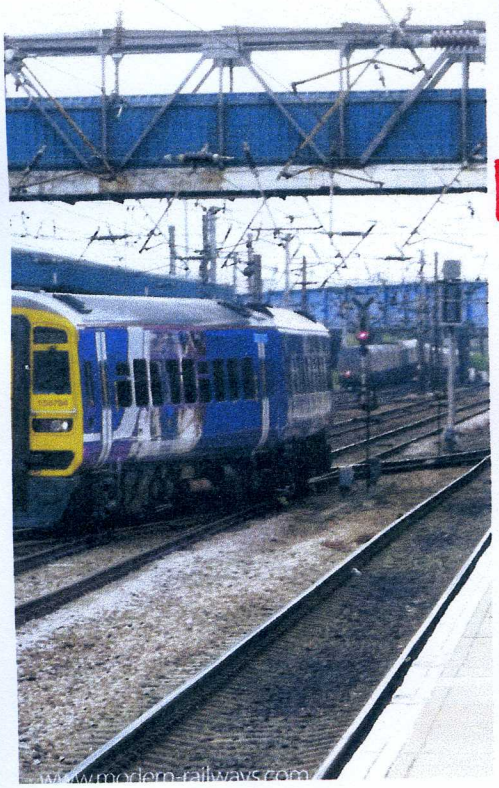
F2N ROUTE

One important route not yet mentioned is the 'F2N' Felixstowe to Nuneaton route, connecting the UK's biggest generator of rail freight with the ECML at Peterborough, the MML at Leicester and the WCML at Nuneaton. With the Great Eastern main line at capacity, all growth from the Port of Felixstowe will need to be routed via F2N. The current scheme on the Felixstowe branch will increase capacity from 33 to 48 trains a day in each direction, but without improvements at Haughley Junction, Soham and especially Ely this extra capacity can only be partially utilised.

Unlike the other growth corridors for modern rail freight, most of which follow the main inter-city routes, F2N is relatively unimportant as a passenger axis, Birmingham to Stansted notwithstanding. It is, however, crucial for UK trade and will become more so as trading patterns post Brexit re-orientate away from Europe in favour of deep sea origins/destinations. Accordingly, grade separation at Haughley Junction, doubling of the line through Soham and a solution to the Ely problem (as much of an issue for passenger service as freight) is urgently required: time for the optioneering and debate to stop and for construction to begin. The payback for the economy and the environment in getting HGVs off the A14 is substantial and should pass a stringent Treasury value-for-money test.

CALL TO ACTION

In conclusion, we can and must do more with the existing infrastructure to generate more paths and make better use of those we have. HS2 is essential, but we also need a range of smaller schemes to remove constraints and pinch points in the system, most obviously by grade separation of key junctions. With the likely shortage of funds,



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David Haydock of *Today's Railways Europe* points out the rise is from a very small base. Beyond three core services (British Steel's flow of steel slab from Scunthorpe for rail-making at Hayange in northern France, Ford components from Silla in Spain to Barking, and aluminium between Ditton on Merseyside and Neuss in the Rhineland), rail freight through the Channel Tunnel is minimal.

Freight delay per 100 train kilometres worsened compared to the same period the previous year, increasing by 1.7% to 12.19 minutes.

The total number of freight train kilometres was 8.63 million during the quarter, down 2.5% on the previous year. Freightliner Heavy Haul (6.0%), GB Railfreight (3.1%) and Freightliner Intermodal (0.9%) all recorded increases; Freightliner Heavy Haul was boosted by a new iron ore contract acquired in June 2016, while GBRf started a contract running fuel trains from Immingham to Bedworth and Theale. The other four operators all recorded a decrease in freight train kilometres, the hardest hit being Devon and Cornwall Railways (down 54.8%) and Direct Rail Services (down 31.5%); Colas and DB Cargo also suffered falls.

HOWBURY INTERCHANGE MOVES CLOSER

BEXLEY COUNCIL has granted planning permission for the construction of a strategic rail freight interchange (SRFI) at Howbury Park, adjacent to Southeastern's Slade Green depot. However, as the site sits across the boundary of two local authorities the development also requires approval by Dartford Borough Council, which is still to be granted.

The application was submitted by Roxhill Developments. A proposal for a similar rail freight interchange was allowed at appeal in 2007 by the then Secretary of State, but the scheme was put on hold due to the recession and the permission lapsed.

Existing buildings at the 57-hectare site would be demolished, with rail access provided from the adjacent North Kent line. It is estimated that the SRFI would employ 1,966 permanent (full time equivalent) staff and the aim would be for up to seven trains per day to serve it. If approved, construction would start in November and be completed by March 2019, with full occupation of the site planned by March 2023.

Network Rail has supported the application, and the project has presently reached stage 2 (initial feasibility) in the GRIP process. Land safeguarded for a potential extension of the Elizabeth Line eastwards from Abbey Wood to Gravesend and Hoo Junction would not be affected.

DIVE-UNDER TO RADLETT SRFI

A DIVE-UNDER is to be built as part of work to connect the new Radlett strategic rail freight interchange (SRFI) to the Midland main line. The terminal will be on the west side of the Midland main line, sandwiched between that line and the Watford to St Albans Abbey branch at Park Street, with an access route under the Midland main line to join the slow lines on the east side of the formation.

The next stage in development work for the interchange is the creation of a plan for the building works required, which according to Network Rail will be the responsibility of developer Helioslough Ltd.

NR has tentatively concluded that services to and from the interchange (up to 24 paths per day, 12 in each direction) will not have a noticeable impact on passenger services on the Midland main line. During peak periods the railway would be entirely reserved for passenger services.

As well as a connection to the site, work to increase the loading gauge is required to allow the largest containers to operate. This will necessitate adjustments to Elstree and Belsize tunnels. The level of disruption these works are likely to cause is presently unclear.

Compared to many railway schemes, the loss of £4 million does not sound that large. We have been challenged on whether the loss of such a 'small amount' of money can really have such dramatic consequences. Yet for a freight customer it is the 'per load' rate that matters; they will be comparing rail to, for example, a double-decker road trailer. By this standard, the grant can make all the difference for rail.

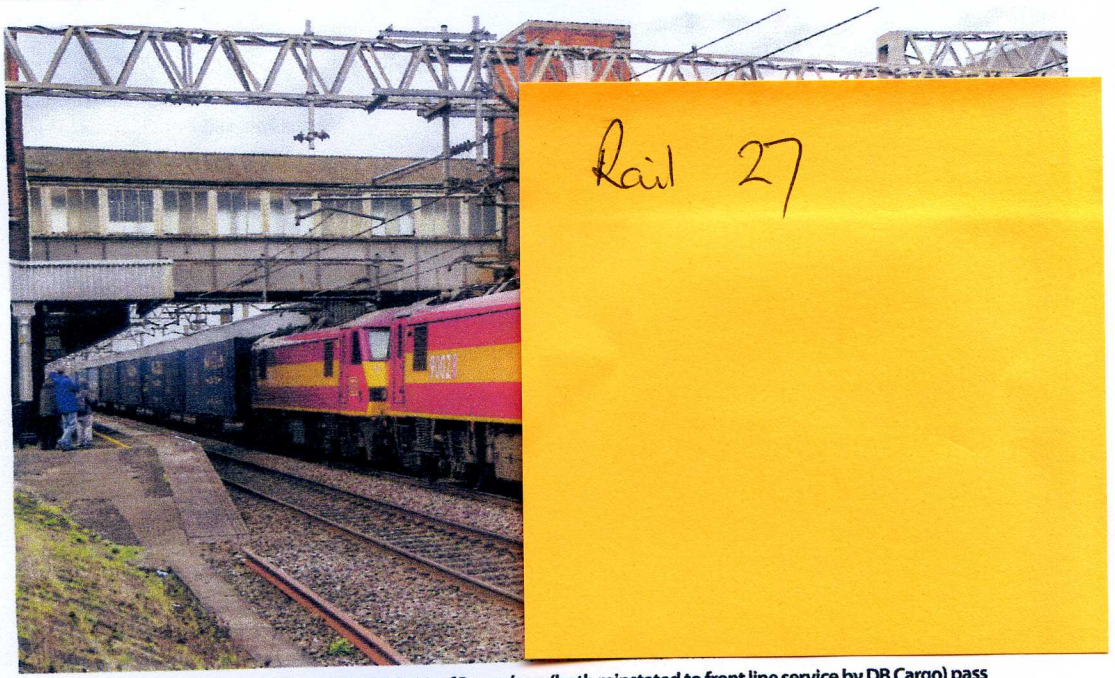
Speaking to those affected by this cut shows the depth of concern that they have. Not only are existing services now under review, but future expansion plans are also being called into question. This includes some new services to rail, including new routes in the North of England and the Midlands.

Even before growth is taken into account, the existing services that have seen their grant cut are estimated to be keeping in the order of 200,000 lorries each year off the motorway network. In addition, some of the services affected serve as feeders for other rail routes, which are also now at risk.

The irony is that DfT has a real choice to reinstate the grant budget and avoid all the negative consequences and poor publicity from forcing goods back onto the road. After all, it has recently found £320 million for Southern and £4 million for apps to help road users find free parking spaces and other measures. Even reinstating half the cut – £2 million – would enable some level of grant to be paid and may tip the balance in some cases. It would certainly act to restore market confidence.

Ministers have the opportunity now to put additional funds into the upcoming bid round for MSRS, and again later in the year, and we hope they can find a way of doing so. Otherwise the commitment to rail freight, as outlined in the strategy, must be brought into question.

An opinion column of the Rail Freight Group, *www.rfg.org.uk*



Flow under threat: loco Nos 90028 and 90037 *Spirit of Dagenham* (both reinstated to front line service by DB Cargo) pass through platform 4 at Nuneaton with the 06.06 Mossend – Daventry intermodal service on 21 February 2017. Graham Nuttall

INTERMODAL BREAKS RECORDS

THE THIRD quarter of 2016-17 (October-December) saw domestic intermodal traffic set a new record for the highest amount of freight moved in any quarter since the time series began in 1998-99. Data from the Office of Rail and Road indicates that the category saw 1.72 billion net tonne kilometres of freight moved, up 5.2% on the same period in 2015-16.

The total volume of freight moved across all categories was 4.42 billion net tonne kilometres, 2.8% lower than the previous year. This was driven by significant falls in coal (down 34.5%) and 'other' (which includes biomass, down 14.8%). ORR says the removal of the climate change levy exemption for renewable energy from power stations is gradually feeding through as freight operators renew their supply contract, with possibly fewer orders for freight in the 'other' category. However, while coal traffic fell year-on-year, ORR says the commodity has recorded successive increases for freight moved in each quarter of 2016-17.

All other categories recorded a year-on-year increase. Construction and domestic intermodal together accounted for over 60% of freight moved, with construction traffic up 6.6% to 1.04 billion net tonne kilometres. Metals traffic grew by 6.6% and oil and petroleum by 0.6%.

There was a recovery in international traffic, which grew by 14.4% after a significant fall last year while the migrant crisis affected security at Calais. But commentator

Veteran locos pressed into service: Freightliner Intermodal Class 86/6s Nos 86638 (outshopped in June 1965) and 86639 (May 1966) at the head of a Crewe Basford Hall – Felixstowe South intermodal train, normally the preserve of a single Class 90, passing through Nuneaton on the Up Slow on 21 February 2017. Graham Nuttall

Rail Freight Group

GRANT CUTS RISK UNDERMINING FREIGHT

Back in the autumn, the then newly-appointed Rail Minister Paul Maynard published the Department for

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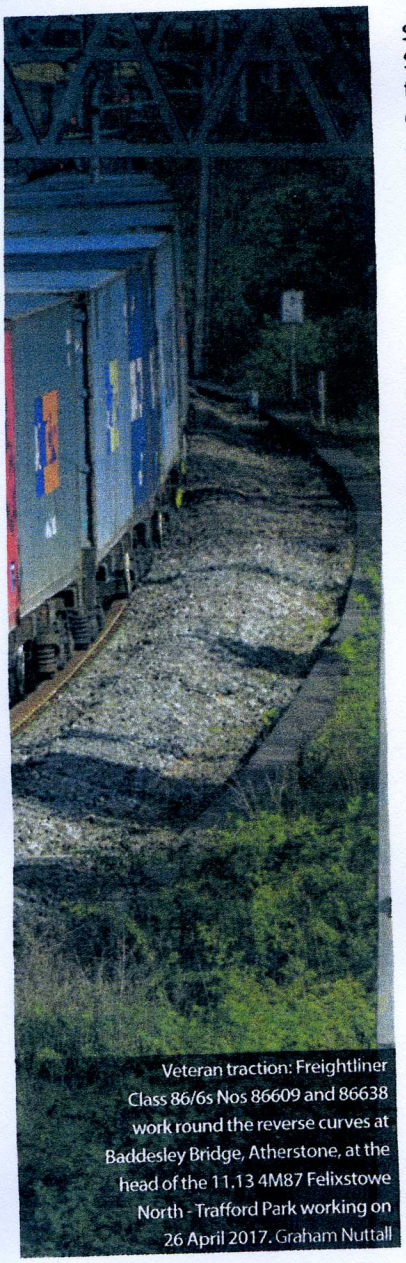
Since publication, the various work-streams underpinning the strategy are making some progress, with industry input. And whilst own specific strategies easily, ncouraging market he quarterly results ce of Rail and ermodal traffic and construction to the same see story above). backdrop llaboration, has acted to ery sector of rail aps shows the most vth by reducing r the Mode Shift t (MSRS) grant. This ntive for companies termodal rail f road freight.

The scheme, and its predecessors, have existed since rail privatisation, and provide a 'per box' level of support where rail costs exceed those for road and the environmental benefits of rail justify modal transfer. The budget has been reduced from around £19 million last year to around £15 million this year, leading to a number of routes and services finding that their grant has been removed. This includes some short- and medium-distance intermodal services from ports, and many domestic intermodal services that haul retail goods between warehouses. Scottish Transport Minister Humza Yousaf has warned that the cut threatens three of the six existing cross-border rail freight flows – Freightliner's Liverpool – Coatbridge workings and the Daventry to Mossend flows operated by both J. G. Russell and Stobart.

No industry likes to be reliant on grant support, and over time rail freight operators have acted to reduce the need, with many routes no longer receiving support. This has been achieved through staff efficiencies, gauge clearance, longer trains and private sector investment in equipment ports and terminals. Domestic intermodal services have achieved efficiency improvements, with grant rates falling over time. But with relatively few services, economies of scale are harder to find. The lack of suitable rail freight interchanges in some areas further compounds this. Nonetheless, the value for money of the grant remains high, with the 'cut-off point' for support around a benefit-cost ratio of 3.5:1.



Veteran traction: Freightliner Class 86/6s Nos 86609 and 86638 work round the reverse curves at Baddesley Bridge, Atherstone, at the head of the 11.13 4M87 Felixstowe North - Trafford Park working on 26 April 2017. Graham Nuttall

routed through the heart of the busiest area of the country for rail traffic – London and the South East – and along the crowded main lines.

This underscores the need for capacity enhancements on the

Soham redoubling, and Ely and Syston junction remodellings, will finally be addressed? 'Capacity enhancements take too long and cost too much – we've got to do better' says Mr Worth.

HS2 is eagerly awaited by the freight community, not for the opportunity to run freight trains on it per se, but for the capacity it will free up on the West Coast main line.

TERMINALS, TOO

Besides capacity on the main line, intermodal freight needs terminals if it is to grow. Too often, these get bogged down in the planning procedure – to the extent that the market moves on and makes the proposals irrelevant, as it may have done for the Radlett terminal that spent more than a decade marooned in the Sargasso Sea of the planning system.

Sites in the golden triangle of distribution are key. The Daventry terminal has proved a turbo-booster for the rail freight renaissance, enticing major supermarket groups back to rail. Other sites are coming on near East Midlands Airport and at Four Ashes near Wolverhampton, but more will be needed if expansion is not to be held back. The Treasury must be restrained from raiding Network Rail's property bank for short-term gain – once a site alongside the railway is sold for housing or other non-rail related development, it is lost for good.

For its part, Network Rail must keep the lid on the cost of connections. Maggie Simpson of the Rail Freight Group reports that the connection to the Arcow quarry on the Settle to Carlisle line cost £4 million, which in this case had to be paid as planning restrictions prevented expansion of the quarry without a rail link. Connecting Alstom's new Widnes facility to the national network had

rail links, for instance, could make ideal distribution parks if they are in the right part of the country.

OPPORTUNITIES

While containers off deep-sea routes heading for the centre of the country constitute the core intermodal market that has capacity for growth if we can solve the terminal and capacity conundrums, there are other niche markets where rail has opportunities. The China train which garnered headlines earlier this year (p20, March issue), showed the possibilities presented by the Channel Tunnel with the end of disruption at Calais due to migrant incursions and the opening up of a high-gauge route to Barking via HS1. However, poor service quality on the Continent will continue to dog prospects here; the tendency of the French to regard international traffic as a lower priority than domestic services seems unlikely to change as the Brexit negotiations get underway.

Short sea traffic offers more hope. Feeder services from Antwerp and Rotterdam to Scottish east coast ports may rob traffic that would be rail's were the boxes landed in southern England, but there are other avenues worth exploring. East – west flows such as Purfleet and Tilbury to South Wales and Teesport to Manchester could transfer to rail if the conditions were right. Julian Worth points out that gauge enhancement on the more important routes is freeing up low-platform wagons formerly used for carrying 9ft 6in containers: these could usefully be employed carrying swapbodies (typically of larger dimensions than deep sea containers) that are landed off short sea vessels on those gauge-enhanced routes. He adds that a 10ft 3in swapbody with an interior floor halfway up raises some interesting possibilities: for lightweight goods, as many as 60 pallets could be accommodated on the two floors, as against 20 pallets in a deep sea box and 26 pallets in a conventional road-sized trailer body.

Domestic freight is another area for exploration. Supermarket groups such as Tesco and Asda value the way their green credentials are burnished by using rail, and Tesco has been pleasantly surprised to find its Anglo-Scottish rail service is a couple of percentage points more reliable than its road competitor. Surprising, too, has been the finding that a flow of less than 100 miles, between Daventry and Purfleet, can be competitive for rail, with this route currently sustaining one train a day. New flows from Teesport to Daventry and Tilbury are in the offing.

But this is a natural market for road and rail needs to be able to present the keenest possible offering to retain the traffic. That is what makes the pennypinching displayed by the Department for Transport in the last Parliament so depressing: the Mode Shift Revenue Support grant, paid in recognition of the carbon reduction benefits offered by rail freight, is having to accommodate a £4 million reduction in funding allocation (p18, March issue). As a result, all the Anglo-Scottish domestic intermodal traffic (see box) is under threat. The money this might save the Department is peanuts in overall government spending terms and counter-productive at a time when new immigration controls may present the road freight industry with a driver recruitment crisis. The cut is a classic example of one branch of government failing to see the bigger picture: it should be reversed by the incoming administration.

Finally, there are the opportunities in high-value parcel freight, with GBRf looking at the possibilities of impending retirement of HSTs from passenger service for implementing high-speed freight shuttles between Doncaster and London. Julian Worth is sceptical: he says you'd need a couple of round trips a day to get the utilisation necessary to get the figures to stack up, which may be beyond the potential size of the market.

But he admires the lateral thinking about reuse of passenger stock. Think about all the 1980s units that are soon to be made redundant, especially the ones with wide doorways. You could forklift in pallets and move them by hand trolley inside the vehicle (forklift tines could not fit in an HST's doors). A Class 150 parcels unit, anyone? MR

DOMESTIC INTERMODAL FLOWS

- W. H. Malcolm: Daventry (DIRFT) – central Scotland
- W. H. Malcolm/Asda: central Scotland – Aberdeen
- J. G. Russell: DIRFT – central Scotland (+Dourges)
- Stobart/Tesco: DIRFT – central Scotland
- Stobart/Tesco: central Scotland – Inverness
- Stobart/Tesco: DIRFT – South Wales
- Stobart/Tesco: DIRFT – Barking/Purfleet
- DB Cargo: Teesport – central Scotland

Source: CILT

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Philip Haigh *Transport writer*

Rail freight must beat challe

The rapid decline of coal has struck the rail freight sector hard. Does the future of the industry lie in the hands of local operators with multi-skilled staff? asks PHILIP HAIGH

A day in April marked Britain's first without using coal to generate electricity. Wind and solar power played their part, but burning gas shouldered the bulk of electricity generation that day.

Coal fuelled the industrial revolution and spawned Britain's rail network. The black stuff, dug from beneath this island, was a staple traffic for railway companies. No longer. Its recent rapid decline has struck rail freight hard. Coal is dead; long live… containers?

Just a week or so later, the Rail Freight Group held its annual conference in London. Graphs from Network Rail's freight chief Paul McMahon starkly showed coal's terminal decline. Also shown were graphs plotting the increase in intermodal and aggregates traffic, but even with a changed scale it was clear that both those traffics were only rising slowly. And, they're the only freight traffics rising.

Freight measures 'gross tonne miles', which is a combination of goods moved (including the weight of locomotives and wagons) and the distance hauled. It's fallen 20% since 2014-15 because of coal's collapse.

That fall is the only thing that's moved quickly in rail freight. Network Rail is still developing projects announced for 2009-14, such as clearing longer trains to run between Southampton and the West Midlands. Also in development are improvements to the branch line running to Felixstowe, but there are other obstacles between this great port and the West Midlands. Flat junctions with the Great Eastern Main Line (including the recently-built Bacon Chord at Ipswich) and sections of single line serve to constrain traffic. There's plenty of detail in NR's recently-published *Freight*

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into ports. This wood, called biomass, cannot be stockpiled as easily as coal so Drax needs a regular flow. Yet it takes six hours for a train to run the 100 miles from Liverpool's docks. Such a slow journey demands more drivers, locomotives and wagons than higher speeds would need. The problem, according to Drax Logistics Manager Steve Taylor, is that passenger train operators are running ever more small trains that fill the network.

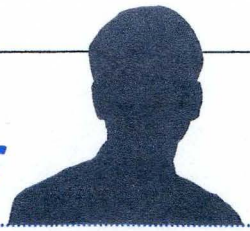
There are important questions for governments and politicians. If they decide to keep calling for more passenger services when they let franchises, they should realise that they are pushing more freight traffic onto the roads. GWR, ScotRail and Virgin Trains East Coast have already taken capacity released by some of the 3,700 freight timetable paths returned recently to 'white space' in NR's planning systems.

Doubtless, these decisions were sensible in themselves, but any presumption that passengers should always trump freight will clog the roads with unnecessary lorries.

Meanwhile, rail's economic and safety regulator, ORR, talks about applying fixed cost mark-ups to all rail operators and removing price caps on charges those operators pay to run trains. Despite affirming support for rail freight, ORR Chief Executive Joanna Whittington's words gave me little comfort. Not least because road fuel duties look set to continue to be frozen while rail charges rise. Coal trains paid extra charges because ORR considered the market could bear these charges (and to compensate NR for the higher cost of maintaining lineside equipment clogged with coal dust). Are those charges now to be redistributed to other freight commodities?

Claiming restrictions from election purdah

Industry Insider



Rail freight's predicament

Operators reveal weak finances and face network access challenges

Financial results for 2017 have revealed that (taken together) rail freight operators had a revenue shortfall against costs of £113 million, on a turnover of £790m. This was partly offset by the payment of £19m in Model Shift Revenue Support (MSRS) grants from the Department for Transport, but that still left a loss for the sector of £94m.

Statistics before the payment of MSRS showed each of the freight operating companies posted losses, with the exception of GB Railfreight. The largest operator DB Cargo, which has a market share of 44%, declared a loss of £58m. Freightliner had a market share of 33% and a loss of £25m, Direct Rail Services a 9% share and a loss of £15 million, and GBRf a 16% share and a surplus of £4m.

Government agencies have conflicting views about the value of rail freight. On the positive side, the DfT published a strategy in 2016 recognising that moving more freight by rail and reducing the amount of heavy goods vehicle traffic represented the most realistic way of reducing carbon emissions to the level that climate change legislation requires by 2050.

The current position is that HGVs account for 17% of all carbon emissions, compared with just 2% for all passenger and freight rail activity.

In 2007, a Strategic Freight Network fund was established by the DfT. In the current Control Period (2014-19), this has provided £235m to increase capacity for freight services at critical locations, such

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but was subsequently raised to £19.8m - presumably to accommodate applications with high external cost benefits. The flows are not identified for reasons of commercial confidentiality, but are dominated by intermodal movements.

Recently a decision was announced that the fleet of locomotives operating freight services would be converted to use the European Train Control System (ETCS). As part of the Digital Railway programme, Network Rail has contracted Siemens Rail Automation to work with six freight operators to install in-cab signalling in up to 750 traction units.

The benefits are that the moving block system will allow more trains to operate, by providing a continuous movement authority through the driver's display equipment.

Amid this positive background for freight, the National Infrastructure Commission comes along with a wrecking ball from Chairman Lord Adonis, who

"The plan to run 47 daily trains from Felixstowe could not possibly become a road-based operation."

thankfully has now resigned (to be replaced by industry favourite Sir John Armitt CBE, who was chief executive of Network Rail until 2007, and who then chaired the Olympic Delivery Authority).

Adonis, frustrated by train delays said ave been caused by freight operations, d social media to put out the view that freight might be a less good idea than rnight motorway truck platooning. of the kinder comments was that this cedure was completely untried, with stions about how these multiple lorry nations supervised by a single driver ng radio control would cope with access ds to motorways and roundabouts.

lore reflective commentary pointed out t the greater part of rail freight volume oncentrated on specific corridors. The n to run 47 daily trains from Felixstowe ld not possibly become a road-based eration, with up to 75 HGVs required each service. And in the movement of k products, users of the M4 would not nprehend the transfer of stone traffic m the Mendips quarries, that is carried in trains of up to 4,000 tonnes capacity.

Statistics show that delay to passenger services as a result of freight operations has declined since the regulatory freight delivery metric was introduced. This requires the measurement of freight train punctuality against a target of arrival at terminals within 15 minutes of the scheduled time.

The Office of Rail and Road (ORR) has also become less of a railway champion. It has tabled proposals to increase track access charges for coal and biomass operations. In part, this is due to NR's inability to reduce the cost of infrastructure provision, and is a reflection that more income from track access charges is needed for both passenger and freight operations.

But it seems to ignore research by the Transport Research Unit (an independent organisation at Oxford University) that found that road damage caused by HGVs was £6 billion greater than Vehicle Excise Duty fees, and even worse that in 2014 HGVs caused 45% of fatal crashes compared with only 11.6% of miles driven.

Freight operators have pointed out that the market does not allow increased charges to be recovered from customers, and would result in a worse financial performance than is already the case. GBRf, the one profitable rail freight company, said there is diminished confidence in ORR's ability to accurately understand the profitability of rail operations.

The Rail Freight Group added that for biomass in particular it did not support the introduction of a new infrastructure cost change, as this would penalise third party investment.

The ORR has said that responses would be reviewed carefully, and that it would work with stakeholders to understand the evidence provided on the impact of increased charges.

Independent regulation of the road network is in its infancy, but at least Highways England has been established as an arms-length agency of Government, overseen by ORR. There is the potential to develop a future management structure that parallels Network Rail in identifying how the cost of using the road network should be allocated. This is long overdue. R

WHAT'S YOUR VIEW?

Email: rail@bauermedia.co.uk

From: Lahan Danielle [mailto
Sent: 21 June 2018 19:50
To: k.net
Cc: , Tommy ent.uk>
Subject: Strategic Rail Freight Interchanges (SRFIs) on the West Coast Main Line

Dear Mr

Thank you for your email on 15 June. I can tell you that Network Rail colleagues have continued working with both Ashfield Land and Roxhill as they have sought to develop their plans for their respective SRFIs south of Northampton. A brief update on where we are with both schemes is provided below:

Roxhill, promoters of Northampton Gateway have now submitted their Development Consent Order (DCO), and continue to work with Network Rail to validate a GRIP2 Technical Feasibility Study they have commissioned via a Consultancy. This work is programmed to be concluded at the end of July 2018

Ashfield Land for Rail Central have completed a GRIP2 Feasibility Study with colleagues in Network Rail, and are now working with us on a programme of works to take forward some additional deliverables during their examination, these will bring greater clarity to the scheme

NSIP rules provide for a Cumulative Effects Assessment to be submitted with DCO. Please see guidance
note produced by PINS https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/12/Advice-note-17V4.pdf.

We are currently working with both developers to develop Statements of Common Ground with each of them.

I do hope this answers your queries. Please do not hesitate to get in touch if you have any further questions.

Kind regards

Danielle
Danielle Lahan I Public Affairs Manager – London Nor
1st Floor, Square One, 4 Travis Street, Manchester, M1
Tel: 0161 880 3144
[redacted]
E-mail:

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Cumulative Assessment with Northampton Gateway

It would appear that through the DCO process both Rail Central and Northampton Gateway developments are required to undertake a cumulative assessment of the impacts of both sites.

Being conducted independently by each developer these assessments will be based on different assumptions, and therefore will inevitably provide different results, neither of which will be likely to represent the true situation.

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.

Summary

As many of the items above are subject to on-going work and discussions, the LHA shall comment further at the appropriate stage.

Rob Sim-Jones
Principal Engineer – (Principal Lead) Development Managemen

Traffic Assessment 11

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NORTHAMPTON
BOROUGH COUNCIL

Air Quality 4

Our Ref: GS/WK/201712327

Your Ref:

Please ask for: Gavin Smith

Direct Dial: 837648

E-Mail: gsmith@northampton.gov.uk

Date: 21 November 2917

Dear Mr Bodman,

Re: Query Regarding Air Quality Management Areas (AQMA's)

I am in receipt of your enquiry, which was e-mailed to Neil Polden.

Mr Polden no longer works at Northampton Borough Council and his e-mail was redirected to me. Unfortunately, due to the above I am not able to e-mail you directly, hence this letter.

In answer to your question, we do not envisage to either amend or revoke either of the AQMA's referred to in your e-mail. Whilst traffic derived Nitrogen Dioxide (NO2) levels are slightly below the currently the Air Quality Objective for NO2 of , monitored levels from our diffusion tube network within the AQMA's are near the limit and no noticeable trends in reduction has been noted.

Due to the number of large developments in the pipeline outside Northampton that could have a combined net increase on traffic flows through the AQMA's, from a cumulative perspective potential nominal increases in NO2 concentrations could feasibly occur within both AQMA's. Due to the above and the fact we have limited control ever increasing cars on our roads, we are retaining both AQMA's and are continuing to monitor NO2 concentrations within the AQMA's.

With regards to the 5 town centre AQMA's we are looking at amending then to consolidate them into one town centre AQMA. This is going to take time to come to fruition.

If you wish to discuss things further please do not hesitate to contact me.