



NORTHAMPTON
GATEWAY
STRATEGIC RAIL FREIGHT INTERCHANGE

CONSULTATION REPORT

DOCUMENT 6.1

The Northampton Gateway Rail Freight Interchange Order 201X

Section 37(3)(c) Planning Act 2008

Consultation Report | MAY 2018

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Pursuant to Section 37 Planning Act 2008

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1.0 EXECUTIVE SUMMARY

1.1 Introduction

1.1.1 This report has been prepared on behalf of Roxhill (Junction 15) Limited (the 'Applicant') and is intended to fulfil the requirements of Section 37(3)(c) of the Planning Act 2008 ('the Act'). It is submitted in support of the application to the Planning Inspectorate for a Development Consent Order (DCO) for the development of a Rail Freight Interchange (RFI) and associated infrastructure. A fuller description of the proposals is given below.

1.1.2 The proposed development is referred to as 'Northampton Gateway' (and also referred to in this report as 'the Proposed Development'), and is defined as a Nationally Significant Infrastructure Project (NSIP) by the Planning Act 2008.

1.1.3 This report sets out how the Applicant has carried out pre-application consultation on the proposals, and how this consultation complies with the requirements set out in the Act. It contains details of the responses received and how the Applicant took account of those responses in developing the proposals.

1.1.4 The Proposed Development comprises:

- An intermodal freight terminal including container storage and HGV parking, rail sidings to serve individual warehouses, an aggregates facility as part of the intermodal freight terminal, and with the capability to also provide a 'rapid rail freight' facility;
- Up to 468,000 sq m (approximately 5 million sq ft) (gross internal area) of warehousing and ancillary buildings, with additional floorspace provided in the form of mezzanines (155,000 sq.m.);
- A secure, dedicated, HGV parking area of approximately 120 spaces including driver welfare facilities to meet the needs of HGVs visiting the site or intermodal terminal;
- New road infrastructure and works to the existing road network, including the provision of a new access and associated works to the A508, a new bypass to the village of Roade, improvements to Junction 15 and to J15A of the M1 motorway, the A45, other highway improvements at junctions on the local highway network and related traffic management measures;
- Strategic landscaping and tree planting, including diverted public rights of way;
- Earthworks and demolition of existing structures on the SRFI site.

1.2 Consultation Undertaken

1.2.1 The Applicant has, in addition to its ongoing engagement with interested parties, the local community and local authorities, undertaken three ‘formal’ rounds of consultation, which are explained in detail in this report. In summary these were held:

- Stage 1 – 12th December 2016 to 16th January 2017 – see Sections 3.0 and 4.0 of this Report;
- Stage 2 – 9th October 2017 to 24th November 2017 – see Sections 5.0 to 8.0 of this Report;
- Stage 3 – 19th December 2017 to 2nd February 2018 – see Sections 9.0 and 10.0 of this Report.

1.2.2 A wide range of local and statutory bodies have been engaged in dialogue which has had a direct influence on the nature and form of the submitted proposals. This dialogue has taken a number of forms of consultation and engagement, and taken place over an extended period of time. This has included informal and *ad hoc* (non-statutory) engagement and discussion about the emerging proposals with a number of bodies and groups before a first stage of public consultation was held in the winter of 2016/17.

1.2.3 This ‘Stage 1’ consultation included a series of public exhibitions held in December 2016. Many key messages received from this process helped inform the design and detail of the Proposed Development, and informed the continued evolution of the proposals alongside ongoing technical and environmental assessment work at that time. The Stage 1 consultation is detailed in Sections 3.0 and 4.0 of this report.

1.2.4 Prior to submitting an application for a DCO to the Planning Inspectorate, and in accordance with the requirements set out in the Act, the Applicant carried out statutory public and stakeholder consultation on the proposals. All statutory consultation (under Sections 42, 47 and 48 of the Act) has been carried out in line with the advice and guidance provided by the Planning Inspectorate¹ and the Department for Communities and Local Government².

1.2.5 A Statement of Community Consultation (SoCC) was agreed with the relevant local authorities in September 2017 in advance of the formal statutory consultation process, and consultation was then carried out in accordance with the SoCC. The

¹ Advice note fourteen: “Compiling the consultation report” Version 2 produced by the Planning Inspectorate in April 2012

² “Guidance on the pre-application process” produced by the Department for Communities and Local Government in March 2015

SoCC is enclosed at Appendix 12. Further detail including the approach to preparation of the agreed SoCC is explained in section 3.0 of this report. Appendix 13 includes a summary of how the activity undertaken complies with the key actions and commitments as set out in the agreed SoCC.

- 1.2.6 The statutory stage of consultation (referred to as the ‘Stage 2 Consultation’) was undertaken in October and November 2017 and is detailed in Sections 5.0 – 8.0 of this report.
- 1.2.7 A further stage of focused consultation was undertaken in December 2017 (to February 2018) in respect of specific changes to the proposed development made following the Stage 2 Consultation. This process focused on amendments to the scheme which had some (albeit limited) implications for the amount and location of land required to deliver a small number of the highways mitigation proposals.
- 1.2.8 The further consultation was also used to ensure that minor changes or refinement to the description of development were explicitly and clearly understood. The focused consultation, referred to as the ‘Stage 3’ consultation is explained in Sections 9 and 10 of this report.

1.3 Consultation Outcomes

- 1.3.1 Non-statutory pre-application consultation was undertaken over a prolonged period since 2014/15 and the formal statutory consultation took place more recently (in 2017) ahead of submission of the application to the Planning Inspectorate in May 2018.
- 1.3.2 The Applicant’s extensive consultation has ensured that the local communities, statutory bodies and other interested parties have been made aware of, and actively involved in the evolution of, the Northampton Gateway development proposals. The consultation process as a whole has made a positive contribution to the proposals, with the input and feedback received from consultees resulting in a number of alterations and modifications which directly influenced the evolution of the scheme. The process is summarised in this report with relevant in detail also provided in the attached appendices.
- 1.3.3 This Consultation Report provides details of the consultation responses received, and the issues which arose through consultation. It also provides information about the way the proposals have changed over time in response to the input and concerns of local people and bodies. Many aspects of the evolution of the scheme are also described in part in the separate Design and Access Statement (Document 6.9).
- 1.3.4 The information provided in the schedules at Appendices 9, 10, 19, 21, and 30 summarises the relevant consultation and associated responses with responses

provided by the Applicant. The narrative in later sections of this report also provide details of how the Applicant has considered or taken account of those responses, and includes a fuller response to key issues or themes emerging from the consultation process.

1.3.5 Particular issues or themes arose from the various consultation and engagement exercises – the most common issues included:

- Concerns about the impact on the local road network which is already considered by many to be under excessive pressure, including
 - whether the improved Junction 15 would cope with predicted future levels of traffic, and
 - concerns over the potential for increased through-traffic in the villages;
- A local perception that there is no capacity on the rail network to accommodate any additional freight traffic;
- Questions about the likely landscape and visual impacts of the proposals, particularly on nearby villages to the west and south of the site, and Collingtree on the opposite side of the M1 – this was increasingly represented by messages of support for an earthworks and landscape strategy which substantially screens the site from outside view;
- Objections to the principle of development on currently agricultural land on an unallocated site;
- Concerns about the potential for additional noise and air pollution impacts on nearby communities, some of which are already very concerned about air quality associated with the M1 motorway with a perception that air quality is generally poor;
- Some support in principle for the provision of a Roade bypass – the village has historically struggled with various adverse effects of through-traffic. Some local residents have raised questions or objections about the proposed route of the Bypass for a range of sometimes inconsistent reasons including:
 - concerns that an ‘outer’ route would provide significant areas for future additional housing development, and
 - concerns that an ‘inner’ route may lead to significant noise or visual impacts.
- Questions and challenges over the extent to which an SRFI is needed in this location, and whether there is a realistic prospect of a rail freight terminal being either built or operated if approved;

1.3.6 Key examples of ways in which the Proposed Development has been amended or revised as a result of comments received include:

- The earthworks, landscape and green infrastructure strategy is based around the objective of substantially screening the site and buildings from outside view - this is to minimise or eliminate visual and lighting effects, and to aid mitigation of other potential impacts (including noise). This aspiration and principle was in place from the earliest stages of the design evolution following input from local people and Parish Councils, but the strategy was revisited and enhanced with increased heights to some of the landscaped bunding (earthworks) on the eastern boundary of the SRFI site in response to concerns and questions during Stage 1 of the consultation process about visual impacts on Collingtree to the north of the M1 motorway;
- The highways strategy improves key strategic routes to attract traffic away from more local roads, reducing the impact of through-traffic on existing communities while ensuring efficient access to and from the development site – as a direct response to local discussions, this includes a ban and physical restraint on right-turns out of the site (i.e. turns south onto the A508) for HGVs leaving the SRFI;
- Clear commitments are given by the Applicant regarding the delivery and phasing of key infrastructure, including provision of the rail terminal prior to first occupation, and early delivery of the Roade Bypass, as a direct response to concerns by local people and politicians that neither of these key components would be delivered;
- The package of highways mitigation works on local roads close to the site was amended in direct response to detailed comments and suggestions from local people and road-users during Stage 2 of the consultation (and led in part to the holding of the Stage 3 Further Consultation focused on a small number of changes made after Stage 2);
- Inclusion of a secure HGV parking facility to accommodate early arrivals to the SRFI site, and to eliminate any risks associated with encouraging or facilitating HGV related crime. Also, to reduce the potential for adverse impacts on local communities from over-night HGV parking associated with the site – this was in direct response to comments from the Police and Road Haulage Association during Stage 2 of the consultation (and led in part to the holding of the Stage 3 Further Consultation);
- The application includes a range of low emissions and sustainability measures geared around supporting the Northampton Borough Low Emissions Strategy to help reduce air quality concerns in some parts of the

local area – this includes exploring the extensive use of solar PV and battery storage to maximise the sustainable energy generation potential of the site and buildings, and electric vehicle charging infrastructure, in addition to meeting the BREEAM ‘Very Good’ standard required by local policy.

1.4 Conclusion

- 1.4.1 The Applicant is satisfied that the consultation process undertaken has fully complied with the requirements for pre-application consultation and the duty to have regard to relevant responses pursuant to the Act. The consultation undertaken was in line with the advice and guidance provided by the Planning Inspectorate and the Department for Communities and Local Government.
- 1.4.2 Significantly, the consultation undertaken was also consistent with the agreed SoCC. Further consultation undertaken (referred to as ‘Stage 3’) was conducted in accordance with the statutory consultation processes, and was over and above that envisaged by the SoCC. This was undertaken following explicit dialogue with the LPAs, and was to ensure that minor clarifications to the description of development, and amendments to some highways mitigation measures, were properly understood and an opportunity provided for further comment or input.
- 1.4.3 The Applicant is satisfied that the issues raised by consultees have been considered and addressed throughout the evolution of the proposals. There has been an iterative process of design evolution, informed by both consultation dialogue, and the technical and assessment work undertaken. Many local people and representative bodies have engaged throughout the consultation process to raise objections to the principle of the Proposed Development, and these comments have been noted and are summarised in this report.
- 1.4.4 However, where possible, through design evolution and other amendments, the proposals have been adapted or changed throughout the process to help minimise the local negative effects, and maximise the positive effects.

2.0 INTRODUCTION

2.1. Background

2.1.1. The proposal is for the development of a Strategic Rail Freight Interchange (SRFI) located on a site in South Northamptonshire adjacent to Junction 15 of the M1. Some of the proposed highways improvements are located in Northampton Borough.

2.1.2. The proposals comprise:

- An intermodal freight terminal including container storage and HGV parking, rail sidings to serve individual warehouses, an aggregates facility as part of the intermodal freight terminal, and with the capability to also provide a 'rapid rail freight' facility;
- Up to 468,000 sq m (approximately 5 million sq ft) (gross internal area) of warehousing and ancillary buildings, with additional floorspace provided in the form of mezzanines (155,000 sq.m.);
- A secure, dedicated, HGV parking area of approximately 120 spaces including driver welfare facilities to meet the needs of HGVs visiting the site or intermodal terminal;
- New road infrastructure and works to the existing road network, including the provision of a new access and associated works to the A508, a new bypass to the village of Roade, improvements to Junction 15 and to J15A of the M1 motorway, the A45, other highway improvements at junctions on the local highway network and related traffic management measures;
- Strategic landscaping and tree planting, including diverted public rights of way;
- Earthworks and demolition of existing structures on the SRFI site.

2.2. Site Location

2.2.1. The Northampton Gateway proposal is located in a highly accessible location and as described above consists of a number of related but distinct components. To aid communication and presentation and to ensure clarity about the location of proposed development (and the associated potential environmental effects) different parts and parcels of land have been identified and referred to in the application documents. This is explained in further detail in the Guide to Application (Document 1.3) and shown on the plan titled 'Components of the Proposed Development' (Document 2.13).

- 2.2.2. The proposed SRFI site is referred to as the 'Main Site' (or the SRFI site), and includes the works to provide a new access from the A508. In addition, there is a package of highways development proposed at Junction 15, 15A, and at locations on the A508 corridor. This is referred to as "*highway mitigation works*". The proposals also include delivery of a Roade Bypass around the western side of the village of Roade (referred to as the 'Bypass site' or 'Bypass corridor').
- 2.2.3. The Main Site is located on land to the west of Junction 15 of the M1, and to the east of the Northampton Loop railway line. Further to the west are the villages of Milton Malsor and Blisworth, with the village of Collingtree (in Northampton) located immediately to the north/eastern side of the M1 which runs alongside the site. The A508 road defines the Main Site's eastern boundary and forms one of the routes which link to Junction 15, with the A45 running north from Junction 15 with connections to the A14.
- 2.2.4. The main site has an area of approximately 219 hectares, and the total application area covers an area of approximately 290 hectares incorporating all of the land included within the Order Limits, including the package of highways mitigation works. Most of this land is located within South Northamptonshire District, but some is in Northampton Borough as can be seen on the Location Plan (Document 2.12).
- 2.2.5. As referred to above, the proposed highway mitigation works consist of new roads and improvements to existing roads located on land on and around Junction 15 and 15a of the M1, land to the west of the village of Roade to the south of the Main Site, and small areas of land along the A508 corridor.
- 2.2.6. The town centre of Northampton is approximately 4 miles to the north of the main site, and Towcester is approximately 10 miles (by road) to the south-west. Milton Keynes is located around 20 miles to the south-east. The proposed rail freight terminal will connect the site to the Northampton Loop railway line providing direct access to the main rail freight corridor in the country, with access provided to key national ports and markets.
- 2.2.7. The proposal is therefore located in a strategic location on the road and rail networks, with access to key north-south and east-west road links via the M1, A45, A14, and A5, as well as connectivity to the national rail freight network.

2.3. Purpose of the Report

- 2.3.1. The purpose of this report is to identify the consultation processes and outcomes which have informed the preparation and evolution of the proposals and application. It sets out the various elements of the consultation process which have been

undertaken, including the non-statutory consultation activity which ran for a prolonged period before the more formal and statutory consultation process commenced.

2.3.2. It also describes the local and public consultation process which has been undertaken. Consultation has been undertaken in various stages which provide the overall structure of this report. Table 1 below provides some details of the structure, but in general terms, the key stages are as follows:

Stage 1 – Non-Statutory Consultation

- Informal and non-statutory consultation with various bodies and communities has been underway since 2014/15, starting in the context of an earlier planning application on a site within the now proposed SRFI Site.
- The report describes the key activities and outcomes from informal consultation and engagement including the general awareness raised about the potential for development on part of the same site in the context of the earlier planning application.
- Stage 1 saw a series of public consultation exhibitions held in the vicinity of the Proposed Development in addition to a leaflet/newsletter drop, and mail shot.

Stage 2 – Statutory Consultation

- This focuses on the formal consultation processes in compliance with Sections 42, 47 and 48 of the Act in relation to the preparation of the DCO application – these were undertaken in October – November 2017.
- This Report provides a summary and overview of the responses and input received from the public and technical stakeholders (and other prescribed persons).
- The account taken of any ‘relevant response’, including where comments have led to changes in the submitted application. Every response received has been considered, including those received outside the deadline for representations.

Stage 3 – Further Consultation

This additional stage of focused consultation was undertaken in December 2017 to February 2018 to ensure that:

- consultees and stakeholders were explicitly aware of minor amendments and clarifications made to the description of development;
- local land owners were aware of minor changes to the areas of land required to deliver some components of the package of proposed highways mitigation

measures following discussions with the County Council (Highways Authority) and local people during the Stage 2 consultation.

Table 1. Consultation Undertaken – quick reference guide

Consultation Stage	Purpose/intended outcomes	Timing	Report Section
Non-Statutory Consultation	Earlier dialogue and discussions were held regarding potential development in this location 2014/15. This was followed by more specific consultation and dialogue to raise awareness of the emerging proposals, and seek informal input and views from partners including local communities, local authorities and statutory agencies.	Stage 1 consultation 12 December 2016 – 16 January 2017 (Stage 1)	3.0 and 4.0
Section 47	<u>Duty to Consult Local Community</u> Consultation with local community and 'people living in the vicinity of the land'.	9 October and 24 November 2017 (Stage 2) 19 December 2017 to 2 February 2018 (Stage 3)	5.0 and 6.0 10.0 and 11.0
Section 42	<u>Duty to Consult</u> Consultation conducted with statutory and technical stakeholders. Including local authorities under Section 43 and parties with an interest in land under Section 44.	9 October and 24 November 2017 (Stage 2) 19 December 2017 to 2 February 2018 (Stage 3)	7.0 11.0
Section 48	<u>Duty to Publicise</u> Publication of the intention to submit the application to the Planning Inspectorate	October 2017	8.0

2.3.3 In preparing this Consultation Report due regard has been had to the DCLG Guidance, and Planning Inspectorate (PINS) Advice Notes. In particular, Advice Note 14 which relates to '*Compiling the Consultation Report*' was used by the Applicant as a guide as to key elements and content expected or preferred for inclusion by PINS. In particular, the approach taken reflects the advice from PINS that:

- *There is no 'one size fits all' approach to the Consultation Report;*
- *The Consultation Report should provide clear links back to the legislation (Planning Act 2008) and other relevant legislation to aid the Secretary of State;*
- *Making distinctions between non-statutory and statutory consultation is helpful and appropriate;*
- *Copies of relevant notices, letters, and other examples should be appended to the Consultation Report, or cross-referenced if they are provided elsewhere;*
- *Reporting the responses received can be dealt with in a number of different ways, including either on an 'issues' basis, or based around summaries of responses. It is important to be clear what regard has been had to comments received and identify if changes were made as a result, as well as explaining where no change was made as a result of responses received.*

3.0 STAGE 1 - NON-STATUTORY CONSULTATION

Summary of Consultation history, methodology and objectives

- 3.1.1 Ahead of the requisite statutory consultation process, and from the early stages of the evolution of the proposals, the Applicant informally consulted with a number of stakeholders regarding the emerging scheme. This engagement began on a relatively small scale initially but has been an ongoing feature of the project as it has evolved, with informal and non-statutory engagement and dialogue also continuing throughout the period up until submission.
- 3.1.2 Appendix 1 provides a summary of the range of meetings and other engagement held with a range of local and statutory bodies since early 2016.
- 3.1.3 However, also of relevance is the earlier dialogue and contact with local bodies and communities during 2014 and 2015. Before the Northampton Gateway scheme was brought forward the principle of part of this site was being proposed for redevelopment by the Applicant when a high-profile locally based manufacturer sought to relocate from Northampton to a new national distribution centre on part of the current main site. In 2014 the Applicant prepared and submitted a planning application to South Northamptonshire Council (SNC) working alongside the occupier. This was later withdrawn (in June 2015) prior to determination with the intended occupier deciding to seek alternative ways to meet their expansion needs in or very close to Northampton. In light of the local political context at the time, and other opportunities and timing pressures, the occupier subsequently secured planning permission for a new purpose built distribution and campus facility in East Northamptonshire District which is now under construction.
- 3.1.4 As part of preparing that planning application the Applicant undertook pre-application public consultation, as well as receiving pre-application advice from SNC. To a relevant extent the awareness raised during this process played an important role in setting the scene for the Northampton Gateway. It provided a clear understanding of a number of key local issues and some concerns about the potential impact of development in this location, both from the community and local politicians, which played a direct role in informing the Northampton Gateway proposals.
- 3.1.5 In their input to that process many local people asked about the potential for the site to be rail connected, pointing to the direct access to the Northampton Loop railway line and criticising those earlier proposals for being entirely road based. Indeed, many criticised those proposals for not seeking to make any provision for use of rail as part of the distribution process. The occupier in question at that time did not (and still does not) use rail in any significant way for its distribution or supply chains, and saw no potential to incorporate it into their complex network of suppliers and sales depot outlets across the UK and beyond. However, this early round of dialogue with

the District Council and surrounding communities raised questions about the opportunities for rail connected distribution development in this location.

- 3.1.6 Therefore, when the Applicant engaged with a range of partners to begin the process of discussing their early ideas for an SRFI in early to mid-2016 there was already some local awareness of the market interest in the site. Furthermore, in the minds of some in the local community, there was also an awareness of the potential for a rail connected development.
- 3.1.7 In the summer of 2016 the Applicant wrote to a number of local interested parties to introduce the emerging proposals, and to offer a meeting to discuss them. This included letters to local Parish Councils, and MPs. Some examples of these are attached at Appendix 2.
- 3.1.8 In the months following that formal approach the Applicant and their representatives had various meetings with, and made presentations to, various bodies and groups. An overview of the non-statutory consultation and engagement with the key groups or categories of stakeholder is provided in following sections of this Report alongside the details provided in Appendix 1.
- 3.1.9 This early engagement served to introduce the then emerging scheme, to provide updates where relevant and appropriate, and to allow relevant bodies to comment on and influence the proposals. This often included meetings or updates with groups or bodies which at that time had no formal view or position on the proposals, and some bodies which were expressly concerned about, or opposed to, the proposals. It ensured that, regardless of whether the groups or bodies in question were minded to support or object to the proposals they were aware of the Applicant's ideas, approach, and timetable, and equally it ensured that the Applicant was aware of the key areas or issues of concern or interest to local groups and bodies. This early engagement proved of significant value in undertaking the Environmental Impact Assessment and presenting the Environmental Statement (Document 5.2), and in how later statutory and more formal consultation and engagement activity was undertaken.
- 3.1.10 Informal engagement and consultation has been held with a range of relevant bodies, including:
- Local Authorities, including SNC, Northampton Borough and Northamptonshire County Council;
 - Parish Councils;
 - Local MPs (for local constituencies);
 - The Local Enterprise Partnership for Northamptonshire (SEMLEP);
 - Network Rail;

- Bus companies and operators;
- Highways England;
- Local groups (e.g. representatives of the 'Stop Rail Central/Stop Roxhill' opposition groups);
- Utilities providers;
- The Environment Agency;
- Neighbouring land-owners;
- Potential occupiers of the SRFI site, and potential operators of the rail freight terminal.

3.1.11 The presentations and meetings allowed those involved to comment on the scheme and have a valuable if informal input into its evolution. The input and comments received during the non-statutory stage led directly to alterations and amendments as part of the evolution of the scheme – later sections of this Report provide more details about the evolution of the proposals through both the non-statutory and statutory stages of consultation. Engagement and consultation with various bodies throughout the application preparation process ensured that they were kept up to date with progress on the scheme and how the proposals were developing.

3.2 Creation of the Transport Working Group

3.2.1 An early action in response to non-statutory consultation and dialogue was the creation of the Transport Working Group. It was understood from the outset that the highways and wider transport agenda would be fundamental to the project as a whole. With this in mind, it was determined that there would be mutual advantages to working closely with key consultees on a technical level to progress core elements of the Transport Assessment associated with the transport and traffic modelling.

3.2.2 The Group provided a forum for discussion and agreement, and was formed in order to provide a collaborative approach to the transport issues. It had input to, and oversight of, the technical work being undertaken to ensure consistency of approach and methodology, and also to ensure appropriate data and assumptions were used by the Applicant in preparing the Transport Assessment. This has included some over-sight and review function of the associated traffic modelling which has been undertaken using Northamptonshire County Council's 'Northamptonshire Strategic Transport Model' (NSTM), delivered by the County Council's consultants (WSP). This modelling then formed a direct input to developing the package of highways mitigation works which has also been assessed and debated by the Transport Working Group.

3.2.3 The Transport Working Group first met in July 2016 and has met approximately every month since then. The core membership of the Group, in addition to representatives of the Applicant, are:

- Northamptonshire County Council Highways
- Highways England (HE)
- AECOM as the HE's consultants

3.2.4 Invitations were made to a range of other bodies, including Buckinghamshire County Council (as a neighbouring Highways Authority) and South Northamptonshire Council both of which requested membership of the TWG through the ES Scoping process. In response to these invitations it was agreed with South Northamptonshire Council that it was appropriately represented by the attendance of the NCC highway officer representing South Northamptonshire Development Control. Buckinghamshire CC declined to take up the offer of membership once further details about the scope and role of the group were provided. Therefore while both of these invitations remained open they were not taken up.

3.2.5 Examples of minutes from some of the early TWG meetings are enclosed as Appendix 3.

3.2.6 Separate to the Transport Working Group, but of direct relevance to practical and operational transport issues associated with the Proposed Development, dialogue with Stagecoach (as the local bus company) began in 2016. This was to discuss options associated with public transport access to the Proposed Development, and to explore the potential for the introduction of additional or enhanced services. This dialogue continued with the bus company's input important in the preparation of the Public Transport Strategy which forms part of the proposals.

3.3 Engagement with local and political stakeholders

3.3.1 Engagement with representatives of the relevant local authorities and Parish Councils in the villages surrounding the development area was seen as a priority, and formed the focus of the first local engagement in 2016. This included contact with South Northamptonshire Council as the local planning authority, and early meetings were held in 2016 with senior officers to present and discuss the emerging Northampton Gateway scheme.

3.3.2 This non-statutory period of consultation also saw the start of more formal and structured pre-application advice processes held with both the local planning authorities (South Northamptonshire Council (SNC), and Northampton Borough Council (NBC)). This pre-application dialogue began on a more formal basis in December 2016/January 2017 with a Planning Performance Agreement approach

adopted at the request of SNC. The Applicant was asked to help fund the Council's technical support and advice to ensure it was able to respond fully and in an informed way to consultation, including draft ES and other technical documents. Update meetings have been held as required, or as requested by either party, but have not been held on a regular schedule. In the interim, phone-calls and emails have been exchanged more regularly between the Councils' officers and the Applicant's team.

3.3.3 The Parish Councils closest to the proposals were considered to be key bodies in terms of ensuring awareness about the project and for seeking to establish early and ongoing dialogue. Therefore, the focus of engagement activity was with:

- Milton Malsor Parish Council
- Blisworth Parish Council
- Collingtree Parish Council
- Roade Parish Council
- Courteenhall Parish Meeting

3.3.4 Letters were sent to the above Parish Councils in June 2016, as well as to a number of local SNC Ward Councillors, and to the County Council, to introduce the scheme.

3.3.5 Engaging with the Local Enterprise Partnership (LEP) was also seen as an appropriate early action given its role in bringing together local authorities and business representatives, and to take a strategic role in promoting and supporting economic development.

3.3.6 Similarly, ensuring the local MPs were aware of the proposals was also considered important. As a nationally significant project proposed in or close to two Parliamentary constituencies (of Daventry, and Northamptonshire South) it was considered necessary that they were offered opportunities to understand both the emerging scheme and the NSIP process.

3.3.7 Following the initial approaches to these local political bodies, a series of meetings were held, and contact by email, phone, and in meetings has been regular and ongoing since with politicians and officers at the Parish, District, and County levels. Initial meetings held during mid-2016 introduced the emerging proposals and presentations were made to Council officers and Parish Councillors to explain the key elements of the scheme and what it could deliver in the local context.

3.3.8 The focus of many early meetings was to explain the emerging proposals and establish a dialogue as the scheme evolved. The Applicant continued to keep the relevant Parish Councils named above informed on progress on the scheme with appropriate correspondence and meetings. Often, the meetings held with the Parish

Councils provided an opportunity for them to informally raise their objections or concerns about the potential impacts of the scheme. These informal meetings and discussions have helped to ensure at all stages that the Applicant is fully aware of the priorities and main concerns of the Parish Councils as representatives of local communities near the site. This awareness was directly relevant to decisions taken about the technical work undertaken as part of the Environmental Statement and other supporting documents, and has also informed some aspects of the proposals.

- 3.3.9 As the scheme and proposals became increasingly clear and some elements became fixed, later meetings often included discussions in more detail about the aims, ambitions, procedures and timescales for the project as a whole. Again, this dialogue also continued throughout the formal public consultation stages to ensure that the political stakeholders were aware of the consultation process.
- 3.3.10 To provide a framework and context for key elements of the non-statutory Stage 1 consultation a 'Consultation Strategy' document was prepared and shared for discussion with the local authorities (SNC and NCC) in November 2016 – this is submitted at Appendix 4. This Strategy provided an explanation of the activity being undertaken, including an overview of that already underway, and that planned, including the Stage 1 consultation exhibitions. The November 2016 Consultation Strategy provided a basis for the Statement of Community Consultation (SoCC) referred to later in this Report in the context of the statutory Stage 2 consultation.
- 3.3.11 Around the time of, and during the non-statutory (Stage 1) consultation held in December 2016 and January 2017, a number of Parish Council public meetings were attended by the Applicant. These meetings followed the same basic format including a short presentation to outline the emerging illustrative masterplan and to describe some of the ongoing surveys and technical work being undertaken at that time to inform the ongoing design and environmental impact assessment. In every case questions were then taken from both Parish councillors and members of the public. Key meetings were held as follows:
- Meeting with Blisworth Parish Council, 7th November 2016 – approximately 20 residents attended;
 - Meeting with Milton Malsor Parish Council, 8th November 2016 – approximately 20 residents attended;
 - Meeting with Roade Parish Council, 28th November 2016 – approximately 100 people attended, with the meeting focused around an open floor 'Q&A' session;
 - Meeting with Collingtree Parish Council, 18th January 2017 – approximately 30 residents attended;

- Attendance and presentation to the Roade Parish Council Annual Meeting, 21st April 2017 – around 300 people attended from Roade and beyond with a session which included input from Mrs Andrea Leadsom MP, and involved an open floor (approx. 2 hrs) open floor 'Q&A', this also involved promoters of the alternative 'Rail Central' SRFI scheme.

3.3.12 Although not a formal part of the public consultation process, these meetings offered an important opportunity for the Applicant to discuss the emerging proposals, and to hear direct from local people their key concerns, issues and ideas. Crucially, this informal stage of consultation also helped ensure local awareness of the emerging proposals in advance of the statutory consultation process which was to follow, and which is described in further detail in the following Sections of this Report.

3.3.13 The project website (www.northampton-gateway.co.uk) was launched in the Autumn of 2016 to coincide with and support the Stage 1 consultation process, and the website address details were given at the Stage 1 consultation exhibitions described in Section 3.5 below.

3.3.14 Frequently asked questions ('FAQs') notes were compiled from several of these public meetings to help both the applicant and local communities in tracking key issues, and to help ensure that commonly raised questions were being addressed and understood in a consistent way. These notes were also posted on-line.

3.3.15 The outcomes from local public consultation, including the non-statutory consultation stage, are described in Sections 4.0, 5.0 and 11.0 of this report.

3.5 Stage 1 (non-statutory) Public Consultation Exhibitions

3.5.1 This first round of public consultation exhibitions was held on three consecutive days in December 2016 (12th, 13th and 14th) at the Hilton Hotel in Collingtree within close proximity to the Main Site. The exhibitions were all held from early afternoon to 7.30pm to make it possible for people to attend before school pick-up times and on their way home or after work.

3.5.2 Around 6000 leaflets were distributed by post to addresses in the vicinity of the SRFI site. A copy of this leaflet is included at Appendix 5. In addition, letters were sent to interested parties and consultees in a similar manner to how a statutory (Section 42) consultation process would be undertaken. The lists of those consulted are included at Appendix 6. This ensured wider awareness of the process, and increased the chance of the Applicant receiving responses from a range of bodies at this early, non-statutory stage.

3.5.3 The Applicant was able to raise awareness of the planned consultation period and events in updates to local Parish Councils via meetings, and through updates to

Clerks sent by email. Similarly, key local Ward members were also informed of the consultation process in advance.

- 3.5.4 The project website was updated to provide details well in advance of the consultation period beginning, and the exhibition material was also added to the website for people to view and/or download.
- 3.5.5 The exhibitions were manned by a team of representatives of the Applicant, including some of the consultant team to ensure it was possible to provide technical information and explanation about the emerging proposals, and planned or ongoing technical and assessment work, as required.
- 3.5.6 Approximately 300 people attended the three exhibitions in total, with a fairly even split across the three days.
- 3.5.7 Members of the public were able to make their representations and comments on the proposals via the following methods:
- *By hand (or post – see below) via a printed comments form available at the public exhibitions;*
 - *online via the project website: www.northampton-gateway.co.uk;*
 - *by email;*
 - *by telephone using the phone message line on 01788 538 440;*
 - *by post to a dedicated PO Box address; and*
 - *in person at the public exhibitions in dialogue with the team and applicant.*
- 3.5.8 The consultation period was held over an approximate 6 week period (allowing for the Christmas period) from early December 2016 with comments requested by 16th January 2017.

The material consulted upon

- 3.5.9 The material consulted upon during this consultation process included:
- *The draft illustrative masterplan;*
 - *The draft parameters plan;*
 - *Preliminary draft Environmental Statement chapters;*
 - *Emerging highways and other infrastructure proposals, including plans/drawings of proposed junction improvements at Junction 15 – this included an explicit request for comments and preferences with regard to 2 potential Roade Bypass alignments;*

- *A 1:1250 scale physical model of the SRFI site and surrounding land; and*
- *A 3D computer generated model to provide visualisations of the landscape and visual impacts of the Proposed Development.*

3.5.10 The public consultation exhibitions consisted of a series of 12 large (1.8m x 1.2m) exhibition boards. A copy of the Stage 1 Exhibition Boards is attached as Appendix 7.

3.5.11 The Boards presented the key emerging findings of the Environmental Impact Assessment process to date, with reference to ongoing technical or assessment work where relevant. The Boards also included explicit consultation on detailed issues where there remained no clear or fixed proposal.

3.5.12 The website was also updated with the exhibition material presented at the Stage 1 consultation exhibitions, as well as early Preliminary Draft ES chapters and supporting information.

3.5.13 A 'Summary of Proposals' document (Document 6.5A) was prepared and made available at the exhibitions, as well as online, to provide not only a good summary of the proposals but also of the main elements of, and programme for, the consultation process. This document provided the basis of the 'Short Explanatory Document' (Document 6.5B) which was prepared for the Stage 2 (statutory) consultation process described later in this Consultation Report.

3.5.14 As referred to above, around 300 people attended the first three exhibitions in total, and 71 comments forms or emails were provided as a result of the three exhibitions, including some anonymous responses. This included comments forms completed at the exhibitions as well as further responses via the project website and the dedicated PO Box. Responses were reviewed and entered into the consultation database.

3.5.15 The comments forms provided at the exhibitions (Appendix 8) consisted of a series of questions and an area for general comments. The questions were:

1. *Do you think that a Strategic Rail Freight Interchange in this location is a good idea? Please give reasons for your answer.*
2. *What do you think of the emerging proposals for improvements to Junction 15?*
3. *Do you have any comments about the proposed Roade Bypass? Which of the two identified alignments do you think is most appropriate?*
4. *What do you think of the emerging landscaping strategy? Were the models useful in understanding the approach with regards to visual screening and containment?*

5. *We will be holding further consultation during 2017 when the technical work has progressed – is there any specific information you would find helpful at the next exhibitions?*

4.0 ISSUES ARISING AND APPLICANT'S RESPONSE TO COMMENTS RECEIVED DURING STAGE 1

4.1 Summary of Responses to Stage 1

- 4.1.1 A full summary of the responses and comments received can be found in the Stage 1 Section 47 Consultation Schedule (see Appendix 9). This schedule includes responses from the Applicant, and where relevant details of any changes made in response to the specific issues raised in the comments. Section 6.0 of this Report also provides analysis and responses to the key issues raised during Stage 2 of the consultation process, some of which relate directly to some of the earlier input received at Stage 1 with an ongoing dialogue and narrative between some issues across the two consultation Stages. To prevent duplication and repetition some issues are dealt with briefly below and in more detail later in Section 6.0.
- 4.1.2 It should be noted that the summary of issues draws not only on the written responses received (comments forms and letters or emails), but also on discussions had with visitors to the exhibitions, not all of which result in comments being submitted in writing.

Transport issues

- 4.1.3 Transport issues dominated the responses to the Stage 1 consultation process. Traffic and congestion was clearly a major concern of many of the local residents who provided comments, and many local residents were keen to emphasise existing problems and issues. Many people were particularly interested in what transport impacts the Proposed Development would have, including with regard to the numbers of HGVs in the local area, and in terms of through-traffic in local villages. 'Rat-running' traffic was identified as an existing issue which causes regular problems, and this topic dominated much of the discussion at the exhibitions, as well as the comments received in writing. Local people clearly already feel this is a major issue, and are very keen not to see it getting any worse. During Stage 1, around 60% of the comments referred to general traffic concerns as part of the response.
- 4.1.4 At Stage 1, and as explained in the consultation material, sufficient work had been undertaken to begin to develop a highways mitigation package centred around Junction 15 improvements, and a Roade Bypass. However, the Applicant had not undertaken all of the detailed traffic modelling, albeit detailed and technical work

regarding the Transport Assessment (TA) and associated modelling was underway via the TWG referred to above.

- 4.1.5 It was clear that the existing local traffic and transport conditions are often so poor, especially around Junction 15, that many people were struggling to comprehend what could possibly be done to create more capacity and to enable the junction to work more effectively. In the absence of confirmed technical details or a well advanced draft TA many people who raised objections expressed the views that either they did not accept that the road network can cope with any more traffic at all, or disbelief that the proposed highways infrastructure improvements at Junction 15 could mitigate existing problems adequately to accommodate the further growth proposed.
- 4.1.6 Many local people were particularly keen to understand what impact the development would have on HGV numbers using local (including village) roads, with their questions and concerns rooted in their observations of the way the local road network performs now.
- 4.1.7 However, while there were many questions and concerns raised about the emerging highways proposals and ongoing TA work, there was also support for the then outline package of highways measures proposed, with around 18% of respondents supporting the emerging Junction 15 highways improvements.

Air, Noise and Lighting 'pollution'

- 4.1.8 Beyond traffic and congestion concerns, the most common issues given as the basis for concerns or objections was the potential for significant additional air, noise and light pollution as a result of the Proposed Development. Of the responses received to the Stage 1 process, over a third made reference to concerns or objections over one or more of these issues.
- 4.1.9 These comments and questions ranged across these issues, but air quality and noise were the most commonly cited issues of concern, particularly given the frequently held local opinion that air quality is already poor in communities around the Main Site. Residents from Collingtree in particular often referred to this at the exhibitions, offering a view that the village as a whole has poor air quality, and concerned that any further adverse effects as a result of the Proposed Development would have significant health impacts.
- 4.1.10 General concerns about noise were also referred to regularly, with an assumption that the intermodal rail terminal would generate significant noise, and concerns about 24 hr operations on the site.

Impacts on amenity and 'quality of life'

- 4.1.11 There were also objections to the principle of development in this location with some local people expressing the view that any development south of the M1 would adversely impact the amenity and quality of life of nearby local communities. Many local people were keen to explain that they view the villages of Milton Malsor and Blisworth as rural communities with no connection or direct relationship with urban Northampton.
- 4.1.12 While some local people were prepared to concede that the southern edge of Northampton is already visible from some viewpoints in these villages, including recently added buildings at Grange Park, others were of the view that the villages are rural in nature with no physical or visual relationships with Northampton. In this context and from this perspective, many local people offered general objections to the principle of any proposed development, regardless of the detail with regard to likely effects or benefits it could deliver.

Visual and landscape impacts

- 4.1.13 Related in part to impacts on local amenity, there were some concerns about the visual and landscape impacts of the Proposed Development. However, Stage 1 included a well progressed draft landscaping and earthworks strategy, which resulted in a number of positive comments too. A good number of local people acknowledged the efforts made to devise a comprehensive and substantial landscaping strategy to help screen the SRFI site from outside view, including from nearby villages. The physical model of the Main Site was generally well received at the exhibitions, and written comments also expressed the value the model (and the CGI model) added to understanding the scale of the proposed landscaping bunds and buffers, and their role in mitigating potential effects of the proposals.
- 4.1.14 Verbal points were made at the exhibitions, picking up questions also raised during engagement with the Parish Council during Stage 1, about whether the emerging landscaping and earthworks strategy was doing as much as it might to help screen views (and noise and lighting effects) which might otherwise impact parts of Collingtree on the opposite side of the M1.
- 4.1.15 Residents in Roade and further afield were generally less concerned by landscape and visual impacts given their distance from the SRFI site.

Roade Bypass

- 4.1.16 Comments were explicitly sought by the Applicant during Stage 1 about the proposed Roade Bypass. Two potential route alignments around the west of Roade were displayed following initial work by the Applicant to identify deliverable and effective routes.
- 4.1.17 The response to the question of which bypass route would be preferred was low, with only 5 individuals offering a view – 4 of these preferred the inner Blue route over the Green (outer) route. However, a slightly higher number of people chose to comment on the principle of the bypass without commenting on either proposed alignment – 14 people (20% of those who provided comments) supported the provision of a Roade Bypass, and 11 (15%) objected to it. The need for a bypass was questioned by some, with others referring to concerns that wherever a bypass is located new housing ‘infill’ would be inevitable. There was no overall clear consensus on which route, with support for both the inner (‘blue’) and outer (‘green’) routes. Key reasons given for supporting the inner route were the more limited potential for future ‘in-fill’ housing which is seen by many as inevitable between any Bypass and the village edge, while reasons given for supporting the outer route were to help limit any adverse effects of the road on nearby homes.
- 4.1.18 Queries were raised about how existing recreational routes (rights of way) would be affected by the Bypass, and how they could be incorporated or retained with minimal disruption to existing local access and use.

Alternatives or other SRFIs

- 4.1.19 Stage 1 responses underlined that many local people object to the proposals, and as referred to above in the context of concerns over the potential change to a rural way of life, many objections were to the principle of development. These were often expressed regardless of the emerging technical details and draft assessment findings, or of the stated objectives of the Applicant with regard to minimising local effects. These in principle objections often included a questioning of the need for the Proposed Development, and a relatively common comment referred to there being other alternative sites or existing SRFIs, including Daventry International Rail Freight Terminal (DIRFT) at Junction 18 of the M1. Many local people expressed surprise or a lack of understanding of why another SRFI would be required at Junction 15 having concluded that the presence of DIRFT must mean there is no need for another.
- 4.1.20 To some extent related to the same issue, some responses referred to their being no local planning policy in the adopted West Northamptonshire Joint Core Strategy (the WNJCS) which supports or allocates development of this site, or which advocates a further SRFI being delivered in addition to DIRFT. This was seen by some

respondees as grounds for objection, coupled with general comments of objection to the NSIP process which is seen by some to be undemocratic.

Other issues raised

- 4.1.21 A small number of comments referred to rail capacity issues, citing a commonly held belief that the West Coast Main Line (WCML) is already 'full', with no new capacity for further freight traffic.
- 4.1.22 A number of verbal and written comments referred to the consultation process, suggesting that the venues would have been better were they distributed closer to, or within, other villages also likely to be interested in (or affected by) the Proposed Development. Holding three exhibitions in a single venue was not considered very accessible by some respondents.
- 4.1.23 The Applicant was pleased to note no concerns raised about the newsletter distribution, and few if any reports of problems as a result of newsletters not having been seen by people in the vicinity of the Proposed Development.

Applicant's actions and responses to issues raised at Stage 1

Traffic and congestion

- 4.1.24 The Stage 1 consultation confirmed that traffic and congestion were the main issues of interest and concern to local people.
- 4.1.25 The Applicant continued to progress the modelling work with Northamptonshire County Council's consultant, and through the Transport Working Group, with a view to being able to refine key details of the TA and highways mitigation works in advance of the Stage 2 (statutory) consultation process.
- 4.1.26 In the absence of agreed transport modelling outputs, the Stage 1 consultation had presented initial findings from the work to progress an early draft Transport Assessment. The Applicant had undertaken sufficient work to have high levels of confidence that a Highways package based on significant improvements to Junction 15 and a Road Bypass on the A508 would mitigate the development traffic, while also alleviating existing congestion issues and challenges. While there was a good amount of information regarding likely traffic impacts there was not a full or comprehensive evidence base available to fully address all of the questions asked in detail. However, the Stage 1 process provided a chance to outline the main components of the emerging highways package and seek local views to aid ongoing work.

4.1.27 It was made clear that many village residents already feel that they suffer from 'rat-running' traffic, including some HGVs, and were worried that the Proposed Development would see this increase, with associated noise and air quality impacts. This was already an issue which the Applicant was aware of, and something which the final TA and modelling work has addressed. The material consulted upon at Stage 2 dealt more fully with these issues and showed positive impacts and benefits as a result of the Highway Mitigation Works. This is also clear in the Application as submitted, and is referred to in more detail in the context of the Stage 2 Consultation.

Road Bypass

4.1.28 While useful in many respects, unfortunately the responses from Stage 1 did not provide a robust or clear sense of the local preferences with regard to the Road Bypass alignment.

4.1.29 The Applicant had offered the view that, on balance, the inner (Blue) route was preferred as it was likely to have a less adverse impact on a local wildlife (grassland) area. A small number of responses suggested this was a view shared locally, but there were very few responses to the question of the alignment and the results quite finely balanced.

Air, noise, and lighting effects

4.1.30 The importance of assessing the likely air, noise, and lighting effects of the scheme was always understood and featured in the proposed scope of the ES from the outset. The Stage 1 consultation confirmed that these issues were of interest locally, with high levels of awareness about the Air Quality Management Area on the M1. Interestingly, Stage 1 underlined a clear and robustly expressed perception that local air quality is already poor across many areas close to the Proposed Development, particularly in Collingtree where it was cited as a particular existing and ongoing concern at meetings held with the Parish Council and community, and at the consultation exhibitions, as well as in written comments.

4.1.31 However, even at Stage 1 the emerging (albeit incomplete at that stage) baseline data suggested that air quality problems and issues were highly localised, but that overall, air quality was generally good. However, air quality monitoring was ongoing at Stage 1, and in the absence of the TA data, the analysis of impacts of the Proposed Development had not been undertaken. However, local perceptions of widespread air quality problems were noted by the Applicant.

4.1.32 The submitted Environmental Statement (ES) (Document 5.2) includes a full assessment of the likely Air Quality impacts, and confirms that overall the Proposed

Development will result in negligible effects, albeit with some localised improvements. Further details are provided in the response to Stage 2 issues later in this report.

Landscape and Visual impacts

- 4.1.33 The potential landscape and visual impacts of the development of this site were a major focus of discussions and technical work which had been undertaken in 2014 in the context of the first development proposals of this site (referred to above). The awareness gained at that time by the Applicant of local concerns had a direct influence on the evolution of the Proposed Development and was considered to be a key issue which needed to be properly and comprehensively managed.
- 4.1.34 This was reinforced during Stage 1, with residents of surrounding villages, including Blisworth and Milton Malsor, very keen to emphasise the importance of any development being well screened, and also raising concerns over the potential impact of built development on the wider landscape.
- 4.1.35 Although separated from the site by the M1 motorway some residents of Collingtree also raised questions over the extent of the visibility of the proposed SRFI. At Stage 1 there were suggestions that the landscaping around the north-eastern side of the site was not as generous as that on the western side, with calls that the Applicant look again at whether more could be done to screen the site and buildings from Collingtree. The Applicant responded positively through ongoing work in response to this issue. The landscaping strategy, while based on clear and fixed principles of ensuring that the Main SRFI site was substantially screened from outside view, continued to evolve beyond Stage 1. This is also referred to in the context of Stage 2.

Need and Alternatives

- 4.1.36 The issues of need and alternatives are addressed in the Application. The Planning Statement (Document 6.6) provides a detailed description of the policy context for the proposals, including details of the National Policy Statement for National Networks (NPS), and the consultation material (including the exhibition boards) also provided a summary of what the NPS says about the “*compelling need for an expanded network of SRFIs*” (NPS, paragraph 2.56).
- 4.1.37 The need for more SRFIs is clearly set out in the NPS, and the projections used by Government for planning purposes are clear that more SRFIs will be required to meet longer-term freight market requirements.

- 4.1.38 The Planning Statement and the Market Analysis Report (Document 6.8) also provide an assessment of the market characteristics and strengths of this location to serve the distribution sector. This issue of 'need' is also referred to in sections 6.0 and 7.0 of this Consultation Report. The ES (Chapter 2) explains the alternatives considered and the reasons why the Proposed Development site and development is preferred over the reasonable alternatives.
- 4.1.39 This and the Planning Statement includes an assessment (comparison) of Northampton Gateway with the Rail Central location which is seen as a potential alternative. The Applicant's clear view is that the Rail Central location is not preferable, and in fact is inferior to, the chosen site of Northampton Gateway which has the benefit of a more favourable topography and location with regard to nearby villages and other receptors.
- 4.1.40 As a Nationally Significant Infrastructure Project the Proposed Development is not allocated or identified in the local development plan. The site is greenfield, and countryside, and as the NPS explicitly recognises, this is not uncommon given the scale and strategic nature of the proposals.
- 4.1.41 The WNJCS did not anticipate or actively plan for further SRFI capacity to be brought forward, but does include a reference to how the local planning authorities would respond were this to happen: the adopted WNJCS refers to the intention of the local authorities to work with Network Rail and the private sector should further proposals for SRFI come forward. The Planning Statement (Document 6.6) also refers to the local policies of the WNJCS. The Applicant does not present the content of the WNJCS as an explicitly supportive policy context, but contrary to many comments made via the consultation process, it is also not accurate to say that the WNJCS explicitly precludes any further SRFI development.
- 4.1.42 Local development policies encourage sustainable development, balancing economic, social, and environmental objectives and outcomes. The Strategy focuses major and strategic development on land in and adjoining Northampton as the principal urban area, and as the main focus for economic growth.

Rail capacity

- 4.1.43 Although not referred to by a large number of people, it was clear that some local people, and local political representatives, were of the view that the WCML is already 'full', resulting in questions over whether even the minimum SRFI criteria of 4 goods trains per day could be met. This was often referred to in the context of the committed HS2 line, with reference to challenges regarding capacity passenger traffic growth on the fast lines of the West Coast Main Line.

4.1.44 The Applicant engaged with Network Rail early in the process, and this engagement has been ongoing. Rail Reports form part of the Application (Document 6.7) based on expert analysis of the rail network and timetables. This evidence is clear that there is sufficient capacity for additional freight traffic.

Consultation approach

4.1.45 The comments about the consultation process, specifically about the number and location of exhibitions, were noted by the Applicant.

4.1.46 As referred to in Section 5.0, changes were made to how the statutory Stage 2 exhibitions were organised as presented in the Statement of Community Consultation (SoCC).

4.2 STAGE 1 INPUT FROM BODIES AND OTHER CONSULTEES

4.2.1 In addition to undertaking local community consultation during Stage 1, the Applicant also sought views and input from a wide range of other bodies, using a list which would later form the basis of the Section 42 consultation at Stage 2.

4.2.2 This process saw a number of responses to this early consultation, many of which highlighted the ongoing nature of the technical and environmental assessment work, and which sign-posted the Applicant to key sources of national or local policy. Others identified key issues which the Applicant should consider as the early work on the ES and other application documents progressed.

4.2.3 The responses received are enclosed at Appendix 10, with brief responses from the Applicant.

4.2.4 As shown in the Appendix, many of the 19 bodies who responded chose to provide comments of 'no objection', or to indicate that given the location of the proposals, they did not have any comments to make.

4.2.5 Many of the responses were from bodies with whom the Applicant was already engaging on a technical or consultative basis, and the ongoing dialogue or anticipated contact with the Applicant was referred to in many of these responses.

4.2.6 Some responses were also received from local bodies keen to express concerns or objections about the proposals – this included from Collingtree Parish Council, and Blisworth Parish Council, as well as the local opposition group 'Stop Rail Central'.

4.2.7 Some issues arising during this non-statutory stage feature in Stage 2, and are discussed in further detail in Section 7.0 regarding the statutory Section 42 consultation process.

4.3 Summer 2017 Update Newsletter

4.3.1 The Stage 1 consultation process described above was held from December 2016 to early 2017. In July 2017 a Newsletter (attached as Appendix 11) was prepared and distributed to update the local community on progress, including the anticipated timing of the next steps of the programme.

4.3.2 The Newsletter was used to remind the local community about the proposals and the consultation undertaken in late 2016 and early 2017, and to explain some of the ongoing technical work which was being progressed over the summer relating to both the ES and the detailed modelling required to underpin the Transport Assessment. The Newsletter included an update on proposed changes to the site access junction design to prevent HGVs from turning right (south) onto the A508, and also changes proposed to the landscaping closest to Collingtree.

4.3.3 In particular, the Newsletter served to remind local people that during the Stage 1 consultation process we had sought views on the Roade Bypass. In practice, a very low number of responses was received from the Stage 1 consultation in respect of the Bypass, and so the July 2017 Newsletter again invited views on the two potential alignments proposed.

4.3.4 It also provided a more general update regarding ongoing work on many ES chapters, and included an updated project timetable with references to the statutory (Stage 2) consultation process planned for 'Autumn 2017', although no specific dates or details were confirmed at that time.

Stage 2 – Statutory Consultation

5.0 SECTION 47 (DUTY TO CONSULT LOCAL COMMUNITIES)

5.0.1 This section of the report describes the statutory local and public consultation processes and activities. It provides details of the procedural steps taken, the ways in which the Applicant engaged with local people and communities, and also provides details of the material consulted upon.

5.1. Statement of Community Consultation (SoCC)

5.1.1 The Planning Act 2008 section 47(2) requires the Applicant to consult relevant local authorities about the content of a Statement of Community Consultation (SoCC). The key local authorities with regard to consultation about the SoCC for the Northampton Gateway project are South Northamptonshire Council (SNC), Northampton Borough Council (NBC), and Northamptonshire County Council (NCC).

5.1.2 It is noted that the Applicant is not required by the regulations to agree a SoCC with the local authorities, but is required to consult them and consider their comments in preparing a SoCC.

5.1.3 As described in Section 3.3, dialogue and engagement regarding the community consultation strategy was held with SNC and NBC as part of the Stage 1 consultation process. With an eye to the future requirement to prepare a SoCC the Applicant prepared an outline 'Consultation Strategy' and shared this with officers in November 2016. This Strategy included details of the proposed area in which the Applicant would deliver newsletters to raise awareness of the Stage 1 consultation process and exhibitions, as well as setting out early thoughts about the wider consultation strategy going forward.

5.1.4 Ahead of the Stage 2 (statutory) consultation a draft SoCC was shared with the local authorities (SNC, NBC, and NCC) in July 2017, and discussed with officers. The draft SoCC reflected comments received during the Stage 1 process by some local people and Parish Council representatives that it would be more useful to a wider cross-section of the community to hold a number of smaller events in different venues in nearby villages. Those comments were taken into account and the SoCC contained an amended approach to the Stage 2 consultation process.

5.1.5 Responses to the draft SoCC were provided by the local authorities within the required 28 day period, and the SoCC was finalised and published by the Applicant in September 2017. A copy of the SoCC is attached to this Report at Appendix 12. Comments contained in the written response from SNC included several suggestions which the Applicant reflected through changes made to the final SoCC. This involved

adding additional text to make it clearer what material would form the focus of the consultation process (it is understood this suggestion was made by one of the Parish Councils and incorporated into the SNC comments). Also, SNC suggested an additional public exhibition in Towcester be added to the four locations proposed by the Applicant. The Applicant took this into account and confirmed in the final SoCC that an exhibition would also be held in Towcester as part of the Stage 2 exhibitions in October 2017.

- 5.1.6 The SoCC made it clear that the exhibition content would be adapted depending on the size of the available venues with the physical 1:1250 scale model of the Proposed Development and surrounding area potentially being too large to be accommodated in every venue. In practice, the model was displayed at four of the five exhibitions, with the Blisworth venue (Royal Oak pub) being the only one unable to accommodate it along with the other material and plans.
- 5.1.7 The Stage 2 consultation exhibitions, in accordance with the final SoCC, were held through early to mid-October 2017.
- 5.1.8 Pursuant to the requirements of the Act, a Section 47 Notice was placed in the Northampton Chronicle & Echo newspaper on 14th September 2017 to notify the public of the intention to undertake the consultation exercise and to explain where copies of the Statement of Community Consultation (SoCC) could be inspected (a copy of the notice is at Appendix 14). The Northampton Chronicle & Echo was chosen due to the strong overlap of its core circulation area with the proposals and those communities closest to it, where it is considered to be the main local newspaper.
- 5.1.9 A SoCC Compliance Table is included at Appendix 13 and underlines how the requirements of the SoCC were met.

Public Consultation – overview

- 5.1.10 On the 9th October 2017 the statutory (Stage 2) public consultation began, with a deadline date given for responses of 24 November 2017. This is a seven week period, exceeding the minimum required of 28 days, in part to allow for the October school half-term holiday which fell during this period.
- 5.1.11 In advance of the start of the consultation period a newsletter leaflet was posted across the agreed consultation area to reach people living in the vicinity of the Proposed Development (the consultation area, which formed part of the SoCC, is identified at 15). The leaflet distribution was focused on the villages of Blisworth, Collingtree, Courteenhall, Grange Park, Milton Malsor, and Roade, but included other outlying villages as agreed in the SoCC. Details of the exhibitions were also

contained in the statutory consultation letters and press notices (see Appendix 20, and 24), and was publicised on the project website.

5.1.12 The newsletter made local people and businesses aware of the proposals and the consultation process, and invited the local communities to submit comments on the proposals (see attached newsletter leaflet at Appendix 17). As described in the following sections, the Applicant also raised awareness of these exhibitions, and of the consultation process overall, through a range of related activity.

5.1.13 In accordance with the SoCC, written information was also sent by email with a copy of the newsletter leaflet to the Clerks at the local Parish Councils closest to the proposals to ensure that the Parish Councillors were made aware of the events, as well as to District Councillors in both South Northamptonshire, Northampton Borough, as well as Northamptonshire County Council. These emails were in addition to the updates being provided to key officers at SNC and Northampton Borough as part of the ongoing pre-application dialogue process.

5.1.14 The project website was updated in early October 2017 to coincide with the start of the Stage 2 consultation process. This enabled those with access to the internet to view information about the proposals, the exhibition material, and updated draft Environmental Statement chapters.

5.1.15 A summary of the proposals known as the 'Short Explanatory Document' (Document 6.5) was prepared and included in the information available for inspection and on the project website. This document was intended to help provide an overview of key issues known to be of interest to local communities based on the experience gained through the earlier Stage 1 process, but did not seek to describe in full detail the policy context or the findings of the emerging draft Environmental Statement. This document was printed, and on display with copies for people to take away from the exhibitions.

5.1.16 Copies of key consultation documents and material (see below for details) were also made available across the consultation area at libraries and local authority offices to enable people to view and comment on information outside of the exhibitions.

5.1.17 This included placing documents in local libraries and at Council offices to help ensure easy access to the documents by the local community. The documents were available at:

- Roade Library High Street, Roade, NN7 2NW;
- Wootton Library Wootton Community Centre, Curtle Hill, Northampton, NN4 6ED;
- East Hunsbury Library, Overslade Close, Northampton, NN4 0RZ;
- SNC offices (Towcester Library), The Forum, Moat Lane, Towcester, NN12 6AD;

- Northampton Borough Council offices, St Giles Sq, Northampton;
- County Council offices, One Angle Sq, Angel Street, Northampton.

5.1.18 In addition, hard copies were also provided to the Clerks of the Parish Councils of Blisworth, Collingtree, Milton Malsor, Roade, and Courteenhall Parish meeting. This was intended both to aid the Parish Councils in engaging with the consultation process, but also to be made available for local use during the consultation process. The Parish Councils advised the Applicant as to how and where they intended to hold these hard copies, and as several do not have public offices or other public facilities, this varied from one to the next. As most Parish Councils do not run standard office hours, access required by the public was clearly described as by arrangement with the Parish Clerks.

5.1.19 As for Stage 1, the leaflet distribution was carried out by Royal Mail around a week in advance of the start of the consultation period and the first exhibition. The area includes around 6000 properties. This area was the same as that used for the Stage 1 consultation process, and the July 2017 Newsletter, and was agreed by officers at both Northampton Borough and South Northamptonshire as part of the SoCC (referred to above).

5.1.20 During the course of the Stage 2 process it became clear that some of the hard copy sets of the draft application documents had errors on some of the contents pages. This issue was not raised by any members of the public, or any of the consultees who received hard copies of the documents, but was spotted by a member of the project team. Also, there was some confusion with Transport Appendices having been filed inaccurately (for example, Appendices 12.5 and 12.15 had been swapped around). Once identified, corrected versions of the contents pages were transported to the various venues and added to the hard copies during the consultation period. All of the Appendices were filed accurately on the project website throughout the consultation period, and venues holding hard copies reported that there had been very low levels of demand for access to the documents, with clear evidence that the online versions were in far greater demand.

5.1.21 Copies of discs containing the consultation material were shared at the public exhibitions with those keen to engage in the detail of the ES.

5.2 Public Exhibitions (October 2017)

5.2.1 As referred to above, the Applicant responded to suggestions and criticisms made by local people and Parish Councils during Stage 1 by holding the exhibitions at different venues in the communities closest to the Proposed Development. This was considered to make it easier and more convenient for people to attend from the

nearest communities, and to reduce the likelihood that interested local residents with mobility difficulties or without access to a car would feel unable to attend.

5.2.2 Emails were sent to Parish Council Clerks, and local Ward members (in South Northamptonshire and Northampton Borough) in early October 2017 to ensure that they were aware of the dates and venues for the Stage 2 exhibitions.

5.2.3 SNC had also published the dates on its website as soon as they were confirmed, and the Northampton Gateway website was updated several weeks before with details of the exhibitions. It is understood that exhibition details were also publicised by the local opposition group and on its website.

5.2.4 The Stage 2 public consultation exhibitions were held as follows:

- Hilton Hotel, Collingtree, Monday 9th October 1.30pm – 7.30pm;
- Royal Oak pub, Blisworth, Wednesday 11th October 1.30pm – 7.30pm;
- Milton Malsor Village Hall, Friday 13th October 2pm – 7.30pm;
- Roade Primary School, Saturday 14th October, 12 noon – 5pm;
- The Forum, Towcester (SNDC Office), Friday 20th October, 2pm - 7pm.

5.2.5 As shown above, exhibitions were held from early afternoon through into the evening, and included an event on a Saturday afternoon (in Roade). The exhibitions were spread over a period spanning two weeks early in the consultation process to enable people to view the material and discuss the proposals with plenty of time remaining to consider the information and prepare responses. The exhibition dates avoided the half-term school holiday in October.

5.2.6 The exhibitions took a similar form to the Stage 1 exhibitions with a very similar range of material presented, but there were changes, including:

- Updated Exhibition Board content to describe in fuller detail a number of key issues and outputs from the updated ES work – this included fuller emerging details of likely environmental effects, and of a range of proposed mitigation measures where relevant;
- Of particular note were a series of new plans showing a number of highways mitigation proposals on the surrounding road network as a result of the (ongoing, but by now further progressed) highways modelling;
- Updated highways modelling information was displayed using a ‘micro-simulation’ video of the proposed Junction 15 improvement scheme and other aspects of the highways proposals;

- An extension to the physical model to include more land to the west of the site, allowing people to view the full extent of the site proposed by the 'Rail Central' alternative SRFI proposal.

- 5.2.7 Based on the records kept by the Applicant at the events, approximately 360 people attended the Stage 2 exhibitions. This equates to an average of 72 people per event, and aligns very closely with the exit poll data of a local group (understood to be led by various parish councillors and others) who informed the Applicant that they counted an average of 76 visitors to each event. The exhibitions resulted in a total of 62 comments forms being completed in addition to the letters and emails submitted during the consultation period.
- 5.2.8 As referred to above, the Stage 2 consultation process included new information which had followed the ongoing technical work through the period since Stage 1 had ended in early 2017. The most significant and notable new information was the package of highways mitigation works in addition to the proposed Junction 15 improvements and Roade Bypass. Although many of the proposed highways works were on land within the highway, some components of the mitigation package had some implications on the amount of 3rd party land which would be required to deliver the proposals.
- 5.2.9 A hard copy of the draft ES was also on display and available for use at the exhibitions. Draft Environmental Statement chapters were uploaded onto the project website along with a range of draft DCO documents and plans, as well as electronic copies of the Exhibition Material.
- 5.2.10 A 'Short Explanatory Document' (Document 6.5B) was also produced to summarise the draft ES, and provide an overview summary of the context for the proposals, with key plans also incorporated. This Document was made available in hard copy at the exhibitions, at the deposit locations, and also shared online.

5.3 Direct engagement with local residents

- 5.3.1 From relatively early in the Stage 2 consultation period, comments and queries were received by email (via the project website). Although not in high volumes at the outset, some of these raised questions or sought clarifications to which it seemed a response was needed to assist the preparation of a final response.
- 5.3.2 In cases where it was clear that questions sent were not rhetorical, and where considered appropriate to do so, specific responses were prepared and sent. This process was overseen by the same team who had been involved in organising and attending the consultation process who were receiving any emails sent via the project

website. Queries requiring technical input were shared with the relevant members of the wider Project team before a response was sent back, usually by email.

- 5.3.3 As revealed by responses in the Consultation Schedule (Appendix 19), some individuals submitted more than one set of comments or questions, including sometimes specific technical questions or requests for clarification, resulting in a dialogue exchanging explanations or further information, where relevant, to address the questions asked.
- 5.3.4 Comments which included fairly generic and commonly raised issues or queries were noted but not generally responded to individually – this applies to the majority of comments provided. However, the issues or queries raised during the consultation period were considered, and helped inform how some information has been articulated or presented in the application. Section 6.0 of this Report describes the issues raised most frequently and provides a response to them with reference to the submitted Application details where relevant. Responses are also provided to each comment received in the Schedule at Appendix 19 which includes summaries of letters or emails received as well as the comments forms completed at the Stage 2 exhibitions.
- 5.3.5 It is important to note that some local residents were consulted through more than one route or under more than one regulatory requirement of the Act. In particular, some local interested parties or parties with an interest in land who also live within the consultation area would have been consulted both under Section 47 (via the newsletter leaflets), as well as under Section 42 through consultation letters sent to them direct by post. Therefore, some consultees are technically within the Section 47 category and also Section 42 category because they are a “*person with an interest in the land*” (“PIL”) under Section 44.
- 5.3.6 While some of these consultees chose only to comment on legal or ownership issues associated with land included within the Order Limits, others also (or only) made comments about the emerging Proposals and submitted them to the Applicant. In addition, the Applicant erected site notices at various locations around the site because the ownership of some small parcels of land is unknown (please see Appendix 22 and section 7.1, and 7.3, for further detail). These site notices erected at areas of land affected by the Proposed Development often also prompted consultation responses from local residents with no legal or other interest in the land, and comments were received via that route as opposed to via the standard consultation email address.
- 5.3.7 A distinction between the various reasons or procedure which prompted responses about the Proposed Development is, in a sense, unimportant, in terms of how the responses were received and treated by the Applicant. The key is that the Applicant considered all comments regardless of why or how that response was submitted. A

summary of comments received about the proposals are recorded in the appended schedules (Appendices 19 and 21).

- 5.3.8 However, PINS Advice Note 14 requires the Applicant to make it clear which category each respondee is in. Therefore, the response schedules seek to make it clear where comments were received by local landowners and other parties who are relevant to both Section 44 (as parties with an interest in land) as well as Section 47 as local residents.

6.0 ISSUES ARISING FROM LOCAL STATUTORY (STAGE 2) CONSULTATION AND THE APPLICANT'S RESPONSES

6.1. Issues raised during consultation

- 6.1.1. The main themes or issues arising from consultation comments and responses to Stage 2 are summarised below.
- 6.1.2. Section 6.2 below provides details of the Applicant's responses to the issues and concerns raised.
- 6.1.3. Given the iterative evolution of the proposals, and the 'in principle' nature of some local objections to the proposals, there is some overlap and similarity to parts of the summary of Stage 1 provided in Section 4.0 of this Report. Indeed, analysis of the responses provided shows some very similar themes and issues raised during Stage 2 to those raised during Stage 1.

Traffic and Highways Issues

- 6.1.4. Questions and concerns about traffic and transport remained the most frequently cited issue raised during Stage 2, and remained a common basis for objections and/or concern. This was notwithstanding the Stage 2 consultation being supported and informed by a more developed draft Transport Assessment, and more detailed modelling information. Objections were often on the basis that – regardless of what the emerging modelling and Transport Assessment (TA) were showing – local people see that Junction 15 and the associated network regularly do not cope now at peak times. In this context, many were openly sceptical that the proposals might not only overcome existing problems but create increased capacity to accommodate more traffic.
- 6.1.5. In simple terms, many local people expressed the opinion that the road network is already at capacity and can accommodate no further development – and on that basis, they object to the Proposed Development. Many of the responses maintained

a position similar to that expressed during Stage 1 that major adverse local transport effects are inevitable. The most common concern raised was the risk of creating more congestion at an already badly congested Junction 15, with very negative implications for the surrounding network, including nearby villages.

- 6.1.6. Comments and objections made in writing on this issue were very often brief with no indication of whether or not they were based on any consideration of the draft Transport Assessment or other detail provided as part of the Stage 2 consultation process. Many discussions at the exhibitions essentially involved local people expressing disbelief at the emerging findings and modelling from the draft TA, but not keen to engage in detailed discussions about how the work was being undertaken, and what the modelling was showing.
- 6.1.7. Some comments received were more detailed, and where detailed questions were raised the Applicant provided responses to help explain or clarify technical issues. For example, some questions received by email related to the transport modelling and the Highways consultant provided a number of responses to aid local people in understanding or locating specific details sought. A number of emails were sent in response to questions submitted via the project website or consultation email address, these are referred to in the response schedules.
- 6.1.8. Notwithstanding the above, the revised proposed Junction 15 improvements again generated a lot of more positive interest, and comments were received with regard to the timescales for the works, delivery and how they would be phased with the rest of the Proposed Development and with other ongoing or proposed highway schemes nearby (including 'Smart Motorways'). Discussions had at the exhibitions showed a strong desire by many local people to more fully understand why and how the proposed improvements would work in practice. While the modelling evidence to show that the improvements to Junction 15 would deliver benefits for local journey times and reliability was received with some scepticism (as referred to above), it was equally clear that many local people would welcome improvements which reduce congestion and queuing, and were encouraged by the emerging TA findings.
- 6.1.9. Related to this, a number of the comments received signalled increasingly optimistic and positive local views about the highways works at Junction 15, but with an emphasis on the importance of timely delivery and the Applicant being required to deliver what was being presented.
- 6.1.10. The Stage 2 consultation included details of an enhanced draft package of Highways Mitigation Works informed by the transport modelling and ongoing but well progressed Transport Assessment. This prompted a range of responses, with some of the proposed works at junctions along the A508 corridor welcomed by local road-users and residents.

- 6.1.11. However, some elements of the draft package were challenged or objected to, and there were often detailed and lengthy conversations held at the exhibitions about the draft details at specific local junctions. The new detail about the emerging Highways Mitigation Works provoked a range of reactions, particularly from those concerned about additional land (over and above that indicated during Stage 1) which may be required to deliver the proposed improvements. Some local residents were particularly keen to understand what if any implications this might have for existing private accesses, and for local journeys which regularly use these junctions.
- 6.1.12. Many comments were informed by local experience of using the existing junctions, and this helpful input was used to inform further design refinements to improve the proposed mitigation measures – this is explained in further detail in the Applicants responses with regard to the Rookery Lane/Ashton Road junction as a particular example which formed part of the later Stage 3 consultation process.
- 6.1.13. A specific issue raised fairly regularly was concern over the effect of M1 closures (during emergencies, etc) which have a negative and significant local impact. There had been several examples of such closures within a fairly short period of time during late 2017 and with the consequences fresh in the minds of many local residents it was an issue they were keen to discuss.
- 6.1.14. It is noteworthy that there were very few comments received from the community about the proposed Public Transport proposals to serve the site, or about cycling access.

Comments about the principle of, and need for, the Proposed Development

- 6.1.15. Notwithstanding the widely recognised strength of the logistics and distribution sector in Northamptonshire, many local people raised objections to both the principle of development, and questioned the need for the proposed SRFI. In addition to written/emailed comments this was also reflected in the tone of discussions with some residents at the exhibitions.
- 6.1.16. As at Stage 1, many comments received raised objections with specific reference to the notion of growth in South Northamptonshire which is in part associated with the growth and economy of Northampton.
- 6.1.17. These ‘in principle’ objections made reference to a range of issues or concerns, including several which are discussed separately below. As examples, concerns raised referred to issues such as:
- The jobs which would be created are not needed locally due to low unemployment in South Northamptonshire, perceived as resulting in few, if any, benefits to the local area;

- The existing DIRFT SRFI at Junction 18 of the M1 means there is no need for the proposed Northampton Gateway SRFI;
- The development would harm the existing rural lifestyle of surrounding communities and would result in a loss of open countryside.

6.1.18. There is some consistency to this list with the issues raised during Stage 1. Many local people hold the view that with an SRFI at Junction 18 of the M1 (Daventry International Rail Freight Terminal) there is no need for any further SRFI capacity as now proposed at Northampton Gateway. Many local people reject the notion of this as part of the 'nationally significant infrastructure', and object on the grounds that the proposals appear to them as speculative in nature, unrelated to any strategic picture or context.

6.1.19. Others suggest that if an SRFI is to be proposed it should be on brownfield land, and they object in part on the basis of the loss of a greenfield site.

6.1.20. However, a small number of responses were clear in their general messages of support for the proposed SRFI. These comments of support often referred to the benefits of local employment and investment in the economy, but also an in principle recognition of the need to encourage freight from road onto rail.

6.1.21. Many of these positive responses welcomed the significant investment in improving Junction 15 which is currently a major congestion bottleneck at peak times and a cause of significant frustration, or the provision of a Roade Bypass (see below) which would help address significant local issues.

'Pollution' - Air Quality, Noise, and Lighting

6.1.22. The potential for adverse 'pollution' impacts – adverse air quality, noise and lighting - on nearby communities was a fairly common theme both verbally at the exhibitions in the written responses received during Stage 2. Indeed, the number and content of the comments received on this issue was similar to those received during Stage 1.

6.1.23. Air pollution was an issue most frequently raised in the context of Collingtree which sits close to an existing Air Quality Management Area (AQMA) associated with the M1 motorway, but some general comments were made about the potential for adverse air quality impacts on other communities near to the Proposed Development. As at Stage 1, this was often from a starting assumption that air quality is already generally poor, and will inevitably get worse if the Proposed Development is approved. However, the response forms from the Collingtree exhibition showed a lower reference to Air Quality issues than the responses from other exhibitions, and from the written responses received outside of the exhibitions.

- 6.1.24. The potential impacts of the Roade Bypass on air quality – both in terms of the potential for improvements through the village, and for negative impacts for locations close to the western edge of the village – were also raised, albeit less frequently.
- 6.1.25. Lighting effects were often mentioned in the context of wider concerns over the visual effects of the proposals (see below for landscape and visual issues). The potential for lighting effects (pollution) was often referred to in the wider context of concerns about urbanisation and loss of rural character for the villages, also referred to above.
- 6.1.26. The comments received about noise tended to focus on concerns about the likelihood of operational noise (including from the rail terminal) having an adverse impact on the nearest villages (Milton Malsor, Blisworth, and Collingtree). It was clear from responses received that many local people assume that the Proposed Development would generate high levels of additional noise, and that the effects will, inevitably, be negative and significant.
- 6.1.27. Questions about potential traffic noise from the proposed Bypass were raised by some residents in Roade, although residents from the centre of the village were keen to discuss the potential for noise reduction benefits as a result of the Bypass removing through-traffic. Written comments from residents raised concerns about noise from the Bypass as part of wider concerns expressed about the overall impacts on the character of the area, and potential noise and lighting effects are given as the issues of most interest or objection. Also see below regarding the Bypass.
- 6.1.28. By Stage 2 the noise assessment had progressed to provide a draft of the ES chapters and many of the key appendices regarding likely residual noise effects from the proposed development (SRFI site and Bypass), and formed as basis for discussion and consultation with the local community.

Landscape and Visual impacts

- 6.1.29. General comments expressing concerns about the scale of the Proposed Development remained during Stage 2, particularly from Milton Malsor and Blisworth, and there were some negative or sceptical comments or objections about the likely success of the proposed landscaping strategy in screening the Main Site. However, there was an increase at Stage 2 in the number of positive comments about the landscaping proposals, and recognition from a larger contingent of local people that the proposals were comprehensive and likely to be effective.
- 6.1.30. This was particularly apparent at discussions held at the exhibitions, and is shown to some extent on the comments forms. Numerous comments were received from attendees at the exhibitions, particularly those held at Milton Malsor and Blisworth, which either welcomed the landscaping proposals, or recognised the efforts made to

mitigate the potential landscape and visual effects of the built development. This was often accompanied by detailed references to the importance of a range of tree types, including some faster growing species to ensure the landscaping quickly establishes and matures.

- 6.1.31. Responses from Collingtree also included some positive recognition of the changes made to increase the earthworks and landscaping heights facing the M1 since the Stage 1 consultation process. However, concerns and objections about the potential for adverse visual effects were also maintained.
- 6.1.32. A small number of comments referred to the potential adverse effects of the proposed earthworks bunding at the Main Site which underpins the landscaping strategy and the mitigation of visual effects. The scale of this bunding was noted by many, and while this was welcomed through conversations had with numerous attendees at the exhibitions, a small number of comments received referred to the risk of this appearing artificial and having a negative effect on the landscape. Others expressed scepticism about the likelihood of the landscaping being delivered as proposed, but indicated the information provided looked good or acceptable (in other words, emphasising the importance of delivery and quality).
- 6.1.33. The landscaping at the Roade Bypass saw a range of comments (including those made at the Roade exhibition), with a small number of concerns that the road would remain visible. However, comments about the Bypass were more focused on the potential noise effects than on any likely visual effects – see below. However lighting of the bypass was referred to as a concern by a small number of responses.
- 6.1.34. There were some queries and concerns from Roade residents about whether the bypass would prevent existing foot, cycle and equestrian access on existing public rights of way heading west from the village.
- 6.1.35. The loss of farm land as a result of the Proposed Development, and the impact on existing footpaths which run across the Main Site, was also raised as a general concern with objections to the principle of any change from agricultural use often tied in with general comments and objections to the principle of the changes proposed.

Route of the proposed Roade Bypass

- 6.1.36. The preferred route of the proposed Roade bypass was received with a mix of interest and concern – including some enthusiastic support - by attendees at the exhibitions. This was a particular focus of discussion during the Stage 2 consultation exhibition held in Roade.
- 6.1.37. As referred to in Section 4.0, the Applicant had explicitly sought comments about the proposed route for the bypass during Stage 1. However, only a handful of comments

were received offering a preference about the route and by the start of the Stage 2 consultation process in October 2017. In advance of Stage 2, the number of explicit objections to the principle of a Bypass was fewer than the explicit comments of support, but the level of explicit responses was low.

- 6.1.38. The Stage 2 consultation included the inner (blue) route as the preferred alignment, and provided additional details with proposed junction general arrangement drawings available, as well as emerging details about the proposed landscaping along the Bypass corridor. The Applicant's reasons for preferring this route, as presented at the exhibitions, referred to the reduced impact on nearby ecological assets close to the proposed new railway bridge, and a balanced judgement about the road having less of environmental impact (i.e. on the landscape) on that alignment.
- 6.1.39. The responses to the Stage 2 consultation process indicated a generally higher level of interest and awareness of the proposed Bypass, albeit still no overall clear local consensus about the route. Many responses implicitly or explicitly accepted the principle of the Bypass, but were keen to engage in detailed issues such as the junction designs with existing roads to which the Bypass would connect rather than offer any view on the alignment. As an example, a small number raised questions of whether a bridge had been considered as an alternative to a roundabout with Blisworth Road.
- 6.1.40. Others offered a preference for the Bypass to be further from the village to alleviate concerns about the potential for noise and lighting effects for local residents, and there were again concerns raised about the risk of house-building in the future should a Bypass be approved and constructed as proposed.
- 6.1.41. A small number questioned the need for a Bypass at all, although this group were in the minority of those who commented on the Bypass, with many recognising the significant environmental and congestion issues caused by the A508 running through the centre of the village.
- 6.1.42. An issue of local interest was how existing rights of way would be integrated with the Bypass. The proposals for an underpass to enable continued use of the existing Bridleway by horses, walkers and cyclists was welcomed by the majority of those who chose to comment on this aspect of the proposals.

Flood risk and Drainage

- 6.1.43. The proposed development is not located in an area prone to flooding and so this issue has not been a major focus of the consultation process. However, some nearby downstream areas from the main site are currently at risk of localised flooding associated with surface water and run-off from the Wootton Brook. In that context,

there was interest and some concern from some local residents in Collingtree of the potential for the Northampton Gateway development to increase the risk of localised flooding in the future.

- 6.1.44. Issues relating to flood-risk and drainage were raised much less frequently during Stage 2 than they were earlier in the process. This may have been due to the information shared and the discussions had during and since Stage 1, and also because the published draft ES and supporting information show that the proposed drainage strategy will provide attenuation and water storage capacity which will not only prevent any additional risks, but provide some betterment to downstream areas.

Cumulative Effects with other proposed development

- 6.1.45. An issue which was discussed regularly at the exhibitions, but was raised less frequently in the written responses, was that of the potential cumulative effects with other nearby development proposals.
- 6.1.46. In particular, there has understandably been local interest in the potential effects if Northampton Gateway and an alternative SRFI to the west (promoted as 'Rail Central') were both approved. At the time of the Stage 2 consultation there was little technical detail available about the Rail Central proposals, but some consultation had been undertaken and there was a general awareness of the likely scale and nature of that alternative scheme.
- 6.1.47. Specific concerns raised through consultation has been the potential cumulative effects on highways and traffic, the local landscape, loss of agricultural land, the cumulative effects on existing rights of way, and air quality.

6.2. APPLICANT'S RESPONSES TO KEY ISSUES ARISING FROM STAGE 2 PUBLIC CONSULTATION

- 6.2.1. The following section explains how due regard has been had to the consultation responses received.
- 6.2.2. Throughout the consultation process, Project team meetings and tele-conferences have regularly included discussion about matters arising from consultation responses to ensure that the outcomes from consultation were considered as the technical work progressed, and that key issues or questions arising were fed into other parts of the team as required.
- 6.2.3. During Stage 2 and beyond this approach helped to ensure that an understanding of the perspectives of local communities and bodies were considered throughout the

ongoing work to prepare the application for Development Consent Order. This included the Environmental Statement, and associated iterative process of finalising the various technical assessments, plans and other material. Project meetings and discussions about issues arising from consultation responses were held at key points in the process, often including workshop sessions regarding any changes or amendments needed to the Proposed Development, and about how best to respond to key issues.

General comments about the principle of, and need for, the Proposed Development

- 6.2.4. The 'in principle' nature of many objections received by local people make it difficult for the Applicant to respond positively, or consider making changes as a result. For example, some comments were explicit in suggesting that the proposed SRFI and associated highways and other infrastructure are simply not needed, the infrastructure and jobs it would deliver are not wanted, and they suggest that the proposals should be abandoned. Some discussion was had with those expressing this view at the exhibitions, but in many cases there was a limited appetite for discussion or to consider any of the evidence base or technical information which underpins the proposals.
- 6.2.5. This of course represents one of a range of valid positions taken by local people, and in discussion it was often clear that people with this in principle objection often held a number of more specific questions or concerns. Many of the issues or concerns, implied or explicit, which underpin some of these objections to the principle are dealt with below under various headings.
- 6.2.6. The Applicant remains clear that in the context of national policy, the local and national economic context, and in the context of the likely local environmental impacts, the proposals are valid, viable, and appropriate. With mitigation as proposed, they represent sustainable development. Furthermore, the various technical assessments and studies which have informed the Proposed Development, including the Transport Assessment (Appendix 12.1 of the ES), show that the proposals would deliver some significant benefits to the local area, as well as aiding delivery of Government Policy for the further development and investment in the national transport networks.
- 6.2.7. The NPS provides a positive and clear context for the private sector to bring forward a network of new SRFIs. National policy does not identify where these should be, but recognises that they will need to be both close to infrastructure networks (road and rail), and the markets they serve (towns and cities). By definition, this rules out many parts of the UK and most sites – this latter point is explicitly noted in the NPS which is

clear that SRFIs will often need greenfield locations, and need to be close to strategic road and rail networks.

- 6.2.8. The expected rate of rail freight growth, and the projections used by Government for planning purposes, requires more SRFI capacity to be delivered. The submitted Market Analysis Report (Document 6.8) provides an analysis of the need and demand for more SRFIs, and the market context in and around Northampton. It identifies the 'Midlands Heartlands' as an area where there is an existing form of logistics activity and where future demand is expected to be high. Unsurprisingly this area also contains a concentration of SRFI's and large RFI's. The Market Analysis Report explains that this existing concentrated network will need to expand if the demand and projections for rail freight growth are to be met. The Report explains how Northampton Gateway will serve a different core market to existing SRFI's (including DIRFT) thereby meeting current market demand as well as helping to meet the general growth in demand for rail freight. The work also demonstrates how Northampton Gateway will help to expand the network of SRFI's in the Midlands, southwards into an area currently poorly served by SRFI's. This area is also part of the Cambridge to Oxford growth area where significant population and economic growth is expected. The Northampton Gateway site forms part of this growth area and relates well to the markets identified for growth.
- 6.2.9. The logistics and distribution sector is understood by the Local Authorities and the LEP to represent one of West Northamptonshire's key economic and employment sectors and strengths. As referred to elsewhere in the Application documents, including in the Market Analysis Report, this market strength results in strong demand for logistics and distribution sites close to Northampton, and opportunities to increase the amount of freight moved by rail.
- 6.2.10. The NPS anticipates SRFIs being led by 'the market' given the need for the sites to meet a range of market needs and requirements. The Applicant is an active and leading developer in the national logistics and distribution sector, and is clear on the strength of the market need and of the suitability of this site to deliver a successful SRFI. Evidence to support this is submitted in the Market Analysis Report, and the Planning Statement.
- 6.2.11. As referred to in the context of the Stage 1 consultation, the Joint Core Strategy did not plan for, or foresee additional SRFI capacity coming forward over the plan period. However, it does refer to the need for dialogue with Network Rail and the private sector should proposals come forward. The NSIP process provides an appropriate route for that dialogue, and the local authorities, and Network Rail, have been in active and constructive dialogue with the Applicant for some time.
- 6.2.12. In South Northamptonshire the emerging Part 2 Local Plan Policy '*Natural Environment 10 -HS2 and Nationally Significant Infrastructure Projects*' sets a context

for projects like Northampton Gateway to ensure it minimises its environmental impact, with environmental ‘harm’ mitigated with compensation measures to address biodiversity and landscape issues, including specific reference to delivery of biodiversity and green infrastructure enhancements. Such issues are referred to below.

6.2.13. Local employment and labour issues are dealt with in Chapter 3 (Socio-Economic Aspects) of the ES, which confirms that 90% of the employment would be filled by people from within the local study area. In reality, the jobs created here would help to reduce out-commuting, which is a current local trend, with many people travelling out of Northamptonshire to work in Milton Keynes and elsewhere. While many residents of the villages of South Northamptonshire may not see the value in jobs in the distribution sector, the LEP is encouraging further expansion of this growing sector.

Alternative Sites

6.2.14. A proportion of the comments received suggest there are preferred or more suitable alternative sites elsewhere do not refer specifically to other sites by name or location. Others, as described above, include references to the existing SRFI at Junction 18 of the M1 near Rugby (DIRFT), or other locations. Some questioned why another SRFI is being proposed in the Midlands.

6.2.15. These issues also arose during Stage 1, and Section 4.0 also includes a response.

6.2.16. Criticism of the choice of site has tended to be on the basis of two common issues, both of which reflect a lack of understanding of the distribution and logistics market and the commercial realities of delivering strategic rail-connected sites. The most common criticisms have been on the basis that a) there is an SRFI 20 miles away at DIRFT, or b) there is a concentration of SRFIs in the Midlands which isn’t seen as delivering the national ‘network’ of SRFIs envisaged by Government policy.

6.2.17. Government policy as set out in the NPS defines a number of criteria and characteristics regarding site location for SRFIs, although it is clear that the choice of sites will be led by the market. The Planning Statement (Document 6.6) sets out the policy context in further detail. The requirement for both rail and road connectivity greatly reduces the number of potential sites, as does land availability, but also the commercial and market considerations are key to understanding the realities of how a network of SRFIs is likely to be delivered in the UK. These issues are explored in further detail in the separate Market Analysis Report (Document ref 6.8). A network of SRFI is highly unlikely to see sites delivered in numbers across all regions of the UK – the focus of the UK distribution and logistics market in and around the Midlands means this is where there will be strongest demand and need and where there is a need for a concentrated network of SRFI’s.

- 6.2.18. The network as it currently exists has a concentration of SRFI's in the Midlands, many close together but operating independently and successfully. As explained above with reference to the Market Analysis Report, Northampton Gateway would expand this existing network southwards. Similarly the committed East Midlands Gateway SRFI will expand this concentrated network to the north east, and the proposed West Midlands Interchange could expand the network to the North West. Northampton Gateway would serve a different core catchment area to DIRFT and would expand the network into an area (including the Cambridge to Oxford growth area) which is currently poorly served by SRFI's.
- 6.2.19. In reaching the decision to promote the Northampton Gateway site other alternatives have been considered. This includes a site close to Junction 13 near Milton Keynes, and the 'Rail Central' site located between Milton Malsor and Blisworth to the immediate west of the Northampton Gateway site.
- 6.2.20. In brief, the Applicant's view is that there is no better alternative site for an SRFI to serve the markets identified. This site would balance the need for a location on both the rail and motorway networks and close to key urban markets and where there is scope to successfully minimise and mitigate the environmental effects.

Transport and Highways

- 6.2.21. As described above, this remains the most commonly raised issue, and the most frequently cited grounds for concerns or objection, despite the increasing body of technical evidence and information at Stage 2. Many local people maintained the opinion that the local highway network will not cope with the traffic generated by the proposals, in part because they see it regularly not coping now.
- 6.2.22. The earliest non-statutory consultation and engagement with key bodies reinforced the need for a comprehensive approach to transport infrastructure, and it was clear from the outset that Junction 15 is a major bottleneck which would need to be comprehensively addressed. The creation of the Transport Working Group – described in Section 3.2 - was a key and proactive response by the Applicant to addressing this fundamental issue.
- 6.2.23. Similarly, the Applicant has been aware from the outset of local dialogue in 2014/15 of the related local challenges presented by through-traffic and 'rat-running' in communities nearby. This was a key concern highlighted as a major issue at the outset of dialogue with local partners, including by local Parish Councils. These issues have been a regular focus of dialogue and concern since, and a major focus of the technical work undertaken by the Applicant, overseen by the Transport Working Group.

- 6.2.24. The approach taken to the Highways Mitigation package of works is shown by the modelling to help reduce through-traffic and rat-running by improving the main roads, focused on Junction 15 and the A508. This includes the various local junction improvements and other works on the A508 corridor. Through improvements to those routes, with reduced congestion, shorter queues and more reliable journey times, the modelling shows that less drivers will be tempted to try and avoid the main routes in favour of routes through the villages.
- 6.2.25. The submitted Transport Assessment (TA) (Appendix 12.1 of the ES) contains the highways and traffic modelling results based on the proposed mitigation which includes measures such as HGV restrictions to reinforce the overall strategy of taking through-traffic out of the villages.
- 6.2.26. The Highways Mitigation works also include measures to prevent HGVs turning south out of the Main Site, further reducing pressure on villages on the A508.
- 6.2.27. While local resident scepticism is perhaps natural and understandable given the extent of the regular problems at Junction 15, and on connected parts of the highway network, the Applicant has responded in a comprehensive manner to the issues and concerns raised. The TA submitted with the application identifies significant benefits in terms of transport and travel impacts for local communities, based on an evidence base which has been prepared with input from, and agreed by, the Transport Working Group.

Road Bypass

- 6.2.28. The Road Bypass is an essential part of the highway mitigation strategy. As reported above there has been a mixed response to the proposed bypass, but the Applicant has welcomed the support expressed by some local people.
- 6.2.29. The Bypass route identified represents the results of work undertaken to determine the most appropriate and effective route in transport and other terms. It proved hard to identify a local consensus. It is noted that the Parish Council has chosen to provide no comments about either the principle of a Bypass, or any steer as to their preference about a proposed route of the bypass in their formal comments.
- 6.2.30. The Transport Assessment (Appendix 12.1 of the ES) contains a Route Bypass Options Report as an appendix which explains the reasoning and justification for the preferred route which was preferred over other alternatives. It also provides details about the considerations which informed the junction designs chosen. This was a balanced judgement taking into account a range of considerations, including local ecological and landscape features. By being closer to the village it reduces the landscape impacts. It also responds to local concerns that the Bypass will create

development in-fill opportunities, although this is not something over which the Applicant has any control in terms of the future plans or strategies by local landowners and others.

- 6.2.31. The highways mitigation proposals as a whole have been informed by the modelling and wider assessment work overseen by the Transport Working Group. This demonstrates that the proposals would redistribute traffic on the local road network around the site, with consequent environmental benefits in many locations. The evidence is clear that the Bypass would deliver notable noise and air quality benefits for the village centre and routes within the village, but it would clearly also result in changes for those living on the western edge of Roade. The bypass proposals include a range of mitigation measures, including bunding and fencing to minimise the noise and visual effects of the proposed road, and lighting is limited to the sections required by highway safety standards. In line with the NPS, the focus of mitigation was not just on potentially significant adverse effects, but also on other adverse effects, and this drove the Applicant's final proposals (as described in Chapter 8 of the ES).
- 6.2.32. The design includes an underpass to retain the existing bridleway on its current alignment, allowing continued use and access by local riders and walkers to the surrounding network of lanes and routes without needing to cross the road. This was a direct and positive response by the Applicant to concerns raised by local people keen to retain easy and direct access to nearby bridleways and footpaths. Other at grade crossings are also provided at other points on the bypass.
- 6.2.33. In response to comments received from a number of people, the Applicant has committed to clear triggers for the delivery of the Bypass. This is to provide some comfort and reassurance to those who have cautiously welcomed the proposals of a Bypass, but were concerned that it may come late in the development process. The proposed trigger for delivery of the bypass is for it to be open within 2 years of first occupation of the SRFI site, or within 4 years of the start of construction works at Junction 15, whichever is the sooner.

Environmental effects – Air quality, noise, lighting and flood-risk

- 6.2.34. Many responses give the grounds for objection as concerns over the potential environmental impacts of the scheme. As summarised above, and as shown in the Consultation Schedules, these include assumptions that the proposals would lead to negative effects such as worsening air quality, increased noise levels, the potential for localised flooding or drainage problems, and increased traffic through the surrounding villages.

- 6.2.35. Although draft ES Chapters were shared in early October 2017, the Stage 2 consultation process shows that many local people continue to object on the basis that they consider there will be a range of significant negative environmental effects as a result of the proposals. The draft chapters were not complete, but were progressed well enough to enable an informed discussion about the extent and scale of likely impacts, and potential or proposed mitigation measures.
- 6.2.36. The submitted ES shows that the Applicant has responded directly to these concerns, and to the need to seek to minimise the effects of the Proposed Development. With the design and mitigation measures proposed, the project would deliver a range of benefits, and negative effects can be mitigated to minor or negligible for the majority of the nearest receptors. This is particularly important with regard to concerns over noise, lighting, and air quality which came through most strongly in the responses received.
- 6.2.37. As a result of the transport proposals and highways improvements, supported by the specific mitigation measures proposed, many communities will see some localised improvements in air quality in the future with the Proposed Development compared to the existing. The assessment undertaken suggests there will be a negligible impact on air quality overall. These negligible effects would be a result of the proposed highways mitigation works including the improvements to Junction 15 and the Roade Bypass, with less through-traffic in village centres, and less standing or crawling traffic in general.
- 6.2.38. Contrary to the perception of many local people, it is important to note that the baseline data, collected both by the local authorities, and by the Applicant, show that air quality in the area around the Proposed Development is good. Existing issues relate to a small number of locations in Collingtree, but there are few if any other wider issues. This will remain the case if the Proposed Development were approved, and underlines that the Applicant has been mindful of the concerns and issues raised. 'Low emissions' measures included in the proposals are also geared to help contribute to local efforts to reduce and minimise air quality issues in Northampton, including investment through the Public Transport Strategy in new bus provision.
- 6.2.39. Similarly, the Environmental Assessment shows that the likely effects on noise are mostly negligible and minor, with both beneficial and adverse effects across the local area. Again, some areas (or 'receptors') will see changed transport flows and reductions in through-traffic, and the assessment shows that most places will see negligible or barely perceptible changes in noise levels as a result of the Proposed Development once operational.
- 6.2.40. There are a number of reasons for this which include, but are not limited to, the relatively high baseline levels of background noise experienced by some receptors in the area surrounding the Proposed Development. Additional reasons include the

proposed disposition and layout of the Proposed Development, including the change to the ground levels and the scale of the landscaped bunding, and the distance from the proposed rail terminal from the vast majority of receptors. As described elsewhere in the Application (see the DAS, and Planning Statement), the development plateau would be placed significantly lower than the existing ground levels, particularly at the western end of the site closest to the nearest villages. Also see the response to landscape and visual issues below.

- 6.2.41. The increased number of freight trains on the Northampton Loop Line will mean more frequent noise and vibration for those receptors closest to the rail line which already experience the effects of rail activity.
- 6.2.42. Other mitigation measures proposed include the erection of acoustic fencing to limit noise effects from the proposed Roade Bypass.
- 6.2.43. With regard to concerns about existing and potential future flood-risk downstream, the Applicant has ensured the proposals will deliver benefits in this regard. The Flood Risk Assessment submitted as Appendix 7.1 to the ES (Chapter 7) reveals that the proposed sustainable drainage measures will ensure reductions in flood risk are achieved downstream by storing water in large basins during times of heavy rainfall to control and manage flows of water into the Wootton Brook.
- 6.2.44. The Applicant therefore feels these issues, while a high priority to many local people, have been dealt with appropriately and positively, both through the technical assessments which underpin the ES, but also in the approach taken to the design and form of the proposals themselves.

Landscape and Visual effects

- 6.2.45. The importance of this key issue was understood by the Applicant from the earliest stages of the planning process, and has fed into the approach taken to the design and layout of the proposals as a whole. This applied many of the main messages received in 2014 when the Applicant was first involved with this site.
- 6.2.46. Significant resources were allocated to developing a landscaping and earthworks strategy which would substantially screen the site from outside view, and also to creating the tools to help explain and present the strategy to local people and other consultees. The natural topography of the site and surrounding areas lends itself to a design which uses a cut and fill exercise to produce development plateau which are significantly below existing ground levels across much of the site, including the more sensitive western half of the site. With much of the development proposed at between 8 and 10 metres below existing levels, from the outset the Applicant has sought to maximise the visual mitigation provided by earthworks and landscaping.

- 6.2.47. The use of both a digital (computer) model of the site, as well as the physical model (1:1250) was felt to provide a sound basis to enable people to understand the likely residual impacts from viewpoints around the main site. The overall feedback received about the strategy, and the models, was encouraging and positive, with many verbal responses expressing support for the efforts made to ensure that the proposed built development would not be widely visible.
- 6.2.48. Questions over whether the screening to Collingtree was as generous and effective as that along the western edge of the site was addressed by the Applicant, and by Stage 2 the further earthworks detail had allowed further height (approx. 4m in places) to be added to the landscaped bunding adjacent to the M1, further improving the extent of screening from Collingtree.
- 6.2.49. The Applicant recognises that the Proposed Development would result in landscape change, and this is made clear in the ES. However, the retention of established areas of existing woodland within the site, coupled with the extensive new planting on the perimeter bunding, results in new landscape features which will assimilate into the landscape effectively over time. The new landscaped features are also designed to provide additional amenity and biodiversity benefits.
- 6.2.50. The Landscape and Visual impact assessment (Chapter 5 of the ES) considers the shorter and longer-term visual impacts (year 0 and year 15) of the proposals, enabling local people and other consultees to understand the likely effects, and timescale, of the maturation of the planting and landscaping.
- 6.2.51. The verbal feedback from many visitors to the exhibitions (during both Stages 1 and 2) was that the landscaping strategy and earthworks directly addressed many of the main concerns regarding landscape and visual impacts from the nearest villages. This was often not represented as strongly in the written comments received, but was an increasingly frequent message received. The Applicant took this issue very seriously from the outset of Stage 1, and the physical scale model of the site and surrounding area was commissioned to help communicate the relationships between the proposed SRFI site, the proposed buildings, and the villages and other receptors. The model often formed a focal point for discussions and dialogue with local residents, many of whom were able to locate their homes on the model, and assess accurately the likely landscape and visual implications from viewpoints they know well.
- 6.2.52. The Applicant has devised proposals which seek to minimise visual effects of the proposed buildings by an earthworks and landscaping strategy which includes significant new footpath provision around and within the Main Site. While change would be inevitable, efforts have been made to incorporate new or retained attractive and useful landscape features. The local communities will have access to an increased network of footpath and cycle links once the development is in place, with

new connections established to surrounding communities through new routes and proposed diversions to existing footpaths.

Rail Network Capacity

- 6.2.53. Rail Reports are submitted as part of the application (Document 6.7). Many comments received refer to there being no rail capacity on the WCML. This is not the case, as explained in the Rail Reports produced by both Victra Railfreight and GB Railfreight submitted with the application.
- 6.2.54. While there are known constraints for passenger (daytime) traffic on the fast lines of the WCML, there are sufficient paths and capacity for additional freight traffic. This conclusion does not rely on capacity released by HS2 in due course, although that too could help enable freight traffic growth over the longer-term.
- 6.2.55. The Applicant noted with interest the Freight and National Passenger Operators Route Strategic Plan from Network Rail in February 2018 which identified a range of actions to enable further freight growth, and which explicitly referred to enabling new rail freight terminals, including at 'Northampton'. Dialogue is ongoing with Network Rail.
- 6.2.56. The Applicant has committed to delivering the rail terminal capable of handling at least 4 good trains per day prior to first occupation of any warehousing, in part to address local concerns that there was no intention to deliver a rail connected site.

7.0 SECTION 42 (DUTY TO CONSULT)

7.1 Section 42 Consultation

- 7.1.1 This section provides an overview of the formal consultation required by Section 42 of the Act. That section refers to consultation with a range of bodies, organisations and interested parties across a wide range of categories, being
- a. those persons prescribed under section 42 and set out in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009;
 - b. the local authorities falling within the categories listed in section 43; and
 - c. persons with an interest in the land under one of the categories listed in section 44).

- 7.1.2 Details of those consulted pursuant to section 42 under the categories explained at (a) and (b) above are attached at Appendix 6. The list of those consulted under section 44 is not included due to Data Protection requirements. The identity of the section 44 parties was obtained through an extensive land referencing exercise which included the distribution of questionnaires to all those with a known interest in land. As referred to in paragraph 7.1.18, where interests were not known, site notices were erected.
- 7.1.3 The Applicant also consulted a number of specific parties at its discretion, in addition to the statutory requirements. This list is also attached at Appendix 6.
- 7.1.4 An example of the Section 42 letter sent to all statutory consultees is at Appendix 20. The Applicant also erected a number of site notices in respect of small parcels of land, the ownership of which is unknown. An example site notice together with a list and map of where notices were posted is contained at Appendix 22.
- 7.1.5 Local authorities are an important category of Section 42 consultee, and as required by Section 43 of the Planning Act, the tables below confirm the ‘status’ of local authorities in the area:

Local authorities

South Northamptonshire District Council	“B” authority
Northampton Borough Council	“B” authority
Daventry District Council	“A” authority
Borough Council of Wellingborough	A” authority
Aylesbury Vale District Council	“A” authority
Cherwell District Council	A” authority
Stratford-on-Avon District Council	“A” authority

County councils

Northamptonshire County Council	“C” authority
Leicestershire County Council	“D” authority
Cambridgeshire County Council	“D” authority
Buckinghamshire County Council	“D” authority

Oxfordshire County Council	“D” authority
Lincolnshire County Council	“D” authority
Warwickshire County Council	“D” authority
Bedford Borough Council	“D” authority
Milton Keynes Council	“D” authority
Rutland County Council	“D” authority
Peterborough City Council	“D” authority

Section 46 (duty to notify the planning inspectorate)

- 7.1.6 The Applicant wrote to the Planning Inspectorate on 4 October 2017 to notify them of the intention to begin the Section 42 consultation. The letter included a copy of the Section 42 consultation letter sent to consultees and statutory bodies on 5 October 2017, and informed the Planning Inspectorate of the consultation period and deadline.
- 7.1.7 The Section 46 letter sent to the Planning Inspectorate is attached at Appendix 23. The Planning Inspectorate confirmed receipt of the notification on 5 October 2017.

The Process

- 7.1.8 Given the nature of the proposals (involving new road and rail infrastructure) the views and advice of bodies such as Highways England and Network Rail have been important. Early informal engagement with both of these bodies was sought to inform the approach taken to the Traffic Assessment and work relating to serving the site via new connections to the Northampton Loop railway line.
- 7.1.9 Northamptonshire County Council has been a key consultee regarding the Highways proposals, and as referred to above is a core member of the Transport Working Group. However, wider discussions have also been held with County Council officers outside of those Group meetings, including to ensure senior officers and Members were aware of the emerging proposals, including issues or amendments arising from local consultation input. For example, a presentation was given to the NCC Cabinet in February 2018, following the Stage 2 consultation process, to discuss the proposals in general, but including the Highways Mitigation Works, economic impacts and other aspects.

- 7.1.10 Similarly, through engagement with the environmental health officers of the local authorities (SNC and NBC) regarding technical discussions about the air quality assessment, contact was also made with the Director of Public Health's team (based within the County Council), and the Applicant's team was able to ensure that they were aware of the approach to consideration of health issues in the ES.
- 7.1.11 Engagement with Highways England has primarily been through the Transport Working Group described above. However, direct and separate contact has also been had with the 'Smart Motorways' project team which is implementing the roll-out of the smart motorway measures on the M1 from junction 13 to junction 19 (therefore including junction 15). The main focus has been to ensure consistency and appropriate levels of awareness about the potential implications of that project.
- 7.1.12 In addition, informal dialogue and contact with bodies such as the Environment Agency and Network Rail has been underway for some time. The ES Scoping process was a relatively early process which helped secure some input and provide relevant contact names at key bodies, some of which were followed up by the Applicant's consultant team. Later contact or meetings focused on more technical work associated with preparation of the Environmental Impact Assessment and other technical assessments. This included dialogue with Natural England regarding the surveys of the Main Site regarding any potential interactions with, or impacts on, the Upper Nene Gravel Pits Special Protection Area (Ramsar site).
- 7.1.13 There has been ongoing dialogue and joint working with Network Rail, with technical studies and assessments funded by the Applicant to aid a common understanding of the relevant issues associated with connectivity to the rail network, and wider capacity issues. Regular meetings were held with key individuals and teams at Network Rail over an extended period which began during Stage 1, and was ongoing at the point of submission.
- 7.1.14 However, some national bodies were reluctant to engage in detailed and specific dialogue until later in the process when there would be a more advanced or final ES, and some national bodies such as Natural England, have become more engaged later in the process through Stage 2, and involved with relevant aspects of the ES. This has included work to prepare Statements of Common Ground.
- 7.1.15 Section 42 consultation with statutory bodies and other parties began formally on 9th October 2017. The letter was sent on 5 October which clearly explained that the consultation began on 9th. As required by Section 48 of the Act and regulation 4 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, press notices were placed in national and local papers – see section 6.3 below for details. A copy of the press notice was enclosed with the section 42 letter.

7.1.16 Letters were sent to around 550 consultees (referred to as the “Section 42 Consultees” for ease of reference) is contained in Appendix 20 of this report. This includes consultees in the following broad categories:

- Government agencies and departments, including statutory consultees such as Natural England, the Environment Agency, English Heritage, and others;
- National transport agencies and bodies such as Highways England, Network Rail, and HS2 Ltd;
- Local authorities, including those neighbouring North West Leicestershire and Northampton Borough at both district and county levels – also see above;
- Parish Councils;
- Local Enterprise Partnerships;
- Land-owners and others with an interest in the land;
- Utility providers and network operators;
- ‘Prescribed Persons’ which includes a range of bodies including Police & Crime Commissioners, Health (NHS) bodies, and Emergency Services;

7.1.17 The Applicant’s approach to the list of prescribed consultees set out in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, has been a targeted one, specifically with regard to the “relevant statutory undertakers” listed under those regulations. Table 2 of PINS Advice Note 3³ explains that relevant public gas transporters and relevant electricity licence holders are deemed statutory undertakers. The footnotes to these entries provide a link to Ofgem’s published lists of electricity and gas licence holders. The footnote states that licences are not always restricted to a geographic area and states that PINS will take a precautionary approach and consult all licence holders whose licence cover Great Britain. The Applicant took the approach of reviewing the very long list of bodies and seeking to rule out those where the licence was limited geographically or where it appeared that the entity would not be relevant to Northampton Gateway (such as “operator of offshore wind farms”). However, where it was not possible to discount an entity, they were included in the consultation list on a precautionary basis. Some responses have been received from such bodies confirming they do not have an interest and those bodies were removed from the consultation list for the focussed consultation.

³ Advice Note 3: EIA Consultation and Notification August 2017, version 7.

- 7.1.18 There were also 37 site notices erected in 53 locations around the Order limits. These notices specifically related to unknown interests and were addressed to those who might have an interest in the specific area of land to which that notice related. There were plans attached to each notice identifying the parcel of land in which there was an interest which the Applicant had been unable to ascertain. An example notice is attached at Appendix 22 together with a list and plan showing the location of the relevant notices.
- 7.1.19 The Applicant monitored the notices weekly and had to replace several of them each week. Several responses were received as a result of the notices, some of which resulted in the addition to certain parties in the Book of Reference as reputed interests (where no title evidence was provided but ownership or rights asserted).
- 7.1.20 All consultees were guided to the project website to review and comment on the updated draft Environmental Statement (ES) Chapters and other information which included draft DCO documentation and plans.

7.2. The material consulted upon

- 7.2.1 The letters sent to the Section 42 Consultees included a copy of the Section 48 Notice. It also contained a summary description of development, and provided a link to the project website where consultees were able to view the draft technical documentation, and also the 'Short Explanatory Document' (summary of the proposals) and other draft DCO documents and plans.
- 7.2.2 The formal Section 42 consultation process formed a natural continuation of already well-established and ongoing dialogue and engagement with key consultees. For example, with regard to transport and highways issues where there have been regular (approximately monthly) meetings of the project Transport Working Group since summer 2016.

7.3. Consultation Method

- 7.3.1 To formally start the Section 42 consultation process letters were sent on 5 October 2017 to relevant consultees across the range of categories referred to above. The letter advised that the statutory consultation period would commence on 9 October 2017 with the deadline for responses being 24 November 2017 (being longer than the consultation period required under the Act).
- 7.3.2 Section 7.0 below provides details of the Section 48 Notices which were placed in the national and local publications:

- Northampton Chronicle & Echo, 5 October and 12 October
- London Gazette, 5th October;
- The Guardian newspaper , 5th October.

7.3.3 The site notices in respect of the unknown interests were erected on 4 October 2017.

7.4. Responses Received

7.4.1 As shown in the Section 42 Consultation Summary Schedule (Appendix 21), the proportion of Section 42 consultees who provided responses either within the consultation period, or soon afterwards, is relatively limited. 47 responses were received from the Section 42 consultation process in total, although this number includes a number of respondees who provided more than one response (e.g. Cadent Gas).

7.4.2 Many of the responses from national consultees or those based further afield who were legitimately consulted due to the requirements of the regulations but either chose not to respond at all, or provided brief confirmations that they had no comments to make.

Summary of key Section 42 responses

7.4.3 The responses received vary greatly in both length, and content. Many responses are fairly standard or generic responses with no detailed response or comment about the proposals.

7.4.4 Others are largely descriptive of the ongoing work being undertaken either by the Applicant or by the consultee, or ongoing dialogue between the parties, without providing any conclusions or definitive comments about the proposals. Key examples of this include Network Rail who responded in brief to confirm their role in working to enable a shift of freight from road to rail, and their work to increase capacity across the network to allow more trains and speeding up rail freight movements. The response refers to the work and dialogue to date with the Applicant, and to further work being undertaken to enable further more formal discussions, including Network Rail's review of the Applicant's Rail Operation Report and Rail Capacity Report.

7.4.5 Of particular interest are the comments provided by the two local planning authorities. South Northamptonshire Council's response referred to a range of issues which they intend to continue to address through ongoing dialogue with the Applicant, and which are anticipated to form part of an emerging Statement of Common Ground, and a

future Local Impact Report. The key issues are addressed in the Applicants responses set out .

- 7.4.6 The response recognises a number of key potential benefits from the proposals, including with regards to infrastructure provision and improvements, and employment creation. It also identified a number of environmental issues where they were keen to understand the likely impacts in further detail as the ES process progressed. The response notes the potential for local adverse effects, and seeks to work closely with the Applicant.
- 7.4.7 Northampton Borough Council submitted comments which explicitly recognise that the proposals would deliver “*a valuable contribution towards the economic growth of Northampton*”, and that the local impacts must be mitigated appropriately. The main focus of the comments was Collingtree village as the nearest receptor in the Borough’s administrative area, with key issues being air quality, noise, light, and traffic. The Borough Council confirms that local policy requires the proposal to meet BREEAM ‘very good’ standards with regard to energy efficiency and climate change.
- 7.4.8 Both Northamptonshire County Council, and Historic England, refer in some detail to the draft ES material, and repeated earlier comments regarding the need for further invasive investigations as part of the process to determine the detailed nature of any buried archaeology.
- 7.4.9 The County Council also made a long response referring to the progress made in progressing the TA and highways mitigation works, as well as the ongoing work to prepare the Public Transport Strategy. This underlined the agreements reached about fundamental components of the TA which underpinned the Stage 2 consultation, albeit with work ongoing at that time.
- 7.4.10 Public Health England confirmed that they are broadly satisfied with the approach taken in the emerging ES with regard to health issues, including that air and noise assessments were long-term and based on worst case assumptions. It welcomed the positive regional and national contribution of the scheme to lowering traffic and air pollution, and noted the relative impact compared to other schemes (such as the Smart Motorway initiatives on the M1). It encourages efforts to reduce effects of operational noise, and that consideration be given to issues associated with electromagnetic fields associated with new sub-stations on-site. The main comment is the suggestion that the application include a section relating to Public Health issues (relating to air, noise, waste, land and water contamination) in one place without duplicating the topic specific content which has already been prepared and consulted upon.
- 7.4.11 Responses from a number of surrounding local Parish Councils, including Collingtree, Blisworth, Roade, and Milton Malsor confirm their grounds for objection

to the proposals. With the exception of Collingtree, the Parish Councils provided few comments about the proposals or about specific elements of the draft application documents. While asserting that the scheme would deliver no local benefits, the brief responses from these Parish Councils focused on issues relating to the large amount of the information made available, and concerns that they thought the consultation events were poorly advertised or inconvenient for local people.

7.4.12 These issues had not been raised with the Applicant prior to the submission of written comments. The issues raised included complaints that there was too much information made available as part of the consultation process, but also that the Summary ('Short Explanatory Document') was too brief, selective, and misleading. The publication of draft, as opposed to final, documents was also criticised. The Applicants response to these issues is included in the following section below (in paragraphs 7.4.27 and 7.4.42 to 7.4.49).

7.4.13 Roade Parish Council's response provided no direct comments about the proposed Bypass, but expressed a general objection to the proposals which is seen by the Parish Council to deliver no local benefits.

7.4.14 Collingtree Parish Council provided a fuller response to its counterparts and this focuses on the content of the Short Explanatory Document. The issues raised as part of their objection include:

- *Proposals will deliver no local benefits to the local community;*
- *Outstanding concerns over local air quality, noise and lighting effects, and no evidence to show they can be mitigated;*
- *Contrary to local planning policies which do not allocate this site;*
- *No need for an SRFI with DIRFT around 20 miles away – provision here would not represent a 'network' as proposed through Government policy.*

7.4.15 The response from Collingtree PC refers to the high levels of awareness of, and opposition to, the proposals, with reference to thousands of signatures gained on various petitions, and 500 local people involved in a protest walk held over the summer.

7.4.16 Highways England provided a brief response to confirm the comprehensive range of details and information already shared by the Applicant and which have been agreed. It also confirms a key area of ongoing work which they are aware remains outstanding and which will be shared in due course.

7.4.17 The Northamptonshire Police provided verbal input at one of the exhibitions, but then followed this up with written comments intended to help remove the need for them to object in due course. The comments include a strong emphasis on the importance of

providing secure HGV parking (as opposed to the initially proposed parking areas on lay-bys within the site) to help prevent HGV based crime which is frequently seen in Northamptonshire. There were more general comments that the final submission should include more detail regarding crime prevention measures overall. As described below, the Applicant made changes to the detail of the proposals in response to these comments – HGV parking had always been assumed within the site (and was referred to in the earlier description of development), but this was amended to be explicitly provided as a discrete secure parking area.

7.4.18 The Road Haulage Association (RHA) provided comments which picked up on a number of the same issues as the Police with regard to the need for on-site facilities to meet the needs of HGV operators and drivers. However, the RHA comments recommend inclusion of HGV Parking and facilities which would contribute towards wider unmet need in the surrounding area.

7.4.19 The Section 42 schedule includes a number of comments from local landowners or people with an interest in land consulted under Section 44. These were provided either in response to letters received, in response to site notices placed on or near relevant land, or the newsletter leaflets which would also have reached many of them as local residents. Most of these comments were regarding land and ownership issues, but some included other comments regarding the proposals.

7.4.20 For example, a number of local landowners queried whether Bailey Brooks Lane in Roade would be used for construction traffic relating to the Bypass, and or sought other confirmations about access and other rights sought as part of the DCO. Responses were typically sent to these comments via the legal team.

Applicant's responses to key issues raised

7.4.21 Many of the Section 42 responses provide a helpful basis for the ongoing engagement and dialogue with a wide range of consultees. Some of these are already covered by Statements of Common Ground, or will be in due course with work ongoing. The interim nature of the responses from many consultees reflects their understanding that they will continue to play an active role, and will have further opportunities to comment on the DCO and associated documents later in the process.

7.4.22 Some of the Section 42 responses represent an interim or holding position in advance of having concluded the ongoing dialogue regarding those Statements – for example, South Northamptonshire Council's response did not reach an overall conclusion about the proposals, but instead provided a useful range of comments and issues to structure the ongoing dialogue and discussion. This included a range

of comments about the draft ES to be taken into direct account as the final ES was prepared ahead of submission.

7.4.23 The emerging Statement of Common Ground with South Northamptonshire Council will address as many of the local issues raised by local communities as possible with reference to the ES and other application material. The Council's recognition of a number of local benefits is welcomed by the Applicant.

7.4.24 Highways England's response confirmed the agreement already reached on a range of technical issues at that time, and this has since been progressed further and formalised through a Statement of Common Ground.

7.4.25 While many Section 42 responses do not require a specific response given the nature of the comments made, a number outline issues or potential concerns which the consultees suggest must be addressed by the Applicant. Where specific responses have been sent to consultees following comments provided within the Section 42 consultation process these are referred to below:

Local environmental effects

7.4.26 There is similarity between the issues raised by some Parish Councils and those raised by local people (as described in Sections 4.0 and 6.0). Therefore, many of the Applicant's responses contained in the context of Stage 1 are also of direct relevance.

7.4.27 The Applicant provided each of the nearest Parish Councils with a full set of printed draft documents, and a disc copy, for their own use and for use by local people. It seems clear from the content of the Parish Council's responses that the amount of information made available caused some concerns, and that much of the information was considered technical and lengthy. The summary information provided by the Applicant (document 6.5B) to provide a shorter, more accessible source of information geared around issues known to be of local interest, was criticised for being too brief. This was intended by the Applicant to help local consultees, and to perhaps help focus their engagement with the draft ES on those issues of most relevance to them.

7.4.28 The Parish Councils have retained similar positions to those expressed at the Stage 1 consultation process in late 2016 when they were, naturally, keen to know more about the likely environmental impacts and were keen to underline the potential for adverse effects on the nearest communities. The draft ES and other information made available to them as part of the Stage 2 consultation contains information which relates directly to these issues. It was intended to enable a more detailed and

structured discussion about the likely effects based on the wide range of environmental impact assessment work undertaken.

- 7.4.29 The assessments undertaken and presented in the ES suggest that significant local effects are unlikely following mitigation. For example, the ES suggests that the Proposed Development with the proposed mitigation measures included will result in negligible overall impacts on air quality, and that noise impacts for most receptors in the villages will be negligible, or minor. Indeed, air quality improvements and noise reductions are likely where there are predicted to be reductions in through traffic in several villages as a result of the highways mitigation measures. This includes Roade, Blisworth and Milton Malsor. These outcomes were contained in the exhibition material presented at the consultation events.
- 7.4.30 Some of the Parish Council's comments criticising the Applicant display a lack of awareness of the NSIP process. For example, criticisms that it is unacceptable for the Applicant not to confirm how many buildings will be developed suggest that the illustrative nature of the Illustrative Masterplan, and the key role of the Parameters Plan in the ES, are not well understood.
- 7.4.31 Similarly, criticising the Applicant for referring during the Consultation process to the 'emerging' proposals also suggests a continued lack of understanding that the draft proposals could be refined and amended in light of consultation comments, as well as in response to the findings of the Environmental Statement. Indeed, changes have been made to the proposals as a direct result of the consultation process, helping underline the iterative relationship with consultation input as well as the ongoing technical work to help refine and shape the emerging proposals ahead of finalisation and submission, which is the very intention of pre-application consultation.
- 7.4.32 The flood-risk and drainage assessment shows that measures proposed would help ensure flooding is not made worse elsewhere off-site, and reductions in flood risk are achieved. A Drainage Strategy based on Sustainable Drainage principles has been designed within the proposals, storing water in large basins during times of heavy rainfall. By reducing the rate of runoff this strategy will produce a reduction in flood-risk downstream. This was a local issue raised fairly regularly in the Stage 1 consultation, and at early public meetings, and one where the scheme will deliver a positive outcome.
- 7.4.33 The proposals would deliver BREEAM 'very good' standards – this is in accordance with the Applicant's typical approach to building design and sustainability, and will ensure local planning policy requirements are met in that regard, with positive implications for climate change, energy, and air quality agendas.
- 7.4.34 In response to the suggestion from Public Health England, the application documents (ES) includes a specific section relating to public health issues with cross-references

to the relevant parts of the assessments undertaken regarding topics such as air quality, noise, contamination, etc.

Heritage/Archaeology

- 7.4.35 Following input from both Northamptonshire County Council and Historic England a programme of trial trenching was undertaken by the applicant over the winter of 2018, and has informed the submitted ES.
- 7.4.36 These investigations, which targeted the main areas of likely archaeological interest identified by the earlier geophysical surveys, have tested those earlier findings, including by also digging trenches in 'blank' areas on the survey. The results of this programme of trenching have further increased the understanding of the archaeological potential of the site, and are reported in the submitted ES.
- 7.4.37 The Applicant fully accepts the need for further on-site investigations on remaining areas of the site, should consent be granted, prior to any development taking place.

Accordance with National Policy

- 7.4.38 Some of the Parish Councils suggested that the scheme does not comply with national policy as set by the NPS. Key strands to this argument included the suggestion that another SRFI 'in the Midlands' would not deliver the network of SRFI envisaged by the NPS. As referred to in earlier sections of this Report, a frequent point made was the presence of DIRFT some 20 miles to the north means there can be no need for the Northampton Gateway SRFI.
- 7.4.39 Neither the Planning Statement or the Market Analysis Report were available at the time of the Stage 2 consultation, but the exhibition material and the Short Explanatory Document which were available explained the national policy context.
- 7.4.40 The Applicant's response to comments received under the Section 47 public consultation process are of direct relevance to the questions and issues raised by the Parish Councils regarding national policy. Paragraphs 6.2.4 to 6.2.19 provide a full response to this issue, but in brief, the Applicant's view is that there is no better alternative site for an SRFI to serve the markets identified. This site would balance the need for a location on both the rail and motorway networks and close to key urban markets and where there is scope to successfully minimise and mitigate the environmental effects. It would further strengthen the network of SRFIs, extending the core midlands logistics and distribution 'heartland' further southwards.

7.4.41 The proposals meet all of the required criteria set by the NPS for an SRFI, including the capacity to handle at least 4 goods trains per day.

Consultation material and process

7.4.42 To be criticised for providing too much information is, while disappointing, something which the Applicant sees as preferable to being criticised for not making enough information available.

7.4.43 The NSIP regulations require consultation for a minimum of 28 days (4 weeks). The consultation period was held from Monday 9th October to Friday 24th November (almost 7 weeks). This extended period compared to that required was deliberately intended to allow consultees and the public time to both attend the exhibitions and review key documents, and took into account the October half-term week.

7.4.44 As is always the case with pre-application consultation, the Applicant consulted on draft documents, not final documents, and there were some technical appendices or other supporting documents not complete or available. However, the draft ES was well progressed and clear in expressing likely environmental effects and proposed mitigation measures. Where work was ongoing this was also made clear. This approach is considered appropriate and consistent with the requirements of the NSIP regulations and guidance: it allows for consultation input at a sufficiently early stage as to allow for further adjustment or change in response to the scheme or mitigation measures.

7.4.45 The final ES and other supporting information form part of the submission. While questions regarding the draft nature of the ES and other material is to some extent understandable, to consult on final documents would arguably have drawn local criticism and objections that there was no scope for change or amendments following local comments, ideas and concerns. As explained above, some aspects of the Proposed Development have been amended in light of comments and ideas raised through consultation.

7.4.46 Several Parish Councils expressed a view that insufficient awareness was raised about the consultation process, and that events were poorly signed. Many representatives of the Parish Councils attended the exhibitions, and none of them, nor the public at large, raised this issue then. The Applicant was very aware of the activity of the local opposition group (known as 'Stop Roxhill'), and spoke to several of the core Members at the exhibitions as well as at earlier public meetings. Many members of the opposition group attended several of the exhibitions, with one or two individuals attending every exhibition.

- 7.4.47 In addition to the leaflets distributed by the Applicant, the Section 48 press notices, site notices and the information on the project website, it is understood that the opposition group's website publicised the consultation process and exhibitions details, as did South Northamptonshire District Council. There were no concerns held by the Applicant, or raised at any stage during the consultation process by the LPAs or any other consultee about a lack of awareness about the proposals or about how to view or access information.
- 7.4.48 As explained in section 5.0 above, in accordance with the agreed Statement of Community Consultation, Stage 2 exhibitions were held in the various villages closest to the development site, as well as in Towcester, and included a Saturday. This was a different approach to that taken during Stage 1 where the exhibitions were held across several days in a single venue (in Collingtree close to the main site). An approach where the exhibition was taken out to the nearest villages was encouraged by Parish Councils, some local residents, and SNDC following the Stage 1 consultation process. Informal feedback about the SoCC from a number of local bodies welcomed those changes.
- 7.4.49 Collingtree Parish Council's response confirms the high levels of awareness of the proposals (and the neighbouring alternative SRFI scheme), with reference to the hundreds of people who apparently attended a protest walk, and thousands who apparently signed petitions. The Applicant is content that there were very high levels of awareness about the proposals, and about the consultation process.

Specific changes made to the proposals

- 7.4.50 Some aspects of the scheme were changed as a result of the Stage 2 consultation process. Examples include some of the detailed highways mitigation measures where local people, including some representatives of Parish Councils, commented on proposed improvements or works based on their experiences of using the roads.
- 7.4.51 Several junction designs have been improved further, and are expected to result in better outcomes from a road safety and network resilience perspective. This is described in further detail in Section 9.0.
- 7.4.52 A secure HGV parking area was incorporated as a direct response to comments received by the Police. This also addresses issues raised by the RHA, but as a facility to serve the site only it does not pick up on their wider point about a current shortfall in the provision of HGV facilities for over-night stops in and around Northampton. To provide such a facility which was open to for general use by any HGV in the area would have different transport and traffic implications beyond those assessed in the Transport Assessment.

7.4.53 As a result of the changes, albeit relatively minor, to the land required to deliver the highways mitigation works, a 'further consultation' process was undertaken in December 2017. This process was to ensure that these changes were clearly understood by relevant landowners. For the avoidance of doubt, the changed approach to HGV parking also formed part of this process, as did the explicit provision for an aggregates terminal within the intermodal terminal area. The detail of that further consultation is set out in Section 10.0.

8.0 SECTION 48 (DUTY TO PUBLICISE)

- 8.0.1 The Applicant publicised the proposals pursuant to Section 48 of the Act and regulation 4 of the Infrastructure Planning (Applications and Prescribed Forms and Procedure) Regulations 2009 by placing a public notice in the Northampton Chronicle & Echo for two consecutive weeks (starting 5 October).
- 8.0.2 The Section 48 Notice was also published in The Guardian national newspaper and the London Gazette on 5th October.
- 8.0.3 The Northampton Chronicle & Echo was specifically chosen by the Applicant because they were aware that the paper has a large readership in the villages where the exhibitions were to be held.
- 8.0.4 Copies of the published Section 48 Notices are contained at Appendix 24.
- 8.0.5 It is impossible to ascertain from the responses submitted whether they have been submitted as a result of the public exhibitions, local press notices, leaflet distribution, site notices or word of mouth. All responses are detailed in this report but we are not aware of any responses being made specifically to the section 48 press notices.

STAGE 3 – FURTHER CONSULTATION

9.0 Further Consultation

9.1 Introduction

- 9.1.1 Following the Stage 2 consultation exercise described in Sections 5.0 to 8.0, the Applicant took a view that a further, targeted stage of statutory consultation was appropriate.
- 9.1.2 This further, focused consultation, referred to as Stage 3, involved consultation with the same parties as were consulted under the Stage 2 statutory consultation, in addition to a further press notice and the methods of consultation are described below.
- 9.1.3 The consultation ran from 19 December 2017 to 2 February 2018.

9.2 Reasons for, and scope of, Further Consultation

- 9.2.1 Then decision to undertake a further, targeted stage of consultation was taken in the context of several related issues and considerations. This included consideration given to the feedback and comments made during a number of the discussions had with local people during the Stage 2 consultation process. It also reflected the ongoing clarity regarding the final package of Highways Mitigation Works as a result of the well advanced but ongoing technical work relating to the Transport Assessment which forms part of the submitted Environmental Statement.
- 9.2.2 During the Stage 2 consultation the Applicant received a number of specific comments and suggestions from local road-users and residents regarding some of the proposed (draft) highways mitigation works. Based on local experiences and perceptions of the existing highways issues, both relating to congestion and safety, many of the discussions had with visitors to the Stage 2 exhibitions saw mixture of questions and concerns about some of the specific junction improvements included within the draft mitigation works package.
- 9.2.3 Furthermore, there were ongoing discussions with the County Council via the Transport Working Group about the emerging package of Highways Mitigation Works, and as a result of this coupled with the local views expressed, some changes were made to two of the highways mitigation works proposed. This is described in further detail below. As a consequence of those minor changes, more third party land than had previously been indicated during the Stage 2 consultation would be required to accommodate the revised improvement (mitigation) works, and the design of the highways mitigation works, at these two locations, had changed,

including one junction close to a number of properties (at Rookery Lane/Ashton Road).

- 9.2.4 An additional area of change related to the range and types of activity anticipated at the SRFI terminal (i.e. on the Main Site). Up to this stage, the descriptions and information presented about the proposed Rail Terminal had included references to intermodal traffic, and also to the potential for 'other freight'. Although not explicit, this reflected a recognition that while many bulk commodities were seeing a declining share of the rail freight market (such as coal), other sectors, such as construction and aggregates remain important as part of the rail freight market, with the potential for further increases in the future.
- 9.2.5 Therefore, as a response to Government's expectations and aspirations that rail freight increases over the longer-term, these references to 'other freight' were seen as an important, if non-specific, part of the flexibility and 'future-proofing' of the site to meet a range of market needs.
- 9.2.6 Over the course of the Autumn and Winter of 2017 it became increasingly clear that a national aggregates company with a site in urban Northampton (Galliford Road Stone Ltd) is keen to relocate to the Northampton Gateway site. As the legal process of securing their interest and commitment to the site was quickly gaining pace, the Applicant felt it would be appropriate to ensure that the inclusion of an aggregates terminal was explicitly referred to in the description of development, and made clear to all interested parties.
- 9.2.7 Albeit resulting in a delay to the application preparation process, this was considered helpful in the interests of transparency and clarity.
- 9.2.8 The final, detailed component of the targeted Stage 3 consultation was also a direct result of the Stage 2 consultation process during which the Police had made strong representations about the importance of providing a dedicated, secure HGV parking facility on-site. Although HGV parking had always been assumed on-site, and was already listed in the description of development used during the Stage 2 consultation, an amendment to the wording of the description, and to the Illustrative Masterplan, was made to refer to a secure HGV parking on-site.
- 9.2.9 Therefore, the Stage 3 consultation was ultimately the result of a judgement that it would be better and more helpful to all interested parties to undertake a further stage of consultation regarding the above changes or clarifications. Despite the relatively limited nature and scope of the issues being specifically consulted on, it was considered better to hold the further consultation to avoid questions – or confusion - about the changes once the Application was finalised and submitted.

The Consultation Process and Material Consulted Upon

- 9.2.10 The intention to undertake a Stage 3 consultation process was discussed with the Local Authorities (SNC, NBC, and NCC) who were made aware of the Applicant's intentions in advance, and provided with the opportunity to comment. It was considered important to ensure that the LPAs were fully aware of the additional further consultation, because this Stage 3 process was beyond that included within the scope of the agreed Statement of Community Consultation (SoCC – Appendix 12).
- 9.2.11 The Stage 3 consultation followed the same basic procedure as that used for Stage 2, with letters to the same Section 42 consultees, that were consulted for Stage 2 (please refer to section 7.0 above. In addition, the Applicant specifically consulted a small number of additional parties who had responded to the Stage 2 Consultation. These were added to the "s42 'plus' list", which is attached at Appendix 29 together with the s42 and s43 parties consulted at Stage 3. As before, the list of s44 parties is not included due to Data Protection. A copy of the 'Further Consultation' letter is attached at Appendix 26.
- 9.2.12 Site notices were also erected close to land included within the proposed highways works, with details of how to provide comments, in the same manner as for Stage 2. An example notice is included at Appendix 27. The same locations were used as for Stage 2 (map enclosed at Appendix 22).
- 9.2.13 The Stage 3 consultation was also undertaken with a newsletter/leaflet distributed to the same, agreed consultation area as that used for Stage 2. The newsletter leaflet for the Stage 3 Further Consultation is enclosed at Appendix 25. In agreement with the Local Authorities, this was extended to ensure that leaflets were also delivered to the village of Stoke Bruerne located further south along the A508. The village was not within the agreed consultation area previously, but in light of the relevance of one of the specific issues which formed the focus of Stage 3 (one of the amended junctions is in the village), it was considered appropriate.
- 9.2.14 Plans and information about the Stage 3 consultation material were also sent to the Clerk of Ashton Parish Council following contact with the Applicant's Project Team. The Parish Council had a particular interest in certain elements of the Highways Mitigation Works and was keen to ensure they were able to communicate the proposals to local residents.
- 9.2.15 The relevant plans and information about the Stage 3 further consultation was also posted on the project website, with clear information about the content, purpose and timescale of the consultation.

10.0 ISSUES ARISING FROM LOCAL STATUTORY (STAGE 3) CONSULTATION AND THE APPLICANT'S RESPONSES

10.0.1 This section of the Consultation Report presents the issues raised by comments received in response to the Further Consultation, and the Applicant's responses to them.

10.1 Summary of issues raised by consultation responses at Stage 3

10.1.1 A total of 32 responses were received from local residents. Many were from individuals who had previously responded to earlier consultation processes, but the majority were from respondents who had not previously commented on the proposals.

10.1.2 The responses received to the Stage 3 Further Consultation are summarised in detail as part of the Consultation Responses Schedule enclosed as Appendix 30, with responses by the Applicant to the issues raised.

10.1.3 As shown, a large proportion of the responses received used the opportunity to make general comments about the Proposed Development, rather than commenting on the specific issues which formed the intended focus of Stage 3. Those general comments raised issues similar to those raised during Stage 2 which, as referred to in Section 6.0 above, saw a dominance of comments and objections based on existing highways issues, and concerns about potential additional highways impacts should the Proposed Development be approved.

10.1.4 This included recognition by some respondees of the proposed HGV weight restrictions to help remove through-traffic from the nearby villages, with questions raised about enforcement and resourcing to ensure that these measures – which were implicitly supported by many – were effective.

10.1.5 A small number of the responses received from the public did respond to the specific issues which formed the focus of Stage 3. This included some questions about the likely nature and scale of the aggregates terminal, with some concerns that this might refer to an intention to extract aggregates (minerals) on-site, with associated noise and dust effects.

10.1.6 Others sought clarification as to whether the aggregates traffic would be additional to that already assumed for the SRFI site as a whole, and as to whether any likely additional environmental impacts of the aggregates terminal, such as dust or noise, had been considered.

- 10.1.7 The proposed highways mitigation works also generated some useful responses, with questions and comments received both to the newsletter leaflet, but also to the site notices which were erected in the vicinity of the proposed locations of highways improvements.
- 10.1.8 A further 26 responses were received from other bodies and consultees, albeit this figure includes a number of consultees who sent more than one response – a schedule of consultation responses from these other bodies is enclosed at Appendix 30.
- 10.1.9 The vast majority of these confirmed that the additional further information provided did not have any material impact on the comments already provided during Stage 2. This includes a number of national bodies including Natural England, Historic England, Highways England, Coal Authority, Public Health England, the Health & Safety Executive, Royal Mail, and many of the local authorities in neighbouring counties.
- 10.1.10 Some of these included confirmation of no objection to the proposals – see appended summary schedule for detail.
- 10.1.11 Other comments helpfully included comments about the minor changes or new information provided, and these were largely consistent with those comments made by local residents. For example, South Northamptonshire Council (SNC) made some detailed points regarding the proposed secure HGV parking, including about how it would be secured, and how wider use by HGVs unrelated to the Northampton Gateway site would be controlled. SNC also raised questions about any detailed environmental impacts of the aggregates terminal, and listed a number of potential local environmental issues which would need to be confirmed and considered in the ES, and which would inform any final judgement by SNC about that component of the proposals.
- 10.1.12 Two local Parish Councils (Collingtree, and Milton Malsor) responded with comments which reflected the key points raised by SNC regarding the aggregates terminal and the need for an assessment of any specific environmental effects within the ES.
- 10.1.13 Northamptonshire County Council 'Key Services' department made detailed comments regarding matters of relevance to the detailed site planning should the DCO application be approved (such as emergency fire access, and broadband connectivity to the site). The
- 10.1.14 Northamptonshire Police commented to offer their support for the proposed inclusion of the secure HGV parking area, a change made by the Applicant following the Stage 2 response from the Police and others.

10.1.15 Anqlian Water made detailed and technical comments regarding the potential interaction of the proposed works with their network, and seeking clarification regarding the timetable for application preparation and submission. Similar comments were made by other utilities operators, such as Cadent Gas, with other network operators confirming the changes raised no issues.

Applicant's responses to key issues raised

10.1.16 Brief responses to the issues raised during the Stage 3 consultation are provided in the schedule at Appendix 30.

10.1.17 As the majority of the responses from consultees confirmed that there were no further comments over those made at Stage 2 there are few additional responses required from the Applicant to those provided in Sections X of this Report.

HGV Secure Parking

10.1.18 As a change driven directly by the comments submitted at Stage 2 by the Police the comments of support for the confirmation of secure HGV parking being provided was welcomed by the applicant. This now forms an explicit part of the description of proposals, and will be delivered if the Proposed Development is approved.

10.1.19 Detailed issues regarding how access to the Parking will be limited or secured will be through detailed design to be agreed with the local authority in accordance with proposed DCO Requirements. In simple terms, as a secure area the proposal is for it to be fenced and gated with a specific point of access to be controlled and managed. Therefore, it will be possible to control access to this facility, addressing fears that it may attract HGVs from across Northampton, generating more local traffic. This was an issue raised by SNC and others.

Aggregates Terminal

10.1.20 Queries about the potential for additional environmental effects as a direct result of the aggregates terminal are noted, but are fully covered by the scope of the submitted ES.

10.1.21 The most likely effects of potential concern referred to in responses were related to air quality (dust), noise, lighting and transport. These issues are all covered by the agreed scope of the ES, albeit with assessment work ongoing at the time of the Stage 3 consultation. Therefore, the issues raised are covered by the submitted ES which provides detailed information about likely effects. The aggregates terminal activity is included within the wider assessment of operational activity on-site.

- 10.1.22 Traffic (road and rail) associated with the terminal is also included in the assumptions and modelling within the TA, and within the scope of the assessments presented in the ES.
- 10.1.23 The ES confirms that there are no significant likely air quality or noise effects from the Main Site including the intermodal and aggregates terminals. This is the consequence of a range of factors set out in the ES, including the location, layout and design of the proposed SRFI site which means many sources of potential operational noise or dust are remote from sensitive receptors. Furthermore, the earthworks bunding (mounding) used to visually screen the Proposed Development also provides mitigation for potential noise and dust (and lighting) effects.
- 10.1.24 However, specific mitigation measures of potential airborne dust will be implemented using standard water-based suppression systems commonly used on aggregates and similar sites to manage any issues associated with stockpiles of material. In fact, dust suppression measures are proposed both during the construction process and as an operational part of the aggregates terminal. Vehicle wheel-washing facilities will also form part of the mitigation measures regarding dust.

Amended Highways Mitigation Works

- 10.1.25 There were few direct or detailed comments about the proposed changes to the Highways Mitigation Works. However, there were some positive comments regarding the package of measures proposed, including the HGV weight restrictions. This is noted and welcomed by the Applicant, and these measures form an important part of the overall highways strategy.
- 10.1.26 The amendments made to two of the specific local highways schemes – at Rookery Lane/Ashton Road, and widening the bend on Knock Lane – form part of the final proposed Highways Mitigation Strategy, and help result in the positive overall highways and traffic effects identified by the Transport Assessment.
- 10.1.27 As described elsewhere, the changes made to the Rookery Lane/Ashton Road improvement, responded directly to comments received from local people. The revised scheme will result in a safer and better outcome for local road-users.

11. CONCLUSIONS

- 11.0.1 Prior to submitting an application for a DCO to the Planning Inspectorate, and in accordance with the requirements set out in the Act, the Applicant carried out public and stakeholder consultation on its proposals. All statutory consultation has been carried out in line with the advice and guidance provided by the Planning Inspectorate and the Department for Communities and Local Government.
- 11.0.2 Formal consultation took place over three stages with defined periods for comments and input from consultees, but has also seen engagement on a less formal and ongoing basis over a longer period with regular and open channels of communication and contact with key local groups.
- 11.0.3 The non-statutory stages were undertaken in accordance with the same procedures and processes as those required for a statutory exercise. A consultation area, agreed through the SoCC process, of 6000 addresses has formed the basis of all three stages of public consultation, with this area extended slightly for Stage 3. The Stage 3 Further Consultation undertaken to ensure limited changes to the highways mitigation measures after the Stage 2 consultation process was additional to the SoCC, but discussed and agreed with the Local Authorities in advance.
- 11.0.4 The early stages of the consultation process ensured the Applicant was fully aware of a range of wider concerns and issues from the perspective of local communities. The Parish Councils in particular were effective and consistent in raising issues regarding the potential local environmental and other effects. Many of these issues have remained on the agenda throughout the non-statutory and statutory consultation processes, and feature prominently in the Environmental Impact Assessment and other supporting information which have informed the proposals.
- 11.0.5 The input received by the Applicant throughout the consultation process, including the non-statutory stages, has had a direct influence on the proposals. This Consultation Report has referred to the ways in which the proposals have been amended or designed to respond to local issues and comments, including the insight gained from an earlier planning application on part of the same site, which involved dialogue with some of the same communities and consultees. The Design and Access Statement (Document 6.9) also refers to the design evolution of the proposals in further detail,
- 11.0.6 Across the consultation process there have been some common themes and issues raised by the comments received, and it is clear that existing traffic and transport impacts are of particular concern to local communities and other stakeholders. The Application would address many of the existing local transport challenges and issues through a substantial programme of improvements and mitigation measures,

creating local benefits while also meeting the transport and accessibility requirements of the proposed SRFI.

- 11.0.7 Although the strength of the logistics and distribution sector in and around Northampton and across the wider South-East Midlands has not been challenged or questioned by the public or other consultees, questions about the choice of site location, and about the need for further SRFI capacity, have been raised.
- 11.0.8 The concerns and objections raised by nearby residents and communities have focused on a relatively limited number of issues, all of which have been assessed by the Applicant through a combination of the Environmental Impact Assessment and the design process. The main focus of comments received through the statutory (Stage 2) consultation majored on questions over the package of highways mitigation measures and their likely impacts, and on the need for the SRFI.
- 11.0.9 Naturally, many of the issues and concerns raised through local consultation have focused on the site specific characteristics and effects of the proposals. From the non-statutory stage onwards, the Applicant has been keen to evolve and adapt the proposals in response to concerns about local potential effects, and as described in this report and the Design and Access Statement (Document 6.9), the final proposals have evolved significantly from those originally proposed.
- 11.0.10 In addition to questions and concerns about the potential for local environmental impacts, it is also clear that the principle of any development on the western/southern side of the M1 is not supported by many local residents of South Northamptonshire.
- 11.0.11 The 'in principle' nature of many objections received by local people make it difficult for the Applicant to respond positively, or consider making changes as a result. Comments have included direct and explicit views that the proposed SRFI and associated highways and other infrastructure are simply not needed, the infrastructure and jobs it would deliver is not wanted, and have suggested that the proposals should be abandoned.
- 11.0.12 However, compliance with national transport policy is clear. The proposals also explicitly align with the priorities and objectives of the Strategic Economic Plan of the Local Enterprise Partnership.
- 11.0.13 The Applicant has ensured that the Environmental Impact Assessment prepared alongside the proposals has assessed and considered the key issues raised by local bodies and the community. The mitigation measures proposed minimise the negative effects, and maximise the potential benefits, and the results of the assessments contained in the ES reveal that the proposals will deliver a range of

effects, including some significant and notable environmental and economic benefits.

11.0.14 The Applicant is fully content that comprehensive consultation was undertaken in line with the agreed Statement of Community Consultation (SoCC), and in accordance with the requirements of the Act.