

NORTHAMPTON  
**GATEWAY**  
STRATEGIC RAIL FREIGHT INTERCHANGE

PLANNING STATEMENT

**DOCUMENT 6.6**

The Northampton Gateway Rail Freight Interchange Order 201X

Regulation No: 5 (2) (q)

PLANNING STATEMENT | MAY 2018

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# 1. INTRODUCTION

- 1.1 This statement is submitted on behalf of Roxhill (Junction 15) Ltd to accompany an application for a Development Consent Order (DCO) for a strategic rail freight interchange on a site adjacent to Junction 15 of the M1 motorway in Northamptonshire.
- 1.2 The site of the proposed rail freight interchange consists of land to the immediate east of the Northampton Loop railway line, and west of the A508 road. The M1 forms the site's northern boundary, running north-west to south-east, with Junction 15 to the immediate east of the site.
- 1.3 In this Statement reference to the '*SRFI Site*' or '*the main site*' refers to the main development site bounded by Collingtree Road, the M1 motorway, the A508, and the Northampton Loop Line as shown on the Parameters Plan (Document 2.10). Reference to '*the bypass site*' refers to land to the west of the village of Roade. The '*highways mitigation works*' (or '*highways mitigation measures*') refers to the package of improvements to the road network including at Junction 15, 15A, and at various junctions within the A508 corridor (described in detail in Section 2 of this Statement). Reference to '*the Proposed Development*' is to the entire development proposed to be authorised by the Development Consent Order comprising the development on the SRFI Site and the highway works, including the Roade Bypass. The different components of the proposed development are all shown on the 'Components of the Proposed Development Plan' (Document 2.13)
- 1.4 The SRFI site is located within South Northamptonshire District. The proposals, known as 'Northampton Gateway' ('NG'), are defined as a Nationally Significant Infrastructure Project (NSIP), and so are subject to the 2008 Planning Act ('the Act') and associated application and determination processes and procedures.
- 1.5 The proposal consists of an intermodal freight terminal together with substantial warehousing, extensive highway infrastructure and strategic landscaping and earthworks. A detailed description of the development and works proposed is included in Section 2.
- 1.6 The proposed development meets the definition of an NSIP as defined in Section 26 of the Act. The Highways works associated with the SRFI are not an NSIP in their own right. The elements of the development which are not encompassed within the NSIP are characterised in the order applied for as "Associated Development" as defined by the Act. An explanation for these different categories of the development can be found in section 3 of the 'Guide to the Application' (Document 1.3)
- 1.7 The application for the Development Consent Order is accompanied by an Environmental Impact Assessment presented in the form of an Environmental Statement, including an extensive range of technical reports and assessments. This includes a Parameters Plan (Document 2.10) setting out the main development parameters which have formed the basis of the ES, and an Illustrative masterplan (Document No. 2.11) which indicates one way in which the development could be delivered in accordance with those parameters.
- 1.8 The vision for the proposal is to provide a Strategic Rail Freight Interchange in response to a range of national and local economic and policy drivers. In particular the proposal seeks to respond to the objectives set out in the National Policy Statement for National Networks and fully accord with the requirements and criteria for SRFI's defined in that Policy. The Proposed Development responds directly to the growing market demand for increased use of rail freight, and the demand for large scale warehouse space, with the opportunity now and in the future to utilise rail.
- 1.9 The strength of the south east midlands area for distribution and logistics activity is recognised by the Local Enterprise Partnership, as well as through local planning documents and the associated evidence base. As recognised by Government in concluding that there is a compelling need for new SRFI's, unless new SRFI's are provided, in locations which address market requirements,

the movement of goods will continue to be primarily road based. An SRFI at Northampton Gateway will help to expand the network of SRFI's to address existing and future demands. These contextual issues regarding the 'need' for the NG are described in more detail in Section 3, and in full in the separate 'Market Report' (Document 6.9).

1.10 The purpose of this Statement is to provide the information necessary to appraise the application's proposal against the wide range of policies and guidance. The statement is structured as follows:

Section 2 describes the proposals in detail

Section 3 identifies relevant planning and other relevant policy

Section 4 provides a detailed appraisal of the application with regard to relevant policies and guidance, and with regard to the conclusions of the Environmental Statement. It considers the application in terms of its social, economic and environmental effects. This section also considers the suitability of the approach to the design and access of the proposal.

Section 5 provides the conclusions of this statement.

1.11 The application is supported by a range of reports and these have helped to inform the judgments and conclusions reached in this statement. These include:

- Design and Access Statement
- Rail Reports
- Consultation Report
- Market Report
- Construction Environmental Management Plan (CEMP) (which forms an Appendix to the Environmental Statement.)
- the Environmental Statement
  - *Socio-economic aspects*
  - Landscape and Visual effects
  - Ecology and nature conservation
  - Geology, soil and groundwater
  - Water resources and drainage
  - Noise and vibration
  - Air quality
  - Cultural Heritage
  - Lighting
  - Transportation
  - Agricultural land
  - Waste
  - Cumulative impacts

## 2. NORTHAMPTON GATEWAY PROPOSAL

### Location of Development and Context

- 2.1 The Order Limits (as shown on edged red on the Location Plan (Document 2.12) consist of the land necessary to deliver a Strategic Rail Freight Interchange (SRFI) together with the landscaping and highway works associated with the SRFI.
- 2.2 The main site consists of land to the immediate east of the Northampton Loop railway line, and west of the A508 road. The M1 forms the site's northern boundary, running north-west to south-east, with Junction 15 to the immediate east of the site. The urban area of Northampton, and the Collingtree area, are located on the opposite (north-eastern) side of the M1. Further to the west of the site is the West Coast Main Line (WCML) railway, and the village of Milton Malsor, with the village of Blisworth located further south. Courteenhall, including the Hall and Gardens is located further east and south from the main site. The village of Roade is located further south along the A508, and the proposed bypass site is located around the western side of the village, including a crossing over the WCML.
- 2.3 The main site has an area of approximately 219 ha, with a total area of 290.5ha covered by the Order Limits as a whole.
- 2.4 This main site is at a strategically significant location on the strategic transport network at a junction of the M1 motorway, and adjacent to the Northampton Loop of the West Coast Main Line, a key national rail freight route. Beyond the M1 motorway the site has good access to the wider strategic road network via the A45 and connections to the A14, and the A43. As referred to in the Environmental Statement (Socio - economic Chapter 3) and the Market Analysis Report (Document 6.8), the site has access to an appropriate labour supply from Northampton and other nearby urban areas.

### Description of Development

- 2.5 The development proposed is described below. This should be read in conjunction with the Parameters Plan (Document 2.10), Schedule 1 of the Draft Development Consent Order (Document 3.1) and the works plans/highway drawings submitted as part of the application for Development Consent Order:
- An intermodal freight terminal including container storage and HGV parking, rail sidings to serve individual warehouses, and the provision of an aggregates facility as part of the intermodal freight terminal, 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;
  - 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.

- 2.6 The built development of the SRFI has defined parameters for each of the zones proposed as set out in the Parameters Plan and a detailed description of development contained in the Environmental Statement. The main parameters defined and fixed at this stage include the site access, but also the disposition of the proposed uses including the intermodal freight terminal, the rail and road corridors within the site, the built development zones containing the proposed warehousing, and the strategic landscaping screening bunds. The maximum heights of buildings relative to AoD is also fixed, as are the relative heights of the bunds, and the minimum development plateau levels. The defined parameters have been used to explain and test the proposals in relation to economic, social and environmental assessment criteria.
- 2.7 The components of the scheme listed under paragraph 2.5 above, are each described in further detail below.

### ***Rail Freight Terminal (Zone B)***

- 2.8 The terminal is identified as Zone B on the Parameter Plan and is designed to accommodate trains of up to 775m length (standard freight train length), and to accommodate up to 16 trains per day once fully operational. This excludes any allowance for the potential for additional trains associated with the rapid rail freight terminal over the longer-term. In the initial period after opening the terminal is expected to handle a minimum of 4 trains per day before increasing over time.
- 2.9 The terminal would enable the transfer of freight from road to rail (and vice versa), as well as the storage of containers or other freight at the terminal itself. An aggregates terminal area will be delivered within Zone B (for the storage and transfer of aggregates) in response to a requirement for the relocation of such a facility from Northampton town centre. The provision made for a 'rapid rail freight' terminal forms part of the longer-term future-proofing of the site to ensure it is able to meet a wide range of rail market requirements as the site is developed and occupied.
- 2.10 The terminal area will also include HGV parking relating to the terminal use, and associated ancillary built accommodation such as gatehouses, and estate management offices.
- 2.11 A fully functioning rail freight terminal capable of accommodating a minimum of 4 trains will be built and completed prior to first occupation of any warehouse on the site. It is expected to then be expanded in response to market demand and activity (this is shown on the Illustrative Rail Terminal Plan (Document 2.8)). As part of the construction of the initial terminal, rail infrastructure, connecting directly to warehouse plots, will be put in place. These will provide the opportunity, from day one, for warehouse units to have direct rail connections.
- 2.12 The terminal area will comprise:
- Main line connections to the Network Rail WCML Northampton Loop (with new north and south facing connections)
  - A set of three 775 meter Reception Sidings
  - A 775 metre headshunt and run round loop to permit shunting moves around the site
  - A three track intermodal terminal, again of 775m capability
  - An extensive container and other freight storage area
  - HGV parking
  - Management offices and welfare areas, including buildings associated with the aggregates terminal and the potential rapid rail freight facility;
  - Gatehouses
  - Rail connections directly to over half the warehousing plots



### ***Warehousing and ancillary buildings (Zone A)***

- 2.13 The application is for buildings within Zone A (see the Parameters Plan) with an internal floorspace of up to 468,000 sq. m. In addition to this floorspace figure, up to 155,000 sq. m of floorspace is also proposed in the form of mezzanine floorspace to units within Zone A as part of the flexibility provided by the scheme and based on experience of the common requirements of occupiers (who often require mezzanine space for a range of uses to increase the productivity or capacity of the building).
- 2.14 The number and precise layout of buildings is not fixed, but the application includes an illustrative masterplan to show how this floorspace could be accommodated on the site. However, the height and broad layout of development zones on the site are fixed via the Parameters Plan. The final, detailed layout of the site will be determined post consent, but the expectation is for a range of large floorplate building sizes to be provided. The layout of the site allows for flexibility in the scale and the design of individual units so that it can meet a wide range of market requirements. This includes the ability of the site to accommodate very large floorspace units to respond to the needs for National Distribution Centres.
- 2.15 Much of the built floorspace would be located on development plots sunk into the site following a proposed earthworks strategy (see below) to not only create flat plateau, but to also enable creation of substantial bunds around the site to form part of the visual screening (mitigation) and landscaping.
- 2.16 A small amount of ancillary floorspace is also proposed such as gatehouses, estate management offices, and other small ancillary buildings.
- 2.17 Zone A will also include an area of secure, dedicated, HGV parking in direct response to the potential for the site to exacerbate existing concerns held by the Police with regard to crime against HGV vehicles and drivers in and around Northampton. This provision will ensure that HGVs arriving early at the site are able to wait in a safe, suitable location. This will include driver welfare facilities and will help ensure that the site does not contribute to any impacts on the amenity of nearby communities caused by parked HGVs, particularly overnight. This provision will only be available for HGV visiting the warehousing or the terminal.
- 2.18 In addition to the 'built' development described above, Zone A will include:
- Rail lines to serve buildings (in Zones A2, A3 and A4);
  - Service roads including road access to the rail terminal;
  - On-plot landscaping and planting;
  - Sub-stations and other utilities infrastructure;
  - Bus turning-head (associated with public transport access to the site).

### ***New road infrastructure and works to the existing network***

- 2.19 A package of highway works is proposed as part of the proposed development. These include substantial improvements to Junction 15 of the M1, and a new bypass to the village of Roade to the south of the main site.
- 2.20 In addition, a wider range of more localised works are proposed to mitigate likely transport impacts, and to address existing known bottle-necks or problematic junctions which would otherwise see worsening reliability and/or safety in the future.

2.21 The proposed package of highway mitigation works is:

**A508 SRFI access**

- Construction of a new roundabout on the A508 Northampton Road to serve as the access to the Development, configured to require all departing HGVs to travel north to M1 Junction 15; and
- Dualling of the A508 carriageway between the new site access roundabout and M1 Junction 15.

**Bypass Corridor**

- Construction of a new Bypass west of Roade between the A508 Northampton Road to the north of Roade and the A508 Stratford Road to the south of Roade, including a four arm roundabout connecting the Bypass to Blisworth Road;

**Highway mitigation works/measures**

- Significant enlargement and reconfiguration of M1 Junction 15;
- Widening of the A45 to the north of M1 Junction 15 and the signalisation of the Watering Lane junction;
- Alteration of M1 Junction 15A to provide an additional lane and signalisation on the A43 northbound approach, signal control and additional flared lane on the A43 eastbound approach, an additional lane on the A5123 southbound approach and circulatory carriageway widening;
- 7.5T environmental weight restriction (with access permitted for loading):
  - throughout Roade;
  - along Knock Lane/Blisworth Road between Roade Bypass and Stoke Road;
  - along Blisworth Road (Courteenhall Road) between the A508 and High Street, including parts of Blisworth;
  - along the unnamed road between the A508 and Quinton;
  - throughout Stoke Bruerne and Shutlanger; and
  - Wootton & East Hunsbury, to the west of the A45, east of Towcester Road and south of the A5076.
- Alterations at key locations along the A508 as part of an 'A508 route upgrade'; comprising:
  - Blisworth (Courteenhall) Road junction improvement;
  - C26 Rookery Lane/Ashton Road junction improvement;
  - C85 Pury Road junction improvement;
  - C27 Stoke Road/Knock Lane junction improvement and additional widening to Knock Lane/Blisworth Road (although not on the A508, this is required as a result of changing traffic volumes on the A508); and
  - Provision of a pedestrian crossing at a bus stop and ghost island in Grafton Regis.

2.22 Further details are provided in the Transport Chapter of the ES (Chapter 12) and associated appendices, including the Transport Assessment (TA).

### ***Earthworks, and demolition of existing structures***

- 2.23 To enable development substantial earthworks will be undertaken on the main site, with some areas in the western part of the site being lowered by between 8 and 10 metres from existing ground levels. This change in levels is required to establish the flat plateau required for the buildings, and the 'cut and fill' exercise enables the creation of the bunding referred to in the context of the landscaping strategy. The earthworks strategy is to achieve an overall earthworks balance across the site. Details of the earthworks phasing and strategy are set out in Environmental Statement Chapter 2.
- 2.24 The main site is currently used primarily for arable agriculture, and small existing structures (former agricultural buildings) will be demolished. The buildings to be demolished are identified on the Parameters Plan.

### ***Strategic landscaping, planting, and rights of way***

- 2.25 The proposed development includes provision of landscaping and tree planting as part of the mitigation of visual and landscape effects. The design of the main site incorporates a landscaping strategy which includes retention of existing woodland blocks within the site, as well as around parts of its boundary (such as along the M1).
- 2.26 The landscaping strategy compliments the earthworks strategy which would create substantial landscaped bunds around much of the main site perimeter, and which would form the bulk of the visual mitigation measures to substantially limit or eliminate outside views into the main site.
- 2.27 The strategy would ensure the establishment of a strong and cohesive framework of landscape and environmental areas. These would form one of the main elements of the overall development and would be fully integrated with the built development and infrastructure zones. In this respect it has not been designed (or should not be considered) as a separate part of the proposed development.
- 2.28 A number of key landscape and visual considerations have been identified as part of the assessment process, and full details of them, and of the key issues and benefits, are provided in Chapter 4 of the ES, and summarised in later sections of this Planning Statement.
- 2.29 The bunds will also be planted with new trees, and will incorporate diverted public rights of way (PROW). The Proposed Development site currently contains a number of PROW, including several bridleways and footpaths in and around parts of the bypass corridor, and two footpaths (KX13 and KX17) which run across the main site. Further details of the existing and proposed routes are provided in the Transport Chapter, and the existing routes are also considered in the Landscape and Visual Chapter (Chapter 4). The Access and Rights of Way Plans (Document 2.3) show the substitute routes for public footpaths and bridleways affected by the Proposed Development.

## **Construction and Phasing**

- 2.30 It is anticipated that the general construction programme will broadly be broken down into four key components, as listed below:
- Off-site highway improvements;
    - M1 J15 & A45 improvements and link to site access
    - M1 J15A improvements
    - Roade Bypass and A508 improvements.
  - On-site;
    - Bulk earthworks
    - Landscaping
    - Road.
  - Rail Terminal; and
  - Buildings.
- 2.31 The above works are expected to be phased over a 5.5 year period, and this forms the basis of the assumptions in the ES. Assuming the Development Consent Order is made in 2019 (i.e. assuming the proposals are approved by the Secretary of State for Transport) initial works are assumed to begin in 2020. The Master Program, appended to Chapter 2 of the Environmental Statement, sets out the anticipated program for the construction of the scheme.
- 2.32 The proposed approach to the phasing of works would see initial development commence on:
- The A508 site access junction and dualling of the A508 between the site access and M1 Junction 15;
  - The M1 Junction 15 and A45 improvements; and
  - On-site earthworks and roads.
- 2.33 The proposal involves a commitment to the delivery of significant infrastructure early in the construction process, including rail, highway works, earthworks and landscaping. Prior to occupation of the first building on the site, assumed to be 2022 at the earliest, the following works will have been completed:
- The A508 site access junction and dualling of the A508 between the site access and M1 Junction 15;
  - The M1 Junction 15 and A45 improvements;
  - The rail terminal with rail line connecting the terminal to rail served development plots and head-shunt;
  - On- site earthworks and road, with landscaping in the first available planting season.
- 2.34 A Construction Environmental Management Plan (CEMP) has been prepared and is appended to Chapter 2 of the Environmental Statement. It sets out the systems and controls that will be adapted during the construction of the scheme to minimise any adverse environmental effects in accordance with the conclusions of the Environmental Statement and Construction Good Practice.

## **Development Principles and Vision for Northampton Gateway**

- 2.35 The Northampton Gateway proposals are a direct response to the clear and explicit recognition by Government that additional SRFI capacity is required, as set out in detail in Section 3 of this statement. Through provision of an expanded network of rail-connected sites, national policy is clear that more SRFIs are required to respond to the forecasts for significant increases in freight volumes in the UK, to realise economic growth, and to deliver environmental benefits as a result of enabling a shift of freight from road to rail.
- 2.36 The Applicant's vision for Northampton Gateway is to maximise the strategic benefits and opportunities of this location to provide a high quality Strategic Rail Freight Interchange of national significance. In terms of the connectivity and scale of the proposals, and the quality and commercial attractiveness of the site and location, Northampton Gateway will serve national and regional markets and, via connectivity to the ports and the Channel Tunnel, international distribution and logistics markets. It will respond directly to the concentration of existing logistics activity in the Midlands Heartlands and the anticipated continued demand for logistics space, particularly to serve a National distribution function, in this area. In this regard there currently exists a network of SRFI in the Midlands. The scheme will expand this network southward and address currently unsatisfied demand for access to rail, as well as helping to facilitate the future growth of rail freight.
- 2.37 The approach to the master planning, access and landscaping of the SRFI site seeks to provide a context for high quality rail served site and premises, capitalising on the excellent strategic road and rail links, and access to an appropriate labour supply. The proposals are intended to balance the functional needs and requirements of large-scale logistics and freight distribution to create a high-quality, and attractive development and environment, while also seeking to minimise local environmental effects.
- 2.38 As described in Section 4 the scheme (as shown on the Illustrative Masterplan) is underpinned by a strong landscaping strategy, with key parameters fixed to ensure this strategy is delivered. The evolution of the proposals is intrinsically linked to the work undertaken to evaluate and understand the constraints and opportunities of the location and site, and in response to the need to properly assess and manage the environmental effects of the proposal. The proposed strategy will ensure the establishment of a strong and cohesive framework of landscape and environmental areas within and around the proposed built development. Buildings will be set in a landscaped site on development plots surrounded by a significant landscaped bund and planting which will both help screen and visually contain the site.
- 2.39 The SRFI development would provide opportunities to embrace the latest techniques in design and construction and to incorporate highest standards of design – important in the context of the desire to create a nationally significant, strategic rail freight interchange.
- 2.40 The overall scheme is intended to generate significant economic advantages for the sub-region as well as local communities, whilst managing environmental effects and delivering an extensive package of highway, landscape and other benefits. In addition to the SRFI, the proposals would introduce significant new road infrastructure improvements. This includes significant improvements to the existing M1 Junction 15 which is currently well known as a congestion 'hot-spot' with regular delays and poor reliability for road-users. A key part of the scheme is to provide substantial improvements to this enabling it not only to accommodate the traffic expected as a result of the proposed development, but also provide further additional capacity. The Transport Strategy seeks to improve the key routes in the vicinity of the proposed SRFI, enabling them to perform more efficiently and reliably, and as a result, encouraging traffic back onto the most appropriate routes. The outcomes would see a reduction in through-traffic in nearby villages, reversing the trend over recent years for increasing 'rat-running' and congestion in the villages, and which is otherwise predicted to worsen over coming years without intervention.

- 2.41 The proposed Roade Bypass is required to help mitigate the impacts of development traffic, and would also deliver significant local transport and other benefits. These are described in detail in the Environmental Statement, but in addition to significant reductions in through-traffic in Roade, local residents would also see improved air quality, and reductions in noise through the village centre. While the bypass would result in changes to the current context for homes on the western edge of Roade, the proposed road alignment is sufficiently remote from the village and the landscaping and earthworks proposals such that the residual change in terms of noise and visual impacts are reduced to acceptable levels.
- 2.42 The proposals include provision of improved and additional public transport connections from Northampton Centre and new footpath and cycle links to nearby communities, including between Roade and the main site.

### 3. RELEVANT PLANNING POLICY AND OTHER MATERIAL CONSIDERATIONS

3.1 This section of the Planning Statement provides an overview of the national policy context for the proposals, with a focus on planning policy, but reference to other relevant policy agendas and other material documents or strategies.

3.2 This includes reference to national documents and strategies of direct relevance to the proposals for a strategic rail freight interchange.

#### **National Policy Statement for National Networks**

3.3 In December 2014 the Government published the National Policy Statement (NPS) for National Networks. The NPS replaced and updated earlier (2011) national policy guidance for rail freight interchanges. Paragraph 1.2 of the NPS explains that the NPS will be the primary basis for making decisions on development consent applications for National Network National significant infrastructure projects. At paragraph 4.2 it confirms that there is a presumption in favour of granting development consent for national network NSIPs that fall within the need for infrastructure established by the NPS. It states

*‘subject to the detailed policies and protections in this NPS, and the legal constraints set out in the Planning Act, there is a presumption in favour of granting development consent for national networks NSIPs that fall within the need for infrastructure established in this NPS.’*

3.4 The NPS underlines the importance of facilitating the movement of freight from road to rail, both in terms of economic development and addressing climate change. Facilitating the movement of freight from road to rail is seen as central to Government’s vision for transport as described in the NPS:

*‘Government’s vision for transport is for a low carbon sustainable transport system that is an engine for economic growth, but is also safer and improves the quality of life in our communities. The Government therefore believes it is important to facilitate the development of the intermodal freight industry. The transfer of freight from road to rail has an important part to play in a low carbon economy and in helping to address climate change.’ (NPS, paragraph 2.53)*

3.5 The NPS recognises the importance of SRFIs in terms of economic development and addressing climate change, and makes explicit references to their role in facilitating the movement of freight from road to rail. The NPS describes the aim of an SRFI as:

*“.....to optimise the use of rail in the freight journey by maximising rail trunk haul and minimising some elements of the secondary distribution leg by road, through co-location of other distribution and freight activities. SRFIs are a key element in reducing the cost to users of moving freight by rail and important in facilitating the transfer of freight from road to rail”. (NPS, paragraph 2.44)*

3.6 Government policy as expressed through the NPS states explicitly that there is a **“compelling need for an expanded network of SRFIs”** (paragraph 2.56), and that this network of SRFIs is needed **“to serve regional, sub-regional and cross-regional markets”** (paragraph 2.54).

- 3.7 The clear signal of intent which underpins Government policy on SRFIs is that there is a need for more of them. Indeed, as supported by market evidence, Government policy reflects an acknowledgement that without more SRFI capacity and increased choice and access by logistics and freight operators, the objective of delivering a shift from road to rail will not be achievable. This issue is discussed in further detail in Section 4.
- 3.8 The NPS refers to the increasing trend for users and buyers of distribution services to look to integrate rail freight into their transport operations, and that this requires the logistics sector to develop new facilities. The NPS refers to the ‘unconstrained’ rail freight forecasts prepared by Network Rail to 2023 and 2033 which are “considered robust and the Government has accepted them for planning purposes” and which, while they will change over time, are considered to “demonstrate the scale of the pressure” created for additional investment in the national networks, including freight interchanges (NPS paragraph 2.49). Further information about forecasts of freight growth is provided later in this section of the Planning Statement.
- 3.9 The context for the NPS and the national recognition of a need for more SRFIs is a result of a number of trends and drivers of demand for rail freight which are summarised in the NPS as including:
- **Rail Freight Growth** – the forecasts of freight growth to 2030 and beyond are seen by Government to “confirm the need for an expanded network of large SRFIs”, and also to “indicate that new rail freight interchanges, especially in areas poorly served by such facilities at present, are likely to attract substantial business, generally new to rail” (NPS paragraph 2.49, and Table 3);
  - **Changing needs of the logistics sector** – the growth of port and retail sector freight in particular, and the specific needs of these markets, is requiring the logistics industry to develop new facilities “alongside major rail routes, close to major trunk roads as well as near to the conurbations that consume the goods” (NPS paragraph 2.45);
  - **Sustainability, Environmental and Climate change policy imperatives** – Government policy is to encourage transfer of freight from road to rail because rail transport delivers significant reductions in pollution, carbon emissions, and congestion.
  - **National and local economic growth** – in addition to the wider role SRFIs play in enabling supply chains and other economic and trading transactions and relationships, the NPS is also clear that SRFIs can deliver “jobs and growth” through new employment and skills generating “wider longer term benefits to the economy” (paragraph 2.52)
- 3.10 The NPS is clear that in delivering the environmental advantages associated with carbon reduction and climate change:
- “Rail transport has a crucial role to play in delivering significant reductions in pollution and congestion. Tonne for tonne, rail freight produces 70% less CO2 than road freight, up to fifteen times lower NOx emissions and nearly 90% lower PM10 emissions.<sup>39</sup> It also has de-congestion benefits – depending on its load, each freight train can remove between 43 and 77 HGVs from the road.” (NPS, paragraph 2.35)*
- 3.11 While the strategic environmental benefits of SRFIs are recognised, the NPS also recognises that it is likely that there will be local impacts, including associated with “increased road and rail movements”, and that it is “important for the environmental impacts at these locations to be minimised” (NPS paragraph 2.51). The NPS therefore recognises, at paragraph 3.4 that “whilst applicants should deliver development in accordance with Government policy and in an environmentally sensitive way, including considering opportunities to deliver environmental benefits, some adverse local effects of development may remain.”



- 3.12 This balance between national and strategic impacts, and more localised impacts, is clearly key to how proposals are considered, and is referred to later in this Planning Statement.
- 3.13 While the NPS does not identify how many SRFIs are required, or on which sites they should be provided, it does provide criteria and characteristics which provide a clear outline of the types of locations which are considered most suitable. These can be summarised as sites which:
- have good connectivity both with the road and rail network, in particular the strategic rail freight network (paragraphs 2.45 and 2.54);
  - are near the business markets they will serve – major urban centres, conurbations, or groups of centres – and are linked to key supply chain routes (paragraphs 2.45 and 2.56);
  - located alongside the major rail routes, close to major trunk roads as well as near to the conurbations that consume the goods (paragraphs 2.45, and 4.85 ).
- 3.14 The NPS (paragraph 2.56) refers to the operational and location requirements of sites which means that there will be a “limited” number of suitable locations, and that this will “restrict the scope for developers to identify viable alternative sites”. This is of particular relevance to preparation of Environmental Statements and the requirement to consider ‘alternatives’ – see later sections of this Planning Statement. The NPS refers to the possibility that due to the range of operational and locational requirements “countryside locations” may be required for SRFIs (paragraph 4.84).
- 3.15 Notwithstanding the suggestion that the scale and location requirements of SRFIs will result in a limited number of suitable sites, it is anticipated in the NPS that market led activity and investment will increase the supply of SRFIs to deliver the expanded network of terminals envisaged by Government. As referred to in Section 4 of this Statement, this brings an implicit recognition of the likelihood of inter-relationships, synergy and competition across the ‘network’ of SRFI envisaged by the NPS in seeking to encourage and enable increased use of rail freight.
- 3.16 The NPS provides a strong and coherent policy framework within which to consider and assess proposed SRFI developments. As referred to at the outset of this section, the NPS confirms at, paragraph 1.2, that “The Secretary of State will use this NPS as the primary basis for making decisions on development consent applications for national networks nationally significant infrastructure projects in England.” At paragraph 4.2 the NPS confirms that “there is a presumption in favour of granting development consent for national networks NSIPs.” It goes on then to identify the balanced judgements that need to be taken into account when considering proposed development:
- “In considering any proposed development, and in particular, when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State should take into account:*
- *its potential benefits, including the facilitation of economic development, including job creation, housing and environmental improvement, and any long-term or wider benefits;*
  - *its potential adverse impacts, including any longer-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.”*
- 3.17 Reference to the specific NPS criteria with which SRFIs should, or should where possible, accord are dealt with in the Compliance Statement, Appendix 1 to this statement, and not repeated here. However, this confirms that Northampton Gateway fully accords both with the absolute requirements of the NPS, and those elements that should be delivered at or by SRFIs ‘where possible’.

3.18 Chapter 5 of the NPS contains a comprehensive list of the ‘Generic Impacts’ likely to be relevant in considering national infrastructure, and while some of this relates to linear infrastructure, much of it is of direct and specific relevance to SRFI proposals. Section 4 of this Statement, and Appendix 1, consider how the Northampton Gateway proposals accord and comply with the guidance provided in the NPS, and the key generic impacts of relevance include:

- Air Quality
- Carbon Emissions
- Biodiversity and ecological conservation
- Waste management
- Dust, odour, artificial light, smoke, steam
- Flood risk
- Land instability
- The historic environment
- Landscape and visual impacts
- Noise and vibration
- Impacts on transport networks
- Water quality and resources

#### **National Planning Policy Framework**

3.19 The NPS is the primary source of national policy guidance for NSIP projects such as Strategic Rail Freight Interchanges. The relationship between the NPS and more general national planning policy (as contained in the NPPF) is explained in the NPS, with the two documents (the NPS and the NPPF) being consistent, but having different roles to play. The NPS refers to the role of the NPPF in informing local plan preparation and planning decisions under the Town and Country Planning Act 1990 by local authorities, and in embedding the principles of sustainable development within local plans.

3.20 The NPS states that the NPPF is “likely to be an important and relevant consideration in decisions on nationally significant infrastructure projects, but only to the extent relevant to that project” (NPS, paragraph 1.18). It goes on to state:

*“However, the NPPF makes clear that it is not intended to contain specific policies for NSIPs where quite particular considerations can apply. The NPS will assume that function and provide transport policy which will guide individual development brought under it.”*  
(NPS paragraph, 1.19).

3.21 Both national policy documents and associated Ministerial statements clearly articulate the government’s commitment to ensuring that barriers to sustainable economic growth are removed. An integral part of the planning system is a “presumption in favour of sustainable development” which is clearly expressed through the National Planning Policy Framework (NPPF).

3.22 The NPPF is clear about the importance of the planning system directly supporting sustainable economic growth, to create jobs and prosperity. The NPPF states:

*“Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth..... significant weight should be placed on the need to support economic growth through the planning system”* (paragraph 19)

- 3.23 As defined in the NPPF there are three dimensions to sustainable development:
- An economic role, ensuring sufficient land of the right type is available in the right place, at the right time, to support growth;
  - A social role, supporting strong, vibrant and healthy communities;
  - An environmental role, to enhance the natural and built environment.
- 3.24 A key thrust of the NPPF is the need to balance the effects of development taking account of economic, social and environmental issues to achieve sustainable development. The NPPF and the NPS are therefore consistent in many respects, and much of the NPS content is either identical to, or otherwise consistent with, the NPPF regarding many environmental and other planning related issues. Given the NPSs pre-eminence in the NSIP process, a full summary of the NPPF is not considered relevant or necessary.
- 3.25 The NPPF is in the process of being revised. A revised Draft Text for consultation was published in March 2018. There are no specific changes which would alter the approach to and assessment of the Northampton Gateway SRFI.

### **National Freight Documents and Forecasts**

- 3.26 As referred to above, the NPS includes reference to ‘unconstrained’ forecasts produced by Network Rail for the period 2023 to 2033, and which suggest rail freight volumes (by tonne km) will more than double between 2011 and 2033.
- 3.27 A number of other forecasts also exist, produced on different timescales, and based on different core assumptions. The Department for Transport (DfT) ‘Rail Freight Strategy’ (September 2016) sets out forecasts of future rail freight growth, the opportunities for enhancing modal shift from road to rail, and the policy interventions necessary to achieve this. Central to the analysis is a view that Ports Intermodal traffic will at least double in size by 2030. In the same timeframe Domestic Intermodal traffic is projected to nearly double.
- 3.28 Unlike Network Rail’s forecasts, DfT’s growth figures are ‘constrained’ in that they take into account the existing capacity of the rail network and the availability of rail freight terminals to receive and handle traffic, and incorporate only policy interventions outlined in DfT’s Control Period 5 High Level Output Statement (HLOS) of July 2012 (or other more recent policy statements).
- 3.29 While still predicting significant growth, these forecasts inevitably produce lower growth forecasts than the Network Rail unconstrained growth figures. This difference serves to demonstrate the impact and role that infrastructure and terminal capacity have on overall traffic forecasts. The DfT constrained forecasts emphasise that growth relies on the provision of additional terminal capacity for both movements between the major import ports and inland rail freight terminals, and also for onward domestic distribution. Indeed, DfT specifically refers to the unmet need for new terminal capacity as a key potential constraint on realising the forecasts for freight growth.
- 3.30 Therefore, while there are various forecasts which differ in terms of the methodologies and assumptions made, they share a common conclusion that the demand for rail freight is increasing. They also clearly underline the importance of additional rail freight terminals in delivering the capacity needed to unlock the predicted market demand for rail freight.
- 3.31 The NPS refers to the economic importance of the logistics industry, identifying national employment of over two million people across more than 190,000 companies, and refers to the sector generating over £90 billion annually, but also that it underpins the efficient operation of most sectors of the wider national economy.

- 3.32 The economic importance of rail freight to the UK economy is also stated in the more recent Network Rail Freight & National Passenger Operators Route Strategic Plan (referred to as the FNPO) of February 2018 which identifies the economic benefits of rail freight to be £1.6bn per year, and states that it transports goods worth over £30bn per year (FNPO, page 21). That report sets out a five-year plan from April 2019 to March 2024, and is focused on objectives that support freight and national passenger businesses which use the railway. In particular, the FNPO “sets out the first stage of a longer-term vision to facilitate significant rail freight growth over the next fifteen years” (FNPO, Foreword, page 3).
- 3.33 The FNPO identifies that rail’s market share has grown by 50% since 1998 (FNPO, section 5.1, page 21). It also reiterates the continuing change and evolution of the rail freight sector which is occurring while it grows and expands, with increasing diversity in the types of goods moved, and increasing adoption of rail in major retail supply chains. Opportunities for growth are identified in the FNPO (section 5.8), including “immediate” opportunities for intermodal and construction sector growth, and longer-term opportunities in “retail logistics, express freight and urban logistics”.
- 3.34 For planning purposes, the FNPO is based on estimates of freight growth of 15.6% over the seven year time horizon (2.1% per annum), although reference is made to updated forecasts (by MDS Transmodal for Network Rail) which suggest that “freight moved could increase from 2016/17 to 2023/24 by up to 50%”, subject to market conditions, and “assuming unconstrained network capacity” (FNPO, Summary, paragraph 2.1, page 4). These forecasts are being updated by Network Rail, but this is consistent with the earlier documents referred to above in making a clear link between freight moved and the capacity of the network. This is illustrated by reference to the “lost mode shift benefits of between £1.7bn and £4.7bn” (FNPO, Section 5.7.1) depending on the level of constraints imposed to levels of growth – the FNPO is clear that this “provides further justification for the case for freight network enhancements set out elsewhere in this plan” (FNPO, Section 5.7.1).
- 3.35 Consistent with the Network Rail and DfT strategies referred to above, the FNPO recognises the importance of additional terminal capacity if freight volumes on rail are to continue to increase – it says:

*“Network capacity and capability enhancements are ineffective if there is insufficient terminal capacity to accommodate the traffic they enable, such capacity being a function of both the number of terminals and their respective individual capability.”*

and

*“Additional inland terminal facilities are required and this need is primarily addressed by Strategic Rail Freight Interchange (SRFI) developments.”*

(FNPO Section 5.12, ‘Terminals’)

- 3.36 The FNPO sets out a range of priorities, measures and actions which Network Rail will implement, including those geared around ‘achieving rail freight growth’. Key actions and objectives set by the FNPO regarding rail freight growth include a number of initiatives and measures geared around new capacity, infrastructure, and freight path availability, as well as (emphasis added):

*“Facilitate new terminal developments at Daventry, Northampton, West Midlands and Parkside” (FNPO Appendix B, Page 121)*

- 3.37 This recent (February 2018) Route Strategy document from Network Rail therefore supports the principle of new rail terminal capacity, including at Northampton, as well as other locations across the Midlands.

### **The Local Enterprise Partnership (LEP)**

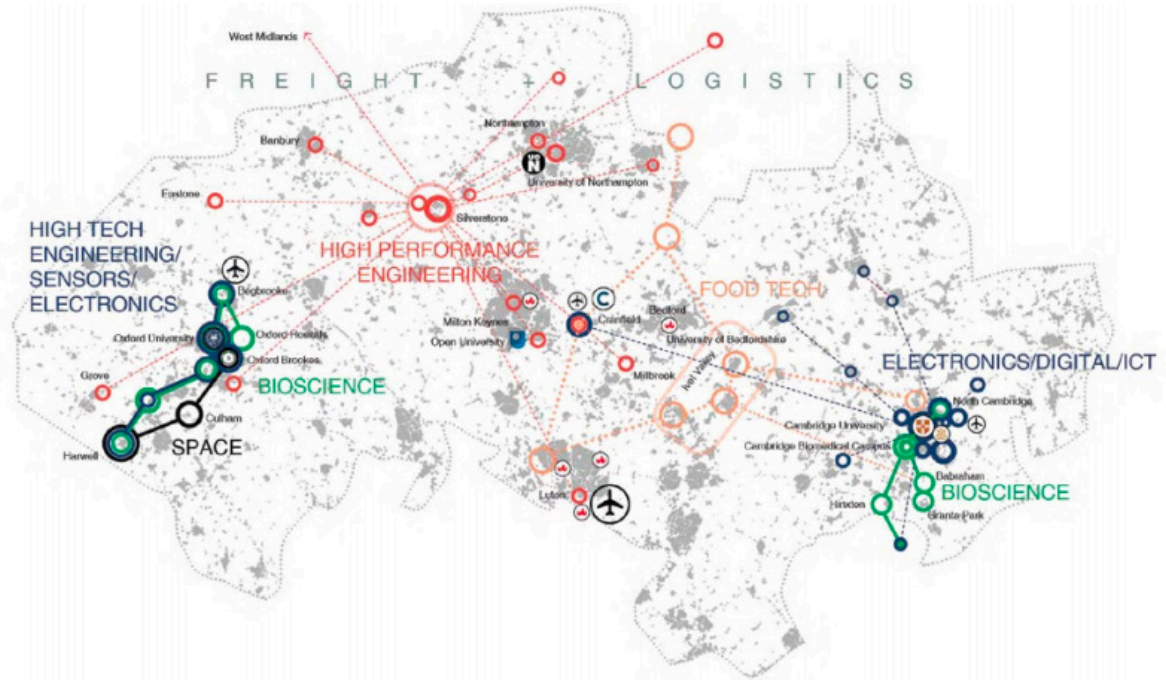
- 3.38 LEP's were introduced in 2011 to lead in the preparation of strategic plans that identify and align strategic economic priorities and guide infrastructure delivery at the sub-regional level. These public/private partnerships are business led, but also include key local authority representatives.
- 3.39 The NG SRFI proposal is in the area of the South East Midlands LEP (SEMLEP). In 2017 the LEP updated its Strategic Economic Plan (SEP). The SEP sets out how the LEP intends to build on the areas competitive advantages grow the sub-regional economy, and includes a range of priorities and initiatives designed to support and develop further economic growth across the area.
- 3.40 The revised SEP explains where SEMLEP and its partners will target investments and actions to create and support the right conditions for successful growth, and provides detailed economic evidence that explains the long-term strategic priorities.
- 3.41 SEMLEP's vision is to enable the economy to double in size (measured in Gross Value Added) by 2050. This ambition requires and seeks to enable additional job creation, investment, and improved infrastructure, and positions the South-East Midlands as a core part of the wider Oxford-Milton Keynes-Cambridge Growth Corridor (see details set out below). The SEP refers to the South East Midlands area as having a key role in the "commercialisation of ideas" into growth in part due to the "central geographical location and strong logistics networks" (SEP, page 36).
- 3.42 One of SEMLEP's goals is to increase investment in the South East Midlands, including specifically:
- *Expansion of existing businesses;*
  - *Relocation of existing businesses to the area;*
  - *New businesses (domestic or foreign) setting up in the area.*
- (SEP, page 32)
- 3.43 The SEP is clear that 'logistics' is one of the areas key strengths and presents opportunities for economic and employment growth as one of the 'showcase sectors' now and looking ahead at the prospects for further growth. Manufacturing, and 'next generation transport' are also recognised as key sectors to the SEMLEP area economy with regards to productivity and employment. Key issues identified in the SEP as 'critical' for the continued success and growth of the Logistics sector include:
- Appropriate employment land and transport infrastructure. (SEP, page 27)
- 3.44 With regards to the 'Growing Business' section of the SEP one of the issues identified is the relatively poor supply of employment land, and the important role this plays in attracting investment and supporting economic growth.

### **Cambridge - Milton Keynes - Oxford Growth Corridor**

- 3.45 Alongside the Autumn Budget 2017, and following reports produced by the National Infrastructure Commission, the Government published an overarching vision for the Cambridge – Milton Keynes – Oxford Corridor to stimulate economic growth in the national interest. This vision was published in November 2017 titled, 'Helping the Cambridge, Milton Keynes and Oxford corridor reach its potential'.
- 3.46 It states that the corridor has significant potential for growth and that with interventions the growth potential can double the growth expected without interventions. It welcomes the findings of the National Infrastructure Commission, including that up to 1 million houses will need to be built in the corridor by 2050.

- 3.47 It recognises that infrastructure will drive productivity and provide capacity needed to mitigate congestion and enable agglomeration of business and jobs.
- 3.48 The National Infrastructure Commission (NIC) produced its ‘Partnering for Prosperity: A new deal for the Cambridge – Milton Keynes – Oxford Arc (November 2017). This followed an Interim Report in 2016. The Report defines the arc as area stretching from Cambridgeshire, via Bedford and the south east Midlands, to Oxfordshire. It encompasses Northampton in the north and Luton and Aylesbury in the south. The Plan at page 21 of the NIC Report identifies the areas included in the arc, as well as major business clusters.

**Plan from page 21 of the NIC Report (2017)**



- 3.49 Fundamentally the Report concludes that home building in the arc must increase significantly and investment in the arc must be a national priority. It states that a new deal between central and local Government and which aligns public and private interests is needed.

**Local Policy**

- 3.50 The local development plan consists of the West Northamptonshire Joint Core Strategy (WNJCS). The WNJCS was prepared and adopted by South Northamptonshire Council and Northampton Borough Council (as well as Daventry District Council) in 2014.
- 3.51 The SRFI site is not allocated, and there are no site specific policies in the WNJCS which apply directly to the site – it is not in a designated landscape or heritage area, and has no other local designations or allocations. A small part of the southern end of the Bypass corridor extends into a locally designated landscape area (as discussed in Chapter 4 of the ES).
- 3.52 The WNJCS sets out a number of key objectives, as well as strategic issues and challenges. Spatial Objectives of relevance include:

**Objective 1 – Climate Change**

*To minimise demand for resources and mitigate and adapt to climate change, by:*

- *Promoting sustainable design and construction in all new development;*

- *Ensuring strategic development allocations are located and designed so as to be resilient to future climate change and risk of flooding;*
- *Encouraging renewable energy production in appropriate locations; and*
- *Ensuring new development promotes the use of sustainable travel modes.*

**Objective 2 – Infrastructure & Development**

*To protect and enhance existing local services and to ensure social, physical and green infrastructure is adequately provided to meet the needs of people and business in a timely and sustainable manner in response to regeneration and new development in West Northamptonshire.*

**Objective 3 - Connections**

*To reduce the need to travel, shorten travel distances and make sustainable travel a priority across West Northamptonshire by maximising the use of alternative travel modes. In so doing, combat congestion in our main towns and town centres, reduce carbon emissions and address social exclusion for those in both rural and urban areas who do not have access to a private car. To strengthen and diversify West Northamptonshire’s economy by taking advantage of our internationally well-placed location, strategic transport network and proximity to London and Birmingham.*

**Objective 8 - Economic Advantage**

*To strengthen and diversify West Northamptonshire’s economy by taking advantage of our internationally well-placed location, strategic transport network and proximity to London and Birmingham.*

**Objective 9 - Specialist Business Development**

*To support and develop opportunities for specialist employment clusters and business development focused on a low carbon economy.*

**Objective 15 High Quality Design**

*To achieve high quality design in both rural and urban areas that takes account of local character and heritage and provides a safe, healthy and attractive place for residents, visitors and businesses.*

- 3.53 The WNJCS recognises that the area has excellent access to national transport infrastructure (road and rail), and that demand for strategic distribution sites and floorspace is high. The WNJCS explains that Northampton accounts for around 70% of the jobs in the West Northamptonshire area, and that there are high levels of commuting across the area with Northampton as the main focus.
- 3.54 The ‘specialist’ clusters and sectors alluded to in Objective 9 are not explicitly defined, but there is some clear overlap and cross-reference to the work of the LEP, and a number of key economic sectors are referred to, including logistics, and High Performance Technology and Manufacturing.
- 3.55 The WNJCS includes a minimum net jobs growth target of 28,500 over the 21 year period between 2008 and 2029. This figure was amended downwards during the WNJCS preparation process from an earlier jobs growth figure of 37,200 over the 20 year period 2001 – 2021 set by the former Regional Spatial Strategy for monitoring purposes. The jobs figure is explicitly included for monitoring purposes in the context of residential and employment land delivery, and is explicitly defined as a ‘minimum’ rather than a fixed ‘cap’ or limit.
- 3.56 The spatial strategy set out in Policy S1 of the WNJCS contains the following strategic emphasis:

*“Development will be concentrated primarily in and adjoining the principal urban area of Northampton”*

3.57 The WNJCS did not anticipate further SRFIs during the plan period to 2029, however, with regard to the principle of further SRFIs coming forward the WNJCS states that:

*“The local authorities in West Northamptonshire will continue to work with Network Rail and the freight industry to consider and support further sustainable opportunities for rail freight interchanges in the longer term once the opportunities for additional access onto the rail network to support viable rail freight interchanges are confirmed.”*

(WNJCS paragraph 5.72)

3.58 SNC commissioned a Logistics Study which reported in 2017 and recognises the importance of the sector to the local economy, and the strong market interest and demand in additional growth and development. The report recognises the opportunities to identify additional sites for the logistics sector if further growth is to be secured, as well as measures regarding skills and other agendas to support economic growth. It is understood that this forms part of the evidence base for the emerging Part 2 Local Plan for South Northamptonshire.

3.59 Other planning policies of the WNJCS are also of note and relevance, including:

- C1 Changing behaviour and achieving modal shift and C2 New developments – requiring access to enable travel by sustainable modes, and to mitigate the transport effects of new development;
- S10 Sustainable Development Principles.- providing criteria regarding design quality and operational efficiency to create sustainable, energy and resource efficient places with regard to the effects on the local environment and regarding climate change considerations;
- BN1 Green Infrastructure Connections – setting criteria for the enhancement or provision of Green Infrastructure in new development;
- BN2 Biodiversity – presumption in favour of measures that maintains or enhances biodiversity, or delivers a net gain in biodiversity;
- BN3 Woodland enhancement and creation – presumption in favour of measures to enhance and manage existing, and create new woodlands, and a need to weigh any impacts on ancient, aged or veteran trees against the benefits of development;
- BN7A Water supply, quality and wastewater infrastructure – requiring adequate supply and infrastructure, and encouraging SuDS wherever practical to deliver water quality and flood-risk benefits;
- BN9 Planning for Pollution Control – requiring assessments to minimise and reduce potential pollution issues, including with regard to air quality, water, light, noise, and contamination.

3.60 In addition to the 2014 WNJCS, South Northamptonshire District Council also saved a number of policies from its 1997 Local Plan. The Local Plan pre-dates the NPPF by some 15 years, and is clearly now out of date in many respects, but a number of these policies remain in place for use in development control decisions by SNDC.



## 4. APPRAISAL OF THE APPLICATION

4.1 This section of the Planning Statement sets out an appraisal of the suitability of the Northampton Gateway proposal having regard to relevant policies. It refers to the explanation and description of the policy context and ‘policy need’ issues set out in Section 3 and also has regard to the wider context including the ‘market need’ issues identified in the Market Analysis Report (Document 6.8). It also draws out the likely effects and impacts of the proposals with reference to the Environmental Statement which accompanies the application. It presents conclusions on the sustainability of the proposals and whether it accords with the NPS and other relevant policy, where necessary applying an appropriate judgement on the planning balance.

4.2 In appraising the proposals this section is structured as follows:

- Overview
- The need for Strategic Rail Freight Interchanges
- Locational requirements for SRFI’s
- Functional Requirements of SRFIs
- Wider policy and ‘sustainability’ objectives
- Overall Planning ‘Balance’
- Alternatives

### **Overview**

4.3 The NPS identifies four strategic objectives (page 9) which underpin the need for improvements to National Networks, including the compelling need for an expanded network of SRFI’s, these are to:

- Support national and local economic activity, facilitate growth and create jobs;
- Support the delivery of environmental goals and the move to a low carbon economy;
- Support and improve journey quality, reliability and safety;
- Join up communities and link effectively to each other.

4.4 The Northampton Gateway SRFI will make a significant contribution to the delivery of these objectives, at a location and in a form that can appropriately minimise, and where necessary mitigate, impacts. In response to these objectives it will;

- Meet the needs of a growing and evolving logistics sector which is vital to the functioning of the national economy, bringing about major investment, creating jobs and facilitating the growth of the economy;
- Add to and expand the network of SRFI’s to meet the demands of business and encourage the continued growth in the use of rail freight – thereby contributing to the shift in the movement of goods from road to rail;
- Through investment in road and rail the scheme will improve journey quality, reliability and safety. Without SRFI’s logistics activity will be necessarily road based, the Northampton Gateway scheme will facilitate an increase in the use of rail freight and a reduction in HGV mileage on the national network. Furthermore the investment in new road infrastructure, particularly at J15 and the Roade Bypass will improve the capacity and safety of the road network at a local level;
- The investment in road and rail infrastructure, together with improvements to pedestrian

and cycle facilities and public transport provision will contribute to the objective to help communities link effectively to each other.

- 4.5 The NPS sets out a range of physical, functional and operational requirements with which SRFI should accord, together with a set of environmental measures against which proposals must be tested. The Northampton Gateway SRFI meets, and indeed in most cases, exceeds the requirement of the NPS for SRFI's.
- 4.6 The site is in the right location to address market requirements and expand the network of SRFI's so there is greater access to and opportunity for growth of, rail freight services. It provides excellent access to both the strategic road and rail network. The site is of the right size, capable of handling 775m trains, handling a minimum of 4 trains a day – with scope for significant expansion. It allows for large format warehousing to be provided to meet market needs, a significant proportion of which can be directly rail connected from day one. The rail and road infrastructure is significant with a commitment to delivery that can be secured through the imposition of suitable DCO Requirements. This includes delivery of the rail terminal, rail connections to building plots, the access to the site and A508 dualling together with the improvements to J15 of the M1, all prior to occupation of the first building.
- 4.7 The NPS recognises that, due to their operational requirements, SRFI's may need to be located in the countryside. Northampton Gateway is located in the countryside, where there will be loss of countryside. However the site has a particular context which means the impact of change would be less than in other countryside locations. Further, through scheme design and mitigation, the environmental effects of the scheme can be – very successfully mitigated. The Main Site lies immediately adjacent to the M1 and its J15 beyond which is the edge of the Northampton urban area. The Northampton loop of the West Coast Main Line forms its western boundary, its eastern boundary is formed by the A508 and its northern boundary by Collingtree Road. The Main Site is contained within these physical features and together with the urban area to the east these provide an urban influence to the site and its character. The villages of Collingtree, Milton Malsor and Blisworth lie close by but are separated from the site by highway or rail infrastructure. Further, because of the topography of the area and the approach to scheme layout, significant landscaped bunds can be provided to minimise and to large extent fully screen views of the development from these villages. These landscape and earthworks measures form a fundamental component of the scheme and are critical in ensuring that its environmental effect is acceptable and its impact on local communities minimised.
- 4.8 The NPS includes policy content which identifies the importance of 'design' to nationally infrastructure schemes, with reference to a range of issues including, for example, how design helps minimise social and environmental impacts (NPS paragraph 3.2), and how it enables accessibility (NPS paragraph 3.17). The NPS also makes clear links between design and visual effects, stating "visual appearance should be a key factor in considering the design of new infrastructure" (NPS paragraph 4.29). Notwithstanding the reference to the nature of national infrastructure, particularly SRFIs, which potentially "limits the extent to which it can contribute to the enhancement of the quality of the area" (NPS paragraph 4.30), the NPS still requires promoters to seek functional but quality design and aesthetically sensitive outcomes. To this extent, the NPS is clear that design is a material consideration in decision making (NPS paragraph 4.31).
- 4.9 Of particular relevance to the approach taken to the design of the Northampton Gateway site, the NPS recognises that while there may be a limited number of practical options for national infrastructure schemes, there may be "opportunities to demonstrate good design in terms of siting and design measures relative to existing landscape and historical character and function, landscape permeability, landform and vegetation" (NPS, paragraph 4.34).
- 4.10 The attached NPS Compliance Statement (Appendix 1) further explains how the Proposed Development accords with the range of requirements of the NPS.

- 4.11 Our overarching conclusion, set out in this Statement, are that the significant benefits of the proposal greatly outweigh the residual adverse impacts and that development consent should be granted in accordance with the presumption in favour of granting consent set out in the NPS.

#### **The need for Strategic Rail Freight Interchanges**

- 4.12 As referred to in Section 3, national policy emphasises and reinforces the “compelling need for an expanded network of SRFIs” (NPS, paragraph 2.56) to enable and encourage an accelerated shift in the movement of freight from road to rail. It is clear from the NPS that there are both economic and environmental objectives and priorities behind this policy. SRFIs form part of the national infrastructure which is described in Government’s vision in the NPS as “supporting a prosperous and competitive economy”, There are numerous references to the role these national networks, including SRFIs, have in supporting or creating economic growth and productivity. For example, the NPS provides a ‘summary of need’ (at paragraphs 2.1 – 2.11) which states (emphasis added):

*“The national road and rail networks that connect our cities, regions and international gateways **play a significant part in supporting economic growth**, as well as existing economic activity and productivity” (NPS paragraph 2.1)*

*“Well-connected and high-performing networks with sufficient capacity are **vital to meet the country’s long-term needs and support a prosperous economy**” (NPS paragraph 2.1)*

*“There is a critical need to improve the national networks to address road congestion and crowding on the railways to provide safe, expeditious and resilient **networks that better support social and economic activity**; and to provide a transport network that is capable of **stimulating and supporting economic growth**.” (NPS, paragraph 2.2)*

*“There is also a need for **development on the national networks to support national and local economic growth and regeneration**, particularly in the most disadvantaged areas. Improved and new transport links can **facilitate economic growth by bringing businesses closer to their workers, their markets and each other**. This can help rebalance the economy.” (NPS, paragraph 2.6)*

Conversely, it also states:

*“In their current state, **without development, the national networks will act as a constraint to sustainable economic growth**, quality of life and wider environmental objectives.” (NPS, paragraph 2.9)*

- 4.13 Therefore, Government’s clear view that there is a compelling need for growth and investment in the national road and rail networks, including SRFIs, is supported by further more detailed information and evidence regarding the drivers and components of need, as set out in the NPS. With reference specifically to the need for development of SRFIs, the NPS refers to rail freight becoming increasingly significant, and becoming “an important driver of economic growth” (NPS paragraph 2.42)

- 4.14 The employment impacts of the proposals are overwhelmingly positive (these effects are also described later, and in detail in Chapter 3 of the ES). The key economic impacts include:
- The Proposed Development will result in around 7,400 additional jobs once fully operational bringing additional (temporary) employment during the construction period. The operational development would bring significant and positive economic effects at both the local and regional level, including wider economic effects on local and regional supply-chains and other business to business links.
  - The ES assessment indicates that the development would generate a contribution to Gross Value Added of some £348 million annually, and a total construction investment of around £400 million.
  - The benefits of a substantially improved M1 Junction 15 which will improve journey reliability and safety with reduced congestion at this key junction, consistent with the ‘vision and objectives’ of the NPS.
    - The transport improvements and benefits delivered will support delivery of already planned housing and population growth in and around Northampton as the single principal urban area within West Northamptonshire.
- 4.15 These economic benefits are of relevance to the national economy as well as the sub-regional and local economy, and are a key factor in the ‘compelling need’ for a network of rail freight interchanges identified by Government in the NPS.
- 4.16 As part of this positive context, based on ‘robust’ forecasts of freight growth from Network Rail, Government is planning on a significant increase in SRFI capacity.
- 4.17 The industry and market led approach to delivering this component of ‘national infrastructure’ implies no limit on the potential number of new SRFIs, nor any restriction on potential competition, in terms of the core catchments and markets served by existing and new SRFIs. The NPS provides a clear context for more SRFIs which provide access to the road and rail networks, and which are located close to “the markets they serve” (NPS paragraph 2.56).
- 4.18 As referred to in more detail below, although the NPS is silent on specifically where SRFIs should be located (in that it does not identify sites), by tying SRFIs to both national transport infrastructure and access to markets in practice it directs the search for SRFI sites to relatively limited areas of search.
- 4.19 The ‘Freight Network Study’ (2016) by Network Rail identifies the amount of SRFI warehousing space needed to meet rail freight forecast (the same forecasts that are relied upon by the NPS), and refers to a need for 5.9 million sq.m of rail connected warehousing by 2023, 9.6 million sq.m by 2033, and 13.3 million sq.m by 2043. The approach is logical and rational – if rail freight is to grow as forecast there will need to be a significant increase in the number of SRFIs to enable and support its integration into supply chains and distribution networks.
- 4.20 Government’s clear expectation is that this floorspace will be delivered by the private sector as part of the continuing development of the UK’s logistics and distribution sector. Furthermore, the NPS is clear about the economic growth imperative behind the national policy of enabling and encouraging more SRFIs as part of a national transport system which drives national economic growth.
- 4.21 The Market Analysis Report (Document 6.8) includes an analysis of the potential supply of SRFI’s to meet these capacity forecasts. It concludes that supply will fall significantly short unless further SRFI’s are planned and delivered. Given the time it takes to identify, plan, secure consent for and then deliver SRFI’s, new SRFI’s need to be brought forward now to secure the necessary infrastructure to meet requirements over the next 10-15 years. Even with the full delivery of committed schemes, the total SRFI’s floorspace in 2023 is likely to be around 3.7 million sq.m, only just over half the 5.9 million sq.m identified in the Freight Network Study as being required by 2023 and some considerable way short of the 9.6 million sq.m by 2033. Put in this context the figures are quite stark in revealing the extent of the requirement for additional SRFI’s.

- 4.22 The 'compelling need' for more SRFIs is presented in the context of international and national trends and market demands which are driving the increased requirement for movement of freight in general, and which create the opportunity to increase the role of rail in the UK distribution and logistics sector. Intermodal freight, together with the construction sector, now accounts for nearly 65% of all freight moved by rail. The amount of intermodal freight which comprises both traffic to and from ports and inland terminals, and movements between those inland terminals, has risen consistently - by 93% over the period from 1998-99 to April 2017. DfT and Network Rail expect intermodal traffic to continue to grow considerably over the next 30 years and at least double in volume again.
- 4.23 The key drivers of the growth in rail freight and the resulting need for SRFI's as recognised by Government and reinforced by the evidence presented in the Market Report, are:
- Rail freight volumes and flows are growing, and the market is changing. Total tonne kilometres are forecast to grow by 3% annually to 2043, with intermodal and port traffic representing a key element of that change;
  - Logistics and distribution activity supports economic development and productivity, and represents a key economic sector in its own right - estimates included in the NPS are that it contributes £1.5 billion per year to the UK's economy;
  - Road infrastructure is increasingly congested and unreliable, and forecast to get worse - each freight train can remove between 43 and 77 HGVs from the road (depending on the load);
  - There are environmental imperatives to be pursued and delivered, including regarding climate change and air quality - tonne for tonne, rail freight produces 70% less CO<sub>2</sub> than road freight, up to fifteen times lower NO<sub>x</sub> emissions and nearly 90% lower PM<sub>10</sub> emissions.
- 4.24 Notwithstanding these pressures, the Market Analysis Report explains that in recent history rail has played a relatively limited role in the logistics sector, with operators focusing on road-based movement. It states that rail will become more economic and more accessible, as its market grows, but that a very significant factor in the limited use of rail, is simply the lack of access to rail due to a lack of strategic rail freight interchanges.
- 4.25 Therefore, the 'need' identified by the NPS for more SRFIs reinforced by the findings set out in the Market Analysis Report is a response to a range of economic and environmental issues, and the principle of delivering additional SRFI's is clearly and explicitly supported by National Policy.
- 4.26 Northampton Gateway is being proposed as one part of the response to this need, and as shown in the following sections accords in full with the relevant components of the NPS.

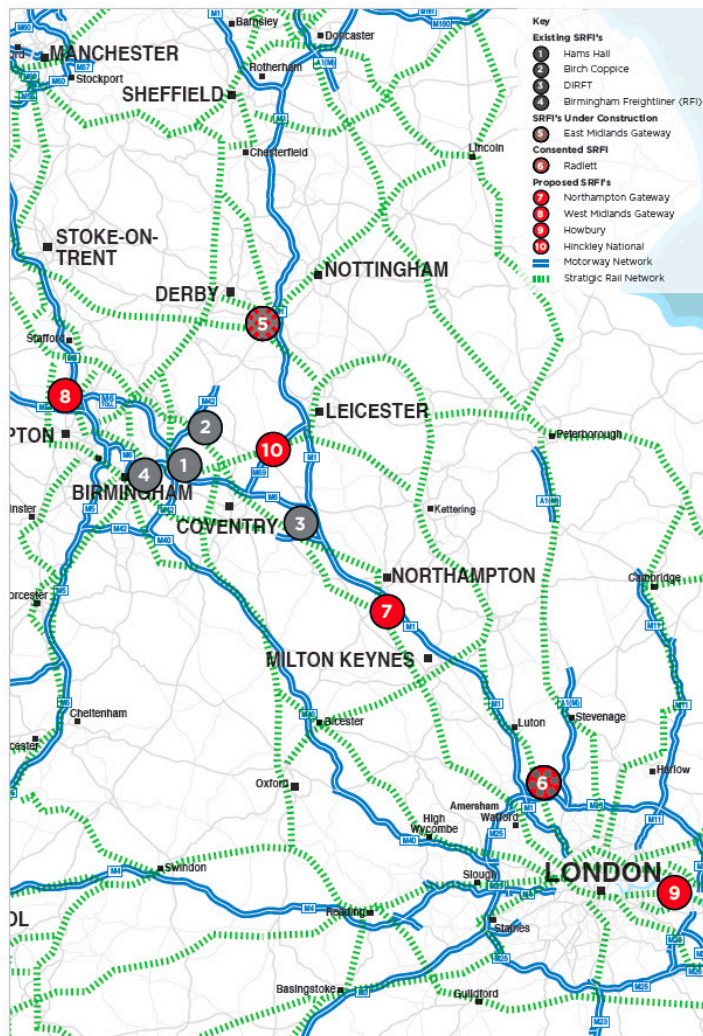
### **Locational requirements for SRFI's**

- 4.27 The NPS does not identify specific sites or locations for SRFI's, anticipating that the identification, promotion and delivery of SRFI's will be market led. It does however identify locational and functional requirements or criteria which new SRFI's should meet. The NPS requires SRFI's to have good connectivity to both the road and rail network, in particular the Strategic Freight Network, and recognises that the number of locations suitable for SRFI's will be limited.
- 4.28 While not identifying specific sites, by being 'market led' and by identifying general locational characteristics geared around access to both strategic infrastructure and key markets, there are limited locations within the UK where SRFI's will be both capable of meeting the necessary criteria and be economically viable. Northampton Gateway provides excellent access to both the strategic road and rail network. It is also capable of meeting all of the SRFI requirements set out in the NPS as described in the Compliance Statement at Appendix One. Its location also allows it to meet the needs of logistics operations requiring access to markets in major urban centres across the UK including London. Appendix Two contains a statement from Roxhill and their partners Segro; it details their extensive experience of the logistics sector and particular expertise in the strategic rail freight sector. It confirms their commitment to the site and confidence in its suitability and attractiveness to the market. Roxhill and Segro are in the process of constructing the East Midlands Gateway SRFI which received a development consent order in 2016. The development of the site has progressed extremely well with strong demand for warehousing and extensive interest in the operation of the rail terminal with a preferred terminal operator already identified.
- 4.29 In terms of strategic road access, Northampton Gateway will provide almost direct access onto the M1, which is one of, if not the most important road link for freight in the country. The proposals would significantly increase the capacity of Junction 15 of the M1, and make more modest improvements at Junction 15A, as part of a package of highways improvements. This will ensure not only that the development traffic can be accommodated without significant adverse effects, but also provide additional capacity for the significant levels of housing and population growth planned through the adopted Core Strategy.
- 4.30 In relation to rail the NPS states that 'ideally' SRFI's should be located on a route with a gauge capability of W8 or more. Further details on rail access and capacity are set out in the Rail Reports (Document 6.7). These Reports explain that the site will provide direct access to the Northampton Loop Line which is part of the West Coast Main Line. The West Coast Main Line is one of the most important freight railways in the UK. It is cleared to W10 structure gauge and provides access to major ports and the Channel Tunnel and as such provides the best access of any route on the national network. The Rail Reports explain that although the West Coast Main Line is an extremely busy network, there is current capacity for more freight services, both due to unused paths and because there are many booked but unused paths which could be made available. Because the West Coast Main Line is such an important freight route in the national context, to a greater or lesser extent any new freight services (to existing or new SRFI's connected directly or indirectly to the line) will need to be managed in line with the current and future operation of the overall network, and services to and from Northampton Gateway would be no different in this regards. The Rail Reports explain the investment planned by Government and Network Rail, including HS2, which is likely to help establish greater capacity for the future growth of rail freight.
- 4.31 The Market Analysis Report describes the ways in which SRFI's function within the logistics supply chain notably the relationship with National and Regional Distribution Centres (NDCs and RDCs), and explains why Northampton is an important location in key logistics supply chain routes. Within this context it identifies the business markets the Northampton Gateway site is intended to serve. It explains that in the logistics sector the ability to serve a large population in a number of major urban centres is an important factor in the attractiveness of a location. For these reasons the Midlands has and will continue to be a focus for logistics activity. .

- 4.32 The Market Analysis Report explains that the Midlands has historically been an exceptionally strong logistics area, driven largely by its central location in the UK and strategic road connections, and therefore its benefits as a location for Distribution Centres serving the whole, or a large part of, the UK. In terms of Northampton Gateway, 32% of the UK population, or 21.3 million people, are within 90 minutes of the Northampton Gateway site, and 87% within a 4.5 hour drive time.
- 4.33 The Market Analysis Report also finds that demand remains very strong and take-up of space in the Midlands area is expected to continue, including around Northampton. It outlines the market trends that are driving an increase in the demand for very large scale logistics buildings (National Distribution Centres), which in particular are driven by the growth of online retail but also structural changes in the logistics sector. These changes underpin the growth in demand for NDC's with a focus of demand in locations central to the UK. The Market Report refers to this area as the 'Midlands Distribution Heartlands'.
- 4.34 The Market Analysis Report explains that users of rail freight terminals are typically moving goods by rail to be sent to and from NDCs and RDCs within a reasonable catchment around the terminals to then be moved onwards to their next destination. The distance between terminals and warehouses is a crucial factor in the use of rail, with rail's cost benefits decreasing with distance from a terminal. The Report considers that because of the dynamics of the logistics sector SRFIs must be located where the logistics sector is strongest (and demand greatest) and that because road distribution will continue to be the prime mover of freight and is required even when primary haul is undertaken by rail, the market will not be attracted to SRFIs if they are in unsuitable, non-prime locations.

4.35 There is, associated with the general concentration of logistics space, an existing concentration of SRFIs in the central Midlands area at Hams Hall, BIFT, DIRFT and an RFI at Birmingham Freight Liner. As a result of the concentration of logistics activity and in particular demand for NDC's, in the Midlands, the Market Analysis Report concludes that the network of SRFI's to serve the logistics industry in this area will need to grow. Indeed this network is already expanded northwards with Roxhill/Segro's (owners of the Applicant company) East Midlands Gateway SRFI. There are other proposed SRFI's which would further expand the network - see the figure below. The Northampton Gateway SRFI would expand this network to the south east. Meeting current market needs for rail freight as well as the wider growth in the demand for rail freight services.

**Extract from Market Analysis Report: Network of SRFIs in the Midlands/beyond**





- 4.36 The Market Analysis Report includes an analysis of the likely catchment areas for rail freight terminals and the likely demand for rail services at a Northampton Gateway SRFI. This analysis found that 60% of the floorspace within a Northampton Gateway research area is already occupied by businesses with either an existing use of rail freight as part of their overall supply chain or an interest in doing so in the future. The Market Analysis Report concludes that as a result of the quality of Northampton Gateway's location and the high level of NDC and RDC warehouse stock in the area there is a large potential pool of occupiers in addition to on-site occupiers who could utilise the Northampton Gateway rail freight terminal. It is clear from the Market Report that there will be strong demand for warehouse space on the Northampton Gateway site and demand from existing and future warehouse occupiers both on-site and in the area around the site, to utilise the rail freight facilities Northampton Gateway will deliver.
- 4.37 Due to the concentration of logistics activity in the Midlands and the importance of distance between terminal and warehouse to the use of rail, commercially successful rail freight terminals already exist close to each other in the Midlands. Despite some overlap of core catchment areas these rail freight terminals continue to increase the volume of goods handled by rail year-on-year. The Northampton Gateway site is close to an existing SRFI at DIRFT. The Market Analysis Report concludes that Northampton Gateway rail terminal will expand the Midlands Network of SRFI's to the south east, thereby meeting potential demand for rail freight services that cannot currently be met, including markets closer to London. Because of the inherent concentration of logistics activity in the Midlands area it will also, alongside DIRFT, provide the capacity to serve future market demand for warehouse and intermodal terminal space as the intermodal market continues to grow. The impact of the Northampton Gateway SRFI will therefore be to further increase the market for rail freight and trigger additional demand from occupiers outside the core catchments of existing terminals.
- 4.38 The planned and anticipated growth in the area is also relevant to market considerations and the markets to be served by the proposed SRFI. This is noted in the Market Analysis Report. Northampton is experiencing significant growth, further it forms part of an area identified by government as an important area, nationally, for growth and prosperity. As explained in Section 3, Northampton forms part of the Cambridge – Milton Keynes – Oxford growth Corridor, where 1 million new houses are likely to be required over the next 30 years or so. The Northampton Gateway SRFI is extremely well placed to serve this market as well as to contribute to meeting the overall vision for the area set out by government. There are currently no existing SRFI's in this growth corridor.
- 4.39 The commitment of GRS (see Appendix 3) to relocate their aggregates facility to Northampton Gateway, with associated expansion plans, is a demonstration of the suitability of the location for a Rail Freight Interchange and the demand in the market place for new and improved facilities. GRS has provided a statement setting out details of their business, their reasons for wishing to relocate and expand and the attractiveness of the Northampton Gateway Site. This is attached at Appendix Three. They explain that their current facility in Northampton town centre is constrained due to its size and location and they are keen to move the facility to invest in the operation and support further growth. GRS's commitment to the site demonstrates the suitability of the site and the proposed rail infrastructure, as well as the demand for rail freight services. The relocation of GRS will move their operation from the centre of Northampton and allow for the beneficial redevelopment of their existing site.
- 4.40 The NPS recognises that the existence of an available and economic workforce will be an important consideration for the applicant of SRFI's. Work undertaken in the Socio-Economic Chapter of the Environmental Statement concludes that there is a suitable available workforce in the Northampton Gateway travel to work area. The Market Report identifies the availability of labour as a key requirement for logistics operations and therefore is a key factor in the suitability and attractiveness of sites. The Report highlights that availability of labour, together with other key factors like direct and easy access to the motorway network, will differentiate sites and their

relative commercial attractiveness. The Report confirms that the Northampton Gateway site is extremely well placed with regard to all key locational requirements for logistics, including its access to a suitable labour supply.

- 4.41 The Market Report concludes that the use of rail in the logistics sector will continue to grow as the benefits of utilising rail compared to purely road-based logistics increases and awareness grows. It states however, and as recognised by the Government, that the provision of additional Strategic Rail Freight Interchanges is essential if growth is not going to be throttled by lack of appropriate infrastructure to facilitate this modal shift. New SRFIs must be located where demand is greatest, in particular in locations where there is a concentration of logistics space, particularly National Distribution Centres and where demand for logistics space will continue to grow. Without the provision of new SRFIs in these locations, the Market Report concludes that logistics operators will be forced to continue to utilise road as their only method of freight distribution.

#### **Functional Requirements of SRFIs**

- 4.42 The NPS sets out a number of functional requirements for SRFI's. The Compliance Statement at Appendix 1 identifies these requirements and explains how the Northampton Gateway scheme will fully comply with each of them. The Statement also emphasises the commitments proposed at Northampton Gateway to secure the early delivery of significant rail and road infrastructure. Indeed it illustrates that, in many cases, the scheme will far exceed the minimum requirements of the NPS.
- 4.43 The Applicant has had regard to the concerns expressed by the Examining Authority when reporting to the Secretary of State on the East Midlands Gateway SRFI DCO application with regard to some of the functional tests contained in the NPS and has sought to address them in this application. In addition, Roxhill and its partner Segro, have experience of developing on SRFI's at East Midlands Gateway. Details of their experience are set out in Appendix Two. The initial, upfront, infrastructure investment at East Midlands Gateway has been significant, and is being rewarded through strong demand. The experience at East Midlands Gateway helps to demonstrate that the commitments proposed are realistic and deliverable.
- 4.44 In summary, Northampton Gateway will;
- Provide an operational rail terminal from the outset, including a rail network connection, appropriate sidings and a large area for intermodal handling and container storage;
  - Provide the ability for warehousing to be directly rail connected from the outset;
  - Accommodate both rail and non-rail activities from the outset;
  - Provide rail infrastructure to allow more extensive rail connection within the site in the longer term;
  - Provide a rail terminal, from the outset, which is capable of handling at least four trains per day, enables trains to arrive and depart in both directions, has the ability to accommodate trains of 775 meters and minimise the need for on-site shunting;
  - Provide large, and flexible development plots to accommodate the varied needs of businesses (capable now or in the future of supporting their commercial activities by rail).
- 4.45 The scale and form of the terminal proposed at Northampton Gateway whilst delivering significant rail infrastructure from the outset, allows for flexibility in its use and expansion. This will enable the terminal to be expanded to handle 16 trains a day ultimately, but also to incorporate an aggregates terminal within the main intermodal area.

- 4.46 As stated above, the proposed aggregates terminal is a direct response to a specific requirement from GRS which operates nationally and has a requirement to relocate and expand their local operation from the centre of Northampton. GRS's contractual commitment to the site demonstrates the suitability of the site and the proposed rail infrastructure, as well as the demand for rail freight services. GRS currently has the ability to utilise 5 rail freight paths (although not all are utilised now) and intends to transfer these for use from Northampton Gateway.
- 4.47 The scheme also allows for the future incorporation of a rapid Rail freight facility. The Market Analysis Report discusses the prospects for the introduction of a rapid rail freight in the market and why the Northampton Gateway scheme has been designed to accommodate such a facility.
- 4.48 Overall the rail components of the Northampton Gateway proposal are significant with large areas set aside for future expansion. This allows for as great a level of flexibility as possible, both in terms of the scale and use of the main container terminal but also the incorporation of the aggregate terminal, and the potential incorporation of a, Rapid Rail freight facility.
- 4.49 This 'future-proofing' within the design of the Northampton Gateway scheme responds directly to the need for flexibility which is explicitly recognised by the NPS. Rooted in the market led nature of SRFIs, the NPS says:
- "some degree of flexibility is needed when schemes are being developed in order to allow the development to respond to market requirements as they arise" (NPS, paragraph 2.45).*
- 4.50 This need for flexibility also relates to the potentially long timescales over which rail freight requirements, and the requirements of logistics and distribution operators are expected to evolve and be met at new SRFIs. A key part of the flexibility of the scheme design is the provision of rail connection directly to over 60% of the on-site warehousing. This rail infrastructure will be provided very early in the development of the site. It's provision, together with the layout of the site will enable occupiers to integrate rail into their plots or units in the form which fits their operational model. For example the rail could be located within the service yard adjacent to the warehouse, or taken directly into a warehouse unit. This flexibility is important, so it allows the scheme to respond to market requirements and meet the specific needs of a wide range of potential occupiers.
- 4.51 Issues relating to flexibility are also reflected in the NPS in the context of what is assessed and considered through the Environmental Impact Assessment (EIA) process. The NPS refers to it not being possible for all applications to "have been settled in precise detail" (NPS paragraph 4.18), and where this is the case, applicants should set out "what the maximum extent of the proposed development may be....and assess the potential adverse effects which the project could have" (NPS, paragraph 4.19).
- 4.52 This need for flexibility is exhibited at Northampton Gateway through the defined scheme parameters (presented on the Parameters Plan, document 2.10) which allow for a potential range of building sizes (in terms of total floorspace and footprint) in a defined built 'zone' containing the warehousing buildings. This allows for building form and sizes, within the defined parameters to be defined by market requirements (with details to be agreed in due course with the Local Authority). An Illustrative Masterplan shows how the site might be developed in accordance with those parameters.

### **Wider policy and ‘sustainability’ objectives**

4.53 The NPS is explicit in recognising that in planning for, and enabling delivering of, nationally significant infrastructure, there will be a range of strategic (national) and local effects and impacts. While assessment of the likely effects is required (through Environmental Impact Assessment), and efforts made to mitigate and minimise the effects, the potential for some residual local adverse effects is understood and accepted. The NPS states:

*“The Appraisal of Sustainability accompanying this NPS recognises that some developments will have some adverse local impacts on noise, emissions, landscape/visual amenity, biodiversity, cultural heritage and water resources.....Therefore, whilst applicants should deliver developments in accordance with Government policy and in an environmentally sensitive way, including considering opportunities to deliver environmental benefits, some adverse local effects of development may remain.”* (NPS paragraph 3.4)

4.54 The NPS , requires the Examining Authority and Secretary of State to weigh any adverse impacts against its benefits, taking into account:

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

4.55 The following sections below provide a summary overview of the proposals in the context of this weighing process to identify the ‘balance’ of any adverse impacts against the benefits, with reference to the conclusions of the ES. They provide a clear summary of the extent to which the likely effects, benefits and impacts can be seen to accord with the requirements of the NPS and deliver ‘sustainable development’ as required by both the NPS and the NPPF.

4.56 Relevant references are also made to the sub-regional and local economic and planning priorities and policies of the LEP and local planning authorities.

4.57 This section includes the key points from relevant parts of the ES, with relevant cross-references where appropriate, but a more detailed assessment of the likely impacts and effects of the proposals are found in the separate ES. The Compliance Statement at Appendix 1 is also of relevance to assessing the proposals against the requirements of the NPS, and it too refers to the ES.

### **Support for national and local economic activity**

4.58 NG has clear economic benefits and would directly support national and local objectives regarding economic development. The NPS is clear in emphasising the importance of ‘the national networks’ to economic growth, and a central component of the NPPF is delivering “a strong, responsive and competitive economy” (NPPF, paragraph 7).

4.59 The employment impacts of the proposals are assessed in the ES for both construction and operational phases, and the likely socio-economic effects of the development are overwhelmingly positive.

4.60 Using standard ratios of floorspace to employment prepared and published by the Homes & Communities Agency the Socio-Economic assessment within the ES estimates that Proposed Development will result in around 7,400 additional jobs once fully operational. There would also be additional (temporary) economic benefits from the construction period. The significant and positive economic effects at both the local and regional level include both direct employment, but also wider economic effects in terms of impacts on local and regional supply-chains and other business to business links.

- 4.61 The assessment indicates that the development would generate a contribution to Gross Value Added of some £348 million annually, and a total construction investment of around £400 million.
- 4.62 The development would deliver not just employment, but also skills and training benefits (consistent with WNJCS policy E6). There would also be scope for improved local services and facilities through the local retention of a proportion of annual business rates by the local authority. This has been estimated as in excess of £12m per annum.
- 4.63 The economic (and environmental) benefits include an improved M1 Junction 15 which will improve journey reliability and safety with reduced congestion at this key junction, consistent with the 'vision and objectives' of the NPS for national networks. The transport improvements and benefits delivered will support delivery of already planned housing and population growth in and around Northampton as the single principal urban area within West Northamptonshire.
- These economic benefits are of relevance to the national economy as well as the sub-regional and local economy, and are a key factor in the 'compelling need' for a network of rail freight interchanges identified by Government in the NPS.
- 4.64 The Socio-Economic assessment of the ES concludes that there is a suitable available workforce in the area and that this workforce is expected to grow as a result of household growth in the area. It also concludes that the development is likely to have positive effects on commuting patterns in the area by reducing the amount of net outward movement from South Northamptonshire into Northampton and Milton Keynes and reducing the outward movement from Northampton to Milton Keynes.
- 4.65 The NG proposals would directly support the continued growth and success of the logistics sector which is identified as a key sector in the local and sub-regional economy, and a priority 'showcase' sector for the LEP<sup>1</sup>. NG would support the LEP's aspirations and objectives regarding employment creation, supply-chain development across a range of sectors, and encouraging and enabling trade links and exporting of goods. Through the provision of additional strategic employment land and premises, and delivery of improvements to (and new) transport infrastructure, the Proposed Development would enable the goal of delivering expansion, relocation, and new businesses investing in the South East Midlands economy.
- 4.66 Through provision of an 'aggregates terminal as part of the intermodal terminal the NG proposals respond to a range of market requirements as part of planning for growth and development over the longer-term.
- 4.67 The Cambridge – Milton Keynes – Oxford Corridor initiative represents part of the strategic context for South Northamptonshire and Northampton Borough with potential implications on housing and economic development policies through subsequent Local Plan preparation and reviews. The Strategy sets what's described as a 'transformational' vision and agenda for higher levels of growth and development across the corridor, with a focus on the performance and role of the main towns and urban areas. Objectives include not only supporting economic growth across the corridor area, but also improving housing supply and affordability through an increase in housing delivery. The Strategy seeks to deliver a joined-up plan for housing, jobs and infrastructure across the corridor, and would see delivery of significant levels of additional housing and economic growth over the next 20-30 years. At the headline level, the LEP has suggested that the corridor could deliver population increase of 1.6m people, and 1 million homes over the period to 2050/51.

<sup>1</sup> SEMLEP, Strategic Economic Plan, November 2017.

4.68 Investment in key road and rail infrastructure forms a key plank of this strategy with an emphasis on the importance of delivering additional infrastructure and housing growth to ensure that economic growth potential is not stifled. With regards to rail and rail freight, the improvements are expected to deliver benefits in terms of capacity and resilience – the report states that the strategic and economic benefits include:

*“Enable journeys from England’s south coast ports to the midlands and northern transport hubs, providing additional capacity required by the rail freight market and a diversionary route for freight traffic between Southampton, the midlands and the north.”*

**(NIC Cambridge – Milton Keynes – Oxford Corridor: Interim Report, paragraph 4.8).**

- 4.69 The Strategy is therefore of direct relevance to, and consistent with, the proposals to add to SRFI capacity at NG, and to improve the performance, capacity and resilience of Junction 15, and 15A, of the M1. The delivery of strategic economic and infrastructure investment at Northampton Gateway in South Northamptonshire would clearly accord with this emerging vision.
- 4.70 Locally, the WNJCS sets out a number of over-riding Spatial Objectives regarding economic development described in Section 3 of this Planning Statement. The WNJCS recognises that the area has excellent access to national transport infrastructure (road and rail), and that demand for strategic distribution sites and floorspace is high.
- 4.71 The main site is not allocated for development, but finds some support and synergy with local economic development focused planning policies. The ‘specialist’ clusters and sectors alluded to in Objective 9 of the WNJCS are not explicitly defined, but local policies overlap and cross-reference to the work of the LEP, and key economic sectors include logistics, as well as High Performance Technology and Manufacturing. Policy C3 Strategic Connections includes an objective regarding enabling more rail freight movements as part of efforts to help reduce road congestion in the wider area. Although geared around the continued role of DIRFT, this policy is also of direct relevance to NG.
- 4.72 The Spatial Strategy through policy S1 seeks to focus all major development to locations “in or adjoining” Northampton. Policy S8 seeks to locate strategic ‘warehousing’ employment development to DIRFT, regardless of whether it requires, or might ever require, rail freight connectivity, and regardless of any understanding of specific or other market requirements for land elsewhere and better related to Northampton. The additional allocated strategic employment site at Junction 16 now has planning permission to deliver in the region of 149,000 sq.m. of floorspace with individual units of up to 81,200 sq.m.
- 4.73 The WNJCS recognises the strong policy support for further rail related strategic distribution development in West Northamptonshire, with reference to the evidence base associated with the former RSS and Regional Economic Strategy<sup>2</sup>. While no new SRFIs are anticipated by the WNJCS during the period to 2029, it does include a recognition of the potential for further expansion of SRFI capacity:

*“The local authorities in West Northamptonshire will continue to work with Network Rail and the freight industry to consider and support further sustainable opportunities for rail freight interchanges in the longer term once the opportunities for additional access onto the rail network to support viable rail freight interchanges are confirmed.”*

**(WNJCS, paragraph 5.72)**

<sup>2</sup> Paragraph 8.16 of the WNJCS refers to the East Midlands Strategic Distribution Study (EMSDS), and paragraph 8.17 refers to the Regional Freight Strategy

- 4.74 It would be highly unusual if the WNJCS had predicted or made active provision for additional nationally significant infrastructure. The WNJCS approach is consistent with the NPS which is clear that the delivery of the national ‘network’ of SRFIs will be led and driven by the market. The Northampton Gateway proposals have now emerged in the context of the continued strength of the need and opportunity in this area, and in the context of a positive national policy on SRFIs, and it seems clear that paragraph 5.72 of the WNJCS had envisaged that this scenario may occur.

#### **Air Quality**

- 4.75 The NPS contains specific requirements regarding Air Quality, including with reference to the ability to meet overall air quality obligations. WNJCS Policy BN9 Planning for Pollution Control also requires development to minimise air quality impacts (as well as any impacts on water quality, and light pollution, and reduce the adverse impacts of noise – these are all addressed elsewhere in this section).
- 4.76 The Air Quality assessment of the ES shows that the scheme would generate benefits to AQMAs across a wide area of the East Midlands and beyond as a result of reduced HGV traffic, as well as some localised benefits compared to the current baseline. Likely residual air quality effects overall are assessed as negligible in 2031 (some negligible adverse, some negligible beneficial), with localised improvements in air quality largely as a result of improvements to the highway networks which would reduce congestion and through-traffic in many nearby communities (such as Roade where a Slight Beneficial impact is likely with the bypass in place). Even over the shorter-term, the overall impact is negligible, with some interim benefits in the study area as the new or improved transport infrastructure is delivered.
- 4.77 The nearest AQMA (on the M1 to the north) would see negligible change as a result of the Proposed Development, and a number of other local AQMAs further from the site would see benefits due to changed traffic flows and distribution. However, Air Quality in some parts of central Northampton (AQMA 4) remote from the site would see slight adverse effects as a result of changed traffic patterns (reassignment of traffic).
- 4.78 Having regards to paragraph 5.9 of the NPS, the Environmental Statement concludes that the project would not affect the UK’s ability to comply with the Air Quality Directive, as the scheme will have a beneficial effect across a wide area, including many AQMA’s across the East Midlands ‘zone’. It is concluded that the scheme will not affect the ability of the East Midlands zone to become compliant under the Air Quality Directive, nor will it delay compliance, because it will not affect the worst link in the zone and will not cause any link to become the worst link. The proposals therefore fully accord with the ‘tests’ set out by the NPS regarding air quality.

#### **Carbon Emissions**

- 4.79 This area of potential impact cuts across a number of policy topics and ES chapters, including transport and air quality, both of which are also covered by their own section within the NPS, and which are subject to assessment in the ES. It is also of direct relevance to wider consideration of climate change issues which is also covered in the ES as required by the amended 2017 EIA regulations.
- 4.80 The NPS makes it clear that SRFIs have a direct and significant role to play in reducing carbon emissions by enabling the shift of freight from road to rail. As referred to earlier in this Statement, the NPS is clear about the benefits in terms of reduced road congestion, and reduced carbon dioxide (and other) emissions, as a result of reducing HGV mileage from the national road network.
- 4.81 Therefore, at the strategic level, the NG proposal would make a significant direct and positive contribution to national policies to reduce the reliance on road transport and move to more

sustainable, more energy efficient alternatives. The proposals would directly play a part in the shift from road to rail which would support national and local economic as well as environmental and transport policies. At full capacity the expectation is for 16 freight trains per day to arrive at the intermodal terminal. Rail freight is five times more efficient in terms of carbon dioxide than road freight on a tonne for tonne basis, meaning NG would make a direct and significant contribution towards national efforts to reduce carbon and other emissions. The Transport (and Air Quality) chapters of the ES refer to HGV mileage reductions in excess of 92 million miles per year, equivalent to 969 HGV loads per day removed from UK roads.

- 4.82 The WNJCS includes a range of policies of relevance to this broad agenda, including general policies regarding sustainability and energy efficiency (such as Policy S11 and Policy S10, also referred to above). In advocating energy efficiency and reducing carbon emissions Policy S11 *Low carbon and renewable energy* includes a requirement for new development to deliver at least BREEAM 'very good' levels of energy and resource efficiency. The NG proposals would deliver this standard of efficiency, further helping reduce carbon emissions associated with energy use.
- 4.83 With the rail terminal proposed for early delivery (pre-occupation of any buildings) at Northampton Gateway, the Proposed Development will begin realising carbon emissions benefits from the outset, and accords fully with the NPS requirements.

#### **Biodiversity and ecological conservation**

- 4.84 Both the NPPF and NPS put an emphasis on the importance of minimising harm to designated ecological sites or features. They also both emphasise the importance of mitigation and compensation to address harm to existing natural assets or to replace lost habitats. Neither the main SRFI site nor the Roade Bypass site contains any designated ecological or biodiversity sites or features. There are locally identified, non-statutory Local Wildlife Sites within 1km of both parts of the Proposed Development, and some 'potential Local Wildlife Sites' adjacent to the proposals, including the existing woodland of 'Highgate' within the Main Site and one relating to the Roade Cutting within part of the bypass site.
- 4.85 The ES provides a thorough assessment of the likely impacts on Ecological features and assets, and concludes that a net gain in biodiversity will be provided. The assessment includes consideration of any relationship with, or potential effects on, the Upper Nene Valley Special Protection Area remote from the site to the north. A series of annual winter bird surveys was undertaken and the evidence is clear that the site is irregularly used, and does not play a significant or important role as supporting habitat to the SPA.
- 4.86 The majority of the SRFI site is of low intrinsic ecological interest or value as a largely arable agricultural habitat. However, the NG proposals seek to retain key landscape and habitat features where possible, including the mature woodland areas of Highgate, and Churchills, on the Main Site. Some removal of trees from Churchills is proposed (around 16% of the current area of that woodland), but there are substantial areas of new tree and other planting proposed across the site which more than replaces that proposed to be lost.
- 4.87 The proposals which accompany the SRFI development will offer some significant environmental opportunities and benefits, including conserved and new landscape and habitat areas extending to including over 29 ha. of new woodland plus over 10 ha. of conserved woodland and tree groups, 13,000 linear meters of new hedgerows are proposed across the Proposed Development. Biodiversity will be enhanced through the provision of new planting, improved connectivity between existing woodland and other features, and provision of new water features.
- 4.88 This approach accords with the requirements of WNJCS policies BN1 *Green Infrastructure*, BN2 *Biodiversity*, and BN3 *Woodland Enhancement and Creation*.



- 4.89 Habitat connectivity will be provided as a result of the additional hedgerows planting (more than compensating for those lost to construction) and other planting within the Main Site and Bypass corridors. Through a clear enhancement to biodiversity overall the proposals accord with the requirements of the NPS.

#### **Waste Management**

- 4.90 The ES includes a chapter on Waste issues, setting out how the proposals would manage waste arisings from the Proposed Development, with regard to construction as well as operational phases. The focus of the assessment includes the 'waste hierarchy', with emphasis on the recovery, recycling, and disposal of waste, and the waste issues and implications of the proposals have been considered in the context of the local context and capacity for treating or disposing of waste which can't be recycled.
- 4.91 Calculations have been undertaken of the likely volume of waste from the (limited) demolition activity required as part of the site preparation process, as well as the likely waste from the construction process, with assumptions made about the likely level of recyclable material as opposed to other forms of waste.
- 4.92 The proposals are informed by an approach which seeks to minimise waste, and re-use as much material on-site as possible. Using data from the County level Minerals and Waste monitoring, the assessment considers capacity at, and access to, existing waste disposal facilities. The conclusions from the waste assessment are negligible, and will not cause any significant impacts during the construction or operational phase.
- 4.93 The Framework Waste Strategy set out in the ES (Appendix 14.2) provides a framework for further, detailed operational waste management plans by occupiers in due course, and the detailed design of the proposals will ensure suitable waste storage, separation, and collection areas are included to enable waste to be minimised and recycling to be maximised. The Construction Environmental Management Plan (ES Appendix 2.1) includes measures regarding construction waste, and requirements proposed in the DCO will ensure that waste management issues are carried forward into the operational phase of the development.
- 4.94 In summary, the proposals will therefore accord with best practice with regard to waste, and accord with the requirements of the NPS.

#### **Dust, odour, artificial light, smoke and steam**

- 4.95 This is a broad category of potential generic impact identified by the NPS, and relates to separate ES chapters regarding air quality, and lighting. Effects regarding odour, smoke and steam are not directly relevant to the Proposed Development.
- 4.96 The **air quality** impacts of the Proposed Development are referred to above. The ES includes an assessment of the (temporary) construction effects, including dust, and a range of best practice measures are proposed to help reduce the potential for dust effects. These measures include damping down any stockpiles of earth or soil, along with management of construction traffic (through routing and wheel-washing). In addition to the ES, these are set out along with a range of other environmental measures in the Construction Environmental Management Plan (CEMP – document reference 6.11). This includes standard operational measures and design features to reduce any risk of significant dust effects from the proposed aggregates terminal.
- 4.97 Air quality impacts are also of direct relevance in the context of the transport issues arising from the Proposed Development, dealt with under separate headings. The **lighting** assessment explains the key parameters and principles which will inform the detail of a lighting strategy to

ensure lighting effects are minimised. The ES concludes that as a result of the proposed strategy the proposals will result in largely negligible lighting effects, with some minor adverse effects associated with the Main Site. This is due to the strategy being based around use of directional lighting, using LEDs wherever possible, with lighting mounted as low as practicable, and positioned to avoid light spill onto adjacent green areas. The earthworks and landscaped bunding will also play a role in helping minimise or eliminate any direct lighting effects on surrounding receptors from the main site.

- 4.98 The most significant residual effects will be lighting presence effects for some properties closest to the Bypass, with a number of properties likely to experience moderate adverse lighting presence effects (i.e. being able to view lit elements in otherwise dark views). This is a visual effect, but not an intrusive effect, and is the result of change from the current relatively dark baseline conditions. No properties will experience intrusive or nuisance effects (such as glare or light spill) or loss of amenity. The lighting of the Bypass is required to meet standards associated with highway design, but the proposals include a range of mitigation measures including bunding, planting and screen fencing to reduce lighting and other potential visual effects.
- 4.99 In summary, issues of dust, odour, artificial light, smoke and steam have been considered in bringing the Proposed Development forward, and the relevant issues are addressed in the ES. Mitigation measures will ensure that environmental effects will be eliminated or minimised.

#### **Flood Risk**

- 4.100 While the NG proposals include a substantial area of the site within the proposed green infrastructure and landscaping, it will inevitably result in the loss of greenfield land. Issues associated with the impact this would have on local drainage and run-off regimes on-site and in surrounding areas are of direct relevance in the context of the likely impacts and implications of climate change. As required by the NPS these potential impacts have been assessed.
- 4.101 The proposed SRFI is in Flood Zone 1, the lowest category of flood-risk. The proposals include a comprehensive Drainage Strategy based on a Flood Risk Assessment and associated water resources assessment (ES Chapter 7). The drainage strategy includes the introduction of a Sustainable Drainage System (SuDS) which would include the provision of water storage and balancing areas to manage and control surface run-off at both the main site and the Bypass site.
- 4.102 The highways mitigation works are largely in the highway corridor, with negligible impacts on the existing highways drainage regime.
- 4.103 The technical work undertaken to inform the design of the drainage strategy shows that the development would provide betterment in terms of a reduction in the likelihood of local flooding down-stream, with particular benefits to communities downstream on the Wooton Brook (such as Collingtree). The strategy would also maintain a good standard of water quality and ensure no harmful effects on SSSIs and other ecological features downstream.
- 4.104 Therefore, the Proposed Development would contribute towards delivering sustainable development including in terms of managing and responding to the climate change agenda. It fully accords with national and local policies and best practice.

### Land instability

- 4.105 The ES includes an assessment of 'ground conditions' (Chapter 6 regarding soil, geology, soil and groundwater). This includes consideration of stability issues as required by the NPS while also considering issues associated with any contamination or other characteristics which may affect the suitability or viability of the site for development.
- 4.106 The ES concludes that there are no significant risks associated with any of these issues, including land stability.

### The historic environment

- 4.107 The NPS and NPPF both include reference to issues associated with the historic environment, and the two national policy documents share much of the same policy wording. The emphasis is on assessing the significance of any assets, and the likely impacts of new development on those heritage assets or features as part of the development process (including within EIA). There is a clear requirement to weigh any harm against the wider benefits associated with the proposed development, with greater relative weight given to any harm to the most significant assets.
- 4.108 At the local level WJCS Policy BN5 *Historic Environment and Landscape* offers similar guidance regarding the need to assess and consider the importance of any assets.
- 4.109 The likely significant environmental impacts of the Proposed Development on cultural heritage (archaeology and built heritage) have been assessed. This includes consideration of the potential for impacts on built heritage assets including Conservation Areas and Listed Buildings in the nearest villages and elsewhere in the vicinity of the proposals, the Courteenhall Registered Parks and Gardens, as well as on any archaeological assets or features.
- 4.110 Baseline assessments (desk-based, and a range of on-site surveys) show that the Proposed Development site does not include any designated built heritage assets. The likely impact on nearby assets (conservation areas, listed buildings and scheduled ancient monuments) has been considered to range from negligible to minor adverse during the construction phase, with the loss of the demolished buildings on-site generating a minor-moderate adverse effect. The operational phase would see nothing worse than a minor adverse effect on the closest assets.
- 4.111 Minor positive effects are likely on the Roade Conservation Area as a consequence of reduced through-traffic as a result of the Bypass.
- 4.112 Highways mitigation works will avoid sensitive receptors, with the detailed design and construction to ensure that any assets close to mitigation works – such as the Courteenhall War Memorial adjacent to the A508 – are treated sensitively to minimise any change to their setting.
- 4.113 While the results of the various desk-based and on-site assessments and surveys to date have identified some areas of potential interest, there is no evidence that the site is of particular significance or importance from an archaeological or historic perspective, nor that any features would preclude development. This conclusion has been supported by a targeted programme of trial trenching on the Main Site and the Bypass Site. In order to mitigate the permanent direct environmental effects of construction on the buried archaeological remains the applicant will carry out a further stage of archaeological trial trench evaluation across the Main Site and Bypass Corridor (beyond that which has been undertaken in the baseline). These post-consent archaeological works would be undertaken in advance of construction in accordance with NPS policy, and under Written Schemes of Investigation (WSI) which conform to recognised standards and guidance in consultation with and to be approved by the Local Planning Authority's archaeological advisor.

## Landscape and visual impacts, open space and green infrastructure

- 4.114 The approach to the landscaping strategy and design of the scheme has evolved through an iterative technical and evaluation process. This was informed by an understanding of the constraints and opportunities presented by the site and surrounding area, and by the input and suggestions of local partners and communities. The scale and form of the proposals has emerged with attention to the surrounding context, but also to the functional role and purpose of the proposed uses and infrastructure proposed. The position of the built development in the context of the wider site, and the proposed landscaping and bunding has been informed by an awareness of the relationship with existing communities nearby, and through a desire to maximise the opportunities offered by the topography of the site to help minimise any visual and other impacts.
- 4.115 The NPS explicitly recognises (paragraph 3.4) that by virtue of the functions and uses they accommodate, and the role they perform as part of strategic distribution and logistics networks, SRFI necessarily require large sites. It follows that the Northampton Gateway proposals are for large-scale buildings and infrastructure which could have a range of potential effects on the local landscape and visual context.
- 4.116 The landscape and visual assessment confirms that while the scheme will inevitably have an impact on the landscape, the proposed strategy is successful in substantially screening views of the proposed buildings and terminal from outside view.
- 4.117 Although the surrounding area already features existing major transport and development infrastructure which has an urbanising influence on the Main Site, the proposals would have residual effects on what is currently an almost entirely greenfield site (with the exception of the highways mitigation measures which are focused on existing highway land).
- 4.118 The Proposed Development site is currently mostly under arable agriculture and parts of the site are of good soil quality (grades 2 and 3a). The proposals would clearly result in change to the landscape and character of the Main Site and bypass corridor, and while largely screened from outside view, the proposals would result in some residual adverse landscape and visual effects on the nearest receptors.
- 4.119 In these regards the proposal would have adverse environmental effects.
- 4.120 However, overall the ES shows that, with mitigation, the Proposed Development has mostly minor effects on the vast majority of receptors. The landscaping and earthworks strategies seek to maximise the opportunities offered by the existing landform and landscape features which already provide a sense of containment to the Main Site. Existing mature woodland features (Highgate and Churchills) are retained which further helps to screen and contain the Main Site and limit the extent of landscape change.
- 4.121 The extent and scale of the visual effects will be greatly reduced by the proposed approach to the development, with significant earthworks mounding (bunding) and landscaping around the Main Site perimeter. Early implementation of this earthworks bunding also helps to mitigate the effects of the construction process, as well as the operational site in due course.
- 4.122 Residual effects are assessed in the ES as likely to be moderate adverse on the site landscape over the longer-term at both the Main Site and Bypass, A similar scale of effects is likely to users of local rights of way as a result of the changes which would result from the Proposed Development. The likely effects on road-users has also been considered typically minor adverse.
- 4.123 Although few properties will have direct or close views of large parts of the proposed built development, a range of minor and moderate visual effects are likely. The bypass will result in a small number of properties experiencing moderate to major visual effects with views of the planting, bunding, and fencing associated with the road, although the road and vehicles are largely screened from view.

- 4.124 In all cases, the landscape and visual effects will reduce overtime as the proposed planting and habitat creation matures, and will help the new landscaped features assimilate into the local and wider context.
- 4.125 As referred to above, through new planting and habitat creation, the proposals will enhance biodiversity, providing a greater range and mix of habitats on-site than the current baseline. The green infrastructure and accessible spaces provided on-site will also be of benefit to the local community, including employees at the site, who will be able to make use of the new walking and cycling routes to and within the site. Existing rights of way will be diverted and incorporated into the Proposed Development, with new links created. This includes a retained bridleway link via an underpass beneath the Roade Bypass to retain existing walking, cycling and equestrian access to the routes beyond to the west.
- 4.126 Local policies of direct relevance to delivering this objective include Policy S10 *Sustainable Development Principles* which is also of relevance to wider environmental, climate change, and energy efficiency issues and objectives (described under other NPS headings).
- 4.127 In taking a comprehensive approach to landscape and associated issues described above the proposals fully meet the requirements of the NPS, both in the context of minimising environmental effects, but also seeking to maximise opportunities for high-quality design and human health outcomes. Also see the comments below with regard to ‘design’.

#### **Noise and vibration**

- 4.128 Consideration of the potential for noise effects has in part informed the design approach with regards to the placement of key infrastructure and on-site operational features. The noise assessment undertaken as part of the Environmental Statement has assessed the likelihood of noise effects from both construction and operational phases. This considers the potential noise effects of road traffic, rail traffic, and the operation of the Proposed Development. In line with the NPS, the application details seek not only to prevent or mitigate any significant noise effects, but also respond to any likely ‘other adverse effects’. The assessment considers the change from the existing levels, referring to the likely absolute noise levels as well as the relative change.
- 4.129 Construction noise effects are temporary, but can be significant, and these have been assessed. Through the use of best and most practical means construction noise and vibration will be minimised to below the lowest observable levels for the majority of receptors. However, those closest locations or addresses may experience some temporary periods of noise disruption when construction activity is at its closest. Even these effects will be below the Significant Observed adverse levels as a result of mitigation measures proposed such as temporary screening of construction works where required.
- 4.130 For most locations close to the site, no significant noise or vibration effects are expected from the potential change to railway use as a result of the Proposed Development. The only potential issues relate to a small number of addresses, and are forecast in the very long term (2043) around which there remains some uncertainty given the likelihood for generally quieter rolling-stock.
- 4.131 Significant adverse road traffic noise impacts are limited to just two receptors (five properties) located close to the A508 road where noise levels may give rise to an entitlement to noise insulation. All other noise effects from road noise are considered largely negligible, with some minor adverse, but all below significant levels.
- 4.132 The Roade bypass will create a range of beneficial and adverse effects, with notable benefits to residents through the centre of the village. No significant adverse effects are likely at any locations, and while there will be change around the western edge compared to the very low baseline noise levels, all residual noise effects remaining below the significant observable adverse levels.

However, in accordance with the need to seek to address all adverse effects, additional mitigation in the form of acoustic fencing is proposed on the Bypass route to further reduce the likely residual noise effects.

- 4.133 The mounding and bunding proposed at the main site, and the buildings proposed, will provide some benefit in terms of mitigating operational noise effects, and no significant residual noise effects from the operational stage are identified. This conclusion is based on worst-case assumptions, with no screening benefits assumed from the presence of containers and other features on site once operational.
- 4.134 Therefore, the Proposed Development fully accords with the NPS in terms of the design and mitigation measures taken to not only minimise any likely significant noise effects, but also measures taken to help also address and minimise other likely or potential adverse effects.

#### **Impacts on transport networks**

- 4.135 The NPS (and NPPF) makes explicit reference to the importance of encouraging transport by a range of modes of travel. The NG proposals directly respond to the NPPF reference to the need to plan for *“infrastructure necessary to support sustainable development, including large scale facilities such as rail freight interchanges”* (paragraph 31). One of the generic impacts identified in the NPS is that of carbon emissions as part of national efforts to reduce greenhouse gases – this is referred to above regarding carbon emission and climate change issues.
- 4.136 The Proposed Development would deliver significant improvements to the strategic and local highways networks, including through removing HGV mileage from the strategic highway network overall as rail freight use increases. As shown in the ‘Transportation’ chapter of the ES, and the associated Transport Assessment, the proposals would reduce congestion and improve reliability for local road-users, creating additional capacity which also removes challenges in the context of delivering the housing and economic growth committed in the WNJCS. By preparing a Transport Assessment and Travel Plan the proposals accord with requirements of both the NPS and NPPF, and ensure that the impacts on transport networks are fully considered.
- 4.137 The Rail Reports (Documents 6.7) consider rail capacity and connectivity issues. These confirm that NG would not have significant adverse effects as a result of the proposed mitigation measures, and would deliver a range of transport benefits.
- 4.138 In addition to highways infrastructure measures the Proposed Development includes other transport measures including improved public transport, walking and cycling connectivity between the site and surrounding areas. This package of measures would improve the ease of movement by local people in the vicinity of the SRFI site. This complies with a number of local objectives and policies of the WNJCS which includes a strategic objective regarding ‘Connections’ with reference to reducing congestion, encouraging modal shift, and growing the local economy.
- 4.139 The Sustainable Transport Strategy, and Framework Travel Plan (ES Chapter 12), include enhancements to existing bus services, and additional stops on other services, to ensure that the site is accessible by a range of non-car modes. The SRFI site includes a
- 4.140 The transport elements of the proposals accord with local WNJCS policies relating to travel behavior and modal shift (Policy C1), assessing and mitigating transport impacts and encouraging modal shift (Policy C2), and improving connections between urban areas (Policy C4). Policy C3 seeks to *“retain and enhance West Northamptonshire’s strategic connections for economic advantage”* with reference to a range of strategic road and rail issues. This includes support for additional rail services for passengers and freight to help relieve road congestion, something of direct relevance to the NG proposals.

- 4.141 The proposals also include the provision of new footpath and cycling links to the SRFI site, but also between the various communities which surround it, including a new footway alongside the A508 from the site to Roade. Existing footpath routes will be diverted but retained within the Main Site and Bypass corridor, with additional links provided.
- 4.142 The Roade Bypass will generate improvements in traffic conditions through the village, supporting and enabling more local journeys by a range of modes by reducing overall congestion, and removing HGV through-traffic from the centre of the village. The package of local highways mitigation works (focused on the A508 corridor) will address several problematic junctions and should make access and movement easier, and safer, for a number of local communities.
- 4.143 This enhanced network of more reliable and user-friendly transport and access options would provide new social and cultural opportunities as well as economic benefits. The outcomes of these elements of the proposals are also of direct relevance to national policies relating to the promotion of human health.

#### **Good Design**

- 4.144 The NPS and NPPF both make reference to the importance of delivering ‘good design’.
- 4.145 A Design and Access Statement has been prepared and submitted as part of the DCO application. This, along with landscaping strategy details submitted, explains the approach to the layout, landscaping of and access to the site and sets out a framework for the future detailed design of the scheme. The submitted information shows how NG will provide a range of development plots and buildings in a high quality landscaped environment on a purpose-built, rail-served site. The Proposed Development would deliver the infrastructure required to create an environment attractive to business, and which would encourage growth and investment. The site would provide large plateaus capable of accommodating large buildings which occupiers are increasingly demanding, although the site could also provide a flexible choice of plot and building sizes in response to a range of specific business needs and demands. This conforms with national and local policy which requires flexibility, and responsiveness to market signals and requirements. The NPS recognises (at paragraph 4.18) that it may not be possible to settle and define all of the precise detail at the time of application.
- 4.146 The WNJCS includes a specific objective regarding design (Objective 15). Local policies of direct relevance to delivering this objective include Policy S10 Sustainable Development Principles.
- 4.147 The approach to the design of the scheme has evolved through an iterative technical and evaluation process, informed by an understanding of the constraints and opportunities presented by the site and surrounding area, and by the input and suggestions of local partners and communities. The scale and form of the proposals has emerged with attention to the context of the site and surroundings, but also to the functional role and purpose of the proposed uses and infrastructure proposed.
- 4.148 The position of the built development in the context of the wider site, and the proposed landscaping and bunding has been informed by an awareness of the relationship with existing communities nearby, and through a desire to maximise the opportunities offered by the topography of the site to help minimise any visual and other impacts. The landscape and visual assessment confirms that while the scheme will inevitably have an impact on the landscape, the strategy is successful in substantially screening views of the proposed buildings and terminal from outside view.
- 4.149 Although the detail of building design – appearance, layout, etc – will form part of future details to be approved by the Local Authority in accordance with defined Parameters, the approach taken provides a clear framework for the delivery of an appropriate and high-quality design to the finished site. This includes a Sustainability Strategy (Appendix 2.2 to the ES) to provide

a framework for the inclusion of energy efficiency and other measures into the buildings. The applicant has committed to deliver to BREEAM ‘very good’ standard, further adding to the low carbon credentials of the proposals.

- 4.150 Notwithstanding the scale and nature of the Proposed Development, the approach to design is entirely consistent with the NPS. It is responsive to the local landform and topography, and being sensitive to existing local features such as the retained woodlands on the Main Site. The site has been selected in part due to the naturally beneficial landform which enables the buildings to be sunk behind an area of higher ground which is increased in height through the proposed earthworks strategy. The residual design outcomes are therefore environmentally sensitive with regard to the visual impacts on nearby communities and other users of the road and right of way network, with access to the site via range of modes of travel (including on foot) encouraged and improved.

#### **Overall Planning ‘Balance’**

- 4.151 The NPS is the main document with regard to decision-making for NSIP proposals. Paragraph 4.3 of the NPS refers to the need for consideration of proposals to include having regard to:
- *its potential benefits, including the facilitation of economic development, including job creation, housing and environmental improvement, and any long-term or wider benefits;*
  - *its potential adverse impacts, including any longer-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.*
- 4.152 The above section provides an overview of how the proposals compare with the requirements of the NPS. Appendix 1 gives a detailed explanation of how the proposals accord with the NPS.
- 4.153 The NPS is clear that in delivering strategic, nationally significant infrastructure there will be some local effects, but requires applications to mitigate and minimise those impacts.
- 4.154 The NG site and location comply fully with the National Policy Statement which identifies the preferred locations for Strategic Rail Freight Interchanges as being those which:
- *have good connectivity both with the road and rail network, in particular the strategic rail freight network (para 2.49);*
  - *are near the business markets they will serve – major urban centres, or groups of centres – and are linked to key supply chain routes (para 2.51);*
  - *are located alongside the major rail routes, close to major trunk roads as well as near to the conurbations that consume the goods (para 2.41).*
- 4.155 It is clear from the scope and findings of the ES, and the content of the submitted application, that due regard has been had to the diverse range of ‘natural environment’ considerations and issues identified by national and local policy. A wide range of mitigation and design measures are proposed to ensure any adverse effects are minimised.
- 4.156 The assessment contained in this Statement, and the findings from the ES and other evidence submitted as part of the proposals, confirm that there are a range of benefits with regard to meeting the strategic, national need for more SRFI capacity, and delivering significant national and local economic benefits. In addition to employment creation, the economic benefits include transport improvements to journey reliability and congestion, and the likelihood of enabling more sustainable patterns of travel to work. The improvements to Junction 15 of the M1 and the provision of a Roade Bypass would have wider benefits in terms of the highways network, with local improvements which will also improve local journeys.
- 4.157 As a Rail Freight Interchange, the scheme would deliver wider benefits in terms of objectives to reduce carbon dioxide emissions from transport, and to enable the shift of freight from road to rail.



- 4.158 There is a clear, positive sub-regional and economic context for the NG proposals, with logistics and distribution identified as a priority (or ‘showcase’) sector by the LEP, and the importance of the sector, and of delivering continued economic growth, recognised by the Core Strategy.
- 4.159 The Proposed Development would deliver a range of beneficial environmental impacts. This includes not only economic development objectives, but also environmental benefits related to reductions in local flood-risk, a reduction in noise compared to existing levels for many receptors, and some improvements to air pollution overall for many communities in the vicinity of the site . The approach taken, informed in part by the ES process, accords strongly with a wide range of local and national planning policies relating to design, natural environment, and climate change.
- 4.160 The iterative approach which has characterised the evolution of the development has ensured that the characteristics and capacity of the site and surrounding land has informed the proposals. As shown, the proposals can be seen as meeting the requirement to deliver economic, environmental and social benefits, and with reference to the conclusions of the ES, these benefits outweigh any likely residual adverse effects or outcomes. In keeping with the NPS approach, while there are some local residual effects and impacts, these have been assessed and presented through the ES, and minimised through mitigation and design measures.
- 4.161 The proposals will result in the loss of a greenfield site currently in agricultural use, and containing some high quality soil, but the site is not in the Green Belt, does not have or contain any statutory landscape, ecological, or heritage designations, and is in the area of lowest flood risk. The site is shown to be relatively limited in ecological terms, and those habitats lost can be mitigated and more than compensated through new and additional provision on-site. The site is well contained by a number of existing physical features, both natural landscape and topography, and man-made, and is influenced by the urban area of Northampton to its east. The scheme is underpinned by a strong landscape strategy which builds on this existing context, with development plots surrounded by landscaped bunds, which will both help screen and visually contain the site.
- 4.162 Therefore, on balance, the Proposed Development clearly represents sustainable development as described and defined by the NPS and NPPF, and as represented in local planning policies. In accordance with the NPS, there is a clear balance in favour of the potential benefits of the proposals, with residual adverse effects limited in number and minimised in scale and significance.
- 4.163 The NPS (at paragraph 4.2) contains a presumption in favour of granting development consent for national network NSIPs that fall within the need for infrastructure established in this NPS.

### **Alternatives**

- 4.164 The EIA Regulations require applicants to provide an outline of the main alternatives studied by the applicant and an indication of the main reasons for the chosen proposal, taking into account the environmental effects. The National Policy Statement for National Networks (NPS) confirms that applicants should comply with these requirements and any other policy requirements in respect of the assessment of alternatives (NPS paragraph 4.26). The NPS also states that all projects should be subject to options appraisal with the appraisal considering “viable modal alternatives” and other options in light of paragraphs 3.23 to 3.27 of the NPS<sup>3</sup>. Those paragraphs, refer to “Road tolling and charging”, and are not relevant to this proposal.
- 4.165 Chapter 2 of the ES includes detailed consideration of reasonable alternatives, with regard to the consideration of alternative locations for the development, where this is feasible, and alternative design and mitigation approaches. This could include alternative approaches to construction activities. The assessments of alternative locations have been limited to the SRFI element of the proposals and does not consider the highway works which are a consequence of the SRFI. The key points from the assessment contained in Chapter 2 is set out below.

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<sup>3</sup> Paragraph 4.27

## Alternative Masterplanning

- 4.166 Alternative design approaches have been considered through the iterative process of site assembly, masterplanning, assessment and consultation with the public and other consultees. The starting point has been the national requirements for SRFIs, however as an iterative process the design of the proposed scheme has undergone many changes as part of a rigorous approach to its design development. This has been underpinned by the environmental assessment process, which has been used to both inform and test the proposals.
- 4.167 The Design and Access Statement (DAS) also explains the evolution of the proposals, including reference to key reasons for the preferred, proposed approach to site design and layout. The proposal are intended to balance the functional needs and requirements of large scale logistics and freight distribution, to create a high quality, attractive development, while also seeking to minimise local environmental effects.
- 4.168 As set out above in earlier sections of this Statement, a key driver of the preferred approach has been to achieve good design through siting and design measures related to the existing landscape character, function and surrounding land form. The evolution of the proposals is intrinsically linked to the work to understand the landscape and visual effects of the proposal.
- 4.169 Various options were also considered regarding the size and location of the proposed warehousing 'zone' within the site to find the most efficient and appropriate disposition of uses within the site. This included consideration of various options of how to configure the rail terminal and associated infrastructure, including the head-shunt and sidings, etc. As shown in the DAS, the key components of the design of the Proposed Development evolved, with an early decision to ensure that as many buildings as possible had the potential to be directly rail connected. This approach has regard to the concerns raised by the Examining Authority in its report to the Secretary of State following the Examination into the East Midlands Gateway DCO application in 2015/16.
- 4.170 Overall, the option taken forward for the Proposed Development balances a range of environmental and operational considerations based on the constraints and opportunities presented by the site. The site access and design proposals reflect the need to ensure that the development minimises the environmental impacts, and maximises the potential for design and/or mitigation measures to be successful in delivering reductions in any adverse impacts and maximise any benefits from the proposals.
- 4.171 Details of various options and alternatives are provided in the DAS, but having considered a number of alternative approaches to site design and layout, and in light of the range of assessments undertaken to prepare the ES – and public consultation responses - the Proposed Development as submitted best achieves this balance. The following issues are seen as key to the identification of the final optimal scheme as submitted:
- It ensures no more land is taken out of agricultural use than is required, but contains sufficient land to ensure a range of new habitats and a net gain in biodiversity are provided.
  - The site and layout ensures that surface water associated with the development can be accommodated, stored and managed. This will deliver some betterment to communities downstream of the main SRFI site which currently experience some flood-risks from the Wooton Brook.
  - The development site includes the land required to accommodate earthworks and landscaping which appropriately screen the rail terminal and buildings, as well as landscaping and drainage features associated with the Roade Bypass and other road infrastructure. The proposed changes to the ground levels on site and the height of the proposed landscaped bunds will minimise the visual effects on nearby receptors, with many locations having views of the proposed buildings and terminal eliminated altogether.

- The proposals also include the land required to ensure suitable mitigation for the likely highways impacts, with improvements to Junction 15 and 15A which will deliver wider benefits to users of the surrounding network.

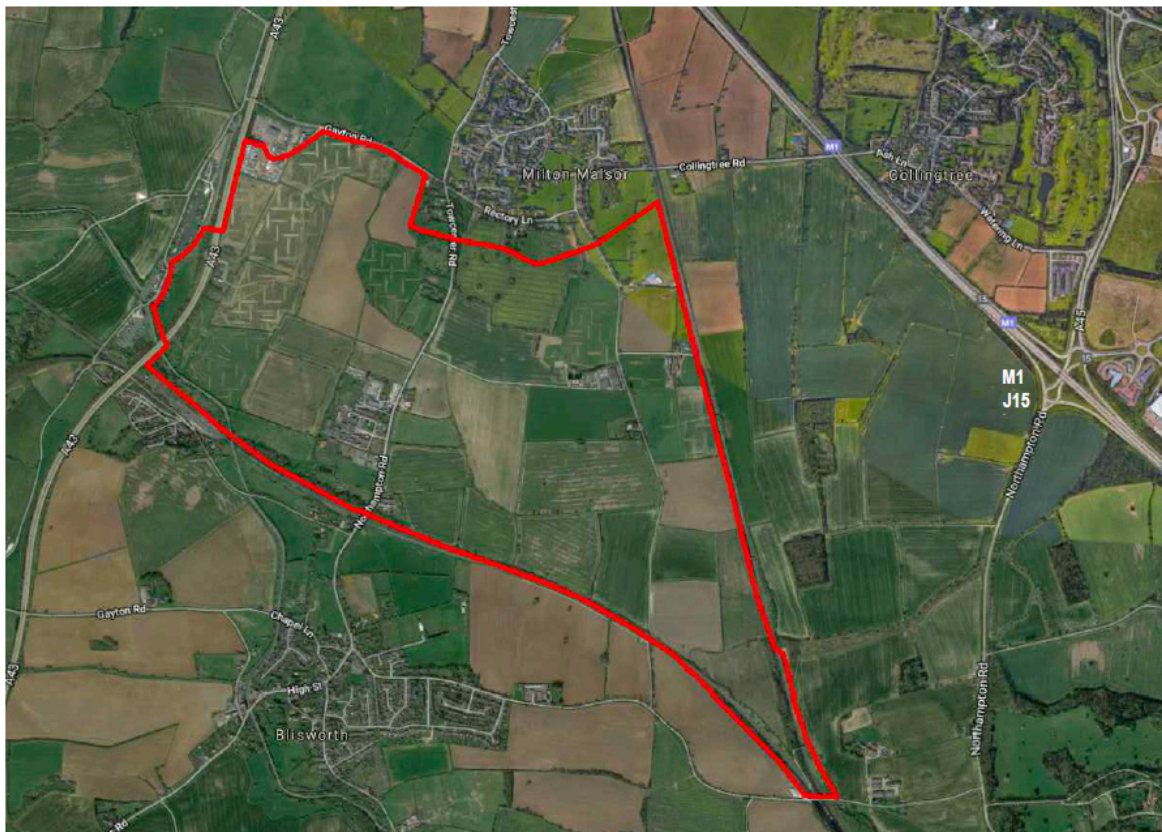
#### **Alternative Locations for the SRFI**

- 4.172 Consideration and, where appropriate, a comparative analysis of alternatives has been prepared in anticipation that the decision maker might find it helpful to have information on the applicant's view of potential alternative SRFI sites.
- 4.173 The starting point for the consideration of alternatives was the identification of the market area that it is anticipated will be served by this proposal. The Market Analysis Report (Documents 6..8) contains an explanation of the research undertaken to inform an understanding of this market area (see in particular Sections 7 and 8). The Market Analysis Report explains that the core catchment area of this strategic rail freight interchange is likely to be around 15km, with a secondary catchment area of around 50 km. It concludes that Northampton and locations to its south are not well served by existing SRFI's and development of an SRFI in this location would meet the needs of existing and future logistics businesses in the area and help to expand, the existing network of SRFI's in the Midlands southwards. In this regard locations which, due to distance, could not specifically serve this market area have not been considered in this analysis.
- 4.174 The only sites within the area of search identified are:
- A site close to Junction 13 of the M1
  - The site being proposed for SRFI development on land between Blisworth and Milton Malsor referred to as 'Rail Central'.

## Site at Junction 13



## Alternative Site: Rail Central



### **Site at Junction 13**

- 4.175 The site close to Junction 13 of the M1 was marketed on behalf of the landowners as a potential rail-served development site in 2015 and was actively considered by Roxhill at that time. The site is potentially large enough to accommodate an SRFI, but there are considered to be several major differences which set the selected site at Junction 15 apart from this alternative.
- 4.176 Key issues and factors which informed the applicant's view that this was not a preferable or suitable alternative include:
- Preferences by the landowners to retain some parcel of their land-ownership for residential or mixed-use development which represented uncertainty over the ability to mitigate likely impact on existing or new residents. Furthermore and importantly in terms of availability, the site is now being promoted and bought forward as residential led mixed-use development site.
  - Challenging and potentially significant visual impacts on the nearby settlement of Aspley Guise and Woburn Sands exacerbated by the existing topography which would make the site very hard to screen adequately;
  - Located two junctions further south on the M1 the site is considered less well located to meet the markets identified in the Market Analysis Report.
- 4.177 As a result of the above, no full comparative assessment has been undertaken. The site is not considered as a reasonable alternative because it is not available and less suitable in terms of environmental impact. In addition it will not meet the market area identified. It is therefore not treated as a potential alternative to the Proposed Development site.

### **Rail Central Site**

- 4.178 The 'Rail Central' site, would address a very similar market to Northampton Gateway. A DCO application for a Strategic Rail Freight Interchange is currently under preparation for this site. The examination of Rail Central as an alternative location has been informed by the documentation produced as part of the recent Rail Central Stage 2 statutory consultation. That documentation includes the draft document entitled "*Alternative Site Assessment*" which assessed many sites. Apart from the Northampton Gateway scheme none of the other sites is considered relevant to the area of search we have identified. Further, we note that of the sites they consider, Rail Central discarded the other sites because none were comparable, in terms of suitability, to Rail Central.
- 4.179 A comparative analysis of the Rail Central proposals compared to Northampton Gateway has been undertaken having regard to the information available about the Rail Central Scheme at the time of writing. This comparative assessment is presented at Appendix 4 of this Statement. The same comparative assessment is also found at Appendix 2.4 of the Environmental Statement.
- 4.180 Unsurprisingly, given the proximity of the Rail Central site and the Northampton Gateway site, the sites share many of the same characteristics in relation to high level considerations such as proximity to markets, and access to the strategic rail network. Both sites have the potential to meet the physical and functional requirements for SRFI's as set out in the NPS (assuming that the delivery of key infrastructure on the Rail Central Scheme will be delivered at an appropriately early stage in the development process). However, there are some fundamental differences between the two sites, which bring us to the conclusion that Rail Central is materially inferior and is not a preferable site to Northampton Gateway.
- 4.181 It is considered that there is no material difference between the two locations in terms of access to the Strategic Rail Network. Both sites have the ability to provide access to Northampton Loop Line in both directions together with an operational intermodal terminal as part of a strategic Rail Freight Interchange.

- 4.182 In relation to access to the strategic road network, Northampton Gateway provides access to the M1 via the A508. The M1 is one of the main motorways for strategic freight distribution in the UK and it is predicted that approximately 85% of traffic from the Northampton Gateway site will travel from the site to Junction 15 of the M1. It is considered that Northampton Gateway has a superior access to the M1 than Rail Central. The Northampton Gateway site access is a little over 500m from M1 Junction 15 whereas the Rail Central site access is nearly 2km from Junction 15A of the M1. This is to some limited degree balanced by the Rail Central access onto the A43 which provides a link to the M40, which is around 20 miles to the south. Rail Central assumes, however that only 10% of their traffic will travel south along the A43, with 90% travelling north towards M1 J15A.
- 4.183 The NPS recognises that due to their operational requirements SRFI's may need to be located in the countryside. Northampton Gateway and Rail Central are both located in the countryside, where there will be loss of countryside. However Northampton Gateway has a particular context which means the impact of change would be significantly less than Rail Central. Furthermore, through scheme design and mitigation, the environmental effects of the Northampton Gateway scheme can be better mitigated.
- 4.184 As described elsewhere in this Statement, the Northampton Gateway Main Site lies immediately adjacent to the M1 and its J15 beyond which is the edge of Northampton. The Northampton Loop of the West Coast Main Line forms its western boundary, its eastern boundary is formed by the A508, and its northern boundary by Collingtree Road. The Northampton Gateway Main Site is contained within these physical features and existing topography and together with the urban area to the east these help to contain the site and provide an urban influence to the site and its character. The villages of Collingtree, Milton Malsor and Blisworth lie close by but are separated from the site by highway or rail infrastructure. Further, because of the existing topography of the area and the approach to scheme layout, significant landscaped bunds can be provided to minimise and to a large extent fully screen views of the development from these villages. These landscape and earthworks measures form a fundamental component of the Northampton Gateway scheme and are critical in ensuring that its environmental effect is acceptable and its impact on local communities minimised.
- 4.185 Rail Central is a larger site, extending between the A43 and the Northampton Loop line. Whilst these features together with the West Coast Main Line provide a degree of containment, the effect of the scheme on existing landscape, on the character of the area and surrounding villages, on views and on local communities, will be far greater and cannot be mitigated to the same degree.
- 4.186 The Rail Central scheme is not contained to its north, with no physical features separating it from Milton Malsor. To the south, whilst the West Coast Main Line separates the site from Blisworth, the local landform is such that views from the village to the scheme will be largely unhindered because Blisworth is at an elevated position. In addition, because the Rail Central site stretches from the A43 to the Northampton Loop Line it's built form is positioned in two distinctly separate areas on either side of Northampton Road/Towcester Road. This results in a degree of sprawl, further reducing the degree to which the site is contained.
- 4.187 As a result, in environmental terms, the Rail Central site would have a greater landscape and visual effect. The NPS makes clear, at paragraphs 4.29 and 4.34 in particular, that visual appearance is a key factor in considering the design of new infrastructure and that good design can be demonstrated in terms of siting and design measures relative to existing landscape and historical character and function, landscaping permeability, landform and vegetation. These are fundamental site location and scheme design factors which affect the suitability, quality and overall environmental acceptability of development proposals.

- 4.188 Because of the inherent characteristics of the Northampton Gateway site, providing greater opportunity for landscape and visual mitigation, it is a superior location and its development will have less environmental affects, than Rail Central.
- 4.189 In relation to other environmental matters, a comparative assessment has been undertaken having regard to the likely environmental effects of the two schemes currently being promoted and assuming these are the most appropriate schemes for each site. Although significant elements of the Rail Central environmental assessment work remain to be completed, the comparative assessment at Appendix 4 concludes that Rail Central is likely to have greater environmental effects on a number of matters. On some matters the degree to which Rail Central would result in greater environmental effects may only be relatively minor but on others the differences are greater. It is considered that the Rail Central site will have greater environmental effects on biodiversity, including veteran trees, on loss of best and most versatile agricultural land, and greater effects due to lighting.
- 4.190 In terms of transportation, whilst the highway mitigation proposed for Rail Central has not yet been modelled, the implications from the work presented through the statutory consultation process, is that the mitigation measures proposed would mitigate the effects of the proposed development but would not bring about any wider benefits. Northampton Gateway includes highway works that will result in significant benefits to the area, helping to address existing problems in terms of congestion and safety. These are key objectives of the NPS<sup>4</sup> and bring about significant environmental benefits. In this regard Northampton Gateway scheme as proposed is superior to Rail Central.
- 4.191 With regard to operational and technical aspects of the site, the two schemes, with reference to their locations, are broadly comparable overall. Final conclusions in relation to differences between the two schemes are not possible because the phasing of the Rail Central scheme and any commitments to the delivery of infrastructure is not known. Differences between the two schemes may therefore include the commitment at Northampton Gateway to early delivery of significant rail infrastructure. It includes an aggregates terminal to accommodate the relocation of GRS from the centre of Northampton, and over 60 % of its floorspace is capable of being directly rail connected, compared to a much lower percentage for the Rail Central scheme.
- 4.192 Having regard to the matters set out above and the findings summarised in Appendix 4 it is concluded that the development of the Rail Central site will have greater adverse environmental impacts than the development of the Northampton Gateway site and is an inferior location. It is not therefore a reasonable and preferable alternative.

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<sup>4</sup> See NPS paragraphs 2.15 and 2.16, and Annex A, as examples regarding congestion; and, Section 3 which includes a section relating to objectives regarding maintaining and improving safety..

## 5. CONCLUSIONS

- 5.1 This Planning Statement has provided an assessment of the planning policy context for the Northampton Gateway (NG) proposals. NG is a Nationally Significant Infrastructure Project, and will be assessed by the Planning Inspectorate, before ultimately being determined by the Secretary of State for Transport.
- 5.2 The preceding sections of this Statement, and the appended Compliance Statement, demonstrates that the NG proposal fully comply with the objectives of and requirements set out by national policy. The National Policy Statement for National Networks (the NPS) is explicit that there is a need for an expanded network of Strategic Rail Freight Interchanges, with an expectation that these will be provided in locations close to national road and rail networks, and close to markets and centres of population. NG clearly meets the criteria and requirements of the NPS.
- 5.3 The NPS identifies four strategic objectives (page 9) which underpin the need for improvements to National Networks, including the compelling need for an expanded network of SRFI's, these are to:
- Support national and local economic activity, facilitate growth and create jobs;
  - Support the delivery of environmental goals and the move to a low carbon economy;
  - Support and improve journey quality, reliability and safety;
  - Join up communities and link effectively to each other.
- 5.4 The Northampton Gateway SRFI will make a significant contribution to the delivery of these objectives, at a location and in a form that can appropriately minimise, and where necessary mitigate, impacts. In response to these objectives it will;
- Meet the needs of a growing and evolving logistics sector which is vital to the functioning of the national economy, bringing about major investment, creating jobs and facilitating the growth of the economy;
  - Add to and expand the network of SRFI's to meet the demands of business and encourage the continued growth in the use of rail freight – thereby contributing to the shift in the movement of goods from road to rail;
  - Through investment in road and rail the scheme will improve journey quality, reliability and safety. Without SRFI's logistics activity will be necessarily road based, the Northampton Gateway scheme will facilitate an increase in the use of rail freight and a reduction in HGV mileage on the national network. Furthermore the investment in new road infrastructure, particularly at J15 and the Roade Bypass will improve the capacity and safety of the road network at a local level;
  - The investment in road and rail infrastructure, together with improvements to pedestrian and cycle facilities and public transport provision will contribute to the objective to help communities link effectively to each other.
- 5.5 The NPS encourages development which would further the economic development and strength of the UK – SRFIs play a key role in delivering economic and environmentally beneficial outcomes through enabling a shift of freight from road to rail, reducing road congestion and emissions associated with road transport.
- 5.6 The Local Enterprise Partnership (SEMLEP) recognises the importance of the Logistics and Distribution sector to the local and sub-regional economy, and is actively seeking to support and encourage further investment and growth in the sector. Northampton forms part of the Cambridge to Oxford Arc, where significant growth is anticipated and being planned for. The NG site relates particularly well to this area of growth which is poorly served by the rail freight.



- 5.7 The NPS sets out a range of physical, functional and operational requirements with which SRFI should accord, together with a set of environmental measures against which proposals must be tested. The Northampton Gateway SRFI meets, and indeed in most cases, exceeds the requirement of the NPS for SRFI's.
- 5.8 The site is in the right location to address market requirements and expand the network of SRFI's so there is greater access to and opportunity for growth of, rail freight services. It provides excellent access to both the strategic road and rail network. The site is of the right size, capable of handling 775m trains, handling a minimum of 4 trains a day – with scope for significant expansion. It allows for large format warehousing to be provided to meet market needs, a significant proportion of which can be directly rail connected from day one. The rail and road infrastructure is significant with a commitment to delivery that can be secured through the imposition of suitable DCO Requirements. This includes delivery of the rail terminal, rail connections to building plots, the access to the site and A508 dualling together with the improvements to J15 of the M1, all prior to occupation of the first building.
- 5.9 The NPS recognises that, due to their operational requirements, SRFI's may need to be located in the countryside. Northampton Gateway is located in the countryside, where there will be loss of countryside. However the site has a particular context which means the impact of change would be less than in other countryside locations. Further, through scheme design and mitigation, the environmental effects of the scheme can be very successfully mitigated. The Main Site lies immediately adjacent to the M1 and its J15 beyond which is the edge of the Northampton urban area. The Northampton loop of the West Coast Main Line forms its western boundary, its eastern boundary is formed by the A508 and its northern boundary by Collingtree Road. The Main Site is contained within these physical features and together with the urban area to the east these provide an urban influence to the site and its character. The villages of Collingtree, Milton Malsor and Blisworth lie close by but are separated from the site by highway or rail infrastructure. Further, because of the topography of the area and the approach to scheme layout, significant landscaped bunds can be provided to minimise and to large extent fully screen views of the development from these villages. These landscape and earthworks measures form a fundamental component of the scheme and are critical in ensuring that its environmental effect is acceptable and its impact on local communities minimised.
- 5.10 The NPS includes policy content which identifies the importance of 'design' to nationally infrastructure schemes, with reference to a range of issues including, for example, how design helps minimise social and environmental impacts (NPS paragraph 3.2), and how it enables accessibility (NPS paragraph 3.17). The NPS also makes clear links between design and visual effects, stating "*visual appearance should be a key factor in considering the design of new infrastructure*" (NPS paragraph 4.29). Notwithstanding the reference to the nature of national infrastructure, particularly SRFIs, which potentially "*limits the extent to which it can contribute to the enhancement of the quality of the area*" (NPS paragraph 4.30), the NPS still requires promoters to seek functional but quality design and aesthetically sensitive outcomes. To this extent, the NPS is clear that design is a material consideration in decision making (NPS paragraph 4.31).
- 5.11 Of particular relevance to the approach taken to the design of the Northampton Gateway site, the NPS recognises that while there may be a limited number of practical options for national infrastructure schemes, there may be "*opportunities to demonstrate good design in terms of siting and design measures relative to existing landscape and historical character and function, landscape permeability, landform and vegetation*" (NPS, paragraph 4.34).
- 5.12 The NG proposals would deliver a range of benefits ranging from positive transport and air quality impacts at the strategic level associated with a shift from road to rail, to local improvements as a result of the significant and varied highways improvements proposed on the strategic and local road networks. The proposals will deliver additional capacity at Junction 15 (and 15A) of the M1, addressing long-standing and significant local congestion problems. The range of habitats created

would support and improve biodiversity across the site, with the existing key woodland habitats retained and incorporated within a green infrastructure network across the site. Off-site flood-risk in downstream areas will be reduced through the sustainable drainage system proposed. New foot and cycle links will be delivered, with diverted and extended public rights of way incorporated within the site with connections to the existing surrounding network. The proposed development is expected to create around 7400 jobs once fully operational and a significant contribution to the sub-regional economy of around £348m per annum (GVA).

- 5.13 Local adverse and harmful effects are minimised through the scheme design and mitigation measures, with landscape and visual change addressed through significant landscaped bunding to substantially screen the rail terminal and buildings. Lighting, noise and vibration effects from the main site will be minimised as a result of the disposition of uses and the screening bunds. Central parts of Roade will see substantial noise reductions (as well as air quality improvements) as a result of the bypass, with all villages seeing a reduction in 'rat-running' through-traffic in the future as a result of the proposed highways works.
- 5.14 Our overarching conclusion, set out in this Statement, are that the significant benefits of the proposal greatly outweigh the residual adverse impacts and that development consent should be granted in accordance with the presumption in favour of granting consent set out in the NPS.

## APPENDIX 1: Northampton Gateway: NPSNN Compliance Statement

Policy Content in NPSNN	Compliance with Policy
<p>Paragraph 1.2</p> <p><i>“The Secretary of State will use this NPS as the primary basis for making decisions on development consent applications for national networks nationally significant infrastructure projects in England.”</i></p> <p><b>The need for development of the national networks and Government's policy.</b></p> <p><i>“Government's vision and strategic objectives for the national networks</i></p> <p><i>The Government will deliver national networks that meet the country's longterm needs; supporting a prosperous and competitive economy and improving overall quality of life, as part of a wider transport system. This means:</i></p> <ul style="list-style-type: none"> <li>• <i>Networks with the capacity and connectivity and resilience to support national and local economic activity and facilitate growth and create jobs.</i></li> <li>• <i>Networks which support and improve journey quality, reliability and safety.</i></li> <li>• <i>Networks which support the delivery of environmental goals and the move to a low carbon economy.</i></li> <li>• <i>Networks which join up our communities and link effectively to each other”</i></li> </ul> <p><b>Paragraph 2.10:</b> <i>“The Government has therefore concluded that at a strategic level there is a compelling need for development of the national networks – both as individual networks and as an integrated system. The Examining Authority and the Secretary of State should therefore start their assessment of applications for infrastructure covered by this NPS on that basis.”</i></p> <p><b>Paragraph 2.45:</b> <i>“In addition, the nature of that commercial development is such that some degree of flexibility is needed when schemes are being developed, in order to allow the development to respond to market requirements as they arise.”</i></p> <p><b>Paragraph 2.48:</b> <i>“The development of additional capacity at Felixstowe North Terminal and the construction of London Gateway will lead to a significant increase in logistics operations. This will increase the need for SRFI development to reduce the dependence on road haulage to serve the major markets.”</i></p>	<p>Northampton Gateway will make a significant contribution to local economic activity. It will facilitate growth and create significant number of new jobs. The investment in infrastructure will, overall, result in major benefits to journey quality, reliability and safety. Northampton Gateway will facilitate the transfer of the movement of goods from road to rail, in doing so this will help to reduce carbon emission and contribute towards the move to low carbon economy. The Northampton Gateway scheme incorporates a range of measures to ensure that environmental effects are minimised and benefits arise wherever possible.</p> <p>The Northampton Gateway scheme has been designed to allow for appropriate flexibility to respond to market requirements as they arise.</p> <p>Roxhill agree with this conclusion.</p>

<p><b>Paragraph 2.50:</b> <i>“While the forecasts in themselves, do not provide sufficient granularity to allow site-specific need cases to be demonstrated, they confirm the need for an expanded network of large SRFIs across the regions to accommodate the long-term growth in rail freight. They also indicate that new rail freight interchanges, especially in areas poorly served by such facilities at present, are likely to attract substantial business, generally new to rail.”</i></p> <p><b>Paragraph 2.51:</b> <i>“The environmental advantages of rail freight have already been noted at paragraph 2.40 and 2.41 Nevertheless, for developments such as SRFIs, it is likely that there will be local impacts in terms of land use and increased road and rail movements, and it is important for the environmental impacts at these locations to be minimised.”</i></p> <p><b>Paragraph 2.52:</b> <i>“SRFIs can provide considerable benefits for the local economy. For example, because many of the on-site functions of major distribution operations are relatively labour-intensive this can create many new job opportunities and contribute to the enhancement of people’s skills and use of technology, with wider longer term benefits to the economy. The availability of a suitable workforce will therefore be an important consideration.”</i></p> <p><b>Paragraph 2.54:</b> <i>“To facilitate this modal transfer, a network of SRFIs is needed across the regions, to serve regional, sub-regional and cross-regional markets. In all cases it is essential that these have good connectivity with both the road and rail networks, in particular the strategic rail freight network.”</i></p> <p><b>Paragraph 2.56:</b> <i>“The Government has concluded that there is a compelling need for an expanded network of SRFIs. It is important that SRFIs are located near the business markets they will serve – major urban centres, or groups of centres – and are linked to key supply chain routes. Given the locational requirements and the need for effective connections for both rail and road, the number of locations suitable for SRFIs will be limited, which will restrict the scope for developers to identify viable alternative sites.”</i></p>	<p>Roxhill believe that there is strong market need for new SRFI’s, particularly in locations where there is an existing concentration of large scale logistic space and where demand from the logistics industry is strong. See Market Report.</p> <p>The Environmental Statement sets out the conclusion of the assessment of the impact of the scheme and demonstrates how local impacts have been minimised through scheme design and mitigation measures.</p> <p>The socio- economic chapter of the Environmental Statement sets out the conclusion of the analysis of labour supply and travel to work patterns. It concludes that there is availability of a suitable workforce, a high proportion of which will be able to access the site through suitable transport means. The availability of a suitable workforce is a key commercial attribute of the Northampton Gateway site.</p> <p>The Northampton Gateway site will provide exceptional access to the strategic rail freight network and to the strategic road network.</p> <p>The Market Analysis Report explains the market for a strategic Rail Freight interchange at Northampton, including the market for the intermodal terminal. It concludes that the site is well placed to meet the market it is intended to serve and will help to expand the network of SRFI’s in the Midlands southwards.</p>
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<p><b>3. Wider Government policy on the national networks</b></p>	
<p><b>Paragraph 3.3:</b> <i>“In delivering new schemes, the Government expects applicants to avoid and mitigate environmental and social impacts in line with the principles set out in the NPPF and the Government’s planning guidance. Applicants should also provide evidence that they have considered reasonable opportunities to deliver environmental and social benefits as part of schemes.”</i></p> <p><b>Paragraph 3.17:</b> <i>“The Government expects applicants to use reasonable endeavours to address the needs of cyclists and pedestrians in the design of new schemes. The Government also expects applicants to identify opportunities to invest in infrastructure in locations where the national road network severs communities and acts as a barrier to cycling and walking, by correcting historic problems, retrofitting the latest solutions and ensuring that it is easy and safe for cyclists to use junctions.”</i></p>	<p>The Planning Statement and Design and Access Statement explain the approach to the design of the scheme including opportunities to avoid environmental and social impact and to where possible bring forward benefits. Where impacts cannot be avoided the Environmental Statement sets out how those impacts can be mitigated and what the residual effects will be. It is concluded, overall, that the adverse effects of the scheme will be outweighed by the benefits of the scheme.</p> <p>The highway works proposed as part of the scheme include pedestrian and cycle provision which will ensure safe and easy access for pedestrians and cyclists and improve the accessibility of the area generally, including helping to address barriers to movement such as the M1 and the A508[?].</p> <p>Details are set out in the Transport Chapter (Chapter 12) of the Environmental Statement.</p>
<p><b>4. Assessment principles</b></p>	
<p><b>Paragraph 4.18:</b> <i>“In some instances it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case.”</i></p> <p><b>Paragraph 4.19: Parameters</b></p> <p><b>Paragraph 4.22: Habitats Regulations Assessment</b></p> <p><b>Paragraph 4.26: Alternatives</b></p>	<p>Details of the approach to the application description are set out in the Environmental Statement and Planning Statement. The main area to be finalised relates to the warehousing. The application is for a Strategic Rail Freight Interchange including significant warehousing space. The occupiers of the warehousing are not known, so flexibility is required so that units can be delivered at a scale and in a form to meet specific occupier requirement as they arise. The scheme has been progressed in accordance with the “Rochdale Principles”.]</p> <p>Parameters for the scheme have been set and used to assess the potential effects of the project.</p> <p>The Environmental Statement Chapter 5 includes an appropriate assessment of the effects of the scheme in accordance with the Habitats Regulations.</p> <p>The Environmental Statement Chapter 2 includes an outline of the main alternative sites considered by the applicant and an explanation of the main reasons why alternative sites, with less environmental effects, are not considered to be available or suitable alternatives.</p> <p>The Design and Access Statement sets out the approach to the ‘design’ and layout of the site including the alternatives considered and evolution of the project having regard to the environmental effects.</p>

<p><b>Paragraph 4.27: Options appraisal</b></p>	<p>This paragraph requires an options appraisal, including viable modal alternatives. It is considered that this is a requirement related to road and rail specific projects and is not relevant to Strategic Rail Freight Interchanges where modal alternatives are not relevant. Footnote 61 makes clear that investment decisions for SRFI's are to be made in the in the context of a commercial framework.</p>
<p><b>Paragraph 4.28 - Paragraph 4.35: "good design"</b></p>	<p>The Design and Access Statement sets out the design approach to the scheme including details of the design process and how the scheme has evolved, including why design decisions have been made. The approach to the application has been to ensure that the scheme is fit for purpose, functionally efficient but sensitive to place. This includes ensuring that the visual effects of the scheme are appropriately mitigated and the scheme contributes to the appearance of the area wherever possible. In particular the approach to the layout and landscaping of the site seeks to position large infrastructure and buildings behind extensive landscape screen bunds, which are sensitive to existing land form, vegetation and built form. The natural existing topography and landform has directly informed this approach. Existing areas of established woodland are retained as part of this landscaping strategy. This approach will ensure that many parts of the site will be substantially screened from view from key visual receptors, including surrounding settlements.</p>
<p><b>Paragraph 4.36 - Paragraph 4.47: Climate change</b></p>	<p>The Environmental Statement sets out how the application proposal will take account of the potential impact of climate change. In particular account is taken of climate change issues on key topics areas including water resources, air quality and transport. The work concludes that the application proposal will be designed to take account of climate change and there are no critical features that could be affected by more radical changes to the climate. The Design and Access Statement together with the Sustainability Statement explains how the approach to the design of the scheme will minimise effects on climate change.</p>
<p><b>Paragraph 4.60 – Paragraph 4.66: Road safety</b></p>	<p>Road Safety Audits have been carried out for all highway mitigation work proposed. These can be found at Appendices to Chapter 12 of the Environmental Statement.</p>
<p><b>Paragraph 4.79 – Paragraph 4.82: Health</b></p>	<p>The Environmental Statement considers the effects of the scheme on human health. An assessment of the effects on health is incorporated into relevant Environmental Statement chapters including on traffic, noise and vibration, air quality (including dust and odour), lighting, water resources, waste, access to jobs and services, opportunities for cycling and walking and access to space for recreation and amenity. These matters are bought together in the Socio-Economic Chapter of the Environmental Statement, which concludes that the scheme will; overall, have a positive effect on human health.</p>

Strategic rail freight interchanges	
<p><b>Paragraph 4.83:</b> <i>“Rail freight interchanges are not only locations for freight access to the railway but also locations for businesses, capable now or in the future, of supporting their commercial activities by rail. Therefore, from the outset, a rail freight interchange (RFI) should be developed in a form that can accommodate both rail and non-rail activities.”</i></p> <p><b>Paragraph 4.84 Markets to be served and good road access:</b> <i>“Given the strategic nature of large rail freight interchanges it is important that new SRFIs or proposed extensions to RFIs upgrading them to SRFIs, are appropriately located relative to the markets they will serve, which will focus largely on major urban centres, or groups of centres, and key supply chain routes. Because the vast majority of freight in the UK is moved by road, proposed new rail freight interchanges should have good road access as this will allow rail to effectively compete with, and work alongside, road freight to achieve a modal shift to rail. Due to these requirements, it may be that countryside locations are required for SRFIs.”</i></p> <p><b>Paragraph 4.85:</b> <i>“As a minimum a SRFI should ideally be located on a route with a gauge capability of W8 or more, or capable of enhancement to a suitable gauge.”</i></p> <p><b>Paragraph 4.87:</b> <i>“SRFIs can provide many benefits for the local economy. For example because many of the on-site functions of major distribution operations are relatively labour intensive, this can create many new job opportunities. The existence of an available and economic local workforce will therefore be an important consideration for the applicant.”</i></p>	<p>The Northampton Gateway scheme has been designed to accommodate both rail and non-rail activities from the outset. The phasing of the scheme, to be secured through requirement ....and requirement ... and described within Chapter 2 of the Environmental Statement, will ensure that an operational rail terminal is completed prior to the occupation of the first warehouse unit. The phasing of rail infrastructure will also ensure that rail provision is made alongside development zones 2,3 and 4 (see Parameter Plan) prior to the occupation of warehouse units on these plots. Occupiers taking space within these zones (2,3 and 4) will therefore have the opportunity for a direct rail connection into their yard or warehouse from the outset. Occupiers anywhere on the site, will have access to rail, via the operational terminal, from the outset.</p> <p>The Northampton Gateway will provide good access to the strategic road network, which will be enhanced through the highway mitigation works proposed. The Market Analysis Report identifies the strength of the market for logistics and rail freight logistics in the Northampton area. It explains the Markets that will be served by the Northampton Gateway SRFI's and how the scheme will help to expand the network of SRFI's in the Midlands southwards.</p> <p>The Northampton Gateway scheme provides rail access onto the Northampton Loop line which is part of the West Coast Main Line, one of the most important freight railways in the UK. The West Coast Main Line (including the Northampton Loop Line) is cleared to Network Rail's W10 structure gauge and as such it provides the best access of any route on the national rail network.</p> <p>Northampton Gateway will bring about significant benefits to the local economy. The Socio – Economic chapter of the Environmental Statement (Chapter 3) assesses the likely effects of the development, which include the creation of around 7500 jobs, a gross value added to the local economy of around £348 million annually and a total construction investment of around £400 million. See Section 3.6 of Environmental Statement Chapter 3.</p> <p>It also assesses the availability of an appropriate workforce and the effects of the scheme on commuting patterns. It concludes that there is a suitable available workforce in the area and that this workforce is expected to grow as a result of household growth in the area. It also</p>

<p><b>Paragraph 4.88:</b> <i>“Applications for a proposed SRFI should provide for a number of rail connected or rail accessible buildings for initial take up, plus rail infrastructure to allow more extensive rail connection within the site in the longer term.</i></p> <p><i>The initial stages of the development must provide an operational rail network connection and areas for intermodal handling and container storage. It is not essential for all buildings on the site to be rail connected from the outset, but a significant element should be.”</i></p> <p><b>Paragraph 4.89:</b> <i>“As a minimum, a SRFI should be capable of handling four trains per day and, where possible, be capable of increasing the number of trains handled. SRFIs should, where possible, have the capability to handle 775 metre trains with appropriately configured on-site infrastructure and layout. This should seek to minimise the need for on-site rail shunting and provide for a configuration which, ideally, will allow main line access for trains from either direction.”</i></p>	<p>concludes that the development is likely to have positive effects on commuting patterns in the area by reducing the amount of net outward movement from South Northamptonshire into Northampton and Milton Keynes and reducing the outward movement from Northampton to Milton Keynes.</p> <p>As explained above in response to paragraph 4.83, the Northampton Gateway scheme will provide for a number of rail connected and rail accessible buildings from the outset for initial take up and rail infrastructure will be constructed to allow other units within Zones 2,3 and 4 to be directly rail connected at the outset or in the longer term.</p> <p>The first phase of the rail terminal will be significant (see phasing description in Chapter 2 of the Environmental Statement), it will provide an operational rail network connection and a large area for intermodal handling and container storage. This will be available prior to the occupation of the first warehouse unit</p> <p>The first phase of the rail terminal will be capable of handling at least four trains per day. It will be capable of accommodating 775 meter trains from the outset and it will minimise the need for onsite shunting. It will also allow main line access for trains from either direction at the outset. The terminal will then be capable of expansion so that it can ultimately handle 16 trains per day. The scale and form of the terminal allows for flexibility in its use and expansion, including the potential for an aggregates terminal alongside the main intermodal area and the future provision of a Rapid Rail Freight facility. See description and Plans at Chapter 2 of the Environmental Statement.</p>
<p><b>Generic Impacts</b></p>	
<p><b>Air Quality</b>  <b>Paragraph 5.6 – 5.9 Applicant’s assessment and</b>  <b>Paragraph 5.10 – 5.13 Decision making</b></p> <p><b>Carbon emissions</b>  <b>Paragraph 5.16 – 5.19</b></p>	<p>The effects of the scheme on air quality have been assessed and the likely impacts set out in the Environmental Statement. The approach to the assessment complies with paragraph 5.7.</p> <p>Having regards to paragraph 5.9, the Environmental Statement concludes that the project would not affect the UK’s ability to comply with the Air Quality Directive. It concludes that the scheme will have a beneficial effect across a wide area, including many AQMA’s across the East Midlands ‘zone’. It is concluded that the scheme will not affect the ability of the East Midlands zone to become compliant under the Air Quality Directive because it will not affect the worst link in the zone and will not cause any link to become the worst link.</p> <p>The Environmental Statement includes, where appropriate, an assessment of any likely significant climate factors; in</p>



<p><b>Biodiversity and ecological conservation</b> <b>Paragraph 5.20 – 5.23</b></p> <p><b>Paragraph 5.36: Mitigation</b></p> <p><b>Waste</b> <b>Paragraph 5.36</b></p> <p><b>Dust, odour, artificial light, smoke, steam</b> <b>Paragraph 5.81 – 5.83</b> <b>Paragraph 5.84 – 5.86 Applicant's assessment</b></p> <p><b>Paragraph 5.87 – 5.89 – Decision making and Mitigation</b></p> <p><b>Flood Risk</b> <b>Paragraph 5.92 – 5.97 Applicant's assessment</b></p> <p><b>Paragraph 5.98 – 5.115 Decision making and Mitigation</b></p>	<p>particular in relation to water resources and has regard to the effects of the scheme on carbon emissions.</p> <p>In terms of transport, details are set out in the Transport Chapter of Environmental Statement, of the significant beneficial effects of the scheme in terms of achieving a modal shift in the movement of freight from road to rail. Measures to encourage a reduction in the use of single occupancy car travel are also described, which will ensure that the scheme is accessible by a range of transport modes and appropriate measures will be put in place to encourage sustainable transport choices.</p> <p>The Sustainability Statement, read alongside the Design and Access Statement explains the measures that will be employed, both in design and mitigation, to reduce the carbon footprint of the scheme, particularly in terms of building design, energy efficiency and low carbon energy options to ensure its carbon footprint is not unnecessarily high.</p> <p>The Environmental Statement Chapter 5 includes an assessment of the full range of ecological effects of the scheme in accordance with paragraph 5.23. It also identifies how the scheme takes advantages where possible, to conserve and enhance biodiversity.</p> <p>The construction process will be controlled through Construction Environment Management Plans. Measures are proposed and will be controlled through requirements to ensure that retained areas of landscape are secured and protected and that best practice is employed to minimise the disturbance to species and habitats.</p> <p>Requirements are proposed which will secure the implementation of new landscaping together with its long term management, including in terms of biodiversity management.</p> <p>The effects of construction and operational waste has been assessed in Chapter 14 of the Environmental Statement.</p> <p>The Environmental Statement includes an assessment of the any relevant or likely effects of odour, dust, steam and smoke in the Air Quality Chapter – see details set out above.</p> <p>The assessment of the effects of artificial light are presented in the Lighting Chapter (Chapter 11) of the Environmental Statement.</p> <p>The environmental Statement includes an assessment of Flood Risk; this is set out in the Water Resources and Drainage Chapter. This accords with the criteria in paragraph 5.94.</p>
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<p><b><i>The historic environment</i></b>  <b><i>Paragraph 5.126 – 5.127 Applicant’s assessment</i></b></p> <p><b><i>Paragraph 5.128 – 5.142 Decision making and Recording</i></b></p> <p><b><i>Landscape and visual impacts</i></b>  <b><i>Paragraph 5.144 – 5.145 Applicant’s assessment</i></b></p> <p><b><i>Paragraph 5.144 – 5.145 Decision making and Mitigation</i></b></p>	<p>The Environmental Statement includes a Heritage Chapter which sets out the applicants assessment of the effects of the proposal on the historic environment in accordance with paragraph 5.126 – 5.127.</p> <p>The Environmental Statement includes an assessment of landscape and visual effects in accordance with the requirements of the NPS and best practice.</p> <p>In the context of landscaping and visual assessment primary mitigation measures have been incorporated as an integral part of the design and layout of the proposal. These include the siting, layout and heights of development and consideration of earthworks and ground modelling and the proposed landscaping of the site. Details are set out in the Environmental Statement Chapter 4 of the Design and Access Statement.</p>
<p><b><i>Land use including open space, green infrastructure and Green Belt</i></b>  <b><i>Paragraph 5.162 – 5.185</i></b></p>	<p>The application site is not designed as Green Belt land and the main site does not have any other special protection in terms of its landscape or ecological value. The scheme incorporates significant new areas of publically accessible green space which will deliver benefits in terms of access to the countryside and recreation. Changes to existing rights of way will need to be made and these are considered in the Chapter 4 of the Environmental Statement.</p> <p>The effects of the scheme on agricultural land and soil management are set out in the Agricultural Land Quality Chapter of the Environmental Statement.</p> <p>The effect of the proposal on mineral resources is set out in the Geology, Soil and Groundwater Chapter Of the Environmental Statement</p>
<p><b><i>Noise and Vibration</i></b>  <b><i>Paragraph 5.186– 5.192 Application assessments</i></b></p> <p><b><i>Paragraph 5.193 – 5.200 Decision making and Mitigation</i></b></p>	<p>An assessment of the effects of the proposal in relation to noise and vibration, in accordance with the criteria in paragraph 5.189 – 5.192, is set out in the Environmental Statement Chapter 8, Noise and Vibration.</p>
<p><b><i>Impact on transport networks</i></b>  <b><i>Paragraph 5.201– 5.210 Application assessments</i></b></p> <p><b><i>Paragraph 5.193 – 5.200 Decision making and Mitigation</i></b></p>	<p>An assessment of the effects of the proposal on the transport network is set out in the Environmental Statement, Chapter 12. This includes detailed consideration of new highway works proposed and travel planning.</p>
<p><b><i>Water quality and resources</i></b>  <b><i>Paragraph 5.219 – 5.231</i></b></p>	<p>The effects on water quality and resources is set out in the Environmental Statement Chapter on Water Resources and Drainage.</p>

## APPENDIX 2: Roxhill Developments Ltd. Statement

# ROXHILL

### Background

Roxhill Developments is a specialist Industrial and Logistics developer operating in the UK. It has a number of major developments and assets of over £200m, operating schemes with an end investment value of in excess of £1.00 billion.

SEGRO is one of Roxhill's major investors and is itself a FTSE100 Property Company specialising in owning and managing industrial and logistics Assets throughout Europe. The two companies are involved with 4 major SRFI developments in the UK at East Midlands Gateway, London Gateway, Howbury, Radlett in St. Albans, as well as Northampton Gateway.

The combined value of these SRFI's (once completed) would be in excess of £2.00billion making the Roxhill / SEGRO partnership the largest investor in SRFI's in the UK.

### The Market Context

The industrial and logistics sector has seen significant expansion over recent years due to the growth in internet use and online deliveries. This sector shows no sign of slowing and combined with increasing pressure on logistics companies to delivery goods the next day and increased congestion on our motorways, this has seen increasing demand and interest in rail based distribution schemes.

Northampton is an extremely strong logistics market, with excellent connections to regional and indeed national markets. The location has the ability to expand the network of Midlands SRFI's, addressing currently unmet market demands for rail as well as anticipated growth in rail freight. We would anticipate extremely strong demand for the site if it were to be bought forward. It includes strong interest to operate the rail terminal, details of which are set out below and in the attached letter from maritime.

### Recent Experience

The strength of and evolution in the logistics market led Roxhill to submit an application to PINS in 2016 for East Midlands Gateway SRFI for a major 6.0million sq.ft scheme delivering over 7,000 direct jobs. A DCO was made in 2016 and the facility is now owned by SEGRO but managed by Roxhill. Following the making of the DCO a major infrastructure contract in excess of £100m was let to undertake site-enabling works, off site highway improvements including a remodelled M1 J24 and the Kegworth bypass, together with the new rail freight facility. Further details of this scheme are set out below.

A contract has now been agreed with Maritime to operate the Rail Freight facility at EMG. Maritime is one of the largest operators of rail ports in the UK and provides rail lead logistics operations throughout the UK. They have written a letter confirming their interest in operating the rail terminal at Northampton Gateway and this is attached in this statement.

Works are well advanced at EMG and a detailed description of the infrastructure being delivered is set out below for reference. A number of major transactions have now been concluded for new facilities with the following customers:

- Amazon – 650,000sq.ft
- Nestle / XPO – 593,000sq.ft
- Littlewoods – 500,000sq.ft

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Roxhill Developments Limited Registered in England 7070462

This level and speed of take up reflects the strength of the market and the benefits for occupiers of the offer at EMG Strategic Rail Freight Interchange.

Nestle are in discussion with Maritime regarding a contract to bring in goods to their new facility via the new rail freight terminal.

Work also continues on our other schemes at Radlett and Howbury, which briefly comprise the following:

- Radlett – a 4.57m sq.ft SRFI located on the former St. Albans aerodrome delivering up to 3,400 jobs. The rail terminal will be connected directly to the Midland Main Line.
- Howbury – a 2.00m sq.ft SRFI delivering up to 2,000 jobs. The rail terminal will be connected to the North Kent line.

## **East Midlands Gateway**

### **1.0 Background**

The east Midlands Gateway SRFI scheme is located adjacent to the Junction 24 of the M1, north of east Midlands Airport. It comprises an intermodal terminal with significant container storage areas, up to 557,000 sq.m of warehousing, strategic landscaping and a range of major highway improvements. The landscape includes the creation of extensive landscape screen bunds to help screen the development from outside views; in total there is around 158 ha of green infrastructure. The scheme includes a capital investment of around £300 million, it is estimated that once fully operational it will result in 7000 jobs and create a Gross Added Value of £267 million to the local economy.

### **2.0 Construction Progress**

- Total infrastructure works in excess of £100m.
- The various construction packages have now been let, as detailed below. This includes the contract for the construction of the rail terminal and private railway linking to the mainline. It is anticipated that the rail facility will be available to rail traffic from summer 2019.
- Construction also progressing for the 3 occupier deals already completed.
- On-site works including the opening of the rail freight terminal to be completed in Dec 2019. Cost £42.75m.
- Off-site works including the remodelling of M1 j.24 to be completed Dec 2018. Cost £26.00m.
- Network Rail connection agreement works to be completed by June 2019. Cost £5.30m.

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- Landscaping works post completion of on-site works to be completed March 2020. Cost £2.00m.
- New utility connections to be completed July 2018. Cost £13.20m.
- Kegworth by-pass to be completed to be completed October 2010. Cost £11.50m.
- Other works including archaeology already completed. Cost £2.00m.

### 3.0 Progress with Network Rail since the DCO was made in February 2016

#### a. Prior to the DCO:

- Basic Service Agreement signed and payment made;
- Statement of Common Ground agreed and signed;
- Protective Provisions incorporated into DCO.

#### b. Post the DCO:

- Active discussions from making of DCO onwards to agree scope of works required, Roxhill's target dates, NR procurement methods, cost control.
- Development Services Agreement (for GRIP 3-4) signed 18 April 2017.
- Implementation Agreement which will take us through GRIP 5/8 to be signed early 2018. This will determine programme and cost of the rail connection. Both parties working together to achieve connection by summer 2019 – allows trains to run into the terminal from this date.
- Connection Agreement will be required before trains arrive. Maritime appointed as preferred rail terminal operator March 2018.

## APPENDIX 3: Galliford Road Stone Ltd Statement



**GRS Group**  
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Phone: 02476 580800  
[www.grsroadstone.co.uk](http://www.grsroadstone.co.uk)

### Northampton Gateway

#### GRS ROADSTONE

GRS are experts in materials trading, supplying the widest choice of loose bulk and bagged aggregates. Each year we deliver over 15 million tonnes of primary and recycled materials. Our expanding distribution network also offers solutions in waste, recycling and logistics. We supply, among others, the UK's top builders' merchants and also many high-profile infrastructure projects.

GRS have been working in the Northampton area for over 40 years. For the last 15 years we operated from premises at the Railhead in the centre of Northampton. The existing Railhead has historically moved between 225,000 up to over 400,000 tonnes per annum. Northampton remains a strong market locally due to it being centrally located (in England) and also due to the continued growth of the area.

We expect to sell approx. 260,000 tonnes this calendar year and have had a strong start to the year.

The vast bulk of materials are bought in by rail; some local sand & gravel and slate are imported by road but these constitute less than 5% of total volume. Generally the materials sold are to local markets with a radius of 45 miles.

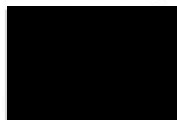
The material comes from a number of sources including Granite from Cliffe Hill, Bardon and Mountsorrel in Leicestershire, Limestone from Dove Holes, Dowlow and Tunstead in Derbyshire. Other materials include concrete aggregates from Somerset and Sand from Norfolk.

Based on 20 tonne vehicles the supply by rail is taking between 11,000 to 20,000 vehicles off the M1 motorway.

Looking forward we believe there will be a year on year increase through to 2020 of about 5 % per year. Our current facility is constrained and will limit our growth as well as the efficient operation of the business. Its constraints relate to the scale and form of the site itself, but also its location in the centre of Northampton.

GRS have now signed an Agreement to Lease, subject to planning (DCO), to operate part of the proposed rail terminal at Northampton Gateway as a dedicated Aggregates Facility. The facility will include two dedicated rail lines into the terminal of 450m, hard standing for loading / unloading of goods, a porta-cabin and parking. GRS will be bringing with them the 5 train paths which they already operate out of their existing facility in Northampton. The Northampton Gateway site would meet all of the requirements of GRS's operation, with excellent rail access, appropriate on-site facilities and expansion space and access to the strategic road network.

The move would also free up the existing site which sits immediately adjacent to Northampton Station. We understand the Borough Council have plans to work with Network Rail to redevelop the site for both housing and an expanded car park facility for the station. The relocation of GRS to Northampton Gateway would also remove a significant number of vehicles from the town centre.



**Martin Hill**  
Chairman – GRS Group

# APPENDIX 4: Comparative Assessment of Northampton Gateway SRFI and the proposed Rail Central SRFI

## 1. Introduction

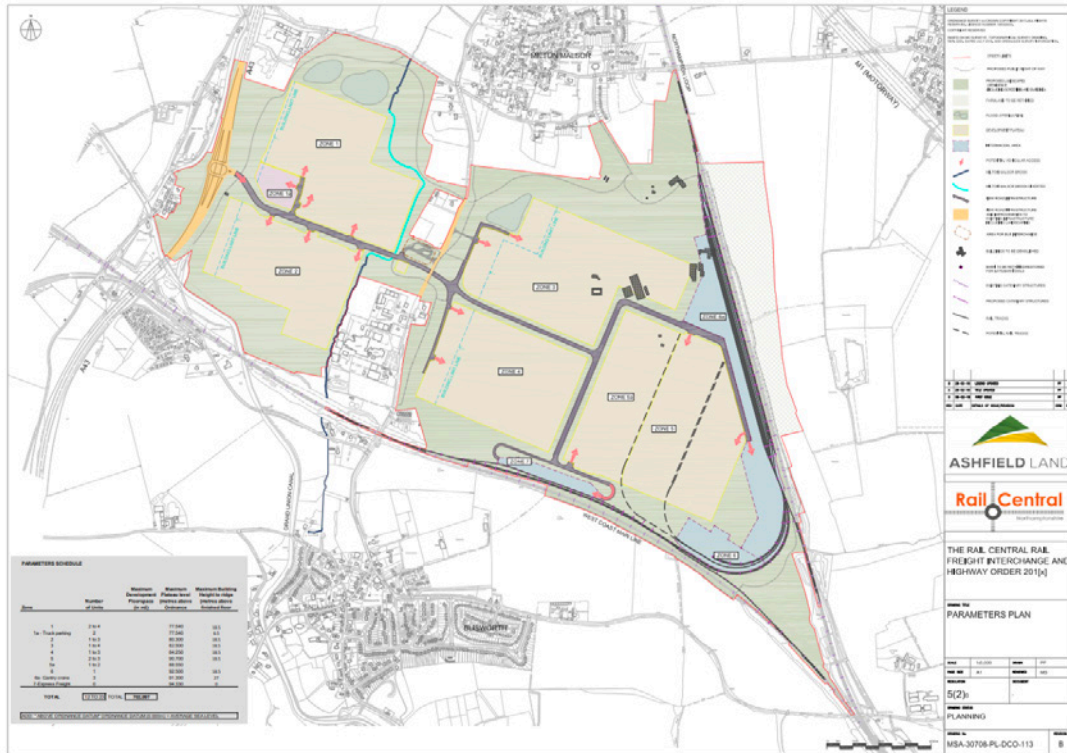
- 1.1 This comparative analysis seeks to compare an SRFI on the Northampton Gateway SRFI site (NG) with and an SRFI on the site proposed by Rail Central SRFI (RC). The basis of the assessment of the two sites are the schemes that have been proposed for the two sites. The assessment is informed by the information available about the RC scheme published in relation to its Phase 2 statutory consultation process. The Rail Central scheme is not in a finalised form and some environmental assessment work is still to be undertaken and consulted upon. Where necessary therefore in order to complete the comparative assessment judgements have been made based on the information available. Where conclusions cannot be made this has been clearly stated.
- 1.2 The comparative analysis includes a section comparing the environmental effects of the two schemes; it then goes on to consider the differences between the two schemes in terms of good design principles and then in terms of operational and technical aspects. Overall conclusions are drawn out in the main body of the Planning Statement at paragraphs 4.178 – 4.192. The comparative analysis concentrates on a comparison between the two SRFI sites and not the consequential, associated, development such as highway works, although reference is made to them.

## 2. Rail Central Overview

- 2.1 The Rail Central site is located between the villages of Milton Malsor and Blisworth. The West Coast Main line runs to its southern boundary with the Northampton Loop line of the West Coast Main line forming its eastern boundary. Access will be gained from a new junction on the A43 on the western edge of the site. The Northampton Road / Towcester Road linking Milton Malsor with Blisworth will remain, running through the centre of the site, effectively splitting the site into two discrete but linked parts. The site is currently mainly arable farmland.
- 2.2 The Rail Central 'Main SRFI Site' comprises the following principal elements:
- Structural earthworks and demolition of existing buildings and structures;
  - An intermodal freight terminal with direct connections to the Northampton Loop Line, capable of accommodating trains of up to 775m long, including up to 3 gantry cranes, container storage, a train maintenance depot and facilities to transfer containers to Heavy Goods Vehicles (HGV);
  - An express freight terminal with direct connections to the West Coast Main Line, capable of accommodating trains of up to 240m long, a freight platform with associated loading and unloading facilities;
  - Up to 702,097 sq. m (GEA) of rail connected and rail served warehousing and ancillary service buildings including a lorry park, terminal control building and bus terminal;
  - New road infrastructure including a new separated access point on the A43 (T), an internal site underpass (under Northampton Road) and necessary utilities infrastructure; and
  - Strategic landscaping and open space including alterations to public rights of way, the creation of new ecological enhancement areas and publicly accessible open areas, flood attenuation, and the partial diversion of the Milton Malsor brook.
- 2.3 Key parameters for the Proposed Development at the Main SRFI Site are provided in draft Parameters Plans and an Illustrative Masterplan demonstrates a means of bringing forward the

proposed development. These are included below for ease of reference. An alternative 'Illustrative Masterplan' was also presented at the Rail Central Stage 2 Consultation - but is not included here.

### Rail Central illustrative masterplan



### Rail Central illustrative masterplan





### 3. Comparative Assessment: Environmental Impacts

#### 3.1 Landscape and Visual Impact

- 3.1.1 The RC Landscape and Visual Impact Assessment is incomplete and there are a number of concerns in relation to the judgements and conclusions reached in the draft assessment. The baseline assessment that the landscape value of the Main SRFI site is Low for example is not justified. This appears to be simply on the basis that it is not locally designated, which is not an approach supported by GLVIA3. Our assessment is that the landscape value of the RC site is likely to be Medium or Low/Medium.
- 3.1.2 Nevertheless a comparison exercise has been undertaken based upon information and plans included with Rail Central's Stage 2 Consultation.

#### Landscape

- 3.1.3 Neither Main Site lies within a designated landscape and both Main Sites lie within the same National Character Area (*Northamptonshire Vales*) and both lie within Landscape Character Areas 13b (*Bugbrooke and Daventry*) and 6a (*The Tove Catchment*). A greater proportion of the Rail Central Main Site is within 13b and a greater proportion of the Northampton Gateway Main Site is within 6a. There are no overriding or significant differences in landscape sensitivity/ quality between these 2 published character areas.
- 3.1.4 One of the key and overriding differences between the respective proposals is the character and features of the existing landscapes at a relatively more localised scale. At this scale, the NG Site occupies a more enclosed location with urbanising areas/ elements adjoining to the east (edge of Northampton and M1 motorway etc.). The majority of the NG Site also generally falls eastwards towards the urban area and motorway/ junction 15 and away from the more rural landscape to the west.
- 3.1.5 By contrast, the RC Site occupies a more open and rural landscape more 'removed' from existing urbanising influences. This landscape includes the settlements of Milton Malsor and Blisworth situated close to the north and south of the Main Site.
- 3.1.6 These settlements are relatively more 'removed' from the NG Site and/ or can be more effectively mitigated in relation to the NG scheme.
- 3.1.7 There is a notable ridge of higher ground to the south of both Main Sites that allows more open and expansive views. The RC Site is notably more visible from most of the localised positions (including rights of way and properties) along this higher ground.
- 3.1.8 A secondary and smaller ridgeline extends northwards from this main area of higher ground through the western part of the NG Site and this small ridgeline in combination with two existing woodlands within the NG Site provide strong separation between the two respective Main Site areas and between the RC Site and the urban area and influences to the east.
- 3.1.9 In a similar way, it also limits the relationship and influence of the NG Site over the more rural landscape (including the RC Site and its surrounds) to the west.
- 3.1.10 Whilst the A43 does impart a more active and urbanising influence over the western side of the RC Site, this road is not visible over any great distance and thus its influence is limited over the wider landscape of the RC Site.
- 3.1.11 In topographic terms, the RC Site occupies a rather low lying and shallow 'bowl' like area. Woodland appears to be less prevalent across this site (in comparison to that of the NG Site) and it thus forms a rather large, open and cohesive landscape area, particularly when viewed from some elevated positions to the south. By contrast, the NG site is rather more contained with existing

woodland and landform changes offering greater enclosure and localised interruptions. This assists in assimilating the proposals.

### **Visual**

- 3.1.12 Both schemes will result in some significant visual impacts. It has not been possible to undertake a detailed comparison of the effects at this stage, however it is likely that the level of visual effects will be materially greater overall for the RC scheme. In particular, the visual effects upon rights of way users (west of the NG Site), residents at Milton Malsor, Blisworth and other properties between Milton Malsor and Blisworth will be greater.
- 3.1.13 There will be some visual effects upon residents/ receptors at Collingtree and rights of way through the NG Main Site that will inevitably be greater for the NG scheme. The Roade Bypass will also add to the visual effects of the NG scheme and will affect residents and receptors that will have no views towards the RC scheme, however, the overall visual impacts are likely to be materially greater for the RC scheme.
- 3.1.14 The RC scheme also includes extensive 6 metre high acoustic screen fencing surrounding a number of the development plots and notably along the southern and more visible side of the site. Whilst this fencing is significantly lower than the proposed buildings it will nevertheless add a further notable and discordant element and will add to the visual impact of the scheme. The NG scheme does not rely on such extensive acoustic screen fencing.

### **Green Infrastructure and Mitigation Proposals**

- 3.1.15 There appears to be some notable differences between the two schemes in terms of the nature and likely effectiveness of the GI/ mitigation proposals. The NG scheme will include significant mounding and planting proposals to the west, north and east of the Main Site. The proposed mounding to the western perimeter will maintain the nature of the existing separation with the more rural landscape to the west. In simple terms, this proposed mounding and associated planting will perform a similar separation role to that of the existing secondary ridgeline that extends broadly north – south also through the western part of the NG Site.
- 3.1.16 This proposed mounding will be notably steeper and more engineered than the existing ridgeline, yet it will perform a similar separation role albeit marginally further to the west. The woodland and tree planting to the mounding will assist in assimilating the mounding and the visual screening of views from the west. It will also offer valuable connections with the conserved woodlands on the relatively higher ground within the Site and form a very strong landscape ‘buffer’ to the more rural landscape to the west.
- 3.1.17 Other mounding and GI proposals around the perimeter of the NG Site will form a strong and cohesive framework within which the built development will be set. The southern side of the NG Site (closest to Junction 15 and the A508) will be more open yet this will form the ‘gateway’ and principal visible ‘face’ to the development and will be designed accordingly (including office frontages and significant landscape areas and water (SUDS) features).
- 3.1.18 By contrast, the RC site does not present the same contextual opportunity for GI proposals which would bring about the same benefits in terms of landscape and visual mitigation. Indeed the GI proposals for RC do not appear to be as extensive or robust. The RC mounding is generally limited to the Milton Malsor side and eastern side of Northampton Rd/ Towcester Rd and there is no obvious mitigation towards Blisworth; the Grand Union Canal; PROW and rising ground to the south. Any mitigation to this side of the RC Site will inevitably be very difficult to achieve given the nature of the rising land to the south.

- 3.1.19 Where present, the RC earthworks proposals/ mounding appear to be less significant and extensive. The mounding is proposed to generally include relatively softer and shallower outer slopes (circa 1:5 instead of circa 1:3) than the NG mounding, yet will be less effective in screening views towards the built development.
- 3.1.20 In terms of the GI Parameter Plan and Illustrative Landscape Masterplan for RC, it is evident how the development will dominate the entire area between Blisworth and Milton Malsor. The embedded mitigation and the nature of the illustrative landscape proposals do not support the assertion that the scheme will be successfully mitigated and assimilated.
- 3.1.21 The Illustrative Masterplan for Rail Central appears to show very limited conserved trees/ planting. The proposed planting and habitats as shown also appear to be out of character with the existing and broader landscape context of the Site, which includes more regular woodland blocks and tree belts with intervening hedgerows (though accepting it is only illustrative). The NG scheme includes considerably more conserved and proposed planting.

## **3.2 Highways**

- 3.2.1 The Rail Central Transport Assessment work has not been completed, including important strategic modelling work with proposed mitigation measures included. Neither has any VISSIM micro-simulation modelling been reported. It is therefore not possible to fully understand the likely residual traffic and transport impacts of RC or whether further or amended mitigation measures may be required.
- 3.2.2 Notwithstanding, an analysis of the mitigation measures proposed at RC and the modelling work undertaken to date, indicates that the mitigation measures proposed may be capable of mitigating effects of the scheme, in accordance with the requirements of the NPS paragraphs 5.211 – 5.218. In the absence of the completed modelling work it is difficult to draw conclusions regarding any benefits the mitigation measures may provide over and above this. However, based on the information that is currently available, any benefits are likely to be confined to M1 J15A, and they are unlikely to result in significant wider benefits over and above this.
- 3.2.3 In comparison NG includes highway mitigation works that will result in significant betterment compared to the current situation. In particular the works to J15 of the M1 and package of measures along the A508 corridor, including the Roade bypass, will reduce congestion, improve journey times and reliability and improve safety. The improvements will therefore benefit existing and future road users and contribute to improving economic activity in the area. The residual environmental effects of NG are therefore likely to be significantly more positive than RC. Furthermore NG is able to make a significant contribution to the vision and strategic objectives for national networks as set out at the start of Section 2 of the NPS.
- 3.2.4 Both NG and RC will help to encourage a shift in the movement of freight from road to rail. In doing so they will have beneficial effects on HGV mileage on the strategic road network and associated air quality benefits and reductions in carbon emissions. These benefits result from the use of rail and the extent of benefits will primarily be related to the capacity of the rail terminal, which will generate custom through association with on and off site warehousing. The main terminal of both schemes will have a capacity of 16 trains a day and significant areas for intermodal handling and storage. When fully operational the two schemes would have similar positive effects in terms of reducing HGV mileage at a national level.
- 3.2.5 There may however be a slight distinction between the two schemes in terms of the speed at which the use of rail may start and then grow on the two sites. The NG scheme includes a commitment to the delivery of the rail terminal very early in the development process, with an operation terminal available prior to the occupation of any warehousing. The RC scheme has not, at this stage, made

such a commitment. The NG scheme includes a greater proportion of warehousing which can be directly rail connected, which will help contribute to the growth of rail. The NG scheme also includes an aggregates terminal and contracts have been exchanged with GRS for them to relocate their Northampton operation from the centre of Northampton to the NG site.

### **3.3 Air Quality**

- 3.3.1 The Rail Central (RC) Environmental Assessment is incomplete and it is therefore difficult to reach full conclusions. For example the Scoping Opinion refers to modelling of AQMAs, but it appears that only receptors in South Northamptonshire have been considered (not Northampton Borough). There is no explanation for this and so it appears the draft assessment is significantly incomplete given the geographic spread and distribution of likely effects and the location of AQMAs.
- 3.3.2 In terms of air quality benefits at a national level it is considered that both schemes will result in similar benefits. The benefits to air quality at this level result from the opportunity presented by the SRFI's to transfer the movement of goods from road to rail. The extent to which this can be achieved is then dependent primarily on the capacity of the rail freight terminal, which will generate custom through association with warehousing both on and off site. The capacity of both main terminals is broadly the same with scope for 16 trains a day.

### **3.4 Noise and Vibration**

- 3.4.1 Significant elements of the draft noise assessment for the RC scheme seem unclear and incomplete. In addition, whilst the policy tests in the NPSNN are referred to, the assessment does not address them. No mention is made of the efforts made to mitigate and also minimise 'other adverse effects on health and quality of life'.

### **3.5 Lighting**

- 3.5.1 The Draft chapter on lighting for the RC scheme appears to have a significant omission in that it does not apparently deal with night time visual impacts. Indeed, as set out, the bespoke methodology and approach proposed will not provide a recognisable impact assessment. Without such an assessment it is not possible to gauge the full likely environmental impact of the proposed development.
- 3.5.2 However, based on the information available, the following is anticipated to be the likely key differences.
- 3.5.3 In terms of construction effects, it is expected that some of the night-time effects resulting from the RC scheme will be Major Adverse. In contrast, for NG effects are predicted to be Moderate Adverse for just a handful of receptors until bunding is constructed, whereupon impacts are more or less fully mitigated.
- 3.5.4 In relation to the effects on properties during operation, night time views from many properties (e.g. parts of Milton Malsor; properties along Towcester Rd/Northampton Rd) are likely to be worse for RC than for NG. This is due to proximity and the wider extent of the RC development in the field of view, giving multiple opportunities for seeing some of the lighting. For similar reasons, any local sky glow from RC will be more intense and widespread in the field of view compared to NG.
- 3.5.5 In relation to the effects on users of the Canal during operation phase, we would expect the night time impacts of the RC scheme to be significant because the sense of remoteness will be lost due to the presence of some lighting effects. In contrast, NG impacts on the canal are to all intents and purposes nil.

- 3.5.6 In terms of the interface between lighting and ecology it appears that there may be a greater number of interfaces on the RC scheme compared to NG. Further assessment work on the RC scheme would help to clarify their impacts.

### **3.6 Biodiversity**

- 3.6.1 It appears that significant elements of the necessary assessment in relation to Biodiversity on the RC site are incomplete. In the absence of the completion of those assessments it is difficult to fully gauge the likely impact of the proposed development.
- 3.6.2 From the information available to date it would appear that the overall environmental impacts resulting from RC will be similar to NG. There are a few potential differences in relation to different aspects of biodiversity as noted below.
- 3.6.3 In terms of habitats, the two sites are broadly similar, with a range of typical farmland habitats dominating both sites. The exception to this is the large number of veteran trees (38 no.) and ancient trees (2 no.) identified by RC as opposed to a single veteran tree identified close to the NG Roade bypass route. 26 veteran trees would be removed from the Rail Central scheme. None would be removed from the NG scheme.
- 3.6.4 In terms of fauna, both schemes are likely to have an impact on bats, GCN, farmland birds and badgers. There is likely to be a greater effect on badgers and GCN as a result of the NG scheme due to the presence of a main badger sett and GCN, although mitigation measures are proposed to mitigate this impact. The assemblage of farmland birds is broadly similar for both sites, although the RC scheme support a large number of nesting Barn owl (c. 4no.). Populations of bats occur, and roosts would be lost, from both main sites (four from RC and a single roost from NG).

### **3.7 Agricultural Land**

- 3.7.1 Both RC and NG will result in the loss of agricultural land with associated environmental effects.
- 3.7.2 However the RC site is larger and contains a proportionally greater amount of 'best and most versatile' agricultural land. It would result in the loss of in excess of 70 ha of 'best and most versatile' agricultural land, whereas NG will result in the loss of 33 ha.
- 3.7.3 The impact of RC in terms of agricultural land is therefore greater than at NG.

### **3.8 Comparative Assessment: Good Design**

- 3.8.1 The NPS requires applicants to include design as an integral consideration from the outset of a proposal. At paragraph 4.29 it states that '*visual appearance should be a key factor in considering the design of new infrastructure, as well as functionality, fitness for purpose, sustainability and cost*'. At paragraph 4.34 it goes on to state that '*whilst the applicant may only have limited choice in the physical appearance of some national networks infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting and design measures relative to existing landscape and historical character and function, landscape permeability, landform and vegetation*'.
- 3.8.2 A comparative analysis of the NG and RC proposals in relation to these matters highlights some key differences between the two proposals. Many of the matters considered overlap with the assessment of environmental effects, in particular the landscape and visual effects, nonetheless a discrete analysis having regard specifically to these design considerations is relevant and important.

- 3.8.3 The NPS recognises that due to their operational requirements SRFI's may need to be located in the countryside. Northampton Gateway and Rail Central are located in the countryside, where there will be loss of countryside and environmental effects resulting from development on the sites. However NG has a particular context which means the impact of change would be significantly less than RC. Furthermore, through scheme design and mitigation, the environmental effects of the NG scheme can be better mitigated.
- 3.8.4 The NG Main Site lies immediately adjacent to the M1 and its J15, beyond which is the edge of the Northampton Urban area. The Northampton Loop of the West Coast Main Line forms its western boundary, its south eastern boundary is formed by the A508 and its northern boundary Collingtree Road. The NG Site is contained within these physical features and together with the urban area to the east, these help to contain the site and provide an urban influence to the site and its character. The villages of Collingtree, Milton Malsor and Blisworth lie close by but are separated from the site by highway or rail infrastructure. Further, because of the existing topography of the area and the approach to scheme layout, the existing landform can be supplemented with significant landscaped bunds to minimise and to a large extent fully screen views of the development from these villages. These landscape and earthworks measures form a fundamental component of the NG scheme and are critical in ensuring that its environmental effect is acceptable and its impact on local communities minimised.
- 3.8.5 Rail Central is a larger site, extending between the A43 and the Northampton Loop line. Whilst these features together with the West Coast Main Line provide a degree of containment, the effect of the scheme on existing landscape, on the character of the area and surrounding villages, on views and on local communities, will be far greater and cannot be mitigated to the same degree.
- 3.8.6 The RC site is not contained to its north, with no physical features separating it from Milton Malsor. To the south, whilst the West Coast Main Line separates the site from Blisworth, the local landform is such (Blisworth is at an elevated position) that views from the village to the site will be largely unhindered. Because the RC site stretches from the A43 to the Northampton Loop Line, it's built form would be positioned in two distinctly separate areas, either side of Northampton Road / Towcester Road. This results in a degree of sprawl, further reducing the degree to which the site is contained.
- 3.8.7 As outlined above the NPS makes clear that visual appearance is a key factor in considering the design of new infrastructure and that good design can be demonstrated in terms of siting and design measures relative to existing landscape, landform and vegetation. These are fundamental site location and scheme design factors which affect the suitability, quality and overall environmental acceptability of development proposals. Because of the inherent characteristics of the NG site, providing greater opportunity for landscape and visual mitigation, it is a materially superior location and its development will have less adverse environmental affect than RC.

### **3.9 Comparative Assessment: Operational and Functional Aspects**

- 3.9.1 The NPS sets out a number of operational and functional requirements for SRFI's. The Compliance Statement at Appendix 1 of the Planning Statement identifies these requirements and explains how the NG scheme will fully comply with each of them. An analysis of the RC scheme indicates that it is also capable of complying with these requirements provided relevant infrastructure is secured at an appropriate time in the development of the site. At the moment there is some uncertainty in relation to the phasing of the delivery of infrastructure for the RC site.
- 3.9.2 Both sites will provide a rail terminal, including a rail network connection, appropriate sidings and a large area for intermodal handling and container storage. The NG scheme however commits to the provision of a rail terminal from the outset. There is no such commitment from RC at this stage.

- 3.9.3 The NG scheme provides the ability for warehousing to be directly rail connected from the outset, it is unclear whether this is the case for RC. Further, the proportion of warehousing which can be directly rail connected is significantly greater on the NG site and the form of connection allows for flexibility in the integration of rail directly into a warehouse plot – for example into a large yard area or directly into a warehouse building.
- 3.9.4 Both schemes will accommodate both rail and non-rail activities, NG can do this from the outset, the phasing of RC is unclear.
- 3.9.5 Both schemes provide rail infrastructure to allow more extensive rail connection within the site in the longer term.
- 3.9.6 Both schemes provide a rail terminal, (NG has committed to provide this from the outset) which are capable of handling at least four trains per day, enable trains to arrive and depart in both directions, has the ability to accommodate trains of 775 meters and minimise the need for on-site shunting.
- 3.9.7 Both schemes provide large, and flexible development plots to accommodate the varied needs of businesses (capable now or in the future of supporting their commercial activities by rail).
- 3.9.8 The scale and form of the terminal proposed at Northampton Gateway whilst delivering significant rail infrastructure from the outset, allows for flexibility in its use and expansion. This will enable the terminal to be expanded to handle 16 trains a day ultimately, but also to incorporate an aggregates terminal within the main intermodal area and allow for the future provision of a rapid rail freight facility. The RC scheme appears to allow for a similar expansion, including the future provision of an express freight facility. Its precise phasing is not yet known.
- 3.9.9 The provision of an aggregates terminal at NG (with a contractually committed end user in GRS) is an additional benefit for the NG scheme. The terminal is a direct response to a specific requirement from GRS which operates nationally and has a requirement to relocate and expand their local operation from the centre of Northampton. GRS's commitment to the NG site demonstrates the suitability of the NG site and the proposed rail infrastructure, as well as the demand for rail freight services. The relocation of GRS will move their operation from the centre of Northampton and allow for the beneficial redevelopment of their existing site. GRS currently has the ability to utilise 5 rail freight paths (although not all are utilised now) and intends to transfer these for use from Northampton Gateway.
- 3.9.10 Both schemes allow for the future incorporation of a Rapid (or Express) Rail Freight facility. The market for Rapid Rail Freight is untested and uncertain. However it is a rail freight sector that might have longer term growth potential. There are some differences in the way in which such a facility would be provided at RC compared to NG, with some pros and cons of each approach (as described in the comments on the comparative table below). Overall the differences are not material to the suitability of the sites overall, nor indeed to the functionality of the sites in relation to this specific aspect of the infrastructure.
- 3.9.11 The RC draft PEIR Chapter 3 contained a comparative analysis of certain aspects of the schemes, focussed on rail components but also including other matters. For completeness and ease of comparison this table has been reproduced here and is set out below with an additional column. Columns 1, 2 and 3 of the Table are direct copies of the Rail Central draft PEIR (text shown in *italics*). Roxhill's comments are set out in the 4th column.

