

Northampton Gateway Rail Freight Interchange (NGRFI) Project Team
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Working locally and nationally for
a beautiful and living countryside

5th November 2018

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Northampton Gateway Rail Freight Interchange (TR050006) Summary submission from CPRE Northamptonshire

Introduction

Northamptonshire lies within the road freight Golden Triangle from where around 87% of the UK population is within a 4.5 hour HGV drive time (a day's round trip). This has made it a very popular location for the logistics industry in which to locate warehousing from which they can carry out national distribution of freight by road. This is evident from the number of large warehousing developments located in the county.

This proposal is for an SRFI located by junction 15 of the M1 and on the Northampton Loop of the West Coast Mainline. The site was promoted for inclusion in the now adopted West Northamptonshire Joint Core Strategy but in the inspection of the plan the inspector was satisfied with the alternative options that were selected.

This response considers the following:

- Relevant planning policy
- Landscape
- Loss of countryside
- Countryside access
- Impact upon rural communities
- Planning balance

Relevant Planning Policy

There are policies at national, joint and local level that are directly applicable to the scheme. These are:

- The Strategic Rail Freight Interchange Policy Guidance which set out the aims and requirements of SRFI developments
- National Planning Policy Framework & Online Planning Practice Guidance which set out the need to protect BMVL and soil resources
- The West Northamptonshire Joint Core Strategy (WNJCS) which includes policy for Warehouse developments in general and SRFI in particular and for development in the open countryside
- South Northamptonshire Local Plan 1997 Saved Policies 2007 (Revised December 2014) which reserves a local gap
- South Northamptonshire Part 2 Local Plan which supersedes the Local Plan and sets out the characteristics of acceptable development within the rural area.

Landscape Impact

The site is currently attractive undulating rural landscape which lies between the villages of Collingtree and Milton Malsor and is bounded by the M1 and the Northampton Loop railway line. It contains a ridge towards the western side of the site. It is crossed by two footpaths that afford open rural views.

The size and scale of the development combined with its elevated position would make it a dominant man-made feature of the landscape. The proposed mitigation would reduce the harshness of the impact but would nevertheless create an incongruous substantial manmade feature inserted into the landscape which is topped with an industrial structure.

The site would become an industrial site and would transform the setting of the adjacent villages and the footpaths that they currently use to enjoy the countryside. Receptors in the locality of the site will see it as an artificial industrial intrusion into what was open countryside. The development would spread the urbanisation of the industrial fringe of Northampton across the M1 against policy. Currently expansive views be curtailed by the bunding and/or screening reducing the feeling of space.

Even with the proposed mitigation measures we consider that the scheme would have a major adverse impact upon the landscape.

CPRE Northamptonshire are disappointed to see that the scheme does not incorporate large scale solar PV generation to reduce the pressure for large scale solar farms in the open countryside.

Cumulative Landscape Impact

The scheme would have an unacceptable cumulative impact if it were to be developed alongside the Rail Central proposal in particular by subsuming the adjacent villages into Northampton. There would also be significant cumulative impact with the Clipper scheme at J15 and Swann Valley at J15A and Brackmills along the A45. DIRFT SRFI is 16 miles to the north at J18.

Countryside Access

Footpaths are a key resource for recreation and leisure in rural villages and are important for wellbeing. The enjoyment of users of the footpaths that cross the site would be destroyed by it becoming a perimeter of an industrial site. This would particularly affect Collingtree where the footpath would be dominated by and shaded by the bunding. The safety of most footpath crossings of the Roade bypass would also deter users.

Impact upon Rural Communities

The scheme would have a significant impact upon the residents of the villages that lie within close proximity to the scheme. It would have a lesser impact on rural communities that have to pass the site. The main impacts come from the loss of a rural feel, increased traffic and new restrictions and 24/7 noise and fumes.

We are concerned that residents would be forced to make detours under the proposed road scheme and that there has not been an assessment of the capacity of local roads when traffic has been displaced from the M1.

Loss of Agricultural Land

The scheme would result in the loss of 33.3ha of BMVL which is a significant loss that policy says should be avoided. The ALC recognises that the impact of soils would be major and adverse over 220ha. We therefore consider that it is incumbent upon the applicant to demonstrate that there is a need for an SRFI cannot be achieved elsewhere.

Conclusions and Planning Balance

CPRE Northamptonshire supports the aims of the SRFI policy but are concerned that rather than furthering those aims this scheme could undermine policy by supporting long haul national road freight distribution. The application reinforces our concerns by tone and content of the Market Assessment and Traffic Analysis.

Policy does not support this scheme. It directs SRFI developments to the DIRFT SRFI and identifies a site near J16 of the M1 for additional warehousing capacity. The scale of loss of BMVL is against NPPF/PPG and local policy. The scheme also does not respect the spatial policies that seek to protect the west of the M1 from development to prevent urban sprawl. Finally the scheme would require TPOs to be set aside.

Planning balance

CPRE Northamptonshire consider that because the proposal significantly and substantially divergences from plans and policy that it is insufficient to simply assert that the scheme would be an SRFI to justify making the DCO. Not only do we not see a case being made but we are concerned that the scheme would undermine the core aims of SRFI by supporting national road freight distribution.

Suggested Conditions

Although CPRE Northamptonshire consider that first and foremost it should be required that the rail hub and intermodal operations are delivered in the first phase of the scheme. We would also suggest that all mitigation measures described in the proposal should be required under condition.

We would also like to see a requirement for a significant amount of solar PV generation to be included as a part of the scheme to reduce pressure on the countryside for solar farms.

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Introduction

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This proposal is for an SRFI located by junction 15 of the M1 and on the Northampton Loop of the West Coast Mainline. The site was promoted for inclusion in the now adopted West Northamptonshire Joint Core Strategy but in the inspection of the plan the inspector was satisfied with the alternative options that were selected.

This response considers the following:

- Relevant planning policy
- Landscape
- Loss of countryside
- Countryside access
- Impact upon rural communities
- Planning balance

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Relevant Planning Policy

There are policies at national, joint and local level that are directly applicable to the scheme. These are set out below.

Strategic Rail Freight Interchange Policy Guidance

This sets out the aims and criteria for nationally and strategic rail freight interchanges and is the primary policy under which the proposal will be judged. The policy and objectives for SRFI are:

The main objectives of Government policy for Strategic Rail Freight Interchanges are to:

- (a) **Reduce road congestion** - to deliver goods quickly, efficiently and reliably by rail and help to reduce congestion on our roads;
- (b) **Reduce carbon emissions** – to meet the Government’s vision for a greener transport system as part of a low carbon economy;
- (c) **Support long-term development of efficient rail freight distribution logistics** - to ensure a network of SRFI - modern distribution centres linked into both the rail and trunk road system in appropriate locations to serve our major conurbations;
- (d) **Support growth and create employment** – through the transfer of freight from road to rail, where this is practical and economic.

Government aims to meet these objectives by encouraging the development of a robust infrastructure network of Strategic Rail Freight Interchanges

SRFIs operate to serve regional and cross regional catchment areas but are also key components in national and international networks. These networks are of strategic importance in facilitating trade links between UK regions and the European Union.

National Planning Policy Framework & Online Planning Practice Guidance

The NPPF seeks to protect against the loss of high quality agricultural land in Paragraph 112 which states: Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification). Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.

Paragraph 109 of the NPPF states:

The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils and preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.

The current Planning Practice Guidance instructs decision makers to:

Use ALC survey data to assess the loss of land or quality of land from a proposed development. You should take account of smaller losses (under 20 hectares) if they’re significant when making your decision. Your decision should avoid unnecessary loss of BMV land.

West Northamptonshire Joint Core Strategy (WNJCS)

Warehouse developments in general and SRFI in particular are addressed in paragraphs 5.70-5.72 of the adopted WNJCS.

Warehousing

5.70 The area remains attractive to the warehouse industry and indications are that it is likely to remain so for the life time of the Plan. However, delivering new space to cater for the warehousing sector on a trend based trajectory would not be desirable nor sustainable in the long term in order to achieve a balanced economy.

5.71 West Northamptonshire already has a large supply of warehouse development with planning consent in the pipeline including Swan Valley, Bedford Road (Former Cattle Market), and DIRFT. The majority of any new warehousing will be accommodated on existing employment sites through the employment land supply pipeline and churn of employment land. The allocation of a strategic employment site at

Northampton M1 Junction 16 provides further support for demand in this sector in a sustainable manner consistent with the economic strategy within the Plan as a whole. New large warehousing developments (in excess of 40,000 sqm) will normally be expected to be provided for at DIRFT.

5.72 DIRFT is a logistics site of national importance and is covered in the Economic Advantage Section 8 of this JCS under Policy E4. DIRFT gains access to the rail network via the “slow” lines on the Northampton Loop Line. The West Coast Main Line fast lines that pass through West Northamptonshire are used by 125 mph passenger services while most freight traffic uses the slow lines via the Northampton Loop. It is essentially a matter of national policy that determines access onto the national rail network. It is expected that access onto the fast lines will remain challenging even after High Speed 2. Consequently it is considered that new rail freight interchanges in West Northamptonshire, in addition to DIRFT, would not be deliverable within this plan period. 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.

Policy R2 considers the types of development that are acceptable in the rural area:

POLICY R2 - RURAL ECONOMY

PROPOSALS WHICH SUSTAIN AND ENHANCE THE RURAL ECONOMY BY CREATING OR SAFEGUARDING JOBS AND BUSINESSES WILL BE SUPPORTED WHERE THEY ARE OF AN APPROPRIATE SCALE FOR THEIR LOCATION, RESPECT THE ENVIRONMENTAL QUALITY AND CHARACTER OF THE RURAL AREA AND PROTECT THE BEST AND MOST VERSATILE AGRICULTURAL LAND. THE FOLLOWING TYPES OF DEVELOPMENT ARE CONSIDERED TO BE ACCEPTABLE:

- a) THE RE-USE OF RURAL BUILDINGS;
- b) SCHEMES FOR FARM DIVERSIFICATION INVOLVING SMALL-SCALE BUSINESS AND COMMERCIAL DEVELOPMENT THAT CONTRIBUTE TO THE OPERATION AND VIABILITY OF THE FARM HOLDING;
- c) SMALL-SCALE TOURISM PROPOSALS, INCLUDING VISITOR ACCOMMODATION;
- d) PROPOSALS THAT RECOGNISE THE ECONOMIC BENEFITS OF THE NATURAL AND HISTORIC ENVIRONMENT AS AN ASSET TO BE VALUED, CONSERVED AND ENHANCED;
- e) THE EXPANSION OF BUSINESSES IN THEIR EXISTING LOCATIONS, DEPENDENT UPON THE NATURE OF THE ACTIVITIES INVOLVED, THE CHARACTER OF THE SITE AND ITS ACCESSIBILITY;
- f) SMALL SCALE EMPLOYMENT DEVELOPMENT TO MEET LOCAL NEEDS; AND
- g) THE USE OF LAND FOR AGRICULTURE, FORESTRY AND EQUESTRIAN ACTIVITY.

South Northamptonshire Local Plan 1997 Saved Policies 2007 (Revised December 2014)

Policy EV8(A) designates an Area of Important Local Gap to guard against coalescence of Northampton with the surrounding villages:

POLICY EV8

IN ORDER TO PREVENT THE COALESCENCE OF SETTLEMENTS THE COUNCIL WILL NOT PERMIT DEVELOPMENT WHICH WOULD SIGNIFICANTLY INTRUDE INTO THE FOLLOWING IMPORTANT LOCAL GAPS AS SHOWN ON THE PROPOSALS MAPS:

- A) BETWEEN THE NORTHAMPTON BOROUGH BOUNDARY AND THE NEARBY VILLAGES AND HAMLETS OF HARPOLE, KISLINGBURY, ROTHERSTHORPE, COURTEENHALL, MILTON MALSOR, PRESTON DEANERY, LITTLE HOUGHTON AND COGENHOE;
- B) BETWEEN THE CHERWELL DISTRICT BOUNDARY AND CHACOMBE, MIDDLETON CHENEY AND WARKWORTH;
- C) AT SILVERSTONE BETWEEN THE MAIN VILLAGE AND CATTLE END AND BETWEEN THE VILLAGE AND THE A43 BYPASS/SILVERSTONE CIRCUIT.

South Northamptonshire Part 2 Local Plan

The emerging Part 2 plan will supersede the saved policies contains Policy SS2 which addresses the general principles for development. This has been submitted for inspection.

POLICY SS2: GENERAL DEVELOPMENT PRINCIPLES

1. Planning permission will be granted where the proposed development:

- a. maintains the individual identity of towns and villages and does not contribute to any significant reduction of open countryside between settlements or their distinct parts; and
- b. does not result in the unacceptable loss of undeveloped land, open spaces and locally important views of particular significance to the form and character of a settlement; and
- c. uses a design-led approach to demonstrate compatibility and integration with its surroundings in terms of type, scale, siting, design and materials; and
- d. is designed to provide an accessible, safe and inclusive environment which maximises opportunities to increase personal safety and security through preventative or mitigation measures; and
- e. incorporates suitable landscape treatment as an integral part of the planning of the development; and
- f. incorporates sensitive lighting schemes that respects the surrounding area and reduces harmful impacts on wildlife and surrounding neighbours; and
- g. will result in adequate standards of living for future occupiers and will not unacceptably harm the amenity of occupiers and users of neighbouring properties and the area through noise, vibration, overshadowing or result in loss of privacy or loss of sunlight and daylight; and
- h. does not result in the loss of the best and most versatile agricultural land or valued soils; and
- i. contributes towards the creation of a healthy community and, where relevant, assesses potential impacts through a health impact assessment (HIA); and
- j. possesses a safe and satisfactory means of access for pedestrians, cyclists and vehicles; and
- k. takes into account existing or planned social and transport infrastructure to ensure development is adequately served by public transport or is in reasonable proximity to a range of local facilities which can be reached without the need for private car journeys; and
- l. is adequately serviced with utility infrastructure appropriate to the development including power, water supply, sewerage, waste management, telecommunications, and high speed broadband; and
- m. provides for satisfactory foul and surface water drainage and incorporates mitigation identified through flood risk assessments and the management requirements to address current and future risks incorporating the required climate change allowances; and
- n. meets the optional higher water efficiency standard of 110 litres per person per day and
- o. will not adversely affect sites of nature conservation value or sites of geological, geomorphological or archaeological importance; and
- p. is not on or in proximity to land containing known mineral resources, or if known resources exist without first considering the need to safeguard these resources; and
- q. would not pose additional risk to users, occupiers and neighbours located in the vicinity of sites that are used for the storage, or processing or transporting of hazardous substances; and
- r. shows a detailed consideration of ecological impacts, wildlife mitigation and the creation, restoration and enhancement of wildlife corridors to preserve and enhance biodiversity.

2. Proposals that contravene any of the above criteria (of relevance to that proposal) will be refused unless over-ridden by other material considerations

Landscape Impact

The site lies between the rural villages of Collingtree and Milton Malsor and is bounded by the M1 to the southeast, the Northampton Loop railway line to the west, the A508 to the south and Collingtree Road to

the north. The site consists of undulating farmland and woodland with a ridge towards the western side of the site that runs parallel to the railway line. The landscape could be described as classic English farmed countryside comprising individual fields separated by hedgerows containing a number of mature trees. The site is crossed by two footpaths that afford open rural views to walkers.

The size and scale of the development combined with its elevated position within the landscape would make it a dominant man-made feature of the landscape. Although the bunding and planting would reduce the harshness of the impact, there would nevertheless be an incongruous substantial manmade feature inserted into the landscape which is topped with an industrial structure. This is best illustrated in the sequence of photomontages from viewpoint 18 (although it should be noted that the year 15 view appears to show inconsistent growth of the screening which has the effect of rounding off the shape of the underlying bunding).

The site itself would be transformed from countryside into an industrial site. This would be particularly felt by the residents of the adjacent villages of Collingtree and Milton Malsor who currently experience the site as the rural context for their villages that they can enjoy using the footpaths that pass through it.

In the wider locality the development would spread the urbanisation of the industrial fringe of Northampton across the current boundary of the M1 breaching spatial planning policy. . As a result when approaching Northampton from the motorway, this would change the perception of Northampton as a town on the edge of the countryside into merely entering into a wider urban area.

The immediate surrounding area would be dominated by the development and even where the bunding and screening are effective in disguising the industrial buildings on the site, receptors would be aware of the artificial slopes that indicate development which would be reinforced by remembered views of the warehousing from their journey through the landscape. This change in character would be further evident by the presence of high volumes of HGVs passing through the landscape as they access the site.

In both the local and more distant landscape currently expansive views which give the feeling of large scale open countryside would be curtailed by the bunding and/or screening which would prematurely terminate the views. This is best illustrated by the sequence of photomontages from viewpoint 10.

Although the proposed mitigation measures would eventually disguise the overt industrial appearance of the scheme in some views we still assess that it would radically transform the landscape site and result in a major adverse impact upon the landscape. This impact would diminish with distance from the scheme.

CPRE Northamptonshire are disappointed that the proposal does not incorporate large scale solar PV generation as a part of the scheme. This would reduce the pressure for large scale solar farms in the open countryside and in a small way mitigate the loss of open countryside that would result from the scheme.

Cumulative Landscape Impact

The application assesses cumulative impact of the scheme with the Rail Central proposal, but does not consider the cumulative impact of the scheme with existing warehousing schemes in the area.

The Rail Central scheme in addition to the proposed scheme would clearly create a vast industrial landscape and would effectively subsume the villages of Collingtree, Milton Malsor and Blisworth into the urban landscape of Northampton. The impact of the two schemes would clearly be beyond the capacity of the landscape to absorb it and would redefine a large swathe of currently rural countryside as an industrial scale warehouse landscape.

The nearest warehousing scheme to the site is the Clipper scheme which lies on the eastern side of junction 15. It is on the opposite side of junction 15 to the proposed scheme. The Clipper scheme already has a substantial presence within the landscape at the junction even though it is significantly smaller than the proposed scheme. It marks the start of the developed area of Northampton. The proposed scheme would extend the industrial developed landscape over the junction creating a warehousing landscape.

Within the local area there are existing warehousing schemes at Swan Valley and Brackmills. The Swan Valley industrial estate lies to the north of junction 15A and is approximately 2 miles from the northern

end of the proposal site. The Brackmills industrial estate lies to the east of the A45 approximately 3 miles to the north of the proposal site.

The nearest rail freight scheme is DIRFT that lies approximate 16 miles north of the proposal site at junction 18 of the M1.

Countryside Access

Rural communities tend to have few opportunities for leisure and recreation and the PROW network is often the main resource available to residents. This makes public footpaths an important asset providing opportunities for the recreation and exercise that are so important in maintaining wellbeing.

Two footpaths cross the site and a number of other footpaths would be affected by the proposed Roade Bypass. On making a site visit it was clear that the footpaths are currently well used. The site visit also showed that although the M1 passes between Collingtree and the site, at this point the M1 is in a cutting and as a result, having crossed the motorway, the traffic noise was not noticeable only a short way beyond the crossing.

It is proposed that the footpaths that currently cross the site would be diverted so that the route is not lost. However, the nature of the environment through which walkers would pass would be radically transformed from relaxing and tranquil open countryside into an environment dominated by steep banks that rise above the footpath and, on the Collingtree side of the site, keep the footpath in shade. It is likely that noise and fumes from the busy industrial complex would also be experienced while walking the new perimeter paths which would further reinforce the knowledge of local residents that they are not walking in a natural environment. Clearly this dramatic change in the experience would act as a significant deterrent to recreational users whose main enjoyment is derived from walking in the open air while experiencing views of the open countryside.

A number of footpaths cross the proposed site of the Roade bypass and at many of these the application proposes at-grade crossings with a central refuge. The A508 is a very busy road link and is frequently used as a diversion route or rat-run when there is heavy traffic or other delays on the M1. Uncontrolled at-grade crossings of such a busy road would be considered unacceptably hazardous by many walkers and so such crossings would deter use of the route. Should the DCO be made we would recommend that safe crossings of the new bypass should be required for the more popular footpaths.

Impact upon Rural Communities

The scheme would have a significant impact upon the residents of the villages that lie within close proximity to the scheme. It would have a lesser impact on rural communities that have to pass the site. The main impacts come from:

- Loss of amenity
- Traffic
- Noise and air quality

Loss of amenity

The villages that are adjacent to parts of the scheme will suffer from the loss of access to their adjacent quality countryside as already discussed above. They will also lose the amenity afforded by their rural setting.

Traffic

The site would generate significant traffic movements both from HGVs and from the private vehicles used by employees and visitors to the site. The scheme includes highways improvements to increase capacity in the local road network however these are not sufficient to avoid the need to impose a no right turn restriction at the junction of the A508 and Courtenhall Road. Whilst this restriction may enable the local road system to handle the modelled traffic volumes, this indicates that the resulting road network would be severely stressed by the traffic generated by the scheme. The restricted junction would also force local traffic to take longer routes to access their villages creating both inconvenience and additional expense for residents and increase their carbon emissions.

Although the traffic modelling may suggest that with the no right turn restriction there is sufficient capacity for the predicted traffic volumes in the local road network under normal conditions, there does not appear to be an assessment of the capacity of the network when there are problems or roadworks on the M1. This section of the M1 is heavily congested and it is not uncommon for collisions to result in lane or carriageway closures. When these occur traffic understandably takes to the local roads in an attempt to bypass the long delays. It is important that the capacity of the road network should be modelled when there are closures or restrictions on the M1. It is particularly important to understand the impact on the A508 when there are issues between junctions 15 and 14.

We consider this to be a significant weakness in the traffic modelling and would recommend that further modelling should be required to demonstrate that the local road network can accommodate the additional load when traffic has been displaced from the M1.

Noise and Air Quality

Logistics operations are a 24/7 operation which would generate constant noise and fumes. The stretch of the M1 that passes Collingtree already has air quality issues and these would be exacerbated by the additional traffic.

Loss of Agricultural Land

The value of BMVL is considered in the NPPF and in the online Planning Practice Guidance. The NPPF acknowledges the importance of agricultural land in Paragraph 112 and the current online Planning Practice Guidance instructs decision makers to take account of losses of less than 20ha in their decisions and to avoid loss of BMVL. NPPF Paragraph 109 seeks to protect the value of soil resources.

Chapter 13 of the application states that the scheme would result in a loss of 220ha of agricultural land of which 33.3 ha is BMVL. It also states that the development potentially results in the loss of all topsoils.

This chapter states that there is no recognised scheme for assessing the significance of loss and observes that losses over 20ha require consultation with Natural England. This aligns with the 20ha threshold in the PPG and in our view this indicates that 20ha is therefore the threshold over which losses should be considered significant. We are unconvinced by the methodology proposed for assessing the significance of harm and consider that by dividing BMVL by grade dilutes the overall impact. Nevertheless under this assessment the assessment finds that the loss of BMVL would have a moderate adverse impact and that the damage to soil function would result in a major adverse impact.

In the Cumulative impact section the report draws comparisons between the BMVL losses under the proposed scheme and those at other local development sites which we take to be an attempt to justify the significant loss of BMVL on this site. Rather than reducing the significance of the loss we consider that this highlights that BMVL is a diminishing resource in the area and further losses should be avoided unless they are proven unavoidable.

The loss of BMVL to this application is significantly above the 20ha threshold and we therefore consider that it is incumbent upon the applicant to demonstrate that there is a need for an SRFI cannot be achieved elsewhere.

Conclusions and Planning Balance

SRFI policy

The primary considerations for the proposal are set out in the SRFI NPS. The extent of the benefits of the scheme are contingent upon how it fulfils the objectives for SRFI as set out in the NPS. The NPS explains that “the aim of an SRFI is to optimise the use of rail in the freight journey by maximising rail trunk haul and minimising some elements of the secondary distribution leg by road through co-location of other distribution and freight activities”. In order to achieve this modal transfer “a network of SRFIs is needed across the regions, to serve regional, sub-regional and cross-regional markets”. The vision being that long haul freight is transported by rail and road is only used to transport freight to or from local SRFI.

CPRE Northamptonshire supports the aims of the SRFI policy because they would deliver a valuable contribution to the reduction of carbon emissions and reduce the demand for road improvements because of the reduction in freight transported by road.

Because of its location within the logistics Golden Triangle the danger is that rather than supporting short haul road freight journeys, the site scheme supports long haul national road freight distribution. This concern is reinforced by the Marketing Analysis Report which does not identify a local demand for short haul freight but instead in 4.18 highlights “Around 87% of the UK population is within a 4.5 hour HGV drive time (a day’s round trip) and 77% within a 2.5 hour HGV drive time”. This goes on to conclude (4.22) that “structural changes (particularly the increase in e-retailing) which have driven demand. In particular changes to logistics have resulted in larger units and a greater number of national distribution centres”. This concern is further reinforced by Appendix 34 of the Traffic Analysis Report which anticipates that when the scheme reaches full capacity (16 trains per day) the majority of the rail transport would transport freight to and from the ports.

The NPS observes that “the majority of existing operational SRFI and other intermodal RFI are situated predominantly in the Midlands and the North”. In our view increasing the supply of SRFI within the Golden Triangle runs the risk of undermining the aims of SRFI by encouraging the industry preference of establishing national distribution centres that distribute goods using long haul road freight. Under this model SRFI can be used to transport goods from the ports but thereafter they are distributed by road. This may deliver a carbon saving when compared to delivering freight by road to national distribution centres, but it removes the incentive to grow the SRFI network in a wide range of locations.

Adverse policy considerations

The following policies would indicate that this order should not be made:

- WNJCS policy on warehousing directs SRFI developments towards the DIRFT SRFI for the duration of the plan period and identifies a site near J16 of the M1 for additional warehousing capacity
- WNJSC policy R2 describes the attributes of acceptable development in the open countryside which the scheme fails to meet because it would not be of an appropriate scale for its location, it does not respect the environmental character of the rural area and it would result in the loss of a significant quantity of BMVL
- The NPPF and online guidance also requires that if BMVL will be lost that the loss should be demonstrated to be necessary and cannot be achieved on less productive land
- the Saved Policy EV8 from the South Northamptonshire Local Plan seeks to protect the proposal site from development in order to prevent coalescence of the villages with the Northampton borough urban area
- Policy SS2 of the emerging South Northamptonshire Part 2 Local Plan requires that development:
 - should not contribute to any significant reduction of open countryside between settlements,
 - should not result in the unacceptable loss of undeveloped land, open spaces and locally important views of particular significance to the form and character of a settlement,
 - should use a design-led approach to demonstrate compatibility and integration with its surroundings in terms of type, scale, siting, design and materials and
 - should not result in the loss of the best and most versatile agricultural land or valued soils.

In addition the development would also require the loss of a number of trees that are protected by TPOs.

Planning balance

In the light of so many divergences from policy it is the view of CPRE Northamptonshire that it is incumbent upon the applicant to demonstrate that the scheme is necessary, that the benefits of the outweigh the harms that it would create and that those benefits could not be achieved on another site.

We do not see any evidence presented in the application that shows that the WNJCS is incorrect in its conclusion that DIRFT (16 miles from the site) can satisfy local SRFI demand. Indeed the tone of the application in respect of its marketing and place in the logistics Golden Triangle raises concerns that the scheme would support national distribution centres and undermine the core aims of SRFI.

Suggested Conditions

Although CPRE Northamptonshire are of the view that the DCO should not be made, we consider that should it be made it is important that should order be made, the environmental goals of the scheme are

delivered and that the scheme is implemented in a way that minimises its impacts where it is practical to do so.

First and foremost we feel that it is essential to ensure that the initial stages of the SRFI development must provide an operational rail network connection and areas for intermodal handling and container storage. This is in line with the NPS and would prevent the intermodal aspect of the site being dropped from the scheme as has happened at Eurohub in Corby.

We would wish to see that all the mitigation measures included within the application are required by condition.

At the public presentation of the scheme we were informed that the scheme would incorporate a moderate amount of solar PV for the local generation of renewable power. We have not been able to find this within the application and feel that should the order be made it should require in order to partially compensate for the loss of countryside that a significant amount of solar PV generation should be incorporated as a part of the scheme.