



NORTHAMPTON
GATEWAY
STRATEGIC RAIL FREIGHT INTERCHANGE

APPLICANT'S RESPONSES TO RELEVANT REPRESENTATIONS

DOCUMENT 8.3

The Northampton Gateway Rail Freight Interchange Order 201X

APPLICANT'S RESPONSES TO
RELEVANT REPRESENTATIONS | 6 NOVEMBER 2018

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Northampton Gateway SRFI – Applicant’s Response to Relevant Representations: Document 8.3

1. INTRODUCTION

- 1.1 Following acceptance of the Northampton Gateway (NG) application by the Secretary of State, Interested Parties were invited to register and make representations (Relevant Representations). Where the Applicant wishes to respond to the issues raised, this report sets out that response.
- 1.2 The report is split into several parts. The first part, **Part 1A below**, deals with issues arising out of the Relevant Representations submitted by statutory bodies, organisation and local Councils. These are addressed in a tabular form by direct reference to each respondees representation number, as assigned by the Planning Inspectorate. Where Statements of Common Ground have been entered into and also addresses an issue reference has been made, and that issue is not the subject of a detailed or specific response.
- 1.3 The second table (**Part 1B**) focuses on relevant representations from individuals or groups of individuals who have raised very specific or uncommon questions or issues.
- 1.4 The final part of the Applicant’s response (**Part 2**) is in the form of a narrative report covering common issues and concerns raised by individual respondees. Most of the representations received have been organised into common themes. In order to avoid repetition, this report does not deal with each individual representation in isolation but rather addresses the concerns raised in a single response to each identified issue. Where statutory bodies, organisations and Council’s raise general issues which mirror the concerns set out by individuals in their relevant representations, these are addressed in Part 2 of this report with a cross reference made to the relevant paragraph in Part 1.

PART 1A – REPRESENTATIONS OF STATUTORY BODIES, ORGANISATIONS AND LOCAL COUNCILS

LOCAL AUTHORITIES

RR Reference	Name/Organisation	Summary of Representation, and Applicant Response
RR-061	Bedford Borough Council	<p>The representation focuses on transport issues, particularly increased freight activity on the A428 between Northampton and Bedford – BBC consider that steps should be taken to promote road freight routeing via the M1 and A421 rather than the A428.</p> <p>The Applicant would be happy for Bedford BC to be consulted on the future Traffic Management Plan or and any ensuing routeing strategies at an early stage, as requested in the representation.</p> <p>Nevertheless, the strategic transport modelling undertaken using the Northamptonshire Strategic Transport Model predicts an overall reduction in two-way traffic using the A428 between Northampton and Bedford because of the SRFI development and highway mitigation works - see Figure 27 and 29 of the Development Case Forecast Report (TA Appendix 24).</p>
RR-574	Northampton Borough Council	<p>The Council submitted a brief representation referring to earlier comments having been sent regarding satisfaction with the community consultation, and to agreeing a Local Impact Report in due course.</p> <p>A statement of common ground has also been prepared between NBC and the Applicant.</p>
RR-672	Warwickshire County Council	<p>Brief representation referring to the strategically significant location for logistics and distribution activity, with the site located at the heart of the ‘golden triangle’ where there is considerable market demand and interest in distribution activity, and the potential for rail freight.</p> <p>The County Council seeks confirmation that the proposals are compatible with aspirations for a new passenger station close to Rugby. Aware of assessments undertaken by Network Rail</p>

RR Reference	Name/Organisation	Summary of Representation, and Applicant Response
		<p>re: capacity and other 'commitments'. The County Council is also commencing an assessment of timetabling changes, in discussion with Network Rail and operators.</p> <p>A statement of common ground has been prepared with the County Council.</p>
RR-003	Environment Agency	<p>A brief representation was submitted referring to more detailed representations being provided in due course covering:</p> <ul style="list-style-type: none"> • flood-risk management, • water resources, and • controlled waters. <p>These issues are in part covered in the Part 2 response, and the Applicant engaged with the Environment Agency to agree a Statement of Common Ground (Document 7.12) with respect to the drainage strategy and compliance with the Water Framework Directive.</p>
RR-218	Cadent Gas Ltd	<p>Cadent Gas Ltd's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those obligations. At the time of the representation, Cadent was discussing the potential impacts on its network with the promoter - a Statement of Common Ground and/or protective provisions have subsequently been agreed and finalised (Document 7.6).</p>
RR-572	Network Rail Infrastructure Ltd (Addleshaw Goddard LLP)	<p>The representation confirms Network Rail's intention to play a full part in the examination process. Network Rail support the modal shift of freight from road to rail, and that more SRFIs are critical to the realisation of new rail freight traffic.</p> <p>Refers to detailed rail capacity work, and to Network Rail being neutral until that work is concluded.</p> <p>Refers to land interests, and queries proposed compulsory purchase of some land under Network Rail's control, including an objection to the powers sought in the DCO as drafted. Protective provisions are required in order to address Network Rail's objections regarding access to the railway and other operational issues.</p>

RR Reference	Name/Organisation	Summary of Representation, and Applicant Response
		A statement of common ground has been prepared with Network Rail (Document 7.13).
RR-622	Natural England	<p>The representation confirms that Natural England (NE) has been working closely with Roxhill Junction 15 Limited and its associate consultants to provide advice and guidance since November 2016, and that numerous earlier issues have been resolved, and dialogue is ongoing. The applicant submitted to NE a draft Habitats Regulations Assessment, and the representation confirms that NE is in agreement that the evidence seen by NE demonstrates that there would be no significant effect on the integrity of the European site.</p> <p>The representation also confirms that Natural England is also satisfied that the project is unlikely to have a significant impact on Roade Cutting SSSI.</p> <p>Confirmation that no objections are raised by Natural England, on the basis that it is able to have input to the CEMP regarding safeguarding measures for the Roade Cutting SSSI.</p> <p>A statement of common ground have been agreed with Natural England in relation to the Geological SSSI and Roade Cutting, and another Statement with regard to wider ecological issues (Document 7.15).</p>
RR-626	Public Health England	<p>No comments made in addition to those made earlier in the process regarding ES Scoping, and the Stage 2 consultation.</p> <p>No response required by the Applicant.</p>
RR-647	Highways England	<p>The representation confirms that Highways England (HE) has been actively engaged in discussion with the applicant (including its consultants) since 2016 with a view to ensuring that the proposed development will not have a severe and detrimental impact on the Strategic Road Network (SRN). It refers to HE's role as a strategic highway authority which requires it to ensure the effective operation of the network; protect and improve the safety of the network and to conform to the principles of sustainable development. "Sustainable development" means encouraging economic growth while protecting the environment and improving safety and quality of life for current and future generations.</p>

RR Reference	Name/Organisation	Summary of Representation, and Applicant Response
		<p>Cross-reference is made to the Secretary of State’s policy in respect of the SRN and the delivery of sustainable development set out in Department for Transport Circular 02/2013 which applies to strategic rail freight interchanges as set out at paragraph 5.209 of the NPSNN.</p> <p>The representation confirms that HE has been actively engaged in discussion with the applicant (including its consultants) since 2016 with a view to ensuring that the proposed development will not have a severe and detrimental impact on the SRN.</p> <p>The representation refers to Highways England and the applicant having reached agreement on a number of matters as reflected in the statement of common ground submitted by the Applicant, with a number of other outstanding technical issues referred to.</p> <p>Subsequent agreement has been reached on most of the matters raised in HE’s relevant representation with three further statements of common ground which are:</p> <ul style="list-style-type: none"> • Doc 7.1A Addendum SoCG on Transport Matters; • Doc 7.1B SoCG in relation to the Smart Motorways Project; • Doc 7.1C SoCG DCO Drafting. <p>Any outstanding matters between the parties are reflected in these SoCG.</p>
RR-726	Anglian Water Services Ltd	<p>Confirmation of dialogue with the applicant prior to submission regarding protective provisions, and requisition applications for water supply and foul sewerage connections to the site, including reinforcements or upgrades to the existing infrastructure.</p> <p>A Statement of Common Ground is in place with Anglian Water (Ref 7.4A), and an addendum has subsequently been agreed (Document 7.4A, November 2018) regarding DCO Drafting and the Water Framework Directive in response to the request by the ExA in the Rule 6 letter.</p>
RR-031	Blisworth Parish Council	Blisworth Parish Council’s representation raises objections on a number of grounds, including:

RR Reference	Name/Organisation	Summary of Representation, and Applicant Response
		<ul style="list-style-type: none"> • Lack of compliance with national policy; • Traffic concerns and road safety – will result in more traffic on unsuitable local roads; • Alternative sites elsewhere, and rail capacity concerns; • Market and ‘need’ evidence is queried - the site is too close to DIRFT, and to the Ports – it won’t be economic or viable; is too far from ‘industrial heartlands’. • Impacts on heritage assets (conservation areas and ancient villages); • Impact on rights of way; • Noise and light pollution; • Lack of social or environmental benefits with reference to low local unemployment; • Ecological impacts; • Cumulative impacts with another proposed SRFI nearby (‘Rail Central’). <p>These issues are common to many other representations, and are included in Part 2 of this response.</p>
RR-043	Shutlanger Parish Council	<p>Shutlanger Parish Council’s representation raises objections on the basis of:</p> <ul style="list-style-type: none"> • Impact on roads A5, A508 and A43, including concerns about ‘rat-running’ traffic in the villages; • Noise and light pollution; • Loss of countryside • Upwards pressure on housing need/development. <p>These issues are common to many other representations, and are included in Part 2 of this response.</p>
RR-395	Roade Parish Council	<p>Parish Council’s representation raises objections on a number of grounds, including:</p> <ul style="list-style-type: none"> • Traffic concerns and road safety – the proposed Bypass is unwanted by many, but if delivered must be delivered before any other development begins – fears it won’t be delivered until after the development is finished; • Concerns that local congestion will be exacerbated, creating air quality concerns; • Potential effect on business due to the bypass removing passing trade; • Capacity of the SRFI site access roundabout;

RR Reference	Name/Organisation	Summary of Representation, and Applicant Response
		<ul style="list-style-type: none"> • Alternative sites elsewhere can meet the need for SRFIs, including DIRFT which has existing capacity; • Lack of need for the proposal including in the context of low local unemployment; • Cumulative impacts with another proposed SRFI nearby ('Rail Central'). <p>These issues are common to many other representations, and are included in Part 2 of this response.</p>
RR-412	Hardingstone Parish Council	<p>The Parish Council's representation raises objections on the basis of:</p> <ul style="list-style-type: none"> • Impact on local roads; • Noise and air pollution; • Loss of countryside <p>These issues are common to many other representations, and are included in Part 2 of this response.</p>
RR-460	East Hunsbury Parish Council	<p>The Parish Council's representation raises objections on a number of grounds, including:</p> <ul style="list-style-type: none"> • Traffic concerns and road safety, including regarding potential increased through-traffic; • DIRFT is still expanding and only 20 miles away; • Air pollution; • Economic trends and growth suggest no need for the SRFI, including low local unemployment; • Cumulative impacts on the locality alongside other committed developments, including the Northampton South SUE, and the emerging proposed SRFI nearby ('Rail Central'). <p>These issues are common to many other representations, and are included in Part 2 of this response.</p> <p>The Applicant wishes to note here that the SRFI proposals include the provision of an Environmental Weight Limit (i.e. HGV restriction) through East Hunsbury. This is shown on the Traffic Regulation Plans, Documents 2.6B and 2.6C.</p>

RR Reference	Name/Organisation	Summary of Representation, and Applicant Response
RR-524	Milton Malsor Parish Council	<p>Milton Malsor Parish Council's representation raises objections on a number of grounds, including:</p> <ul style="list-style-type: none"> • Lack of compliance with local planning policy; • Traffic concerns and road safety, including regarding the Courteenhall Road 'left in-left out' proposal; • DIRFT has capacity for further expansion; • Loss of important local countryside and rural character of the villages; • Impact on rights of way with less convenient diversions proposed; • Noise, air and light pollution; • Cumulative impacts with another proposed SRFI nearby ('Rail Central') not fully assessed. <p>These issues are common to many other representations, and are included in Part 2 of this response.</p>
RR-559	Collingtree Parish Council	<p>Collingtree Parish Council's representation raises objections on a number of grounds, including:</p> <ul style="list-style-type: none"> • Lack of compliance with national and local planning policy – speculative, developer led proposals, and the NSIP process bypasses local democracy; • Environmental impacts – including traffic concerns and associated concerns about air pollution; • Lack of strategic need. <p>These issues are common to many other representations, and are included in Part 2 of this response.</p>
RR-627	Quinton Parish Council	<p>The Parish Council's representation raises objections on a number of grounds, including:</p> <ul style="list-style-type: none"> • Traffic and transport impacts, including potential for 'rat-runs' through villages;

RR Reference	Name/Organisation	Summary of Representation, and Applicant Response
		<ul style="list-style-type: none"> • Lack of need, and criticism as speculative development – low local unemployment; • DIRFT has capacity, so this isn't required; • Local air pollution perceived to be at high levels. • Loss of farmland and habitats; • Lack of compliance with local policies. <p>These issues are common to many other representations, and are included in Part 2 of this response.</p> <p>The Applicant wishes to note here that the SRFI proposals include the provision of an Environmental Weight Limit (i.e. HGV restriction) on the road between the A508 and Quinton. This is shown on the Traffic Regulation Plans, Documents 2.6A, 2.6B and 2.6C.</p>
RR-633	West Hunsbury Parish Council	<p>The Parish Council's representation raises objections on a number of grounds, including:</p> <ul style="list-style-type: none"> • Lack of need, and criticism of the distribution/logistics sector for generating relatively little employment; • DIRFT has capacity, so this isn't required; • Traffic and transport impacts on the M1 and A45, including potential for 'rat-runs' through residential areas; • Loss of large area of farmland and habitats. <p>These issues are common to many other representations, and are included in Part 2 of this response.</p>
RR-669	Stoke Bruerne Parish Council	<p>The Parish Council's representation raises objections on a number of grounds, including:</p> <ul style="list-style-type: none"> • Proposals will do nothing for the village and its residents; • Traffic and transport impacts, including potential for 'rat-runs' through villages; • DIRFT has capacity, so this is speculative and isn't needed - low local unemployment; • Local air pollution perceived to be at high levels. • Loss of farmland and habitats;

RR Reference	Name/Organisation	Summary of Representation, and Applicant Response
		<ul style="list-style-type: none"> • Lack of compliance with local policies. <p>If approved, the Parish Council seeks a permanent 7.5T weight limit and traffic management plan to ensure HGVs avoid Stoke Bruerne.</p> <p>These issues are common to many other representations, and are included in Part 2 of this response.</p> <p>The Applicant can confirm that provision of such a restriction, and an Environmental Weight Restriction is included in the SRFI proposals. This is shown on the Traffic Regulation Plans, Documents 2.6B and 2.6C.</p>
RR-679	Courteenhall Parish Council <i>[Parish Meeting, not Parish Council]</i>	<p>The response refers to the proposals as flawed on the basis that they are based in an area of “zero unemployment”, and “zero manufacturing”.</p> <p>The SRFI is not needed as it will encourage imports at the expense of exports. DIRFT is larger and still has capacity.</p> <p>The representation questions the reliability of the transport assessment and strategy for traffic.</p> <p>These issues are similar to many raised by others, and are largely dealt with in Part 2 of the Applicant’s response. In addition, the explanation provided in the Market Analysis Report (Document 6.8) is considered of direct relevance in terms of explaining the economic context, and operational role, of SRFIs in enabling the movement of goods in and out, as well as around, the UK.</p>
RR-002	CPRE Northamptonshire	<p>Very brief representation submitted referring to a detailed submission to be made in due course which will cover issues relating to loss of countryside, and landscape and visual effects.</p> <p>These issues are included in Part 2 of this response.</p>
RR-175	Northampton Rail Users Group	<p>Object on the basis of adverse effects likely on passenger services – with specific reference to the following points:</p>

RR Reference	Name/Organisation	Summary of Representation, and Applicant Response
		<ol style="list-style-type: none"> 1. Existing studies suggest there are capacity constraints – contrary to the application as submitted; 2. The proposals are not ‘strategic’ because the site is not located on an identified strategic freight route; 3. Even with HS2, the WCML will be back to existing capacity constraints within 25 years; 4. The EIA is flawed - the cumulative assessment is not adequate with regard to impact on rail passengers, and under-estimated impacts on habitats – the application fails to meet EIA regulations with regard to the impact on ‘people’ (passenger rail users); 5. Required changes to the track layout at Northampton are impractical following the new station – quoted train speeds from MK to Rugby illustrate the specific adverse interference with passenger services by freight; 6. The TA is flawed by dismissing many major local effects, or diluting them by averaging over a large area – new highways infrastructure accommodating 1856 HGV movements, and 12,200 light vehicles per day cannot be a ‘permanent beneficial’ effect; 7. Interpretation of the WHO guidelines on noise is wrong. <p>Some of these issues are covered elsewhere in the Applicant’s response to relevant representations (including the Part 2 narrative), but in brief the Applicant’s responses are:</p> <ol style="list-style-type: none"> 1. From the submitted rail studies, available capacity has been and can be identified on the network for new freight services, both passenger and freight. Please use details of availability of paths from these documents. 2. A Strategic Rail Freight Interchange site does not, necessarily need to be positioned alongside what is defined as the Strategic Freight Network. The Department for Transport’s document <i>Strategic Rail Freight Network: The Longer Term Vision (September 2009)</i> clearly defines the types of rail routes that are considered part of the Strategic Freight Network (SFN). The 2007 Rail White Paper has defined the Strategic Freight Route as “a core network of trunk freight routes, capable of accommodating more and longer freight trains, with a selective ability to handle wagons with higher axle loads and greater loading gauge, integrated with and complementing the UK’s existing mixed traffic

RR Reference	Name/Organisation	Summary of Representation, and Applicant Response
		<p><i>network</i>". The West Coast Main Line, and specifically via Northampton, is deemed part of the SFN.</p> <ol style="list-style-type: none"> 3. The longer-term impacts and implications of HS2 are hard to predict with any certainty. However, it is clear that post HS2, there will many ways of making use of released West Coast Main Line rail capacity, both for passenger and freight services. 4. The EIA is explicit in considering the likely effects on people in all relevant chapters – this explicitly includes rail passengers in Chapter 4 (landscape and visual). The various Rail Reports explicitly consider the impact on rail services and passengers, and are cross-referred to in ES Chapter 12. 5. It is unclear what this is referring to, specifically with regard to "required changes to the track layout" and the "new station". It is not clear what relevance this has to freight services, especially those coming into Northampton Gateway from the south. Currently, at Northampton station, the passenger services with their long dwells there, are adversely affecting freight services passing through the area. 6. The TA is not flawed. The Statement of Common Ground and Addendum to the Statement of Common Ground between Highways England and the Applicant, and the equivalent documents between Northamptonshire County Council (as local highway authority) and the Applicant, confirm that the TA, its assessment methodology and findings, and the transport chapter of the ES, have been reviewed and approved by each highway authority. With regard to the assertion that the effect of the development cannot be a beneficial highway impact, reference is drawn to paragraphs 3.16 and 3.17 of the Statement of Common Ground with Northamptonshire County Council, which summarise the overall transport impacts of the proposed development, and concludes: <i>"...The proposals will alleviate existing/future capacity issues at a number of junctions, hence the County Council has no objection to the application in relation to highway matters and, as indicated above, believes the mitigation works would contribute positively to the enhanced operation of the highway network"</i>. 7. The Applicant does not agree regarding the interpretation of the WHO Guidelines, but as no information was provided as to how the respondent believes the interpretation is wrong a detailed response cannot be prepared. The project team would be happy to engage if there is any further detail or comment available.

RR Reference	Name/Organisation	Summary of Representation, and Applicant Response
		In addition to the specific responses provided above, a response to the issue of potential conflict between passenger and freight services is included in the Part 2 response.
RR-176	Parishes Against Pollution (Rod Sellers)	<p>The Group consists of 29 Parish Councils in South Northants. The Group objects to all major traffic related developments in a wide area, based on the cumulative consequences for air, noise and light pollution. Objection on the grounds of traffic and environmental impacts, consistent with objections raised to other large developments.</p> <p>These issues are common to many other representations, and are included in Part 2 of this response.</p>
RR-326	The Coal Authority	No comments or observations raised by the representation – no response required.
RR-437	Northampton Ramblers	<p>Objection raised on the basis of loss of existing footpath between Milton Malsor and Collingtree, as well as loss of habitats and loss of mature trees.</p> <p>Concerns raised over lack of local policy context for the proposals. Object on grounds of air, light and noise pollution, and traffic impacts associated with 24 hr operations.</p> <p>The Applicant notes the contrast between these comments and the support offered by the national Ramblers Association (Northamptonshire Area).</p> <p>These issues are common to many other representations, and are included in Part 2 of this response.</p>
RR-488	Stop Roxhill Northampton Gateway Action Group (SRNG)	<p>The Action Group's representation is largely reflective of concerns raised by individual respondees, therefore please refer to part 2 of this report.</p> <p>It refers to issues of:</p> <ul style="list-style-type: none"> • Consistency with national policy (NPSNN) • 'Need' and whether the proposals form part of a network given distribution markets; • Employment issues; • Environmental issues – 'urban creep', loss of greenfields, and alternative sites.

RR Reference	Name/Organisation	Summary of Representation, and Applicant Response
		<ul style="list-style-type: none"> • Traffic and pollution concerns. • Rail capacity. • Lack of local planning policy context.
RR-666	Rugby Rail Users Group	<p>Object on the grounds of concerns that the proposed development will reduce capacity for passenger train services, and will be detrimental to both future and existing passenger train services.</p> <p>This issue is covered in the Part 2 response.</p>
RR-331	Chris Heaton-Harris MP	<p>Objections in response to issues and concerns raised by constituents, based around key themes:</p> <ul style="list-style-type: none"> • ‘conservation’ - loss of farmland and habitat; • ‘flood-risk’ in the surrounding area; • ‘traffic’; • ‘noise’, and ‘air pollution’. <p>These issues are common to other representations from local people, and are included in Part 2 of this response.</p> <p>The Flood Risk Assessment and Drainage Strategy (ES Appendices 7.1 for the FRA, and 7.3 for the Sustainable Drainage Strategy) demonstrate that flood risk downstream of the SRFI site would not be not exacerbated – indeed, some betterment (reduced risk) is likely.</p>
RR-455	Rt Hon Andrea Leadsom MP	<p>Comments based on issues and concerns raised by constituents, based around several key themes:</p> <ul style="list-style-type: none"> • The strategic location of the site in the context of the NPS, and SRFI Policy Guidance Notes; • Rail capacity issues on the WCML and associated site feasibility; • Traffic movements to and from the site; • Availability of a local workforce; • Blight (visual, auditory, environmental).

RR Reference	Name/Organisation	Summary of Representation, and Applicant Response
		<p>These issues are common to other representations from local people, and are included in Part 2 of this response.</p>
RR-469	Milton Malsor and Collingtree Women's Institute	<p>Objection on the grounds of a number of issues including:</p> <ul style="list-style-type: none"> • Noise, air and light pollution; • DIRFT has capacity for further expansion; • Traffic and congestion concerns, including on the M1, and concerns about 'rat-running' and local effects from the Knock Lane proposed improvements; • Site is not allocated by local planning policy; • low local unemployment; • Government has no strategy for rail freight terminals. <p>These issues are common to many other representations, and are included in Part 2 of this response.</p>
RR-638	Ashfield Land Management Ltd (Turley)	<p>The response describes in some detail the 'Rail Central' SRFI proposals, and refers to earlier input by Turley for Ashfield Land in response to consultation by Roxhill regarding Northampton Gateway.</p> <p>It questions the position of Roxhill that only one of the two SRFIs can be granted consent, and asserts that both could operate alongside each other as Rail Central has been designed to facilitate construction in parallel if both are approved. A 'Rail Operations Report' will be submitted by Rail Central to confirm that both are compatible, as will suggested DCO provisions to enable both schemes to come forward.</p> <p>The response questions Roxhill's judgements regarding the environmental impacts of Rail Central as set out in the submitted ES.</p> <p>The response suggests the examination processes for both schemes should be appropriately joined or coordinated by the Examining Authorities. Rail Central will propose specific provisions for inclusion within the Northampton Gateway draft Development Consent Order to ensure that both the Northampton Gateway and the Rail Central Development Consent Orders work in practice alongside each other, providing the appropriate mitigation at the</p>

RR Reference	Name/Organisation	Summary of Representation, and Applicant Response
		<p>appropriate time where both schemes come forward. Rail Central will make representations on the proposed compulsory acquisition of these parcels, and on the need to include protective provisions for the benefit of Rail Central within the Northampton Gateway draft Development Consent Order.</p> <p>On submission and acceptance by PINS of the final Rail Central application the Applicant will revisit the evidence, but Roxhill's views regarding the likely local effects of Rail Central as compared to Northampton Gateway, and of the potential cumulative impacts were both schemes approved, have not altered.</p>
RR-645	Gazeley GLP Northampton SARL (Turley)	<p>The response describes in some detail the 'Rail Central' SRFI proposals, and refers to earlier input by Turley for Ashfield Land in response to consultation by Roxhill regarding Northampton Gateway.</p> <p>It questions the position of Roxhill that only one of the two SRFIs can be granted consent, and asserts that both could operate alongside each other as Rail Central has been designed to facilitate construction in parallel if both are approved. A 'Rail Operations Report' will be submitted by Rail Central to confirm that both are compatible, as will suggested DCO provisions to enable both schemes to come forward.</p> <p>The response questions Roxhill's judgements regarding the environmental impacts of Rail Central as set out in the submitted ES.</p> <p>The response suggests the examination processes for both schemes should be appropriately joined or coordinated by the Examining Authorities. Rail Central will propose specific provisions for inclusion within the Northampton Gateway draft Development Consent Order to ensure that both the Northampton Gateway and the Rail Central Development Consent Orders work in practice alongside each other, providing the appropriate mitigation at the appropriate time where both schemes come forward. Rail Central will make representations on the proposed compulsory acquisition of these parcels, and on the need to include protective provisions for the benefit of Rail Central within the Northampton Gateway draft Development Consent Order.</p> <p>Suggests the examination processes for both schemes should be appropriately joined or coordinated by the Examining Authorities.</p>

RR Reference	Name/Organisation	Summary of Representation, and Applicant Response
		<p>On submission and acceptance by PINS of the final Rail Central application we will revisit the evidence, but Roxhill's views regarding the likely local effects of Rail Central as compared to Northampton Gateway, and of the potential cumulative impacts were both schemes approved, have not altered.</p>
	<p>Historic England [Late representation accepted on discretion of ExA]</p>	<p>Historic England (HE) was previously consulted on these proposals in the form of preliminary environmental information (PEI) in 2017, and also responded to the applicant on the basis of the draft environmental statement (ES). The representation refers to various concerns raised with regard to the sufficiency of the information that was submitted, and with reference to previously views expressed that the proposed development is likely to result in considerable visual and environmental impacts that may affect the setting of heritage assets. The representation also refers to additional information requested by HE not having been produced.</p> <p>The Applicant notes these comments and the reference to information sought at Stage 2 which HE refers to as not being available – these were:</p> <ul style="list-style-type: none"> • The ZTV plan – this is Figure 4.9 of the ES as submitted to PINS; • Photomontages, including those from viewpoints 8 from the edge of Blisworth and 15 from the edge of Milton Malsor – a series of photomontages are included in the ES (Figure 4.10), including viewpoint 16 from the edge of Milton Malsor; • Inclusion of photomontages to enable greater assessment of any potential impacts on Courteenhall Park (Registered Park and Gardens) – photomontages 25 and 26 form part of the application (ES Figure 4.10). • Inclusion of photomontages to enable greater assessment of any potential impacts on the Roade Aqueduct - photomontage 30 form part of the application (ES Figure 4.10). <p>All of the above information was provided to Historic England, along with other relevant information, in August 2018, and again in September 2018 when Historic England indicated they had misplaced the information.</p>

RR Reference	Name/Organisation	Summary of Representation, and Applicant Response
		The Applicant has prepared a draft Statement of Common Ground, now submitted along with a letter from Historic England (Document 7.14).

Part 1 B - APPLICANT RESPONSE TO LOCAL SPECIFIC ISSUES

The following Interested Parties and respondees have made Relevant Representations – most of these include issues which are common to many other Representations and which are covered in the ‘Part 2’ narrative response from the Applicant. However, in addition the Relevant Representations submitted by the Interested Parties listed below also include other unusual technical, specific or local issues which are not covered in the Applicant’s other responses to representations.

Specific responses to these less common or specific queries are provided in the table below, as well as referring to the Applicant’s Part 2 narrative response:

RR Reference	Identity	Representation (Summary)	Applicant Response
RR-007	Jane Lawrence	The proposed timing for delivery of the Bypass raises concerns about short-term traffic impacts if other highways improvements are made at J15 and on the A508 in advance. The Bypass must be complete early as indicated by the Applicant, and should be before construction starts on the SRFI site.	The Applicant understands the support for, and importance of, the bypass, and is committed to ensuring its delivery. The Applicant has proposed several key triggers to secure delivery – following dialogue with NCC Highways and the Local Planning Authority, these are for the Bypass to be open within 2 years of first occupation of the SRFI site, or within 4 years of the start of construction works at Junction 15, whichever is the sooner.

RR Reference	Identity	Representation (Summary)	Applicant Response
RR-011	Ruth O'Donegan	Questions the ability to stop HGVs travelling south on A508.	<p>A number of measures are proposed to prevent HGVs from travelling south after leaving the SRFI, including:</p> <ul style="list-style-type: none"> • Signage; • a height barrier (within the private estate road) to prevent HGVs turning right at the roundabout and requiring all HGVs departing the site to travel north on the A508; • supported by the installation and use of Automatic Number Plate Recognition (ANPR) enforcement cameras on the site access arm of the roundabout and on the A508 to the south - drivers found to be disregarding the HGV right turn ban, for example by U-turning at M1 Junction 15, will be identified and the relevant site occupier subject to an enforcement regime. <p>These measures are described at paras. 4.23 to 4.25 and 4.38 to 4.41 of the Transport Assessment (TA) (Appendix 12.1 of the ES).</p>
RR-015	Darren Gay	Concerns raised about local traffic impacts. The scheme will deliver positive benefits but only if congestion issues are solved first. Should prevent Grange Park and Collingtree roads being used as rat runs when A45 is congested.	The highway mitigation works have been the subject of detailed assessment and are agreed with Highways England and Northamptonshire County Council (as local highway authority). As described in the TA (ES Appendix 12.1), they are demonstrated to provide additional network capacity, particularly at M1 Junction 15. The highway works in combination are shown to draw existing traffic that currently avoids congestion points back onto the strategic and principal

RR Reference	Identity	Representation (Summary)	Applicant Response
			road network. This is a beneficial impact since these roads are most suited for that traffic, and a consequential reduction in traffic on many of surrounding local roads and surrounding villages is predicted. The assessments predict a reduction in two-way traffic flow on Watering Lane in Collingtree and that there would be no rat running through Grange Park. The residual highway impacts at locations to the north of the M1, including the A45, are summarised at paras 8.156 to 8.165 of the TA.
RR-025	Eileen Lawson	Bypass might result in petrol station and supermarket in Roade becoming 'uneconomic'.	The Bypass will remove through-traffic from the centre of Roade, enabling more reliable local journeys and reduced congestion in the village. There are compelling environmental and transport justifications and benefits for this. However, it will not prevent access to Roade by passing non-HGV traffic, and there is scope to ensure local signage refers passing traffic to the 'local centre' of Roade. In the context of the local resident population, and given the store's location on the key route in and out of the village, the risk of the local filling station and convenience store becoming uneconomic seems unlikely.
RR-033	Gary Crook	Concerns about a range of local impacts and issues, including the lack of electricity capacity in the local network. The applicant has " <i>been told the development must not use Northampton Road in any way however</i>	The District Network Operator (DNO) network in the Northampton area is at or near saturation point due to development in the area over the last few years. The Northampton Gateway development is to be served by Western Power (WP) 'Extra High Voltage network and

RR Reference	Identity	Representation (Summary)	Applicant Response
		<p><i>they have a roundabout linking the two halves together...".</i> New bus service not justified by evidence of likely need or usage.</p>	<p>as part of the Point of Connection requirements the developer will be responsible for an element of reinforcement works to allow WP to improve their existing network to ensure capacity for the project is made available.</p> <p>We are unsure as to the origin of the comment regarding the Northampton Road (A508), our proposals are that the access to the SRFI is provided from a new roundabout on the A508 Northampton Road a short way south of Junction 15. This is shown on the Highway Plans, Documents 2.4A and 2.4B.</p>
RR-041	Mr Simon Jones [and several others]	<p>Questions likely use of NG in context of recent reports which confirm a decrease in the use of Rail Freight by 20% down to 0.4% growth from predictions of 5% increase year on year.</p>	<p>The representation raises numerous issues common to other representations, including regarding existing SRFI capacity elsewhere, low unemployment, and pollution. Specific queries raised regarding rail freight trends:</p> <p>Currently, 38% of the Intermodal market sector is carried by rail. The most recently approved ORR Freight Rail Usage quarterly figures (2017-18 Q4) show a reduction in "billion net tonne km" of 5% for Intermodal services and 3% for construction traffic. However, international traffic increased by 23% over this period.</p> <p>Individual quarter figures for growth cannot be (and are not) used as a guide to growth over a complete</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
			<p>year or a sustained number of years. The reduction in overall freight traffic during that specific quarter was a result of a reduction in trains operated by DB Cargo, although this was offset by a significant increase in freight traffic run by GB Railfreight. Very poor weather related incidents also caused a number of Intermodal services to be cancelled during this period.</p> <p>Even with a sensitivity test for low market growth, Network Rail's Strategic Business Plan for 2019-2024 is predicting an uplift of 22% (in million tonnes) for freight from 2016/17 to 2023/24.</p>
RR-047	Edmund James	<p>Raises a point regarding provision of rail paths: <i>"The rail study claims only three routes will be available with one additional route from the relocation of the aggregates plant – therefore doesn't meet policy of 4 trains into site"</i>.</p>	<p>The representation includes numerous points covered in other responses, but also a specific rail related comment:</p> <p>Both the Victa Railfreight and GB Railfreight rail studies (Document 6.7) provide analysis which shows there are many available freight paths that could cater for new Intermodal services and heavier bulk services, such as aggregates traffic, to and from Northampton Gateway.</p>
RR-060	Terence Tapping	<p>Concern about loss of fields and footpaths, but main query relates to local flood-risk issues - <i>"a pipe takes run off water from the proposed site"</i></p>	<p>The replacement footpath around the SRFI would be located within the landscaping and bunding.</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
		<i>under the M1 to farm fields opposite our bungalow [in Collingtree between MMalsor and the A45], the road in front of this field floods regularly, if the fields disappear under concrete there is going to be a lost more water to flood the road and our home."</i>	The flood-risk and drainage assessment shows that measures proposed would help ensure flooding is not made worse elsewhere off-site, and reductions in flood risk are achieved. The Drainage Strategy is based on Sustainable Drainage principles, storing water in large basins during rainfall events and reducing the peak rate of runoff from the site. A conservative approach to the Collingtree outfall has been taken to ensure that downstream flood risk will not increase.
RR-064	Declan Waters John	There is no solution to the enforcement of a 30mph speed limit through Grafton Regis. Already a speeding problem there.	It is not considered within the scope of the Northampton Gateway scheme to resolve existing concerns or problems regarding enforcement of existing speed limits. However, the issue of traffic speeds is understood, and the introduction of traffic islands within Grafton Regis, as is proposed as part of the highway mitigation works, would be expected to have a traffic calming effect. These works are shown on the Highway Plans, Document 2.4F.
RR-076	Tom McManus	Health concerns re local Air Quality during construction and operation – Mr McManus' wife has health issues, and he is concerned that additional air pollution from these proposals will cause serious distress.	The ES suggests that the layout of the proposed SRFI and the proposed mitigation measures will result in negligible overall impacts on air quality. Improvements in air quality (and road noise) are likely in those nearby communities where reductions in through traffic are predicted as a result of the

RR Reference	Identity	Representation (Summary)	Applicant Response
			<p>highways mitigation measures. This includes Roade, Blisworth and Milton Malsor.</p> <p>The operational phase assessment concluded that traffic generated by the proposed development is not predicted to significantly alter air quality in any part of the study area (according to IAQM/EPUK guidance slight impacts are insignificant).</p> <p>The air quality assessment is based on 'worst-case' receptors (i.e. residential dwellings closest to the roads) and as such, if negligible impacts are predicted at these dwellings the impacts at dwellings further from the road will likely be less. Where no nearby receptors were assessed, it is likely that impacts were screened out in that area, and were therefore considered to be not significant.</p> <p>As background fine particulate matter concentrations are well below the air quality standard at present, there is a low risk of health impacts associated with the construction phase.</p>
RR-091	Cecilia Ella Muir	Concerned about a range of local impacts. Including pollution and traffic. A key concern is the likely routeing of traffic to and from the site, and the inevitable increase in HGVs using narrow roads in Collingtree and ignoring the Low Bridge signs causing even more local congestion problems. This cannot be prevented or enforced.	<p>The scheme will provide improved signage on the A45 at the junction with Watering Lane to warn drivers of the presence of the low bridge on Collingtree Road.</p> <p>The proposed highway mitigation works will provide additional highway capacity at existing congestion points on the highway network, removing bottlenecks</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
			<p>and easing congestion. The strategic transport modelling included in the TA (ES Appendix 12.1), demonstrates, that traffic flows on many of the surrounding local roads would reduce in response to the eased congestion. Collingtree Road is predicted to see a reduction in two-way vehicle movements in the Development Case scenario (i.e. with the development and highway mitigation works in place), as compared to the Reference Case scenario (without the development or highway mitigation works in place).</p>
RR-093	Dr Andrew Gough	<p>Suggestion that Hinckley National Rail Freight Interchange is far superior site to NG or RC as far as the East Midlands is concerned, and that the NG site was discounted by Prologis when they pursued DIRFT III.</p>	<p>The Market Analysis Report (Document 6.8) describes the market that the Northampton Gateway SRFI will serve. It is expected that the focus of this market will be a 15km core catchment area, with a secondary catchment area of 50km. It is anticipated therefore that Northampton Gateway will serve a different catchment than the proposed Hinckley RFI. Furthermore, there is an existing concentration of logistics activity in and around Northampton that will not be served by SRFI at Hinckley. The Northampton Gateway SRFI will help to meet demand for rail services and help to expand the concentrated network of SRFI's in the Midlands, to the south east.</p>
RR-137	Margaret Moss	<p>Lives in Grade II listed house in the Blisworth conservation area. Visitors and tourists bring income which will stop if development is approved.</p>	<p>The ES suggests that the layout of the proposed SRFI, and the proposed mitigation measures on and off-site, will result in negligible overall impacts on air quality and noise. Improvements in air quality (and road</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
		<p>Rat-running traffic and air and noise pollution are a major concern.</p> <p>Can't get planning permission for replacement of rotten windows to prevent noise and pollution. Both will be worse with this development.</p>	<p>noise) are likely in those nearby communities where reductions in through traffic are predicted as a result of the highways mitigation measures. This includes Roade, Blisworth and Milton Malsor.</p> <p>Based on the traffic data provided, air quality will largely improve in Blisworth. However, any change will be negligible. Current air quality in Blisworth is also 'well below' (i.e. better than) the air pollution standard limits.</p> <p>With regard to noise, the main concern in Blisworth would be from road traffic noise. Any change in road traffic noise within the Blisworth Conservation Area is likely to be negligible as a result of the Proposed Development prior to completion of the Kegworth Bypass. Following the opening of the Kegworth Bypass, there are likely to be reductions in road traffic noise at properties on the High Street within the Conversation Area due to the change in predicted traffic flows, and as before, negligible changes elsewhere.</p> <p>Regarding SRFI Activities, due to the site layout and the distance and landscaping between the Main Site and Blisworth, it is unlikely that any adverse impacts from operational sound would occur at the village.</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
RR-147	Andrew Vincent	<p>Blisworth is a quiet rural village which already suffers with through-traffic. It will lose its rural separation from Northampton. Blisworth is elevated – light pollution is a major concern.</p>	<p>The potential effects of light pollution for this receptor have been considered and included in the assessment given in ES Appendix 11.4.</p> <p>For both Construction and Operation phases a Minor Adverse visual effect is expected for those views towards the Site that do not also take in any local lighting. No other views would be affected. It should be noted that Courteenhall Road is lit westward from its junction with Connegar Leys, in Blisworth.</p> <p>Even so, the Proposed Development would be distant by 1200 metres or more and, while this is closer than existing lit development, this is sufficient to retain a substantial intervening dark space that would preserve Blisworth's rural separation from Northampton after dark.</p>
RR-153	Graham Meller	<p>Most important issue is likely traffic impacts. Shutlanger Road will be used as a rat run – damage by large vehicles, and air pollution increases. This route is not capable of handling freight vehicles, and not safe. No evidence of proper air quality monitoring in local villages (PM_{2.5}, PM₁₀, and Nitrogen Dioxide).</p> <p>Also complains about not having been notified of the application direct.</p>	<p>There is currently no environmental weight restriction on Shutlanger Road. However, Shutlanger Road and the road through Shutlanger is included within the proposed environmental weight restrictions that are part of the highway mitigation works and would prohibit this route from being used by HGVs. This is shown on the Traffic Regulation Plans, Documents 2.6B and 2.6C.</p>

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			<p>Background air quality in the local area is predicted to be well below (i.e. better than) the long-term air quality standards for fine particulate matter (PM₁₀ and PM_{2.5}) and nitrogen dioxide. This is principally due to the village's rural location and relatively low traffic flows on adjacent roads.</p> <p>Guidance (Local Air Quality Management Technical Guidance 2009 & 2016) states that significant air quality impacts can generally be screened out (and therefore there would be no need for monitoring) at locations close to roads where the traffic flows are less than 10,000 vehicles as an annual average daily total</p> <p>Given the relationship with the proposed development, Shutlanger was not included in the core consultation area as agreed with the Local Authority. Consultation events were held in nearby Roade.</p>
RR-168	Carol Blake (identical rep submitted by Nick Blake)	<p>Concerns over traffic impacts. Also refers to current rail "bottleneck" at Ely, significantly more freight cannot be transported by rail from Felixstowe meaning the only way to move freight is by Truck movements.</p> <p>Only a small number of rail sidings proposed compared to the proposed number of trains and Truck loading bays. Not clear how the Trucks will</p>	<p>There is no relationship between any identified rail "bottleneck" at Ely and Northampton Gateway traffic Any new traffic from the Port of Felixstowe to Northampton Gateway would not, naturally, run via Ely but via Colchester, North London, Wembley and then northwards into Northampton Gateway. In practice, a Freight Operating Company would not consider any other routing from Felixstowe, so Ely has no relevance to this proposal.</p>

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		be unloaded and questions whether this will/can operate as an SRFI.	
RR-184	Trevor Pinfold	The proposals are considered speculative warehouse development disguised as 'strategic' – this is reinforced by there being no compulsion for occupiers to use rail freight terminal.	<p>Numbered reasons for objection given, most of which are common to many other representations and covered in Part 2 of the Applicant's response, including general traffic and congestion concerns.</p> <p>The National Policy Statement for National Networks seeks an expanded network of SRFI's to encourage the modal shift of goods moved by road to rail and to meet growing demand in the logistics industry. It recognises that SRFI's are required to meet the needs of business now and in the future. It does not seek to restrict the occupation of warehousing as an SRFI site to businesses that will utilise rail now. It states at paragraph 4.83</p> <p><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.'</i></p> <p>It requires (paragraph 7.83) SRFI's to be developed in a form that can accommodate both rail and non- rail activities. The Northampton Gateway SRFI meets this criterion and indeed all other physical requirements set out in the NPSNN.</p>

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RR-197	John Farebrother	The Bypass should start as traffic comes off Junction 15 or at the entrance to the warehousing and continue to past the Stoke Bruerne sharp bends which are an accident hot spot.	<p>Objection is on a number of grounds common to many other representations and is covered in Part 2 of the response.</p> <p>The alignment of the Roade bypass has been determined by a number of factors and these are set out in the Roade bypass options report (TA Appendix 20, the TA being ES Appendix 12.1). In order to mitigate the impact of the proposed SRFI development there was no requirement to consider wholesale realignment of the A508 to the north of Roade, up to the SRFI roundabout. The scheme does, however, provide an improvement at the A508 / Blisworth Roade junction within the parish of Courteenhall as well as provision of a footway / cycleway.</p> <p>The scheme provides a significant improvement at the junction between the A508 and Rookery Lane / Ashton Road within the parish of Stoke Bruerne, these works will include removal of the tight bend on the A508 which we assume is the accident black spot to which the representation refers.</p> <p>The scope, extent and design of the works on the A508 have been agreed with Northamptonshire County Council as the local highway authority.</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
RR-210	Peter Bull	<p>Objects on the grounds that there is no requirement or compulsion for on-site firms to use the rail – so there could be much more HGV traffic than is assumed in the application.</p> <p>Invites ExA to visit at rush hour as part of the Examination process.</p>	<p>Objection is on a number of grounds common to many other representations and covered in Part 2 of the Applicant's response, including general local traffic concerns.</p> <p>The National Policy Statement for National Networks seeks an expanded network of SRFI's to encourage the modal shift of goods moved by road to rail and to meet growing demand in the logistics industry. It recognises that SRFI's are required to meet the needs of business now and in the future. It does not seek to restrict the occupation of warehousing as an SRFI site to businesses that will utilise rail now. It states at paragraph 4.83</p> <p><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.'</i></p> <p>It requires (paragraph 7.83) SRFI's to be developed in a form that can accommodate both rail and non- rail activities. The Northampton Gateway SRFI meets this criterion and indeed all other physical requirements set out in the NPSNN.</p> <p>Technical Note 2 'Trip Generation', which is Appendix 5 of the TA (ES Appendix 12.1), details the trip generation for the SRFI development, including HGV trip generation. The assessment of the interaction between warehousing and rail at the development</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
			<p>uses conservative assumptions based on empirical data available from DIRFT, using a methodology established for an approved SRFI site. The trip generation is agreed with Highways England and Northamptonshire County Council.</p> <p>The Examining Authority will visit the site again as part of the Examination process, and this will include an accompanied site visit where Interested Parties may attend.</p>
RR-223	David Wilson	<p>Passenger train delays on the Loop Line are likely to increase due to broken down freight trains (recent example given from July 2018).</p> <p>Concerned about likely HGV parking in local laybys.</p>	<p>Object with reference to a number of local issues and concerns addressed in Part 2 of the Applicant's response regarding traffic and pollution.</p> <p>The building and serving by rail of Northampton Gateway will not directly contribute to any reduction in the reliability of other rail services. The latest Office of Rail & Road's approved Freight Delivery Metric (FDM) for 2018/19 Q1, which measures all freight trains arriving at their destination within 15 minutes of their scheduled arrival time, shows a combined scoring of 93.3% (provisional data about to be confirmed) which is high.</p> <p>National FDM has recently been between around the 93-94% figure whereas the local passenger operator in the area has been less.</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
			<p>Recent Passenger Performance Measure (PPM) reductions, during this period and in the area, have been caused by a number of incidents including track faults, lineside fires and other Network delays.</p> <p>Following concerns raised by the Police and other consultees a secure HGV Lorry Park was added to the proposals to reduce the potential or the site to generate over-night HGV stops nearby.</p>
RR-230	Mark Redding	<p>The application does not give any consideration of other NSIPs in the region with regard to rail capacity, or overall need for this proposal.</p> <p>Failure to produce an Alternative Sites Assessment to prove this is the least damaging location, or the most appropriate location from a national perspective.</p>	<p>Objection is on a number of grounds common to many other representations and covered in Part 2 of the Applicant's response – many points (5 out of 10 listed) are related to traffic issues.</p> <p>The Rail Report (Document 6.7) considers general rail capacity issues, including with regard to the committed SRFI at DIRFT III.</p> <p>The Northampton Gateway proposals clearly fully meet the criteria set by the NPS for SRFIs, and would directly contribute to the creation of an expanded network of SRFIs.</p> <p>Both the ES (Doc 5.2, Chapter 2), and the Planning Statement (Doc 6.6) refer to the assessment of alternatives both with regard to the site location, and</p>

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			<p>the design process. The 'Rail Central' site is compared as a proposed SRFI serving a similar market area, and the applicant has concluded that this alternative site would result in greater environmental harm than the Northampton Gateway proposal.</p> <p>The Planning Statement provides an assessment of the application in the context of the NPS which seeks an expanded national network of SRFIs.</p>
RR-256	Keith Robert Whitburn	<p>Traffic impacts on Ashton are unclear, as are any proposed junction arrangements with the A508.</p> <p>Roxhill undertook a traffic survey in 2017 when there were roadworks at the A508 Stony Roundabout and people were avoiding the A508. As a result Roxhill's estimations of 800 cars per day are wholly inaccurate – observations suggest much more traffic per hour going from the M1 junction 15 along the A508 (approx. 425 per hour). Clarification is sought on this.</p> <p>Roxhill were unable to clarify the number of trains at night (8 or 12?), and whether they would run 24/7. Clarification is sought on this.</p>	<p>A reduction in traffic through Ashton village, as compared to the Reference Case, is predicted with the development and highway mitigation proposals in place.</p> <p>The proposals include a junction improvement between Ashton and the A508 (the Ashton Road/Rookery Lane junction) to provide safer crossing and access arrangements.</p> <p>Several traffic surveys were undertaken as part of the assessment process, for a range of purposes. Details of these surveys are provided at paras. 3.76 to 3.79 of the TA (ES Appendix 12.1). The assessment of the transport impacts of the development was undertaken using traffic flows provided from Northamptonshire County Council's strategic transport model, the Northamptonshire Strategy Transport Model (NSTM2). Prior to its use, this model was calibrated</p>

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			<p>and re-validated by WSP Ltd, who operate the model on behalf of Northamptonshire County Council. This process included the use of traffic count data from 2016, as described at para 8.2 and 8.3 of the TA. No traffic data from 2017 was used in this calibrated and re-validation process and it would not therefore have been affected by the road works referred to within the representation.</p> <p>It is assumed that the location referred to in the representation with an observed flow of 800 vehicles is on the A508 on the approach to the A5/A508 Old Stratford Roundabout. The validated 2015 base year traffic flows taken from the NSTM2 are provided at the plots at Appendix C of Appendix 23 of the TA for the morning and evening peak hour periods. These plots show a southbound flow on the A508 on the approach to A5/A508 Old Stratford Roundabout of 1172 passenger car units (pcus) in the morning peak hour and 833 pcus in the evening peak hour. These flows are of the same magnitude to the observed flows provided in the representation.</p> <p>The future year traffic flows used for assessment purposes are discussed and presented in Chapter 9 of the TA.</p> <p>The SRFI is expected to operate 24 hours per day, 7 days per week once fully operational, and the ES is</p>

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			<p>based on this assumption. The number of night trains cannot be confirmed at this stage in the process, but the GB Railfreight Rail Study (part of Document 6.7) makes it clear that there can be at least 36 freight paths available between the hours of 00:01 to 06:00 (Monday-Saturday) between London and Rugby, which equates to an average of 6 freight services within each hour, at the maximum.</p> <p>The availability in some hours are different to others. Between 01:01 and 02:00, there may be 9 spare paths whereas, during 03:01 to 04:00, there are only likely to be 3 spare paths. 04:01 to 05:00 is likely to have 7 spare paths.</p> <p>This would not be possible during the early hours of Sunday morning due to the need for planned Network Rail maintenance works.</p>
RR-278	Patrick Barlow	<p>Object on the grounds that the Bypass will not solve local traffic problems in Roade – traffic will still increase on the A508.</p> <p>NCC Highways Authority has already said that any increase in rail freight services may require a reduction in the passenger service to Northampton.</p>	<p>The majority (approx. 85% of light vehicles and 95% of HGVs) of the development traffic will route to and from the north of the site, using the proposed dualled section of the A508 between the site access roundabout and M1 Junction 15. The proposed highway mitigation works include a significant and comprehensive improvement to M1 Junction 15. The improvements provide additional capacity, addressing the existing bottleneck and resolving the existing queuing problem on the A508 on the approach to M1</p>

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			<p>Junction 15. This easing of congestion, along with the positive effects of the Road Bypass, is shown to draw existing traffic that currently avoids these congested locations back onto the A508. This is a beneficial impact as there is a consequential reduction in the traffic on the surrounding local roads and surrounding villages. To ensure that the A508 can accommodate the traffic increases, a series of improvements along the road are included in the highway mitigation strategy as part of the proposed A508 Route Upgrade. The proposals for the A508 are shown on the Highway Plans, Documents 2.4B to 2.4F.</p> <p>The Victra Railfreight and GB Railfreight rail studies (Document 6.7) explain how additional freight services can be accommodated and how this would not result in a reduction in passenger services. They conclude:</p> <p>a) There is spare capacity in the current timetable for freight trains on Monday to Saturday, working around all other passenger and freight services already in the timetable.</p> <p>b) On top of this, there are also already validated Strategic Capacity paths in the timetable for traffic such as new freight services – these paths exist to help prevent tensions and conflicts between freight and passenger services.</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
RR-377	John Exley	<p>Consent should not be granted unless all steps will be taken to minimise the risk of road casualties arising from the scheme and contribute to the overall improvement of the safety of the Strategic Road Network.</p> <p>Impacts of proposed highways mitigation are a concern. Knock Lane roundabout will increase noise and air pollution by slowing traffic down, plus light pollution.</p> <p>The proposed alterations to the Blisworth Road-Courteenhall Rd junction with the A508 will ease one problem but create another: rat running impact through Blisworth. Local issues with cars forced to park on Stoke Road make this route unsuitable for increased traffic.</p>	<p>A number of concerns are raised which are common to many other representations and covered in Part 2 of the Applicant's response.</p> <p>We assume this refers to the roundabout at the junction of the Roade bypass with Blisworth Road/Knock Lane. Air quality impacts were assessed at the nearest receptor (RO9) taking into account reduced speeds, and a negligible impact was predicted.</p> <p>The strategic transport modelling undertaken as part of the TA (ES Appendix 12.1) demonstrates that the overall effect of the proposed highway mitigation works (with the development in place) is a reduction in two-way traffic passing through Blisworth village. This includes Stoke Road. The reductions in traffic flows in the morning and evening peak hour periods are shown on the flow difference plot extracts at Figures 10.11 and 10.12 of the TA.</p>
RR-388	Cheryl Whitburn	<p>The proposed change to the junction where Ashton Road meets the A508 will make entering and exiting this road dangerous. Traffic lights or roundabout are the only safe option.</p>	<p>The scheme will provide a significant improvement to the layout of the existing junction and the layout will a) remove the crossroads, b) provide for safer right turns from the A508 by providing areas for vehicles to wait, c) provide for safer right turns onto the A508 by providing space in the middle of the road for vehicles to wait and make the right turn in two movements, and d) provide significant increases to visibility. The</p>

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			proposals for this junction on the A508 are shown on the Highway Plans, Document 2.4E.
RR-414	Martyn Guerin	<p>Plans for screening the buildings and infrastructure are sparse and do not indicate the length of time that it will take to be planted and grown sufficiently to obscure the scale of proposed buildings.</p> <p>Planned housing expansion for the area (37k new homes by 2012) has not been accommodated in the road infrastructure requirements as the location for this much needed housing stock is yet to be finalised.</p>	<p>A number of other issues are raised in common with other representations and are dealt with elsewhere – e.g. need for the SRFI.</p> <p>The proposed landscaping mitigation is comprehensive, and does not rely only on tree and other planting, but on significant earthworks to help screen the proposed buildings and terminal. Submitted information does include indicative timescales for the mitigation, with a focus on the opening year ('year 0'), and then year 15 after opening. This is referred to in the ES (Chapter 4) including on the Photomontages included at Figure 4.10 of the ES).</p> <p>The TA (ES Appendix 12.1) was informed by modelling using the Northamptonshire Strategic Transport Model – this includes all planned and approved new housing and other development to ensure the assessment is robust. The modelling assumptions regarding housing growth are summarised at para. 8.12 of the TA.</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
RR-430	Jean Packham	<p>Concerns focus on likely effects on ecology and wildlife. The development area is a haven for many species of birds some of which are on the RSPB Red List, including overwintering golden plover.</p> <p>Proposed bunding would be an alien feature in the landscape.</p> <p>New planting won't replace what's lost to this development.</p>	<p>Objection also refers to common issues relating to traffic and congestion covered in Part 2 of the Applicant's response.</p> <p>The site is shown to be unremarkable in nature conservation terms, being dominated by an agricultural use. Key features are to be retained – e.g. the two main areas of Woodland, as well some hedgerows, boundary features and wetland features of interest.</p> <p>The site is infrequently used by golden plover, and the survey data is included as part of the ES (Chapter 5) following dialogue with Natural England.</p> <p>The bunding includes extensive new woodland planting and will increasingly assimilate with the landscape as the planting matures – the landscape and visual effects of this are assessed in the ES (Chapter 4).</p>
RR-458	Stuart Manson	<p>Resident of Milton Malsor, and object to the principle of the development with reference to a range of concerns about possible effects.</p> <p>This includes health concerns relating to Air Quality during construction and operation – wife has health issues (asthma).</p>	<p>Objection also refers to common issues relating to traffic and congestion covered in Part 2 of the Applicant's response.</p> <p>The ES suggests that the layout of the proposed SRFI, and the proposed mitigation measures on and off-site, will result in negligible overall impacts on air quality</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
			<p>and noise. Improvements in air quality (and road noise) are likely in those nearby communities where reductions in through traffic are predicted as a result of the highways mitigation measures. This includes Roade, Blisworth and Milton Malsor.</p>
RR-472	Shan Navaratnam	Owns the petrol station in Roade and says the Bypass will kill his business.	<p>The Bypass will remove through-traffic from the centre of Roade, enabling more reliable local journeys and reduced congestion in the village. There are compelling environmental and transport justifications and benefits for this. It is likely to make local access to the shop easier for local residents. However, it will also not prevent access to Roade by passing non-HGV traffic, and there is scope to ensure local signage refers passing traffic to the 'local centre' of Roade.</p>
RR-510	C P Eads	Suggest that any warehousing development on this site should only be considered if there is an unequivocal commitment on the developers part to a ring fenced guarantee for the inclusion of the rail freight terminal element.	<p>The objection also refers to common issues, including traffic and congestion concerns, covered in Part 2 of the Applicant's response.</p> <p>The Applicant has made a commitment to deliver the rail terminal. The terminal will be delivered as part of the first phase of work, and be capable of accommodating 775m trains and at least 4 trains per day before first occupation of any building on the site.</p> <p>This is to be secured via the DCO requirements (Document 6.8).</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
RR-537	Andrew Bodman	Northampton Gateway is too close to the major container ports at Felixstowe and Southampton to provide economically viable rail journeys from them	<p>The Market Analysis Report (Document 6.8) sets out details of the markets that will be served by Northampton Gateway and includes a section which details the role and operation of rail freight in the logistics sector. The Report also outlines the growth in rail freight and the factors that are delivering that growth. Rail freight is an increasingly viable alternative to road freight and whilst distance is a factor many other factors affect the demand for rail freight – the distance of Northampton Gateway from major ports will not prevent viable rail freight journeys.</p>
RR-544	Hilary Spurrier	<p>The developers admit that they will be satisfied if 5% of the traffic uses the rail connectivity – it is therefore disingenuous to describe a large warehouse development as a rail freight interchange.</p>	<p>Objection also refers to common issues, including traffic and congestion concerns, covered in Part 2 of the Applicant’s response.</p> <p>It is not possible to define or predict with certainty what levels of rail traffic will be seen at an SRFI before it is operational. However, a similar Strategic Rail Freight Terminal has recently opened at Doncaster i-Port, also close to an existing Intermodal terminal at Doncaster and not far from similar complexes at Wakefield, Leeds and Rotherham. It was thought that i-Port would initially attract little rail traffic but the first Intermodal train has already commenced and a second service is due. It is standard for new terminals to be delivered in strategically sound locations with</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
			<p>appropriate, viable rail facilities and examples elsewhere show that the rail traffic is attracted.</p> <p>What constitutes a Strategic Rail Freight Interchange is clear. It is a facility in excess of 60 hectares in size and capable of handling at least 4 goods trains a day. To be efficient, it must be able to accommodate trains up to 775 metres in length, with modern wagons, and provide rapid means of cargo transfer and storage. Northampton Gateway satisfies these and the other requirements for being a Strategic Rail Freight Interchange.</p>
RR-547	Mr Fritz Kok	As a resident living on the A508 I would like to know exactly what measures are proposed to ensure our safety and that of other road users. The road is already very difficult to cross on foot, coming out of our drive is dangerous with the amount of traffic, their speed and the obstruction of view.	It is difficult from the representation to understand where this specific concern on the A508 is. However, the scheme as proposed includes significant improvements along the A508 corridor including improvements for pedestrians and cyclists. The proposals for the A508 are shown on the Highway Plans, Documents 2.4B to 2.4F.
RR-583	William Sellar	Concerns over the proposed by-pass for Roade. I was under the impression before attending the meeting that the by-pass was part of the development. After speaking with the expert, it became clear that the by-pass would only be built when "required" which meant when the development reached a certain level of occupation.	These concerns are noted, but misplaced. The applicant has committed to deliver the Bypass – the triggers proposed, following dialogue with NCC Highways and the Local Planning Authority, are for it to be open within 2 years of first occupation of the

RR Reference	Identity	Representation (Summary)	Applicant Response
		<p>I was told that it would be very expensive and wouldn't be built as an enabling project for the rest of the development. This was the one part of the proposal which may have led to some improvement to quality of life for the people of Roade.</p>	<p>SRFI site, or within 4 years of the start of construction works at Junction 15, whichever is the sooner.</p>
RR-601	Jane Keys	<p>Aggregates Terminal raises concerns - moving existing rail freight paths from the centre of Northampton to Roxhill's Northampton Gateway in order to meet the NPSNN requirement does not increase rail freight.</p>	<p>The process of moving a rail freight path from the centre of Northampton, at Castle Yard, to Northampton Gateway is a perfectly valid example of showing the benefit of a new terminal, especially for traffic that originates south of the country.</p> <p>For the one example given, the rail path currently exists in the timetable between Wembley Yard and Northampton Castle Yard, but with traffic not yet running on every available path to and from the existing, constrained site. These existing paths are therefore a demonstration that there is room in the timetable for this particular new freight service into Northampton Gateway where there is scope for additional growth.</p> <p>The moving of rail freight paths from Northampton Castle Yard (accessed from the north of the station) to Northampton Gateway also frees up network capacity in the station area, to the benefit of the wider rail network, including potentially passenger rail services.</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
RR-620	Berrys Chartered Surveyors on behalf of Mr Anthony John and Mrs Gillian Bament	<p>Mr and Mrs Bament own Hill View Farm - a busy livestock farm that includes a farm house and extensive range of modern agricultural buildings.</p> <p>Roxhill's application for a DCO includes the land used as the vehicular access leading from the A508 main road to the house and farmyard at Hill View Farm. This vehicle access as designated as land parcel 5/3 in the DCO application.</p> <p>In 2012 we worked very closely with the local highway authority and planning officer to ensure that the design of the vehicle access to Hill View Farm increased highway safety, whilst also ensures optimum site security at a time of increasing rural crime. Planning permission S/2012/1338/FUL was granted for this new access onto the A508 - the same area of land is now included within land parcel 5/3 of the DCO application.</p> <p>Mr and Mrs Bament object to Roxhill's DCO application as the design of the project does not currently provide sufficient detail as to the provisions being made to change the access to Hill View Farm. The concern is that an inadequately designed new access will have a detrimental impact on:</p> <ul style="list-style-type: none"> • Highway safety for large, slow moving agricultural and heavy goods vehicles entering and exiting Hill 	<p>The nature and operation of the farm is understood and we have been liaising with Mr and Mrs Bament, and their agent, to give them confidence that the changes to their access (Plot 5/3) will not compromise their operation or security.</p> <p>The existing A508 Stratford Road, just south of the access to Hill View Farm, will be realigned to connect into the bypass at a new roundabout. The section of Stratford Road past the Hill View Farm access will, following completion of the bypass, no longer be part of the A508 and will see a reduction in traffic. In order to connect the existing Stratford Road into the new roundabout we need to realign the road, making it both higher and farther away from the access. This means that we will need to use the land, temporarily, to raise the level of the access to connect into the new road but we are not proposing to permanently acquire this land. The combined effect of the changes to the road layout, together with the reduction in passing traffic, should make it easier and safer for Mr and Mrs Bament to use the access.</p> <p>The access would be constructed in accordance with Northamptonshire County Council's standard detail. A drawing has been prepared for Mr Bament to help to illustrate the design proposals for the amended entrance. The width of the access will be dictated by the turning movements of any large</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
		<p>View Farm.</p> <ul style="list-style-type: none"> • Gradient, layout and drainage of this farm driveway leading from the highway to farm yard and house. • Site security in an area impacted upon by rural crime – hence the existing heavy duty electric security gates and associated fencing. • Landscaping of the entrance and access route <p>Please note that the above four items of design detail were a material consideration when the local planning authority considered, then granted in 2012 planning permission S/2012/1338/FUL for this existing access. Hence, unless Roxhill also provide such important detail that adequately addresses these same planning issues then the DCO application should be refused.</p>	<p>vehicles needing to access the farm. In response to the specific concerns raised in the representation:</p> <ul style="list-style-type: none"> • With the reduction in passing traffic, realignment of Stratford Road and construction of a replacement access in accordance with the relevant standards we consider that highway safety would be improved. • As Stratford Road is to be raised, the gradient into the farm over the length of the works (i.e. plot 5/3) will be reduced which would be of benefit to Mr and Mrs Bament. Replacement drainage measures will be provided. • The gates and fencing will be reinstated to the same standard as currently provided, thus maintaining the necessary security • The landscaping will be reinstated to the same standard as currently provided.
RR-631	Henry H Bletsoe and Son LLP on behalf of Stuart Dunkley	<p>Respondee is a landowner included within the proposals involved in ongoing discussions with the Applicant about a number of issues and/or outstanding concerns including:</p> <ul style="list-style-type: none"> • the ecological and environmental impacts of the scheme, • the traffic impact of the scheme; and • the impact which the scheme will have upon his business in the absence of detailed proposals regarding access to severed land, 	<p>The comments and concerns raised regarding potential environmental and traffic impacts are dealt with via the Applicant's Part 2 response.</p> <p>As acknowledged in the representation, the Applicant is in advanced discussions with Mr Dunkley to ensure that the issues listed with regard to his retained landholding are satisfactorily incorporated into the final land agreement.</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
		<p>fencing, maintenance of water supplies to all grass fields, maintenance of the power supply to his holding, reinstatement of land drains, provision of facilities to gather and manage livestock in fields cut off from his existing facilities, etc.</p>	
RR-698	Miss L Stinson on behalf of Mrs M Stinson	<p>Suggests the limits of deviation in article 4 are too large when residents are trying to assess the impact on their setting. Further challenges the proviso to article 4 re ability to agree deviation with LPA.</p> <p>Request that the tunnel under the bund as environmental screening on it.</p> <p>Concern re traffic routes before and during the period of construction of the Bypass.</p> <p>Construction hours vary in the draft DCO and Ch 8 of the ES.</p> <p>Suggests that para 5.195 NPS is not met re avoiding significant impacts on human health – in respect of residents of Milton Malsor and the playing field.</p>	<p>Agreeing limits of deviation is a standard approach to development schemes where precise construction details are not yet known. The Environmental assessment of effects of the scheme are based on these limits of deviation.</p> <p>The bund will continue over the railway tunnel and will be landscaped.</p> <p>Routing will be agreed at part of Construction Management Plan for the construction of Bypass.</p> <p>There are no discrepancies between the draft DCO and the hours set out in Chapter 8 of the ES.</p> <p>Issues relating to human health are covered in the ES (Document 5.2) – references to health, where relevant, are made throughout the ES, but key summary sections are found in both Chapters 1 and 15. Chapter 15 <i>Cumulative Impacts</i> includes a section headed 'Human Health' and refers to the overall likely</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
			effects, as well as mitigation and design measures which minimise the effects, and are likely to deliver some beneficial effects. In particular, 'human health' is considered with regard to air quality impacts, but also with regard to other issues relating to access to recreation and open space, cycling and walking.
RR-700	Mrs R V L Blyth	<p>Woodleys Farmhouse Day Nursery, a Grade II listed building very close to the proposed Roade Bypass, is not mentioned under Cultural Heritage.</p> <p>Access onto an accident ridden section of the A508 is already dangerous and increased traffic would add to the risk of further accidents.</p>	<p>Objection refers to several common issues, including traffic and congestion concerns, covered in Part 2 of the Applicant's response.</p> <p>Woodleys Farmhouse is a Grade II listed building; however it is situated some considerable distance from the Road Bypass (approximately 350m at the nearest point). The building has a very contained setting, visually enclosed by mature trees. Consequently, the building is not considered likely to be materially affected by the proposals, and as such does not feature in the assessment of likely effects.</p>
RR-729	Cat Murray	<p>Strongly object to the development and construction of the Northampton Gateway Project presented by Roxhill for the following reasons:</p> <p>1. We live adjacent to the A508 in Stoke Bruerne and with the additional expected traffic volumes, we fear our house will devalue, rather than</p>	<p>The majority of the issues raised are common to many of the representations received, and the Applicant's Part 2 narrative response covers these including points regarding traffic and transport, air quality and noise 'pollution', and ecological effects.</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
		<p>increase in value.</p> <p>2. The junction at the A508/Ashton Road/Rookery Lane is currently very dangerous as most vehicles do not slow down when driving down the hill though the junction. The developers had promised to provide a safe way to cross the junction, but I feel what they have offered will not provide us with a safe way to cross the road.</p> <p>3. The A508 has a very serious traffic problem. We can't see that this will be decreased by the changes proposed. There are many occasions of traffic clogging the A508 between J15 of the M1 and the Stoney Stratford roundabout – additional traffic will make this worse.</p> <p>4. We already live with unacceptable levels of air and noise pollution along the A508. We cannot see this being reduced with the increased level of traffic expected. In addition, road dust pollution will have a detrimental impact upon our 150 plus year old house.</p> <p>5. There is already a strategic rail freight terminal at DIRFT, which is just 18 miles further north on the M1. I understand that they have approval to increase capacity until at least 2031.</p> <p>6. The infrastructure in the South Northants area is not able to cope with the addition of a further 7500 new jobs. The housing, schooling and roads are not adequate to deal with this influx into the area. If new employees must travel from adjacent areas, this will simply add to the existing and expected traffic congestion problems.</p>	<p>The exception is numbered point 2 which raises very specific issues about one element of the highways mitigation works. The evolution of the proposed layout for the A508/C26 Rookery Lane/C26 Ashton Road junction is described at paragraphs 8.112 to 8.119 of the Transport Assessment (TA), Appendix 12.1 of the ES (Document 5.2). In addition, the Walking, Cycling and Horse-Riding Assessment Report (TA Appendix 18) sets out the opportunities identified for the development to enhance the non-motorised user provisions. Opportunities 20 and 21 of that document relate specifically to this junction; providing crossing points for pedestrians associated with the residential properties to the immediate east of the junction to cross the A508; and to provide a facility for cyclist travelling between Ashton Road and Rookery Lane (and vice versa) to cross the A508. The Walking, Cycling and Horse-Riding Review Report (TA Appendix 19) confirms that these opportunities have been realised, as agreed with NCC who have approved the TA and the proposed junction layout.</p> <p>The proposed junction improvement includes provision of a new footway on the eastern side of the A508, providing a footway connection for the residential properties on this side of the road. Currently there is no footway and residents must walk on the highway verge. The existing footway along the western side of the A508 would also be widened to 3m, to permit future conversion to a shared</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
		<p>7. The development will have an adverse impact upon the local wild life habitat and will degrade the existing country walks. The permanent loss of 520 acres of arable land will make the view from surrounding villages quite depressing.</p>	<p>footway/cycleway. The footway on the approach to the junction on Rookery Lane would be widened to become a 3m wide shared footway/cycleway, which would extend across the junction and link with a new section of 3m wide shared footway/cycleway on Ashton Road. The proposed footways/cycleways will provide a safe place for pedestrians and cyclists to wait for an appropriate gap in traffic to cross the A508. Pedestrians and cyclists crossing the A508 would be able to do so in two movements, with safe harbourage provided by the large 8m central island.</p> <p>Table 6/1 of DMRB Volume 5, Section 2, Part 5, TA 91/05 'Provision of Non-Motorised Users' provides guidance on the suitability of informal (uncontrolled) at grade crossings based on Annual Average Daily Traffic (AADT) flow. The appropriateness of informal crossings is defined by three AADT flow ranges, as follows:</p> <ul style="list-style-type: none"> • Normally Appropriate (AADT below 8,000) • Potentially Appropriate (AADT 8,000 to 12,000) • Not Normally Appropriate (AADT above 12,000) <p>The current junction layout does not provide any central refuge for pedestrians or cyclists wishing to cross the road and therefore they must cross the A508 in one complete movement. The 2031 Reference Case AADT flow of 13,062 vehicles, places the</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
			<p>existing informal crossing arrangement in the 'Not Normally Appropriate' category.</p> <p>As part of the junction improvement, an uncontrolled crossing point is proposed for the shared footway/cycleway midway between the two minor arms (an additional uncontrolled pedestrian crossing point with central refuge would also be provided towards the northern extent of the junction). With the proposed large central refuge on the A508 in place, pedestrians and cyclists will be able to cross the A508 in two movements. The 2031 Development Case AADT flow of 11,692 vehicles (busiest one-way direction) puts the proposed informal crossing with refuge in the 'Potentially Appropriate' category. There is no accident record involving pedestrians or cyclists at the junction, and visibility along the A508 would also be improved as part of the proposed highway works. Based on these factors, combined with the relatively low usage of the crossing, it was concluded that a controlled crossing is not required.</p>
RR-742	Dr John P Davis	<p>Challenge the accuracy of the traffic visualisation model at the exhibitions and therefore the highway proposals. Visualisation model was overly simplistic and inaccurate – model suggested high levels of collisions.</p>	<p>The micro-simulation modelling undertaken uses PTV VISSIM. This software is used globally in the transport engineering industry. The software simulates individual vehicles using complex algorithms, which then interact with each other and behave differently in accordance with each given situation, to reflect reality in as much detail as is possible.</p> <p>The visualisations on display were therefore based on accurate VISSIM modelling. The visualisation was</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
			<p>intended to show how the new M1 Junction 15 would operate, and how it compares to the existing junction. The visualisation was based on a VISSIM model using traffic data at that stage in the TA preparation process. There can sometimes be graphical errors due to the translation from the VISSIM modelling software to the visualisation software. This can lead to some slight differences in the vehicle dimensions, which then show vehicles 'passing' through another one in the visualisation (particularly when vehicles change lanes on the same approach to a junction). However, the positions of the vehicles are taken from the modelling software where this issue does not normally occur – this does not imply collisions as suggested.</p> <p>The final VISSIM model was reviewed and approved by Highways England. The results of the VISSIM modelling using the final traffic data are detailed at Chapter 10 of the TA (ES Appendix 12.1). The TA has been approved by both Highways England and Northamptonshire County Council Highways.</p>
RR-789	Berrys Chartered Surveyors on behalf of Messrs AW, W & R Irlam	<p>Representation from a farming family that owns and farms the land on the south side of the A508/Ashton Road/Rookery Lane realignment as part of the Roxhill DCO.</p> <p>Roxhill's 'Doc 2.4E – Highway plan general arrangement sheet 5 of 6' shows edged in red the Order Limits for the Roxhill works at this road</p>	<p>The land edged in red is the maximum area of land required to deliver the highway enhancements. We will seek during detailed design to minimise the amount of agricultural land taken. Whilst it is recognised that there will be loss of established hedgerows, these will be replaced as part of the works.</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
		<p>junction. The red limits line shows an excessive area of productive Grade 3 arable land and the removal of a large amount of well-established hedge line. Furthermore, the revised road layout shown on Roxhill plan designation 'Doc 2.4E' will make crossing this junction with large agricultural vehicles more dangerous.</p> <p>Propose that the road scheme be amended to minimise the amount of good quality arable land taken out of production. At the same time please could there be a reduction in the amount of existing hedge line lost - replacement hedges will never have the habitat and environmental qualities of the well-established hedge rows. Any excess land from stopped up highway needs to be transferred to the adjoining land owner to help replaced land lost to the scheme.</p> <p>In the event that the DCO is granted the Irlam family ask that any replacement boundary features include new hedgerows with interspersed trees along the boundary. Any land not required permanently for the scheme (e.g. any temporary working width) needs to revert to the farming operation as swiftly as possible.</p> <p>The realignment and revised layout for the A508/Rookery Lane/Ashton Road junctions, must incorporate the safe crossing of large agricultural vehicles. The current layout facilitates tractors with</p>	<p>The Applicant do not agree that the works to the A508 Rookery Lane / Ashton Road junction will make crossing the A508 more dangerous. The existing junction has poor, substandard, visibility and the A508 immediately to the south has a poor accident record. Furthermore the existing road is a crossroads and these are considered to be less safe than a staggered crossroads as now proposed instead. The proposed scheme provides significant improvements to visibility (as confirmed in the A508 Geometric Design Strategy Record, which is Appendix 29 of the Transport Assessment (TA), the TA being Appendix 12.1 of the Environmental Statement, Document 5.2). Furthermore the tight bend to the south will be removed.</p> <p>Whilst we understand the request for redundant land (stopped up highway) to be returned to the adjoining landowner, we cannot commit to this as this stage as it will depend on matters such as location and easements/wayleaves for statutory undertakers.</p> <p>Whilst we appreciate that the layout needs to accommodate the needs of large agricultural vehicles, the use of the junction by such vehicles will be infrequent and the vehicles used will depend upon the time of year. Analysis of the tracking of large agricultural vehicles has been undertaken using vehicle information supplied by the Irlam family. This demonstrates that the proposed layout will not prevent</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
		<p>cultivators, long combine harvester headers, etc., to swiftly across the junction without any road furniture/structures impeding the route. The revised layout includes a central island which will impede or possibly even prevent agricultural vehicles swiftly and safely crossing. Stopping a large vehicle part way across the junction will leave them vulnerable to an accident with vehicles using the A508 at speed. It is not advisable for large agricultural vehicles to divert south along the A508 and then use the Grafton Road that enters Stoke Bruerne village. The A508/ Grafton Road junction is by the canal bridge and is skewed so that visibility is very poor, resulting in the risk of accidents with agricultural vehicles trying to cross the A508.</p> <p>If the DCO is granted then it must incorporate a further revision to the road layout at this junction to ensure the on-going safety of large vehicles including agricultural machinery. Any change to junction layout must also minimise land taken from agricultural production.</p>	<p>such large vehicles from crossing from Rookery Lane onto Ashton Road and vice versa. This has been shared with Northamptonshire County Council who have confirmed that the proposals are acceptable given the occasional use and such movements are by no means unusual on the rural road network.</p> <p>Whilst a road safety audit has already been undertaken on the proposed layout, the detailed design will be subject to a second road safety audit in due course – followed by further audits following completion of the works.</p>
RR-798	Neil Murray	<p>Junction at the A508/Ashton Road/Rookery Lane is currently very dangerous. Crossing it on foot is nerve racking at times as most vehicles do not slow down when driving down the hill through the junction. The developers had promised to provide a safe way to cross the junction but I feel what they</p>	<p>The A508 does not at present have any refuge in the centre of the road for pedestrians to use. The proposed scheme will provide a wide central area and will therefore allow the road to be crossed in two stages. Footways and cycleways will be provided around the junction. The proposals for this junction on</p>

RR Reference	Identity	Representation (Summary)	Applicant Response
		have offered will not provide us with a safe way to cross the road.	the A508 are shown on the Highway Plans, Document 2.4E.
RR-818	Raymond Miller	<p>The consideration of both planning applications for this adjoining land as individual applications and separate from each other is a breach of common law and an attempt to subvert UK and EU planning laws. Furthermore the separate nature of both applications is a deliberate attempt to enable breaches of UK and EU environmental laws. The evidence to support both applications by each applicant is flawed, inaccurate and misleading and under expert examination will not meet the minimum legal standard required. The consultation for both developments is so inadequate they do not meet the minimum standard required. The evidence supplied regarding the impact on the local road transport infrastructure is so misleading it has serious implications on a regional and national level and requires new, extensive consultation with an enlarged group of national stakeholders. Any attempt to pass these applications will leave the applicants and the government vulnerable to legal action in the UK and the EU.</p>	<p>The Applicant can only respond with regard to the Northampton Gateway proposals and project, not on behalf of the 'Rail Central' SRFI which is also referred to (albeit not by name).</p> <p>The Northampton Gateway application has been prepared with due regard to the relevant legislative context for an NSIP application and has complied with the statutory requirements with regard to Consultation.</p> <p>The Transport Assessment which forms part of the application has been prepared with oversight by a Transport Working Group of local and national bodies (including Highways England), using a validated and relevant Strategic Transport Model to assess the likely impacts of the proposals. A comprehensive suite of transport related mitigation measures are proposed in response to the results of that assessment process.</p>

Northampton Gateway SRFI

Part 2 - Applicant's response to Relevant Representations, October 2018

Introduction

- 2.1. In total around 800 relevant representations were received by PINS from local people, as well as a number of local and statutory consultees. There are a number of clear themes and issues in common to a high proportion of these representations, and this report seeks to provide a response to those themes. Indeed, a large number of the responses received from local people had key text or paragraphs in common with reference to a number of similar or identical numbered points. This shared content was presumably an outcome from community level activity in response to the consultation process. Therefore it is considered appropriate to provide a response to those issues with a common response which applies to the majority of the representations received.
- 2.2. It should be read alongside Part 1 (Parts 1A and 1B) of the Applicant's response to issues raised by consultees and other bodies which cross refers to many of the same issues as those listed below.
- 2.3. The key themes and common issues or objections raised are set out below under relevant headings.

Applicant's responses to key issues raised:

Issue: Scale of development proposed

- 2.4. Many representations refer to the issue of 'scale', with concerns raised both about the amount of floorspace proposed, and also about the likely size of the buildings which could be accommodated on the site. The issue of scale was sometimes expressed with reference to concerns over potential visual effects, but most references were more general in tone, and by implication tied in with wider concerns regarding the associated traffic and 'land-take' which are dealt with under separate headings.

Applicant's response

- 2.5. The Northampton Gateway proposals meet the definition of nationally strategic infrastructure, and are therefore large-scale by definition. NSIP SRFI proposals as defined by the 2008 Planning Act are on sites of at least 60ha (148 acres), and capable of accommodating at least 4 goods trains per day. The National Policy Statement (NPS) for National Networks requires SRFIs to provide for a number of rail connected or rail accessible buildings and rail infrastructure to allow for more extensive connections in the longer term. As a response to a recognised need for more rail served national distribution centres SRFI sites are required to be capable of accommodating very large floorspace units.
- 2.6. The NPS states: "*SRFIs tend to be large scale commercial operations, which are most likely to need continuous working arrangements (up to 24 hours). By necessity they involve large structures, buildings and the operation of heavy machinery.*" (NPS, paragraph 4.86).
- 2.7. Indeed, the NPS refers to the consideration given by Government to a strategy based around smaller freight terminals, but concludes:
"increasing performance and efficiency required of our logistics system would not allow reliance on an expanded network of smaller terminals. While there is

a place for local terminals, these cannot provide the scale economies, operating efficiencies and benefits of the related business facilities and linkages offered by SRFIs.” (NPS, Table 4, paragraph 2.55).

- 2.8. Therefore, there is a clear and explicit understanding and expectation in national policy – indeed, a requirement – for SRFIs to be ‘large-scale’. In the applicant’s view, in addition to the operational efficiencies and nature of the activities undertaken at SRFIs, this emphasis on SRFIs as large-scale developments also reflects the scale of the pressure and demand for additional capacity for rail freight identified by Government in setting out its national policy.
- 2.9. However, in addition to this national policy context and ‘market’ considerations, the application site, and the scale, form and the design of the proposed scheme, has also responded to the assessment of the site and surrounding area. Concerns about potential visual impacts, including lighting effects (see below regarding ‘environmental issues’), and the importance of substantially screening the development was an issue clearly expressed from the earliest engagement with local community groups and other consultees, and was emphasised sufficiently strongly that it drove much of the subsequent design process. The Applicant therefore approached the evolution of the proposals from a starting point of seeking to substantially screen the development from outside view, and to minimise the visual effects of the development.
- 2.10. As described in the Design and Access Statement (Document 6.9), and the Planning Statement (Document 6.6), the SRFI site’s natural topography and location with regard to nearby receptors provides an opportunity to successfully screen the built development through an earthworks and landscape led approach. The site’s topography and location in the context of existing features and infrastructure provide a clear, defensible boundary to the site, which, alongside the proposed earthworks and landscaping, helps to minimise the wider landscape effects, and encroachment on the nearest villages.
- 2.11. Chapter 4 of the ES (Document 5.2) contains the landscape and visual assessment, and provides an assessment of the likely residual outcomes and impacts of this landscaping and earthworks strategy. As referred to in the Statement of Common Ground with the local authority, and as recognised by other consultees, while the scheme would undoubtedly have an effect on the local landscape, there will be relatively limited views of the proposed buildings and terminal, and the most sensitive receptors are protected from significant residual visual effects.

Issue: Traffic and Congestion

- 2.12. A number of issues were frequently raised with regard to traffic and congestion. Many were fairly general objections based on a perception that the road network around the site is already ‘full’ or heavily congested, and seeking further explanation of how the proposals might therefore be possible without making existing traffic problems much worse. This included references to the poor performance of Junction 15 of the M1 at peak times, as well as perceptions of regularly high levels of congestion on local roads and through village centres, including Roade.
- 2.13. Associated with this were numerous references to problems on the M1 motorway, and the local issues caused by ‘rat-running’ traffic on local roads and through several local villages (including Milton Malsor, Collingtree, Blisworth and Roade) when the surrounding road network is heavily congested, or if the M1 is closed temporarily (due to an accident, etc).

- 2.14. Other common issues include concerns about the existing frequency with which HGVs are seen to make use of local roads and lay-bys, including for overnight stops, and the impacts this has on local road-users, and concerns that this will be made worse with the terminal in place.
- 2.15. There were also more specific objections raised to the proposed 'no right turn' from the A508 southbound at Blisworth Road (Courteenhall) (and no right turn out of Blisworth Road (Courteenhall) onto the A508) which forms part of the proposed highways mitigation works. Associated with this are a more limited number of concerns about local access to facilities in one village by residents of other nearby villages. For example, people travelling to the library or GP surgery in Roade from Milton Malsor which will require local residents to drive via Blisworth if they are unable to turn right onto the A508.

Applicant's Response

- 2.16. The application is supported by a comprehensive Transport Assessment (TA) (Document 5.2, Appendix 12.1) which has been prepared with input from a Transport Working Group consisting of the local highways authority (NCC) and Highways England, and using NCC's established strategic transport model for the County. The TA was prepared over a period of approximately 18 months, and the outcomes from the TA, as well as dialogue with local community groups and key consultees, have formed part of the iterative process which underpinned the evolution of the Northampton Gateway application.
- 2.17. It is clear that during peak times the Junction 15 roundabout is operating above its design capacity. This is apparent from the modelling undertaken to inform the Transport Assessment, and to most regular users of the junction during peak times. Therefore, delivering a comprehensive upgrade to the junction was considered an essential component of the Northampton Gateway proposals from very early in the process. The design and detail of the junction improvements and associated infrastructure has changed and evolved over time, but the Applicant committed very early to delivering a reconfigured and expanded Junction 15 which would meet the needs of the development, and provide more reliable and efficient journeys for other traffic. The TA, as approved and agreed with the local highways authority, and Highways England, confirms that the proposals will deliver this outcome.
- 2.18. Furthermore, the TA has informed a wider package of highways mitigation measures which will reduce congestion on other nearby roads, including through the closest villages. This includes a bypass to the village of Roade on the A508, which combined with the improved Junction 15 and dualling of the northern stretch of the A508 as far as the new site access helps attract traffic back to the A508 and away from the local roads and village centres. Detailed assessment of the proposed SRFI site access roundabout has been undertaken, as included in the TA and approved by NCC, confirming its satisfactory operation for both SRFI traffic and A508 traffic.
- 2.19. While the local concerns about traffic overall are noted and understood, the Applicant has a robust, agreed TA and transport strategy which demonstrates that these concerns are misplaced.
- 2.20. The A508, currently through Roade village, is part of Highways England's network of preferred diversion routes at times when the M1 is closed. This is not expected to change in the future. However, with the M1 Junction 15, Roade Bypass and the A508 corridor route upgrade works in place, the A508 corridor will be better able to cope

when functioning as a diversion route, with diversion traffic taken out of Roade village centre.

- 2.21. The proposed 'no right turn' at Blisworth Road (Courteenhall) is part of the strategy to help focus traffic on the A508 corridor. It is a direct response to current and future capacity concerns at the junction and its associated poor accident record. The strategic transport modelling predicts that delay for right turning traffic from the A508 to Blisworth Road will increase to around 5 minutes in the future, without the proposed development or highway mitigation works. Right turning traffic blocks ahead traffic, leading to queues forming on the A508 southbound. The increased delay therefore not only impacts right turning traffic, but also southbound traffic using the A508, leading to drivers seeking alternative less appropriate routes to the A508 to avoid this congestion. The proposed 'no right turn' removes this delay entirely and therefore drivers are drawn back onto the A508.
- 2.22. The issue of HGV parking in local areas, and associated crime against vehicles and drivers, is a wider issue which is known to affect other parts of Northamptonshire and other areas where there are large-scale distribution sites. This is being directly addressed by the inclusion within the SRFI site of a secure, dedicated HGV park. This was something directly requested by the Police during the Stage 2 consultation, and was integrated into the proposals. This facility will meet the internal demands of the site for safe, quality amenities for drivers using the site (rather than serving as a HGV Park to serve wider needs). It will ensure that the SRFI does not generate additional HGVs using local roads overnight, and will provide safe and suitable facilities for drivers.

Issue: Local 'Pollution'

- 2.23. Local people and other local bodies, including Parish Councils and the Action Group refer to concerns about increased local pollution as a result of the proposals, with reference to not only decreased air quality, but also to the potential for high levels of noise and light pollution.

Applicant's Response

- 2.24. The ES includes assessments of the likely effects on these types of pollution as part of the consideration of environmental impacts. The ES considers not only the very local potential impacts, but also the more strategic context where relevant. This is of particular relevance to air quality where part of the driver and justification for the national policies regarding encouragement of rail freight is to reduce the reliance on road transport, and to enable greater use of more sustainable rail transport which is considerably more energy (and carbon) efficient, with benefits with regard to not only air pollution, but also congestion on the roads.
- 2.25. Contrary to local perceptions, the current baseline air quality conditions are generally good in the communities close to the site, with pollution levels below the thresholds or limits identified through legislation and guidance. This includes Collingtree where, with the exception of a handful of properties close to the M1, air quality is shown by the monitoring data not to be problematic. The ES suggests a range of potential effects on air quality at various locations, with the overall impact being negligible. However, this negligible overall likely impact masks a number of likely positive effects as a result of redistributed traffic away from many village centres, and onto more suitable routes. Such a benefit is marked in Roade as a result of the proposed bypass which will remove through traffic from the village centre, but the traffic modelling suggests similar impacts are also seen in villages such as Milton Malsor and Blisworth as a result of the

A508 route to M1 Junction 15 and the A45 becoming more reliable and attractive to road-users.

- 2.26. Low emissions strategy measures relating to travel planning, provision of numerous new walking and cycling routes to enable and encourage increased movement and access by sustainable means of transport, electric vehicle charging points on-site, and highly energy efficient buildings will also help to reduce the air quality impacts of the proposals. Air quality in South Northamptonshire is predicted to be some way below the pollution limits or thresholds set by Government (for particulates (PM₁₀) and Nitrogen Dioxide) with the scheme and its proposed mitigation. The picture in Northampton is different, with areas of the town already predicted to be in exceedance of Government standards in 2021 (without the Northampton Gateway). However, the Air Quality assessment shows that by the time the Northampton Gateway is assumed to be fully operational (2031) Air Quality across the local area will be below (i.e. better than) the air quality pollution level standards.
- 2.27. Noise impacts also vary depending on the proximity of individual receptors to the Proposed Development, but overall, noise impacts are assessed as likely to be no more than minor adverse or negligible for most receptors during the operational phase of the development. As with air quality referred to above, some communities will experience benefits with reduced road noise as a result of the expected changes in traffic arising from the proposals. Conversely, two receptors located on the A508 to the south of the Main Site are predicted to experience significant adverse noise effects from road traffic which will be mitigated through the provision of improved sound insulation.
- 2.28. The Road Bypass will benefit many residents living close to the village centre through a reduction in road traffic noise, with the number of receptors currently experiencing high noise levels being reduced by around 70%. A small number of receptors on the western edge of the village will experience an increase in noise levels, but specific noise mitigation measures are proposed on the bypass in the form of a mixture of 2m and 3m acoustic fencing and landscaped bunding along parts of the bypass route to limit the residual noise.
- 2.29. Temporary construction noise from the building of the development will be mitigated and minimised through the use of best practicable means so that significant adverse effects are avoided. The proposed mitigation measures will be secured through Construction Environmental Management Plans.
- 2.30. Railway noise is only shown as being a potential issue in the very long-term (2043) with some potential significant adverse effects being predicted. However, there is some uncertainty about this conclusion because of the likely technological changes expected over that period which would mitigate that potential effect.
- 2.31. A conservative approach has been taken to the assessment of noise from the SRFI once fully operational. The assessment shows that no significant adverse noise effects are expected as a result of the operational activities taking place at the SRFI at any of the receptors considered. The earthworks bunding and landscaping around the SRFI, with the top of the bunding on the west of the site being some 16m higher than the rail terminal ground surface, coupled with the site's natural topography and relationship with nearby neighbouring homes and villages, helps to mitigate and minimise the likely noise effects. The higher existing noise levels at the east of the site, primarily from road traffic on the M1, reduce the potential impacts of operational noise in this area, including Collingtree.

- 2.32. Lighting effects due to the Main Site lighting are all assessed as negligible or minor adverse (with one exception) and thus insignificant, with no direct lighting effects such as glare or effects which would cause nuisance for any receptors. The only effect exceeding 'minor adverse' relating to the Main Site is on a small number of receptors in Milton Malsor with views of the Main Site during the construction process, and this temporary effect will be mitigated as soon as the north-west bunds are constructed. It is also relevant to note that the construction of the bunds is one of the early activities in the construction programme.
- 2.33. The lighting strategy for the proposals will ensure that lighting is directional and targeted, ensuring light does not reach off-site areas. The landscaping and earthworks around the SRFI will mitigate lighting effects, minimising any effects to minor adverse or negligible 'light presence' effects when seen in the context of the existing presence of lighting from urban Northampton, major highways and other development beyond the site to the north, west and east (Grange Park).
- 2.20. Lighting on the bypass will be limited to the roundabout junctions and will accord with highways safety standards, but will also not result in any direct or significant lighting effects. Nineteen properties close to the bypass are likely to experience moderate adverse 'light presence' effects from new light sources having been introduced into a currently dark view. However, these effects will not have a direct effect on amenity or cause nuisance effects, and will diminish as the landscaping matures. Apart from this limited case, all lighting effects from bypass lighting will be insignificant.
- 2.34. Therefore, while understood and recognised as issues of particular local concern and interest, the location of the proposed development, plus additional design and mitigation measures proposed, will limit the effects of the Proposed Development on local 'pollution'.

Issue: Rail Capacity issues

- 2.35. A number of representations raise questions about the extent of rail capacity on the West Coast Main Line (WCML) for additional rail freight services, and also concerns about whether additional freight trains might create conflicts with passenger services.
- 2.36. There is a general perception by many residents locally that the WCML is 'full', leading to questions about the deliverability of at least four more freight trains per day to serve Northampton Gateway.
- 2.37. There are local aspirations for improved passenger rail services to and from Northampton (focused on services to London), as well as for a new Parkway Station close to Rugby to the north, and some representations question whether the proposed SRFI will frustrate or delay any such projects or objectives. This included comments made by the Rugby Rail Users Group, and Warwickshire County Council (with whom a Statement of Common Ground has subsequently been agreed).

Applicant's Response

- 2.38. Rail issues, including rail capacity, are dealt with in a comprehensive suite of reports which form part of the submitted application (Document 6.7). While the local perceptions regarding a shortage of rail capacity for additional freight trains are noted, this is not supported by the evidence.
- 2.39. Indeed, two separate independent rail consultancy companies have prepared and submitted reports with regard to rail capacity. While the approach taken in each to the

assessment of rail capacity differs, the conclusions do not: there are a number of spare paths available and sufficient network capacity for the Northampton Gateway SRFI, and other commitments. One of these reports has been undertaken by GB Railfreight, a freight operating company with extensive operational and practical experience of the UK rail freight sector, and of securing and operating freight 'paths' on the rail network.

- 2.40. It is evident that the WCML is a busy railway, and is a key national route for both passenger and rail freight traffic. It is estimated that in 2010 43% of all UK rail freight travelled on the WCML at some stage of its journey, with an even higher proportion of national intermodal freight between the ports and national distribution centres in the Midlands and elsewhere. While it is acknowledged that there are some constraints on parts of the WCML, these are mostly north of Rugby (around Crewe), and there are no significant issues facing the section between London and Rugby, including the route via Northampton.
- 2.41. Government expects – and is encouraging - rail freight volumes to grow. This is described in detail in Documents 6.8 (Market Analysis Report) and 6.9 with regard to various technical and operational documents prepared by both the Department for Transport, and Network Rail. The WCML is considered by Network Rail to have current capacity for 73 freight trains in each direction per 24 hour period, and this is expected to grow with improvements and upgrades already programmed and committed by Network Rail to enable further capacity. At present, the analysis submitted by the Applicant as part of the DCO application concludes that there is scope to run many additional freight trains over a 24 hour period through using spare rail capacity, established strategic capacity paths, and also better use and management of existing paths.
- 2.42. The GB Railfreight Rail Study (Document 6.7) makes it clear that, from 06:00 to 00:00 (Mon-Fri) there are at least 22 new paths available and at least 36 paths available from 00:01 to 06:00. It is the Applicant's view therefore that more than enough network capacity exists for Northampton Gateway to be served by rail.
- 2.43. Furthermore, additional capacity overall (including for freight and passenger services) is expected on the WCML once HS2 is operational, from 2026. The Department for Transport's document "*Supplement to the October 2013 Strategic Case for HS2 – Technical Annex: Demand and Capacity Pressures on the West Coast Main Line*" contains more detailed information and it is expected that between 20 and 40 additional freight paths will become available between London and the West Midlands and back, over a 24 hour period.

It is also worth noting that, post 2026, it is expected that there will be 6 trains per off-peak hour between London and Northampton, which is an increase from the current four per hour.

- 2.44. The analysis undertaken, and submitted, provides no basis for any concerns regarding the ability for other bodies to deliver maintained or improved passenger services via the Northampton Loop line, nor for a new Parkway Station close to Rugby. A Statement of Common Ground has been agreed with Warwickshire County Council on this issue. Document 6.7 contains analysis that demonstrates that increasing rail freight paths to serve Northampton Gateway will not result in potential reductions in passenger services for the following reasons:
- a) There is capacity in the current timetable for additional freight trains on Monday to Saturday, working around all other passenger and freight services already in the timetable.

b) In addition, there are also already validated Strategic Capacity paths in the timetable for traffic such as new freight services – these paths exist to help prevent tensions and conflicts between freight and passenger services.

- 2.45. As referred to in various application documents, including the Planning Statement (Document 6.6) and the Design and Access Statement (Document 6.9), Network Rail have acknowledged the demand and need for additional SRFI capacity in the Northampton area in the FNPO Route Strategic Plan, published in February 2018.

Need, and existing SRFI capacity (including at DIRFT)

- 2.46. A common theme to a large number of representations submitted was a questioning of the rationale for a new SRFI some 18 miles from the existing DIRFT SRFI close to Rugby (Junction 18 of the M1). This query was raised by local residents often using some identical or similar text in their representations, as well as in representations from some Parish Councils and others. Some representations referred to existing capacity for further expansion at DIRFT (Phase 3) and suggest this means there is no need for an additional SRFI at Northampton Gateway.
- 2.47. Some representations suggest that a ‘network’ of SRFIs as envisaged and encouraged by the National Policy Statement can’t be delivered if SRFIs are located in the same region as other SRFIs, or if they are relatively close together. This includes the representation from the ‘Stop Roxhill Northampton Gateway’ Action Group (SRNG), and several of the Parish Councils.

Applicant’s Response

- 2.48. The Market Analysis Report (Document 6.8) outlines the economics and operation of rail freight in the logistics market and analyses the market requirement for the Northampton Gateway SRFI. A fundamental part of the Report is an explanation of the current operation of both the logistics market generally and existing SRFI’s (including DIRFT) and how the Northampton Gateway site will respond to these market conditions.
- 2.49. Section 7 of the Market Analysis Report is particularly relevant. It defines the markets served by rail terminals and plots the extent to which the market for existing and proposed terminals will overlap (Figure 13). It concludes that the existing concentration of SRFI’s in the Midlands is not surprising and is wholly consistent with the concentration of logistics within this area generally and importantly the concentration of National Distribution Centres. It also reflects the economics of rail freight, which are explained elsewhere in the Market Analysis Report, particularly Section 5 and 7.
- 2.50. Section 8 of the Report identifies a strong logistics market in the immediate catchment area around Northampton Gateway, which is not currently well-served by DIRFT or other SRFI’s. Northampton Gateway has the potential to expand the network of existing SRFI’s in the Midlands to address markets which are currently not served by existing terminals as well as to help meet the anticipated growth in rail freight.
- 2.51. The National Policy Statement (NPSNN) paragraphs 2.42 – 2.58 set out the Government’s position on the need for the development of strategic rail freight interchanges. This includes an explanation of the importance of SRFI’s and the drivers of need for SRFI’s. At paragraph 2.56 the NPSNN states that;
‘the Government has concluded that there is a compelling need for an expanded network of SRFI’s’

- 2.52. Paragraph 2.56 of the NPSNN goes on to explain that given the locational requirements of SRFI's the locations that will be suitable will be limited. Paragraph 4.83 – 4.89 sets out the locational and other requirements with which SRFI's must accord. As explained in the Planning Statement (Document 6.6) particularly paragraph 4.42 – 4.52, the Northampton Gateway Scheme will fully comply with each of these requirements.
- 2.53. Paragraph 4.84 of the NPSNN states that '*it is important*' that SRFI's 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*'. The application, particularly having regard to the Market Analysis Report, seeks to explain the markets (i.e. demand/need) including urban centres and supply chain routes that will be served by Northampton Gateway.

Cumulative effects with proposed 'Rail Central' SRFI

- 2.54. There are two main dimensions to the issues raised regarding potential cumulative effects with the emerging Rail Central SRFI on land to the west of the Northampton Loop line, and west of Northampton Gateway. One is that there should be a full assessment of the cumulative effects of both of the proposed SRFI schemes to understand the impacts should both be approved in due course. The second are concerns that the cumulative impacts of both schemes, if approved, would be significantly detrimental to the local area, with this forming the basis of objections to the Northampton Gateway (and presumably also the Rail Central) proposals.
- 2.55. A separate issue is that raised by the promoters of Rail Central who's representations suggest both schemes can - and should – operate alongside each other, and who have expressed disagreement with the judgements reached by the Applicant.

Applicant's Response

- 2.56. The Applicant has consistently referred to a judgement that the cumulative effects of both schemes would be unacceptable in environmental terms. An assessment of the likely cumulative impacts and effects has been undertaken based on an assessment of the Rail Central Preliminary Environmental Information and other draft Rail Central documentation available to the Applicant during the final stages of preparing and submitting the application. At that stage there was no final Transport Assessment or completed transport modelling, and an evolving rather than final transport strategy for the Rail Central scheme. There was also no final ES at that stage, although the version published by the Rail Central promoters was relatively well advanced in some regards.
- 2.57. The Applicant's judgement on cumulative effects is referred to in the ES (Document 5.2 – see Chapter 15) and the Planning Statement (Document 6.6). Based on the information available at the time of submission, the Applicant's professional team has reached the judgement that the two sites if approved and constructed would have unacceptable environmental effects, primarily based on the likely cumulative landscape and visual impacts. This is set out in further detail in Section 4.7 of Chapter 4 of the ES which concludes that a significant cumulative effect upon the character and features of the landscape stretching between the M1 motorway in the east and the A43 in the west is likely to arise from the combined effects of the Rail Central proposal, if approved, alongside the Proposed (Northampton Gateway) Development.
- 2.58. However, the analysis concludes that the Rail Central scheme on its own would have more significant landscape and visual effects and it is primarily the effect of that

scheme which results in the unacceptable cumulative effects. The Applicant considers there is likely to be a difference between the effect of the Proposed Development (Northampton Gateway) over a more contained landscape with existing active and urbanising influences and that of the Rail Central proposal over a broader and more open and rural landscape. Consequently, the Rail Central proposal would have a more significant adverse landscape effect and contribute a greater proportion of the combined cumulative effect.

- 2.59. Some of the main conclusions from the assessment of the likely landscape and visual effects in Chapter 4 of the ES include:
- In visual terms, the most notable cumulative effects will arise for receptors to the west, north west and south west of the Main Site. Some properties at Milton Malsor, Blisworth and in the general vicinity of these settlements will experience significant cumulative visual effects from the Rail Central proposal in combination with the Proposed (Northampton Gateway) Development. Similarly, users of a series of PROW will also experience significant cumulative visual effects arising from the combined proposals.
 - The Rail Central proposal would contribute a significantly greater proportion of any combined visual effects upon these receptors and from a number of receptors and locations the Rail Central proposal would screen any views towards the Proposed (Northampton Gateway) Development. From west and south west of the Main Site boundary, the Proposed (Northampton Gateway) Development would generally constitute a more limited and distant part of any views towards the combined proposals. In the medium and longer term, the perimeter mounding and planting to the western side of the Main Site would be increasingly effective in visually separating the Proposed (Northampton Gateway) Development from the Rail Central site and landscape to the west.
- 2.60. More general conclusions regarding cumulative effects are also provided in Sections 15.3 and 15.4 of Chapter 15 of the ES, with references to judgements reached regarding noise at a small number of local receptors. Initial conclusions are reached about the potential for both schemes to result in an improvement in traffic congestion as a result of the combined transport mitigation packages from both schemes, albeit the benefits are likely to be less great than those expected from Northampton Gateway alone.
- 2.61. The Applicant remains of the view that the likely cumulative effects of both schemes would not be acceptable in environmental terms. We also remain unclear as to whether the two schemes as proposed could both be delivered if approved given the overlap in the site boundaries. Further information about the Rail Central scheme has recently been provided and the Applicant will be updating its cumulative impact assessment in light of that new information.

Labour supply

- 2.62. A common issue raised in representations was that of concerns about a shortage of labour due to low local unemployment in the local area. This issue was often cited with regard to questions over the need for the proposed SRFI in this location, and also with regard to the potential for this to result in commuting to the site from a wider area, adding to concerns about traffic and congestion. This issue was raised by many Parish Councils as well as local residents.

Applicant's Response

- 2.63. As a strategic proposal rooted in the economic context provided at both the national and local levels, the Northampton Gateway has regard to a range of economic issues and opportunities, including many which look beyond the immediate local area. Many of the references to labour supply refer to the economic context of South Northamptonshire District with references made to the below average levels of unemployment, and very low levels of deprivation in general. This economic context in South Northamptonshire is clearly set out in Chapter 3 of the ES (Document 5.2) regarding socio-economic issues.
- 2.64. However, the analysis in ES Chapter 3 also provides data regarding the wider study area of relevance to the development site which sits adjacent to the boundary with Northampton Borough, and close to a number of other urban areas in five other local authority areas, including Milton Keynes, Daventry, and Wellingborough. The study area as a whole is shown to contain a more mixed picture with regard to unemployment and wider signs of deprivation than that of South Northamptonshire and the nearest rural communities to the site. Northampton, for example, had a claimant count rate of 1.9% in February 2018, much closer to the national average of 2.3% at that time. The rates in Kettering and Wellingborough were shown to be the same or higher as that in Northampton. Almost 6000 people were claiming unemployment benefits in just Milton Keynes and Northampton in February 2018.
- 2.65. Average earnings are also shown to be lower than the national average in Northampton and several other nearby local authorities, albeit higher in South Northamptonshire.
- 2.66. Importantly, local data set out in Chapter 3 of the ES shows that many local authorities in the study area experience significant net outflows of employed people commuting to jobs elsewhere. This is particularly marked for South Northamptonshire where around 11,000 working people travel to Milton Keynes and to Northampton for employment. There is also a net outflow from Northampton to Milton Keynes.
- 2.67. Therefore, while local employment and economic activity levels are high, this masks significant levels of net out-commuting, with South Northamptonshire and Northampton housing large numbers of people who have to work elsewhere. Added to this, despite the generally low proportion of unemployed people in South Northamptonshire there are many thousands of people seeking work in the study area as a whole, and wage levels are currently below the national average.
- 2.68. If approved, the Northampton Gateway scheme would be delivered over a number of years, with buildings being erected in response to occupier demand. The scheme would generate some 'churn' in the labour market, creating a range of new jobs which would provide opportunities for people across the study area to work closer to home, and reducing the local reliance on often car-borne commuting, as well as attracting new people into the labour market. The creation of new jobs would happen relatively gradually, and as set out in the ES, would be in tandem with planned and committed housing and population growth being delivered across the study area through the Joint Core Strategy, as well as skills and economic growth initiatives being promoted and delivered by the Local Enterprise Partnership (LEP) and other partners. The LEP is promoting growth and investment in the logistics sector across Northamptonshire and the wider south east midlands, having recognised the opportunities associated with the increasingly high-value and high-skilled jobs required by the sector.

Lack of local policy context

- 2.69. A number of representations from local people refer to concerns about the apparent lack of regard to the local planning policy context, including the Core Strategy.
- 2.70. Often linked to this issue were concerns regarding the NSIP decision making process being undemocratic because it is not led by the local authority. A small number of responses refer to the planning history of the site, and see the proposed NSIP only as a cynical approach by the Applicant to bypass local decision-making.

Applicant's Response

- 2.71. The policy context for NSIP applications is provided by the National Policy Statement (NPS), and this is the primary source of policy and guidance to both Applicants and to the Examining Authority. The NPS has much in common with the National Planning Policy Framework (NPPF) which sets the context for local plan-making and decision taking, and which sets out the role of the planning system in delivering sustainable development with social, environmental and economic benefits. Both the NPS and NPPF place the same or similar emphasis on the need for development schemes to seek to balance delivery of economic, environmental and social objectives and outcomes.
- 2.72. The applicant notes that very few of the representations refer to specific local planning policies or objectives of the Core Strategy, and that (as referred to elsewhere in this response) a small number of local residents understand that the site and wider area is designated as Green Belt. The site is not in the Green Belt, and never has been (there is no Green Belt in Northamptonshire), and to this extent at least there is clearly some lack of local understanding of the planning and policy context for the site and the proposals.
- 2.73. Some references were made to an earlier (1997) South Northamptonshire Local Plan policy (EV8) which identified a local important 'gap' adjacent to the M1 where development was actively discouraged. This policy has not been carried forward or updated through subsequent Local Planning policies, and is considered contrary to strategic policies of the now adopted Joint Core Strategy. It is noted that this policy approach is not being proposed by SNC in their emerging Part 2 Local Plan, and in these respects the policy is considered out of date. As the principle urban area of West Northamptonshire, Northampton is identified through local planning policies as the main focus of economic and population growth. The spatial strategy is based around urban extensions on greenfield sites adjacent to the urban area, some of which include land previously in 'local gaps' identified through older local planning policies. Strategic employment is directed either to DIRFT at Junction 18 of the M1, or to a new stand-alone employment site at Junction 16 (now under construction).
- 2.74. The application site is not allocated by local policies, and the Proposed Development responds to strategic (national) drivers and policy objectives to which the NPS relates.
- 2.75. The concerns raised about the NSIP process bypassing local democracy are noted, however the Applicant has no choice regarding how an NSIP scheme is determined. The NSIP process was introduced in part as a recognition that local planning policies are often not effective, or efficient, as a route for planning for or enabling strategic or nationally significant infrastructure proposals in timely or predictable way. That notwithstanding, the Applicant has worked hard to ensure there is extensive local awareness and involvement in the process. The Applicant has undertaken formal and informal local engagement with not only the local community, but also with the local authorities including the local elected Councillors, and MPs, over an extended period and since the earliest stages of the scheme's evolution. There has been detailed engagement on political and technical levels with the local authorities at District and

County Council levels, and the Applicant has met directly with community groups via specific consultation events and by attending other public meetings since 2016.

- 2.76. While the local authorities are not the decision-makers, they are taking the opportunity to play an active part in the Examination process, and preparing a Local Impact Report for the Examining Authority. Their views and comments will clearly be one of the factors taken into account, along with those of the MPs, when the decision is taken.

Local environmental concerns

- 2.77. This heading covers a wide range of issues raised by representations regarding local environmental impacts of the proposals of relevance to a number of different aspects of the ES. The main issues raised include concerns and objections on the grounds of:
- Loss of agricultural land;
 - Loss of habitats and existing public footpaths;
 - Loss of local countryside and an important landscape 'gap' between the villages and Northampton;
 - Proposed landscaped bunding would be 'blot' on the landscape;
 - Increased local flood-risk local.
- 2.78. A number of such issues were raised by local residents and Parish Councils.

Applicant's Response

- 2.79. The ES (Document 5.2) contains analysis of the existing baseline conditions and of the potential impacts of the scheme which are of direct relevance to the issues raised above. These include chapters on Landscape & Visual Impacts (Chapter 4), Ecology and Nature Conservation (Chapter 5), Drainage and Water Resources (Chapter 7), and Agricultural Land (Chapter 13). The Design and Access Statement (Document 6.9) is also of relevance regarding the design evolution of the proposals.
- 2.80. The proposals would result in the permanent loss of rural farmland, albeit with much of the existing soil resource protected and re-used on-site within the proposed landscaping and planting areas. The loss of existing farmland is defined in Chapter 13 of the ES as a '*moderate adverse*' effect of the scheme.
- 2.81. The habitats contained across the proposed development site at present are known to consist of largely arable habitats which do not contain particular diversity or interest from an ecological perspective. Significant areas of existing woodland and hedgerow will be retained within the proposals, with extensive new habitats also provided, including:
- 10.7ha of conserved (existing) woodland and tree groups;
 - 23.55ha of proposed new woodland and tree groups on the main site, and 5.7ha on the Bypass corridor;
 - 3.8 linear km of conserved (existing hedgerows);
 - 13 linear km of new hedgerows;
 - 4.7ha of conserved (existing) species rich grassland/meadow;
 - 26.6ha of proposed new species rich grassland/meadow.
- 2.82. The assessment contained in Chapter 5 of the ES concludes that overall effects of the proposals on ecology and nature conservation would be negligible in light of the balance between losses and gains of various habitat types, but with the opportunities to deliver a net gain in biodiversity. Significantly, Natural England's representations have confirmed their position with regard to the proposals, and raised no objections.

- 2.83. The Proposed Development does not lie within or close to any national landscape designations have been identified within or in close proximity to the Proposed Development Site. However, a small part of the southern end of the Bypass Corridor extends into the locally designated Tove Valley Special Landscape Area (SLA).
- 2.84. The importance attached by some local people to the area of landscape south or west of the M1 is noted, with a small number of respondees under the misunderstanding that the land is part of a “the Green Belt”. The land has no such land-use or other designation, although was identified as part of a ‘local gap’ by policies adopted in the 1990s (also referred to above). A comprehensive assessment of the landscape character of the site and surrounding areas has been undertaken in the ES (Chapter 4), and the rolling nature of the topography and general aspect of the land provides a degree of enclosure to the main SRFI site. A gentle ridge of higher land stretches along the western side of the Main Site and provides some visual separation to the more rural landscape to the west of the Northampton Loop railway, and with lower land closer to the existing urban edge of Northampton. The existing woodland blocks are important landscape features which would be retained.
- 2.85. Many of the visual effects of the completed and operational Proposed Development will reduce over time following the establishment and subsequent maturing of the proposed planting and habitat creation. The comprehensive management of not only the proposed planting and habitats but also the existing conserved woodland, trees, hedgerows and other habitats will also assist in reducing the initial operational visual effects. The maturing and management of the existing and new planting will offer the most notable visual improvements to some of the receptors immediately surrounding the Site or with close views encompassing proposed planting and mounding in between the receptor and the proposed buildings or other infrastructure. The residual effects on the landscape, and the visual effects on local communities, range from negligible to ‘moderate adverse’, but with many local receptors not directly affected.
- 2.86. While queries about local flood-risk are understood given the existing baseline conditions, the ES shows that the proposals would deliver beneficial effects overall with reduced flood-risk in off-site downstream areas as a result of the implementation of a sustainable drainage strategy to better manage and control the release of surface water into local watercourses. So the technical assessment confirms that the scheme will deliver betterment locally – less risk, not more. The Environment Agency has raised no objections to the proposals.
- 2.87. Therefore, the relevant local environmental effects are assessed by the ES which forms part of the application, and as set out above, show a range of likely effects, including how adverse effects are mitigated by various measures incorporated into the proposals.

Potential future housing infill at Roade

- 2.88. A small number of interested parties from Roade commented about the future risk of the proposed Bypass enabling additional infill housing development, and have objected to the Northampton Gateway proposals on this basis. Many clearly feel residential development is an inevitable consequence of the new road.

Applicant’s Response

- 2.89. This is an issue beyond the control or influence of the Applicant, and new residential development is not being proposed or promoted by the Applicant. The route of the

bypass was identified following a process including consultation with the local community and other interested parties and consultees. The intention was to strike an appropriate balance between minimising landscape and visual harm (by not locating the road too far from the village edge), and not creating significant adverse effects on nearby residents. A very low number of comments or suggestions were received by the local community at that time, and no overall consensus emerged. Some concerns about future infill were raised in the context of support for an 'inner' as opposed to an 'outer' alignment, as were concerns about noise from the road if located too close to the existing village edge with some local residents keen to see the road as far away as possible.

- 2.90. The proposed bypass alignment is the 'inner' of the two routes considered, but is sufficiently far away to enable appropriate mitigation of noise and other potential local effects. In that regard, the proposed alignment limits the scope for any future infill development as compared to the 'outer' alternative. The Roade Bypass Options Report (Document 5.2, Chapter 12 Appendix 12.1, Appendix 20) provides further background and explanation of the assessment and issues considered in identifying the most appropriate route. Additional land being made more accessible is an inevitable consequence of a bypass, and it is not possible to design a road on an alignment without creating some pockets of such land.
- 2.91. Any future housing proposals would ultimately be a matter for the local planning authority (South Northamptonshire Council) to consider with regard to the spatial strategy for the District, or in response to speculative planning applications by landowners or others. It is not something being promoted or planned for by the Applicant, and not something within our direct control. To suggest the delivery of any such aspirations for new housing development as 'inevitable' would pre-empt one or both of the statutory plan preparation processes of SNC as the local planning authority, and/or the determination of any future planning applications by SNC.

Increased risk of crime, and reduced amenity in surrounding villages

- 2.92. These issues were not raised in a large number of the representations, but do feature in some from local individuals. By implication, some of the concerns regarding crime appear to be related to the presence of HGVs which can sometimes be target of theft.

Applicant's Response

- 2.93. The perceptions that either of these effects may result from the scheme are not based on evidence. The Applicant has considered these issues as part of the wider responses, but it is difficult to provide an evidence based response to these emotive local issues.
- 2.94. However, with regard to crime, the proposals include a secure HGV parking area as a direct response to concerns and suggestions made by the Police. This is a direct response to high-levels of HGV based crime across Northamptonshire and beyond, and will help reduce crime in and around the site.
- 2.95. It is not clear how the proposals might otherwise be associated with local concerns regarding crime.
- 2.96. The expected benefits from the scheme include reductions in through-traffic in many of the surrounding villages. In Roade the bypass will directly redirect the A508 around the village, greatly reducing congestion, and associated noise and air quality issues, through the centre of the village. The wider package of transport improvements including the comprehensive upgrade to Junction 15 of the M1 will attract more traffic

back to the A508 corridor and away from many local routes through villages such as Blisworth and Milton Malsor.

- 2.97. The Applicant recognises the issues and concerns that use of local roads by HGVs can cause, and as a result has included in the proposals environmental weight limits through several local villages near to the Main Site and along the A508 corridor. This will help to remove HGV through traffic, and should help improve local amenity and quality of life for many. This may also be relevant in the context of comments raised by some local residents about whether the proposals may have an effect on house values. In addition to helping reduce local nuisance from through-traffic, it will have beneficial impacts on air quality and noise compared to the existing conditions in some villages.