



NORTHAMPTON
GATEWAY
STRATEGIC RAIL FREIGHT INTERCHANGE

**STATEMENT OF COMMON GROUND BETWEEN THE
APPLICANT AND SOUTH NORTHAMPTONSHIRE COUNCIL**

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The Northampton Gateway Rail Freight Interchange Order 201X

HIGHWAYS STATEMENT OF COMMON GROUND BETWEEN THE
APPLICANT AND SOUTH NORTHAMPTONSHIRE COUNCIL | 8 FEBRUARY 2019

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ROXHILL

8th February 2019

STATEMENT OF COMMON GROUND

for

NORTHAMPTON GATEWAY SRFI

on

Local Policy Context & CIL

ES Scoping

Landscape & Visual Impact

Ecology

Air Quality

Noise

Economy & Employment

Heritage

between

OXALIS PLANNING for Roxhill (Junction 15) Ltd

and

SOUTH NORTHAMPTONSHIRE COUNCIL

SCOPE

This Statement addresses the topic matters listed below. It has been prepared at the request of the Examining Authority to assist the examination of the application for a Development Consent Order for the Northampton Gateway Rail Freight Interchange project.

The Statement is structured under the following headings:

Parties to the Statement of Common Ground

- 1 Project Description
- 2 Local Policy Context – including Community Infrastructure Levy
- 3 ES Scoping
- 4 Landscape and Visual Impact
- 5 Socio-Economic & Employment
- 6 Air Quality
- 7 Noise
- 8 Ecology
- 9 Heritage - Archaeology
- 10 Conclusion

PARTIES TO THE STATEMENT OF COMMON GROUND

Signatories to this Statement are:

South Northamptonshire Council (SNC)

Oxalis Planning for Roxhill (Junction 15) Ltd.

1. PROJECT DESCRIPTION

- 1.1 The Northampton Gateway proposals are for a Strategic Rail Freight Interchange as defined by the criteria for Nationally Significant Infrastructure Projects (NSIP) contained in the Planning Act 2008 and the guidance contained in the National Networks National Policy Statement (NPSNN).
- 1.2 The details of the proposed development are described within in the Environmental statement (Chapter 2 Description of Development), and summarised in the submitted Planning Statement.
- 1.3 The SRFI site is located on land to the west of M1 Junction 15, west of the A508 road, and east of the Northampton Loop railway line. The majority of the site delineated by the 'red line' of the Proposed Development is within South Northamptonshire, with a relatively small area (relating to highways mitigation works) located within Northampton Borough.
- 1.4 The Parameters Plan (document 2.10) defines the locations of key infrastructure, including landscaping and earthworks and includes parameters to limit and constrain the location, scale and height of buildings.
- 1.5 Highway and other associated transport improvements are proposed as part of the development to mitigate the identified transport impacts. This includes a package of targeted works on key junctions in the A508 Corridor where safety or congestion problems are already known to exist.
- 1.6 The alleviation of traffic congestion on the A508 in Roade and associated environmental impacts, e.g. poor air quality, has been a matter of local concern for some years. The proposed Roade bypass would provide a means to improve the existing situation.

2. LOCAL POLICY CONTEXT

- 2.1. As a national strategic infrastructure project the proposal falls within the framework of national policy statements, in this case the National Policy Statement for National Networks. The National Planning Policy Framework 2018 and the local Development Plan, to the extent these are relevant to the proposal, are considerations.

West Northamptonshire Joint Core Strategy

- 2.2. The West Northamptonshire Joint Core Strategy Local Plan (Part 1) December 2014 (WNJCS) provides the strategic planning policy framework for West Northamptonshire. This spatial strategy focuses strategic growth on locations "*in or adjoining*" Northampton which is the main urban area and centre of economic and population growth. The WNJCS was adopted in 2014 and forms part of the

Development Plan framework for South Northamptonshire, Daventry District and Northampton Borough. The Plan details the locations and scale for both the housing and employment needs of the area.

- 2.3. The 16 Spatial Objectives of the WNJCS provide the balance and direction for the plan policies. Within these elements are consistent with principles within the NSPNN, pertinent Objectives include:

Objective 1 – Climate Change which includes “ensuring new development promotes the use of sustainable travel modes”;

Objective 2 - Infrastructure and Development with an emphasis on ensuring “social, physical and green infrastructure is adequately provided to meet the needs of people and business in a timely and sustainable manner...”;

Objective 3 – Connections: “To reduce the need to travel, shorten travel distances and make sustainable travel a priority across West Northamptonshire by maximising the use of alternative travel modes”.

Objective 8 - Economic Advantage: “To strengthen and diversify West Northamptonshire's economy by taking advantage of our internationally well-placed location, strategic transport network and proximity to London and Birmingham.”

- 2.4. The WNJCS employment policies seek to sustain existing sectors and to grow and diversify the local economy whilst maintaining the balance between the need for new homes and employment and includes allocations for strategic employment development sites in two locations at :

Daventry International Rail Freight Terminal (DIRFT) a Development Consent Order (DCO) was granted in 2014 for DIRFT 3 to include a new replacement rail link infrastructure and a further 731,000 sq.m of rail served logistics development. (WNJCS Policy E4)

Northampton J16 Strategic Employment Site comprising a total site area of 43 hectares (gross) for a development of B1, B2 and B8 uses, subject to limits on the maximum size of any unit (40,000 sqm) and B1 (A) offices (1000 sqm gross) with associated infrastructure and highway works. The development will also include a lorry park with ancillary facilities. (WNJCS Policy E8)

- 2.5. WNJCS does not allocate land for rail connected strategic distribution beyond that already approved at DIRFT Phase 3 which was approved in July 2014, as it did not anticipate further SRFIs being deliverable within the plan period. It does however reflect on the principle that local authorities in West Northamptonshire would continue to work with Network Rail and the freight industry to consider and support further sustainable opportunities for rail freight interchanges in the longer term “once the

opportunities for additional access onto the rail network to support viable rail freight interchanges are confirmed through national policy". (WNJCS paragraph 5.72)

- 2.6. The demand for continued development of the distribution and warehousing sector is thus recognised in the WNJCS. This is a consequence of the area's central geographic location, proximity to key transport infrastructure routes, which combine to provide excellent access to a large proportion of the UK population.
- 2.7. The WNJCS includes a minimum net jobs growth target of 28,500 over the 21 year period between 2008 and 2029 to maintain the balance between homes and jobs and a diverse economic base, (WNJCS Policy S7).

Community Infrastructure Levy (CIL)

- 2.8. The Examining Authority sought comment in this Statement (requested via the DCO Hearing) from the Applicant and SNC regarding the proposal that, if the DCO is granted, the permission would not qualify as a 'planning permission' for the purposes of the 2008 Planning Act with regard to CIL.
- 2.9. SNC has implemented the CIL. Under the current SNC adopted CIL Charging Scheme only residential and retail developments are liable for the CIL. The proposed warehousing or infrastructure development would therefore not incur a CIL liability.

Control of Advertisements

- 2.10. The parameters Plan identifies locations at S1 and S2 for signs. The details of proposed signs will be subject to approval by the Local Planning Authority through the Requirements within the DCO. This provision is currently included within Requirement 8 of the draft DCO document, which was amended by the Applicant in response to SNC's preference to retain control over advertisement signage. This will ensure signs can be subject to appropriate consideration with regard to safety and amenity, similar to those set out in the Control of Advertisement Regulations.

3. ES Scoping

- 3.1 The Scope of the ES was consulted upon by the Applicant, and SNC provided comments and suggestions. This included with regard to the relevant committed developments which the Applicant should consider with regard to assessing cumulative effects. SNC's suggestion of including the South of Brackmills SUE in the assessment was accepted by the Applicant, and any potential cumulative effects with that committed site are considered within the ES.

4. Landscape and Visual Impact

- 4.1 The SRFI site is located close to junction 15 of the M1 motorway, and the A45 trunk road which form part of the strategic road network. The site will also have direct access in both directions to the national rail network via the Northampton Loop of the West Coast Mainline Northampton Loop (WCMLNL) railway which runs immediately west of the site. The WCMLNL connects to the West Coast Main Line (WCML) close to the southern boundary of the site and again at Hillmorton near Rugby to the north of Northampton.
- 4.2 The SRFI site is open countryside with no specific landscape designation. It is however close to the Courteenhall Estate, a designated historic park and garden, which lies to the south east of the site on the opposite side of the A508. A small part of the Roade bypass site encroaches into the northern extent of the locally designated Tove Valley Special Landscape Area which stretches from Towcester to Milton Keynes following the valley of the River Tove and along the Grand Union Canal.
- 4.3 The proposed development will have a significant adverse impact on the existing landscape character of the RFI site given this is in the main previously undeveloped agricultural land. Although there will be a significant change to the landscape character of the site, the impact on the wider landscape is likely to be moderate overall in the longer-term.
- 4.4 The context of the relationship of the proposal with other urban forms of development which include the M1 motorway, the West Coast Mainline Northampton Loop railway and the urban areas to the east of the M1, at Collingtree and Grange Park which form the edge of the Northampton conurbation is significant to assessment of the impact of the development within the wider landscape. It is appropriate that these features are taken into account in establishing the existing (baseline) condition within the Landscape and Visual Impact assessment and in the Noise and Air Quality assessments within the Environmental Statement.
- 4.5 The existing landform across the proposed SRFI Site varies, with the highest land to the west of the site, and the lowest land in the east closest to the A508 road. The SRFI Site thus sits within a shallow but enclosed landform setting, with a general aspect towards the existing urban edge and the motorway junction. A ridge of higher land within the site runs approximately parallel to the WCMLNL railway and the highest point within the SRFI Site lies close to the western boundary and the two areas of existing woodland (Churchills and Highgate) which lie relatively elevated within the SRFI Site. In the north western corner of the SRFI Site the land falls gently towards Milton Malsor, but it is only this far north western corner of the SRFI Site that falls away from the motorway and existing urban edge. In combination the relatively enclosed topography, and the existing Woodland features, provide opportunities to help screen the site from viewpoints west and south-west as part of an earthworks and landscaping strategy.

- 4.6 The lowering of ground levels, boundary mounding, landscaping, new planting and the retention of existing wooded areas within the RFI site will mitigate the visual impact of the proposed warehousing and associated infrastructure. The retention of the existing wooded areas will soften the visual impact from the outset and provide maturity to the green infrastructure. The full effect of the new landscaping and planting will not be realised until this has matured. This will take time therefore new planting will be programmed to be implemented at the earliest practicable time within the construction of the development
- 4.7 The proposal will involve considerable investment in the green infrastructure. Earth mounding, structural landscaping to the boundaries and new tree planting will provide the opportunity to provide new habitats and amenity space around the routes of public footpaths within these areas. The visual mitigation afforded by the green infrastructure will be enhanced if the built form appears to sit naturally within it, rather than the green infrastructure is squeezed around the built form.
- 4.8 The ES includes an appropriate Landscape and Visual Impact Assessment (LVIA) based on the proposed development parameters, including the proposed screening earthworks, landscaping and planting and identified views and receptors. The LVIA identifies that during the construction phase there will be some significant effects for a small number of receptors close to the SRFI on the eastern side of Milton Malsor in particular.
- 4.9 Some visual effects will remain for a small number of receptors in South Northamptonshire in the early years (i.e. on opening) of the development – these include individual properties at Courteenhall West Lodge, Dovecote Road in Roade, and Dovecote Farm east of Blisworth Road. There will be residual effects on users of the PROW network within the main site, and users of some stretches of PROW along the Bypass.
- 4.10 Residual effects are considered to be negligible for many receptors as the landscaping and new planting together will mature to screen the proposed buildings and rail terminal from outside viewpoints, particularly from the west and north although views from the south east will remain. The retained existing woodland will offer some visual softening in the early years. Alongside the existing conserved woodland, trees, hedgerows and other planting, the extensive new woodland, tree and other planting proposals will form connected landscape corridors albeit largely around the perimeter of the SRFI site.
- 4.11 The Roade Bypass is likely to remain visible from properties on the western edge of Roade, these views will be reduced by the planting and earthworks proposed as part of the bypass design.
- 4.12 No significant residual visual effects associated with the rail infrastructure or buildings are likely to persist once the landscaping and planting scheme has matured. The visual mitigation afforded by the green infrastructure will be enhanced by the built

form appearing to sit naturally within it, rather than the green infrastructure being squeezed around the built form.

- 4.13 The proposals will involve considerable investment in the green infrastructure. This extensive green infrastructure, with appropriate management, would be a significant local asset. Earth mounding, structural landscaping to the boundaries and new tree planting will provide the opportunity to provide new habitats and amenity space around the routes of public footpaths within these areas.

5. Socio – Economic

- 5.1. The proposed development could provide a significant number of jobs (circa 7400) bring a range of new employment opportunities, and provide investment and improvements to the transport network including:
- An intermodal terminal to facilitate use of the rail network for freight shipment to reduce road based haulage movements across the country.
 - Opportunity to broaden the employment offer as the logistics sector now involves many companies in secondary processing and assembly that constitutes modern manufacturing.
 - Securing improvements to Junction 15 and 15A will improve connections for wider range of businesses on the motorway and strategic road network.
 - Secure a by-pass for Roade addressing a congestion 'pinch point' on the local highway network.
- 5.2. The Proposed Development would provide significant growth in a key sector within the local and sub-regional economy which would support sub-regional aspirations and objectives regarding employment creation, supply-chain development across a range of sectors, and encouraging and enabling trade links and export of goods.
- 5.3. The logistics sector accounts for a much higher proportion of employment within the sub-region than that seen at the national level, reflecting a significant representation of National and Regional Distribution Centres.
- 5.4. DIRFT (Daverly International Rail Freight Terminal) is identified as an established national distribution hub, with Phases 1 and 2 now successfully complete and capacity to accommodate further growth through the permitted Phase 3.
- 5.5. There are large-scale logistics facilities in the wider local area, in Northampton and Milton Keynes in particular. South Northamptonshire has hitherto not attracted the largest scale of logistics activities. The logistics sector across South Northants comprises a mix of small to medium sized units occupied largely by third party and

direct distribution activities focused on regional distribution. This 'second tier' provides a supporting role and offers choice within the logistics sector.

- 5.6. South Northamptonshire is strategically located to take advantage of forecast 'supply led' logistics growth. Northampton and Milton Keynes are other key centres which would provide a focus for further growth within the wider LEP area.
- 5.7. The positive impact of a 'supply led' growth in logistics that balances the economic benefits with likely impacts on the local economy and the environment are recognised. Opportunities to accommodate greater levels of logistic activity, particularly at the largest scale, will require proactive support and a range of interventions including both new infrastructure and improvements to existing infrastructure development of the supply chain, and investment in skills and training.
- 5.8. There would be opportunities for Training and Skills initiatives related to both construction and operational phases of the Northampton Gateway project which would offer potential local economic benefits.
- 5.9. South Northamptonshire has a relatively highly skilled labour force and experiences low unemployment and high-levels of out-commuting by residents to workplaces in other areas, including Northampton. This varies across the wider area with higher unemployment in other areas, such as Northampton and Milton Keynes, parts of which exhibit relatively high levels of deprivation. There are generally high levels of commuting (net in-commuting) into Northampton from surrounding local areas, including from South Northamptonshire. There is also a net commuting flow out of South Northamptonshire (and Northampton) in the direction of Milton Keynes. Additional local job creation could offer benefits of reducing the need to travel such distances, and enabling more sustainable patterns of travel to work from South Northamptonshire.
- 5.10. The Study Area for the socio-economic assessment within the ES includes South Northamptonshire Council, Northampton Borough Council, Daventry District Council, the Borough Council of Wellingborough, Kettering Borough Council and Milton Keynes Council, and considers data and trends regarding claimant count and commuting. This identifies that employment activity, within the Study Area in 2017 was higher than the national average.
- 5.11. The ES concludes that a significant majority of future employees at the RFI will derive from within the Study Area and anticipates the future workforce for the RFI may be found within the more deprived areas of Northampton, the central and south side of Milton Keynes, and local areas within Daventry, Wellingborough and Kettering.
- 5.12. An effective and affordable system of public transport across the Study Area will be essential to transport potential workers to the workplace.
- 5.13. The Public Transport Strategy will improve the accessibility of the site and proposed new public transport services will improve connections to Northampton.

- 5.14. The proposals include a range of highway improvements, including a substantial improvement to Junction 15 of the M1, as well as improvements at Junction 15A, and at various locations within the 'A508 corridor'. The improvements will deliver benefits for South Northamptonshire in terms of reduced congestion, improved journey-times and reliability.
- 5.15. The package of mitigation works within the A508 corridor will improve a number of existing local junctions and other parts of the local network. The Transport Assessment has used the County Council's Strategic Model. This predicts that the proposed package of mitigation overall will result in reductions in through-traffic in villages including Milton Malsor, Blisworth, and Roade by reducing congestion on the A508 and at Junction 15.
- 5.16. Delivering the improvements to Junction 15 and the A508 in advance of the Roade Bypass would result in a small increase in the traffic travelling through the centre of Roade. Roade already experiences peak time congestion and is a sensitive area with respect to air quality. These adverse effects would be resolved by the Roade bypass.

6. Air Quality

- 6.1. The assessment of the likely impacts on air quality includes consideration of any Air Quality Management Areas (AQMAs) nearby. There are no AQMA in communities close to the Proposed Development within South Northamptonshire, the nearest one being in Towcester. The development is predicted to have moderate beneficial impacts overall, but a Slight Adverse effect is likely on annual mean NO₂ concentrations at a small number of the closest receptors to the M1 (in Collingtree). Most local receptors will see a negligible change in air quality.
- 6.2. The Proposed Development by increasing the use of rail for the long distance transport of freight could contribute to national efforts to reduce air pollution and other emissions from road transport.
- 6.3. The Proposed Development is anticipated to have a *Negligible* impact on annual mean NO₂ concentrations in all years, in most study areas. However some locally significant impacts are predicted in 2021 and the interim period ahead of key mitigation measures being in place.
- 6.4. This is particularly relevant for Roade. The Proposed Development includes a bypass to re-route the A508 out of the centre of Roade, thereby reducing traffic, congestion and hence pollution levels in the village. The A508 bypass is not however due to be operational until after 2021, and the centre of Roade is expected to see small increases in traffic flows in the short-term as the Proposed Development opens.
- 6.5. The overall impact of the proposed development in Roade in the absence of the bypass mitigation is considered to be Negligible Adverse in 2021, following the

provision of the bypass mitigation the impact is predicted to be Moderate Beneficial in 2023. The Roade bypass is thus considered to be significant to reducing risks to air quality through reducing local congestion.

7. Noise

- 7.1. The M1 motorway, a significant noise generator, separates the site from receptors within Northampton and results in relatively high baseline levels of noise at the SRFI site. This makes significant construction noise effects unlikely for most receptors. There are few sensitive receptors close to the SRFI site within South Northamptonshire that are likely to experience effects from noise during construction or when the site is operational. Temporary construction noise effects at nearby receptors will vary as work moves around the site, and will be worst in advance of the boundary screen earthworks being in place. These will be delivered early in the process, and will help to screen noise meaning no significant effects are likely from the works to deliver the buildings. Provisions have been included within the DCO to assess operational activities to ensure mitigation can be provided where required.
- 7.2. Best practicable means defined in the current British Standards guidance relevant to noise and vibration will be applied to minimise adverse effects.
- 7.3. The Roade Bypass will deliver beneficial reductions in noise in the centre of the village, but receptors close to the bypass will experience moderate to major adverse effects which will be noticeable. Mitigation measures, including earthworks and acoustic fencing, are proposed to minimise these effects and will result in residual noise levels below the 'Significant Observed Affect Level'.
- 7.4. The District Council is content that the noise impacts of the development are acceptable and are appropriately addressed by requirement 23 in the version of the draft DCO submitted for Deadline 4 (Document 3.1C) subject to 23 (1) being amended by the addition of the underlined words set out below:

23.—(1) Prior to installation, details of all mechanical and ventilation plant and any other noise making machinery or mobile plant that is intended to be used on any of the warehouses or other buildings within the main site must be submitted to and approved by the relevant planning authority. This will include an assessment of the expected noise impact at relevant receptors, using a methodology first approved in writing by the relevant planning authority. The assessment will consider noise from the proposed plant and machinery to demonstrate compliance with Government and local policy on noise. Any fixed plant or ventilation equipment must be installed and operated in accordance with manufacturers' instructions at all times.

8. Ecology

- 8.1. The Ecological assessment presents evidence of the characteristics of the site in terms of existing habitat types and quality, and the species present or making use of

the site. It confirms that as a largely arable area the site is largely of limited biodiversity interest, with key features limited largely to field margins, hedgerows and woodland areas. While no statutory designated ecological sites are included, the Proposed Development does include a number of Local Wildlife Sites or potential Local Wildlife Sites including species rich grassland in the Bypass Corridor. The Proposed Development site does show evidence of some species of note, including GCN, badgers, and potentially bat roosts, all of which are to be addressed through mitigation or design measures to either retain and protect key features, or replace with new features and habitats. This includes translocating and replanting species rich grassland within the Bypass Corridor.

- 8.2. The key woodland areas will be retained with minimal losses (of around 575 sq.m. or 2%, at the Highgate Woodland, and 0.2ha from Churchill's Woodland), and with substantial new planting proposed. New habitats will be created including through the provision of new drainage features, with several existing ponds retained, creating biodiversity benefits on-site. Pond P1 is known to contain GCN and will be retained. The site is shown not to have an important supporting role for the Upper Nene Valley SPA, and this is confirmed through a SoCG with Natural England following a programme of additional bird surveys.
- 8.3. The ES overall shows a range of likely effects on specific features or species, including many benefits and many negligible effects, as well as some adverse effects. None of the effects are significant. Sensitive management of the hedgerow network will benefit this habitat type and the fauna that relies upon it, particularly bats. Further biodiversity gains will be achieved through the establishment of woodland and wetland features will also provide improved habitat for local fauna, including amphibians and invertebrates.

9. Heritage

- 9.1. The ES identifies that the proposed development will have a number of minor / moderate adverse effects on heritage assets, this includes the loss of two non-designated heritage assets (barns) within the RFI site.
- 9.2. Overall it is not considered the development of the RFI site will result in significant impact on known heritage assets.

10. Conclusion

- 10.1. Substantial investment in rail and road infrastructure is proposed as part of the proposed SRFI development. This investment would provide improvements that would address existing local infrastructure issues.

- 10.2. In terms of scale the proposal represents a significant increase in employment provision within a key sector in the sub-regional economy. In terms of the planned for distribution of development this additional SRFI provision was not envisaged in the WNJCS plan period which includes strategic allocations at DIRFT.
- 10.3. The Proposed Development will deliver significant investment in improvements to the local highway network to mitigate adverse impacts of the proposed development. This 'associated development' is predicted to reduce the congestion experienced on the existing road network thus reducing local journey times. This will have consequential beneficial effects for local communities due to the re-assignment of traffic from minor roads to the strategic road network, and for business and services within the local economy. The A508 corridor improvements and the Road bypass, unique to the mitigation proposed within the Northampton Gateway RFI proposal, are critical to delivering the consequential local benefits.
- 10.4. It is understood by both parties that the existence of two separate proposals to develop SRFIs on adjacent sites is creating local concerns over the potential cumulative effects on the local infrastructure, environment, and communities.

SIGNATURES

On behalf of South Northamptonshire District Council

Name

Denis Winterbottom

Signature

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On behalf of Oxalis Planning, for Roxhill (Junction 15) Ltd

Name

Steven Harley

Signature

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