



NORTHAMPTON  
**GATEWAY**  
STRATEGIC RAIL FREIGHT INTERCHANGE

## APPLICANT'S REPONSES TO ExA'S REQUEST FOR FURTHER INFORMATION

### DOCUMENT 8.25

The Northampton Gateway Rail Freight Interchange Order 201X

APPLICANT'S REPONSES TO ExA'S REQUEST  
FOR FURTHER INFORMATION | 3 APRIL 2019

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## THE NORTHAMPTON GATEWAY RAIL FREIGHT INTERCHANGE ORDER 201X

### Applicant's Responses to ExA Request for Further Information – Document 8.25

#### 1. Introduction

- 1.1 This Document contains the Applicant's responses to the ExA's Request for further information, as contained in the letter dated 29 March 2019 issued pursuant to Rule 8(3) and Rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010.

#### 2. Applicant's Responses to ExA Questions

***ExA - Q1: In its Deadline 7 Review of Northampton Gateway Document 8.22: Climate Change Summary [REP7-012], Rail Central maintains that Doc 8.22 is procedurally and substantively flawed and that the Environmental Statement which accompanied the Northampton Gateway application does not comply with the requirements of the relevant Environmental Impact Assessment Regulations 2017. Can the Applicant please respond to these assertions?***

- 2.1 The assertion on the part of Rail Central (and it alone), is that the Environmental Statement provided with the Northampton Gateway application does not comply with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 due to a failure to appropriately assess "climate change".
- 2.2 This response first sets out the relevant requirements in the regulations and then addresses the criticisms set out in Rail Central's Review of Northampton Gateway Document 8.22: Climate Change Summary [REP7-012] ("the Review Document"). Document 8.22 [REP6-015] is referred to throughout as the Climate Change Summary.
- 2.3 Where in this note reference is made to the Applicant, where the context permits, this includes the Applicant's expert consultant on the topic in question.

#### The Regulations

- 2.4 Regulation 5(2)<sup>1</sup> states as follows:

*"The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors –*

- (a)...*
- (b)...*
- (c) land, soil, water, air and climate*
- (d)...*
- (e)..."*

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<sup>1</sup> In paragraph 1.4 and paragraph 1.5 of the Climate Change Summary (Document 8.22) reference is made to regulation 4 rather than 5 however, as can be seen from the quotes included in those paragraphs, this is simply a typographical error.

- 2.5 It is important to note in respect of Regulation 5(2):
- that it is directed at the EIA process, not simply the environmental statement (which is dealt with by Regulation 14 (see below));
  - that it refers simply to “climate” with no more specificity; and
  - that it requires assessment “in an appropriate manner in light of each individual case”.
- 2.6 Regulation 14 is the relevant regulation for the purposes of considering whether or not the contents of an environmental statement comply with the regulations.
- 2.7 Regulation 14 (2) states:
- “An environmental statement is a statement which includes at least  
(a) – (e)  
(f) any additional information specified in Schedule 4 relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected”*
- 2.8 It is important to note in respect of Regulation 14 that the additional information to be included in an ES specified in Schedule 4 is dependent on the specific characteristics of the particular development and the environmental features likely to be significantly affected.
- 2.9 The relevant paragraphs in Schedule 4 (paragraphs 4 and 5)(setting out Information for Inclusion in Environmental Statements) state that an ES should include:
- “4. A description of the factors specified in regulation 5(2) likely to be significantly affected by the development: .....climate (for example greenhouse gas emissions, impacts relevant to adaptation), .....”*
- “5. A description of the likely significant effects of the development on the environment resulting from, inter alia –  
....  
(f) the impact of the development on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change”*
- 2.10 It is important to note in relation to Schedule 4 that the content of the ES in relation to the consideration of “climate” is not prescribed, simply examples are given of what might be included – dependent, clearly, upon the judgements taken in relation to the application of Regulation 14 (2)(f).

#### Rail Central's Criticisms

- 2.11 It has been a consistent theme of Rail Central that the Applicant has not applied a particular approach or methodology in a standard form across the ES. The ExA are aware of this and the Applicant has explained, in several earlier responses, that:
- there is no standard methodology prescribed by regulations;

- the Applicant's approach differs from the, one size fits all, approach utilised by Rail Central in their ES for their scheme;
  - the Applicant's approach is to assess the likely significant environmental effects applying the methodology it considers appropriate to the impacts being assessed, which, although it does not lead to the uniformity desired by Rail Central, is clearly consistent with the Regulations in providing an assessment "*relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected*"<sup>2</sup>.
- 2.12 The Applicant's Climate Change Summary explains the approach taken in respect of the reference to "climate" in the Regulations referred to above. This has involved judgements on the part of the Applicant as to how to approach the topic which, it is clear, Rail Central would not agree with.
- 2.13 Rail Central further assert that the ES fails to comply with the Regulations for the reasons set out in paragraphs 1.6 (a) to (e) of the Review Document.
- 2.14 Before responding to those paragraphs, the Applicant would point out that it appears that Rail Central's views may be affected by a misapprehension. In paragraph 1.4 of the Review Document, Rail Central state that the Sustainability Statement is not part of the ES "*and therefore must be disregarded for the purposes of demonstrating compliance with the EIA Regulations (2017).*"
- 2.15 As the ExA will be aware, and as is clearly stated in the Climate Change Summary<sup>3</sup>, the Sustainability Statement is part of the ES – it is contained in Appendix 2.2 to the ES. Paragraph 2.3.15 of Chapter 2 (Description of Development and Alternatives) of the ES refers to the Statement.<sup>4</sup>
- 2.16 This misapprehension on the part of Rail Central means that they have incorrectly ignored the Sustainability Statement for the purposes of considering whether or not the ES complies with the Regulations.
- 2.17 The Applicant responds to the criticisms in paragraphs 1.6 (a) to (e) of the Review Document below by first setting out the paragraph (in italics) and then providing the Applicants' response:
- (a) *Paragraph 2.35 acknowledges that Chapter 7 (Air Quality) does not assess the carbon dioxide but rather Nitrogen Dioxide (NO2) and Particulates (PM10). RC agree with this statement given that the terms 'carbon' and 'greenhouse as' are not mentioned once within this chapter nor is there a formal assessment of effects against this environmental topic.*
- 2.18 Nowhere in paragraph 2.35 is there, as it is said there is by Rail Central, a statement which acknowledges that the Chapter 7 (Air Quality) does not assess carbon dioxide. However, paragraph 2.35 acknowledges that the Air Quality assessment "is not focused on carbon dioxide reduction measures" but the paragraph goes on to cross refer to the carbon dioxide reduction which would result from the shift of freight from road to rail. That carbon dioxide reduction effect is explained in Section 12.7 of the

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<sup>2</sup> Regulation 14 (2)

<sup>3</sup> Paragraph 2.12

<sup>4</sup> Whilst the reference in that paragraph is to a Sustainability Strategy, it is clearly the same document because it is identified as the document contained in Appendix 2.2 to the ES.

Transportation Chapter of the ES and Appendix 34, as set out in paragraph 2.42 of the Climate Change Summary.

(b) *Paragraph 2.36 then attempts to conclude that NG would “deliver a positive contribution” to climate change by virtue of its function as an SRFI. This conclusion is not supported by any evidence nor is it in accordance with the EIA Regulations and therefore cannot supplement the deficiencies of Chapter 9 or[sic] the ES with regards to the assessment of greenhouse gas emissions. Document 8.22 is not published as an addendum to the ES and therefore this conclusion must be dismissed.*

2.19 The conclusion that NG would deliver a positive contribution to climate change by virtue of its function as an SRFI is self-evident and clearly acknowledged in the quote from the NPSNN included in paragraph 1.8 of the Climate Change Summary. It might be said that no evidence is needed to prove the obvious. Nonetheless, as paragraph 2.36 of the Climate Change Summary signposts, the Applicant did assess the extent, and benefit, of mode shift from road to rail in Section 12.7 of the Transportation Chapter of the ES and Appendix 34). The fact that the Applicant chose to do so in a Transportation chapter of the ES rather than in the Air Quality chapter does not lead to a failure to comply with the Regulations. Air quality and “climate” are separately referred to in the Regulations. The basis upon which Rail Central assert that the conclusions reached are not supported by evidence or in accordance with the EIA Regulations is, therefore, not clear.

2.20 The extracts from the Scoping Report, referred to in paragraph 2.2 of the Climate Change Summary, explained that climate change would be dealt in various chapters of the ES.

2.21 The Regulations do not require that greenhouse gas emissions be dealt with at all<sup>5</sup> or as a discrete topic. A combination of Regulation 14 and paragraphs 4 and 5 of Schedule 4 require the applicant to use its judgement to decide how to address the issues identified.

2.22 The Climate Change Summary is not relied upon for compliance with the Regulations. It is, as it says, a summary and a vehicle for signposting where the issue of climate is addressed in the ES. Nonetheless it is noted that the Climate Change Summary has been the subject of consultation.

(c) *Paragraphs 2.38 2.48 [sic] attempt to demonstrate that Chapter 12 (Transportation) has considered the GG savings resulting from modal shift with paragraph 2.47 of the [sic] stating that the “general impact on traffic terms can be summarised as a permanent beneficial impact of major significance with regards to traffic flows and congestion relief which are also of direct relevance to greenhouse gas emissions”. Given that the statement underlined nor the term ‘greenhouse’ is contained within Chapter 12 and that Document 8.22 does not constitute an ES Addendum, this conclusion must be dismissed. RC’s previously submitted conclusions therefore remain valid that Chapter 12 does not meet the requirements of the EIA (2017) regulations with regards to the assessment of climate change.*

<sup>5</sup>

Paragraphs 4 and 5 of Sch 4 refers to greenhouse gases only as an example

- 2.23 Much of what is said in response to (a) and (b) is relevant here. It is not clear whether or not Rail Central are disagreeing with the information provided in Chapter 12 regarding the effect of modal shift, although it is thought unlikely since this has not been the source of criticism to date. Absent that criticism it would appear that Rail Central's concern amounts to a criticism that, although the ES has assessed the extent of transfer of freight from road to rail and consequent reduction in HGV movements, it has not also stated explicitly that this reduces greenhouse gas emissions.
- 2.24 Paragraphs 12.7.42 and 12.7.43 of Chapter 12 of the ES refer to the calculations of reduction in HGV mileage in Appendix 34 of the ES. Paragraph 12.7.34 states:
- "Taken together the above reduction in overall HGV mileage on the road network demonstrate how the proposed Northampton Gateway SRFI would comply with Government's objectives, as set out in the NPSNN, to achieve a modal shift from road freight to rail."*
- 2.25 The NPSNN is clear that the desired modal shift *"has a part to play in a low carbon economy and in helping to address climate change"* (paragraph 2.53). The Applicant, in the ES, assessed the extent of modal shift in light of the NPSNN objectives. In the judgement of the Applicant the approach taken to the assessment of that likely significant environmental effect is appropriate.
- (d) *Paragraphs 2.53-2.58 of Document 8.22 appears to assess the cumulative impacts of NG and RC with respect to reductions in greenhouse gas emissions with paragraph 2.58 stating "Therefore, combined the two SRFI's can be reasonably be expected to deliver increased climate change related benefits to those seen by Northampton Gateway alone. In the absence of any formal assessment supporting this conclusion within the submitted ES this statement must be dismissed."*
- 2.26 Given the increasing uncertainty regarding the Rail Central proposals, both in terms of their likely content and their timing, the Applicant would agree that no reliance can now be placed upon any assessment of the effects of the Rail Central proposal, and therefore cumulative effects involving Rail Central. As agreed at ISH4 and as stated by Rail Central in its Post Hearing submissions<sup>6</sup>, the matter of cumulative impacts with Rail Central is for the Rail Central Examination, if, or when, it proceeds.
- (e) *With regards to climate change adaptation RC's previously submitted objections also remain valid in that the ES submitted with the application for NG does not demonstrate an assessment (with significance criteria) of the future impacts of climate change upon NG and how mitigation may be used to reduce any significant effects with respect to climate change effects such as rising temperatures and overheating of buildings."*
- 2.27 The wording within this criticism betrays the fact that the criticism is, essentially, that the Applicant has not approached the issue of assessment effects on "climate" in the same way as Rail Central would. The failure suggested is therefore not a failure to comply with the Regulations (which, as set out above, do not contain the detail

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See paragraph 19. Rail Central's Written Summary of Oral Submissions made at ISH4, ISH5 and CAH2 [REP6-018]

referred to in (e) above) but a failure to comply with Rail Central's view on how the Regulations should be complied with.

- 2.28 Paragraphs 2.2 and 2.3 of the Climate Change Summary explain the Applicant's approach to climate change adaptation.

#### Summary of Response

- 2.29 In summary,

- i. Rail Central are mistaken in stating that the Sustainability Statement is not part of the Northampton Gateway ES.
- ii. The consideration of effects on "climate" involves a number of different issues and disciplines.
- iii. The EIA Regulations do not prescribe how effects on "climate" are to be assessed.
- iv. The Northampton Gateway ES addresses the issue of the likely significant effects on climate in a number of different chapters.
- v. The Climate Change Summary summarises and signposts the conclusions in the ES in relation to climate.

***Q2. In its Deadline 7 response, Stop Roxhill Northampton Gateway suggests that, having regards to climate change, and whilst acknowledging the Applicant's 2019 Climate Change Summary (Doc 8.22 [REP6-015]), there is no additional content to provide insight or confidence of the total impact of the Proposed Development in lifecycle terms relating to carbon lifecycle calculations. Can the Applicant please comment?***

- 2.30 As indicated in response to Question 1 above, the Climate Change Summary was a document which summarised and signposted. Its purpose was not to provide additional content but to provide a document, in response to criticism from Rail Central, which explained the approach taken in the Northampton Gateway ES to the assessment of the likely effects on "climate".

- 2.31 Also, as explained in response to Question 1 above, and in the Climate Change Summary, the Regulations do not prescribe how effects on climate should be assessed. The Applicant has carried out the assessment it feels is appropriate. There is no requirement to assess the carbon or greenhouse gas emissions over the 'life-cycle' of a project in the EIA Regulations nor is it required in the NPSNN. It is noted that Rail Central have chosen to attempt such an exercise and it may be that a comparison with the Rail Central application documentation has given rise to an expectation. However, the reality is that, such emissions can only be truly measured at source as they occur. Furthermore, there is no single approved methodology for evaluating and assessing greenhouse gas emissions nor are there established criteria or any defined significance thresholds<sup>7</sup>. The Applicant takes the view that such an academic exercise (as that carried out by Rail Central) has little

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As acknowledged in Rail Central's ES.



value given the inherent uncertainties and the extensive assumptions upon which such an exercise is based..

2.32 The ES as submitted provides information regarding the principal operational implications of the proposed Northampton Gateway with regard to carbon dioxide emissions. It refers to:

- the operational energy efficiency of the proposed warehousing, where the applicant has committed to deliver as a minimum BREEAM 2018 'Very Good' (BREEAM Industrial 2018 'excellent' standard) – resulting in an 8.8% reduction in CO2 emissions compared to notional development performance (Sustainability Statement Section 6 ES Appendix 2.2); and
- an assessment of the HGV mileage reduction benefits based on a worked example of the potential flows of traffic to and from the SRFI (Section 12.7 Chapter 12.

***Q3. In its Guide to the Application (Doc 1.3A [AS-039]) the Applicant has listed other consents and permissions that would be required should consent for the Proposed Development be granted. However, no separate Consents and Agreements Position Statement has been provided. In light of this, can the Applicant please review whether the list included within the Guide to the Application is, in its view, fully comprehensive?***

2.33 The Applicant set out the other consents and permissions required in connection with the implementation of the development should the DCO be approved in the Guide to the Application (**Document 1.3A** [AS-038]).

2.34 The Applicant notes the ExA's reference to the lack of a "Consents and Agreements Position Statement" and, to avoid the impression being gained by others that the Applicant has failed to provide a document which should have been provided, the Applicant would confirm that no such document is required to be submitted under the regulations or guidance applying to DCO applications. Each application presents the information in the form it sees fit - in free standing documents or as part of broader document and in documents with a variety of titles. In the case of Northampton Gateway, it was felt convenient to include the Consenting Strategy in the Guide to the Application where the context for the strategy had already been set out, and thus avoiding the need to repeat some of that content in a free standing document.

2.35 Nonetheless, and more to the point, the Applicant has reviewed the list contained in paragraph 7.7 and would suggest the addition of:

- Agreement with utility providers for diversion of existing utilities (although provision is made within the DCO in respect of Cadent, WPD, Anglian Water, there may be others);
- Licence for utilities under the M1 (normally obtained by utility company at the time of the works being carried out); and
- Environmental Permit from the Environment Agency for the sewer connection works near the Wootton Brook. These are the works envisaged in paragraph 3.3 of the SoCG with EA (**Document 7.12** [REP1-015]). The licence will need to be applied for when the detailed design of the work is known.

**Q4. A draft Statement of Common Ground with Historic England (Doc 7.14 [REP1-017]) was submitted to the Examination at Deadline 1. The Statement of Commonality (Doc 8.4B [REP5-17B]) submitted at Deadline 5 provides a status update "Letter provided with draft SoCG". Can the Applicant please confirm the current status of this Statement of Common Ground?**

- 2.36 The Applicant has tried on several occasions to encourage Historic England to engage directly with the SoCG. Efforts were made prior to Deadline 1 when the SoCG was due to be submitted and more recently. The ExA's letter of 29 March 2019 was forwarded to Historic England immediately following its receipt and, following a further prompt, a response was received which is appended to this document, at **Appendix 1**. In terms of the contents of that response, the Applicant was not aware that a response was awaited from the Applicant to the original letter.
- 2.37 The ExA will note that the (undated) letter received from Historic England (contained in **Document 7.14 [REP1-017]**) confirms in its first paragraph that it received a revised SoCG as long ago as October 2018. Instead of engaging directly with the SoCG Historic England chose, in its letter, to address the relevant paragraphs of the NPSNN and in doing so arrived at the conclusion in the last bullet point, on page 2 of the letter, that *"the proposed development is likely to result in a level of less than substantial harm to designated heritage assets"*.
- 2.38 That last bullet point also expressly states that the conclusion is based upon *"the previously submitted and additional material and documentation"* and, accordingly, we believe the ExA can be confident that it is an informed conclusion.
- 2.39 Whilst it may be considered regrettable that Historic England have not been prepared to engage with the desire for a signed SoCG, the Applicant believes that the relevant confirmation of the position of Historic England is set out in its letter contained in **Document 7.14 [REP1-017]**.

**Q5. At Appendix 4 of the Applicant's document Post-hearing submission for ISH4, ISH5, CAH2 and OFH2 (Doc 8.20 [REP6-012]) paragraphs 15 and 16 the Applicant indicates that sufficient capacity is available for the relevant wastes, cross-referring to para 14.4.10 of the ES and to its reply to ExQ1.15.16. However, the reply to ExQ1.15.16 states that capacity for non-inert waste is only 0.11 mtpa and the ES states that some non-inert waste may have to be transported out of the local area. Please will the Applicant explain what is the expected annual amount of non-inert wastes arising from the development and how it is concluded the effect will not be significant, or negligible?**

- 2.40 The use of the site for distribution means that the resultant waste streams are from employees or process-based activities resulting from import, storage or export of goods (ES para 14.5.21). The employee derived waste is therefore assumed, for robustness, to be non-inert and the process derived waste would be inert waste arising from disposing of packaging and the like.
- 2.41 In the Operational Commercial Waste Calculations (ES Appendix 14.1) the following waste arisings are calculated:
- Employee derived waste (non-inert): 19,369tpa (tonnes per annum)

- Industrial derived waste (predominantly inert): 155,688tpa
- 2.42 Allowing for a recycling rate of 52% (ES para 14.5.26) then the figures for the assessment are:
- Employee derived waste (non-inert): 9,297tpa
  - Industrial derived waste (predominantly inert): 74,730tpa
- 2.43 Hence, the total non-inert waste arising is 9,297tpa or 0.009mpta which is significantly less than the capacity of 0.11mpta, as stated in the Applicant's response to ExQ1.15.16.
- 2.44 The commentary in the ES at paragraphs 14.4.11 and 14.4.12 is provided for context of overall waste capacity but, as demonstrated above, there is sufficient local non-inert landfill capacity available and hence the assessment in the ES at paragraphs 14.5.26 to 14.5.29 that there would be a minor adverse effect is sound.

## **Appendix 1**

### **Historic England Email Exchange**

## Thomson, Morag

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**From:** Doe, Neville <Neville.Doe@HistoricEngland.org.uk>  
**Sent:** 02 April 2019 11:34  
**To:** Jessica Jones  
**Cc:** NorthamptonGateway@pins.gsi.gov.uk  
**Subject:** RE: Junction 15 Northampton Gateway - SoCG

**CAUTION:** This email originated from outside of RPS.

Dear Jessica ,

Thank you for your email, and for forwarding to me the letter from PINS.

I note that the examining authority are asking for confirmation of the status of the Statement of Common Ground rather than asking Historic England to confirm its agreement.

We set out our position with regard to the submitted Statement of Common Ground in our response letter and confirmed those areas that we agree upon, and also provided commentary on those areas where we take a more equivocal view, or where we recommend further consideration or action is required. We do not appear to have seen any response to the points that we raised, and therefore our position remains as per our response letter, and the comments that we made still stand.

Best wishes

Neville

Neville Doe  
Assistant Inspector of Historic Buildings and Areas  
Planning Group  
Historic England, 2<sup>nd</sup> Floor, Windsor House, Cliftonville, Northampton NN1 5BE  
[REDACTED]

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**From:** Jessica Jones [mailto:Jessica.Jones@cgms.co.uk]  
**Sent:** 02 April 2019 10:06  
**To:** Doe, Neville  
**Subject:** RE: Junction 15 Northampton Gateway - SoCG

Neville

Please could you let me know whether Historic England intend to respond to this? Given the tight deadline imposed by the Examining Authority, if we don't hear from you by lunchtime we will have to let the ExA know that though we requested a response from Historic England, this was not forthcoming.

Kind regards

Jessica

Jessica Jones MA MSt MRICS IHBC  
Associate Director | CgMs Heritage (part of the RPS Group)  
Burlington House, Lypiatt Road, Cheltenham, Gloucestershire, GL50  
2SY  
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**Mobile:** +44 (0) [REDACTED]  
**Email:** [Jessica.Jones@cgms.co.uk](mailto:Jessica.Jones@cgms.co.uk)  
**www:** [www.rpsgroup.com](http://www.rpsgroup.com)

**From:** Jessica Jones  
**Sent:** 29 March 2019 14:13  
**To:** Doe, Neville <[Neville.Doe@HistoricEngland.org.uk](mailto:Neville.Doe@HistoricEngland.org.uk)>  
**Subject:** RE: Junction 15 Northampton Gateway - SoCG

Hi Neville

Please see attached Rule 17 letter – point 4 refers to the SoCG.

You will note the ExA's deadline for responses to the above requests for information is **12 noon Wednesday 3 April**, so your early attention would be appreciated please.

Kind regards

Jessica

Jessica Jones MA MSt MRICS IHBC  
Associate Director | CgMs Heritage (part of the RPS Group)  
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**Email:** [Jessica.Jones@cgms.co.uk](mailto:Jessica.Jones@cgms.co.uk)  
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**From:** Doe, Neville <[Neville.Doe@HistoricEngland.org.uk](mailto:Neville.Doe@HistoricEngland.org.uk)>  
**Sent:** 26 March 2019 16:15  
**To:** Jessica Jones <[Jessica.Jones@cgms.co.uk](mailto:Jessica.Jones@cgms.co.uk)>  
**Subject:** RE: Junction 15 Northampton Gateway - SoCG

**CAUTION:** This email originated from outside of RPS.

Thank you Jessica,

Please can you forward me the letter or email from the examining authority with the details of what they are asking.

Thanks

Neville

Neville Doe  
Assistant Inspector of Historic Buildings and Areas  
Planning Group  
Historic England, 2<sup>nd</sup> Floor, Windsor House, Cliftonville, Northampton NN1 5BE  
[REDACTED]



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**From:** Jessica Jones [<mailto:Jessica.Jones@cgms.co.uk>]  
**Sent:** 26 March 2019 10:55  
**To:** Doe, Neville  
**Subject:** Junction 15 Northampton Gateway - SoCG

Hi Neville

I tried to give you a call just now but understand that you're in meetings for much of this morning.

You may recall that we exchanged emails regarding the above some months back. You issued the attached letter in response to the Statement of Common Ground in November.

The examination process is now well underway and the attached was submitted to PINS in November. However, the Examining Authority have now explicitly asked for confirmation from Historic England that they agree with the content of the draft Statement of Common Ground attached to the letter.

Could I ask you to confirm as a matter of some urgency? As this request has come direct from the Examining Authority, we would be grateful for your urgent attention.

Please don't hesitate to get in touch if you need any further information.

Kind regards

Jessica

Jessica Jones MA MSt MRICS IHBC  
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