

## 2. DESCRIPTION OF DEVELOPMENT AND ALTERNATIVES

### 2.1 INTRODUCTION

- 2.1.1 As described in Chapter 1, the chapters contained in this ES provide information regarding the Applicant's assessment of the likely significant environmental impacts of the proposed development and the mitigation measures proposed.
- 2.1.2 The chapters are all based on a common description of development, and on the key parameters identified for the proposals. The description of development set out below should be read in conjunction with the details set out on the Parameters Plan (Document 2.10) which identifies the parameters on which the environmental assessment is based. The Parameters Plan accompanies the ES and is reproduced in this Chapter as Figure 2.1.

### 2.2 THE SITE

- 2.2.1 The proposed Northampton Gateway SRFI is located on land to the west of Junction 15 of the M1 and to the east of the Northampton Loop railway line in Northamptonshire. The proposal includes associated highway works described in detail below.
- 2.2.2 The main SRFI site has an area of approximately 220 hectares, and the total application area (Order Limits) covers an area of approximately 290 hectares incorporating all of the land containing works associated with the package of highways improvements.
- 2.2.3 As described below, the proposed development has various components. These are also shown on the Components of the Proposed Development Plan (Document 2.13) and the terminology used to describe the sites or land involved in these components is as follows:

*“Proposed Development” – all of the development within the order limits (red line), including land to enable delivery of the various highways mitigation measures.*

*“Main Site” - the SRFI site lying between the M1 motorway and the Northampton Loop line, along with the works associated with the new highway access from the A508.*

*“highway mitigation works” or “highways mitigation measures” – the improvements to Junction 15, 15A, and several local junctions associated with the A508 corridor. This excludes the Roade Bypass.*

*“the Bypass site”, “Bypass corridor” or “Bypass works” - the proposed Roade Bypass west of Roade between the A508 Northampton Road to the north of Roade and the A508 Stratford Road to the south of Roade.*

## 2.3 DESCRIPTION OF DEVELOPMENT

2.3.1 The proposed development comprises:

- An intermodal freight terminal including container storage and HGV parking, rail sidings to serve individual warehouses, and the provision of an aggregates facility as part of the intermodal freight terminal, with the capability to also provide a 'rapid rail freight' facility;
- Up to 468,000 sq m (approximately 5 million sq ft) (gross internal area) of warehousing and ancillary buildings, with additional floorspace provided in the form of mezzanines;
- A secure, dedicated, HGV parking area of approximately 120 spaces including driver welfare facilities to meet the needs of HGVs visiting the site or intermodal terminal;
- New road infrastructure and works to the existing road network, including the provision of a new access and associated works to the A508, a new bypass to the village of Roade, improvements to Junction 15 and to J15A of the M1 motorway, the A45, other highway improvements at junctions on the local highway network and related traffic management measures;
- Strategic landscaping and tree planting, including diverted public rights of way;
- Earthworks and demolition of existing structures on the SRFI site.

2.3.2 The following section provides a fuller explanation of the various elements of the description of development:

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

2.3.3 The terminal is identified as Zone B on the Parameters Plan and is designed to accommodate trains of up to 775m length (standard freight train length), and to accommodate up to 16 trains per day once fully operational over the longer-term. In the initial period after opening the terminal is capable of handling a minimum of 4 trains per day. The application includes several rail related plans including the Illustrative Rail Terminal Plan (Document 2.8), and the Railway Plans (Document 2.9) which show how the terminal connections will be delivered.

2.3.4 The terminal would enable the transfer of freight from road to rail (and vice versa), as well as the storage of containers or other freight at the terminal itself. An aggregates facility is proposed to form part of the terminal area within Zone B. This will be for a specific occupier – Galliford Road Stone. The terminal area will also include HGV parking relating to the terminal use.

2.3.5 A fully functioning rail freight terminal capable of accommodating a minimum of four trains a day will be built and completed prior to first occupation of any warehouse on the site, with the new rail line connecting the terminal to the rail-served development plots, and the head-shunt, also delivered as part of an initial phase of work. It will be expanded in phases in response to market demand and activity. The Illustrative Rail Terminal Plan (Document 2.8) shows the various stages of how the terminal will be expanded over time in a flexible manner.

2.3.6 The Rapid Rail Freight terminal be delivered as required in response to market demand.

2.3.7 The proposed terminal area comprises:

- Main line connections to the Network Rail WCML Northampton Loop
- A set of three 775 meter Reception Sidings
- A 775 metre headshunt and run round loop to permit shunting moves around the site
- A three track intermodal terminal, again of 775m capability
- An extensive container and other freight storage area
- HGV parking
- Management offices and welfare areas, including buildings associated with the aggregates facility and the potential rapid rail freight terminal;
- Gatehouses
- Rail connections directly to over half the warehousing plots

2.3.8 The proposed rail terminal will be connected to the West Coast Main Line railway 'Loop Line' with new north and south facing connections. The rail terminal and expansion areas are significant in scale with extensive storage and operational areas. This will allow the terminal to be expanded and adapted in response to future market requirements. The terminal area also has the capability to accommodate a Rapid Rail Freight facility as part of the 'future-proofing' of the site to enable the site to meet a range of rail market requirements. The rapid rail freight facility would utilise the same rail connections, reception sidings and head shunt as the main terminal, thereby minimising additional infrastructure costs and maximising its potential deliverability.

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

2.3.9 The application is for buildings within Zone A (see Parameters Plan) with an internal floorspace of up to 468,000 sq. m. In addition to this floorspace figure, up to 155,000 sq. m of floorspace can be provided in the form of mezzanine floorspace to the warehouses. The number and precise layout of buildings is not fixed, but the application includes an illustrative masterplan to show how this floorspace could be accommodated on the site. The height and broad layout of development plots on the site are fixed via the Parameters Plan. The final, detailed layout of the site will be determined post consent, but the expectation is a range of large floorplate building sizes will be provided in response to occupier requirements.

2.3.10 As detailed on the notes included on the Parameters Plan, the proposals include fixed minimum Finished Floor Levels and maximum heights for buildings (measured in AOD). This allows some flexibility in terms of how the buildings are configured but also means – as a result of the fixed maximum heights – there is certainty for local communities and the local authorities regarding the worst-case 'visual envelope' of the buildings. These maximum heights have been used as the basis of the assessment undertaken in the ES.

2.3.11 Much of the built floorspace would be located on development plots sunk into the site following a proposed earthworks strategy (see below). This will create a flat plateau, but also enable creation of substantial bunds around the site to form part of the visual screening (mitigation) and landscaping. The phasing of the construction of landscape bunds relative to the formation of development plateaux is set out on the Main Site Built Development Area and Landscape Surrounds - Proposed Components and Sequence plan (drawing 5772-L-39) at Figure 2.2. This Plan should be viewed alongside the Main Site Phasing Plan, Figure 2.3, which shows how the earthworks on the site will be phased. The Plans illustrate how the screening bunds and associated landscaping will be formed early in the construction process and be in place prior to the completion of the buildings which they are intended to screen.

- 2.3.12 A small amount of ancillary floorspace is also proposed in Zone A, such as gatehouses, estate management offices, and other ancillary buildings on the site.
- 2.3.13 The Parameters Plan also identifies 'limits of deviation' for the site access roads and some of the rail lines (those which will serve the rail connected plots). This reflects the uncertainty at this stage regarding the detail of how each plot will be developed and about the precise layout of the road and rail infrastructure, but also provides an appropriate level of certainty in terms of where the roads and rail will be developed.
- 2.3.14 Zone A will also include an area of secure, dedicated, HGV parking in direct response to the potential for the site to exacerbate existing concerns with regard to crime against HGV vehicles and drivers in and around Northampton. This provision will ensure that HGVs arriving early at the site are able to wait in a safe, suitable location. This will include driver welfare facilities and will help ensure that the site does not contribute to any impacts on the amenity of nearby communities caused by parked HGVs, particularly overnight. The provision will only be available for HGV visiting the warehousing or the terminal.
- 2.3.15 A Sustainability Strategy is enclosed at Appendix 2.2 setting a framework for the actions and measures proposed to ensure the proposed site and buildings deliver high levels of environmental sustainability and resource efficiency.
- 2.3.16 In addition to the 'built' development described above, Zone A will include:
- Rail lines to serve some buildings;
  - Service roads including road access to the rail terminal;
  - On-plot landscaping and planting;
  - Sub-stations and other utilities infrastructure;
  - Bus turning-head (associated with public transport access to the site).

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

- 2.3.17 A package of highway works is proposed as part of the Proposed Development. These include substantial improvements to Junction 15 of the M1, and a new Bypass to the village of Roade to the south of the main site. The full scheme of Highways Mitigation Works are shown on the Highways Plans (Document 2.4), and on the Components of the Proposed Development plan (Document 2.13).
- 2.3.18 The Bypass is proposed between the A508 Northampton Road to the north of Roade and the A508 Stratford Road to the south, with a four arm roundabout connecting the Bypass to Blisworth Road.
- 2.3.19 In addition, a wider range of more localised works are proposed to mitigate likely transport impacts, and to address existing known bottle-necks or problematic junctions which would otherwise see worsening reliability and/or safety in the future.
- 2.3.20 The proposed package of highway mitigation measures is:
- A508 SRFI access
- Construction of a new roundabout on the A508 Northampton Road to serve as the access to the Development, configured to require all departing HGVs to travel north to M1 Junction 15; and
  - Dualling of the A508 carriageway between the new site access roundabout and M1 Junction 15.

## Bypass Corridor

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

## Highway mitigation works/measures

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

A financial contribution will also be provided to Northamptonshire County Council for:

- capacity improvement schemes at the A45 Queen Eleanor Interchange and at junctions along the A5076, extending between the A45 and A5123; and
- a Knock Lane and Blisworth Road maintenance and minor works fund, to be used in the event that the increased use of the roads should expedite the need for maintenance or other remedial works.

2.3.21 Further details are provided in the Transport Chapter (Chapter 12) and associated appendices.

2.3.22 There is a commitment to delivering key infrastructure early in the development process. Details are set out under construction and phasing below. In relation to highways this means that the site access, A508 dualling and improvements to J15 will be completed prior to the occupation of the first warehouse unit, with a commitment to complete the Roade bypass, the earlier of no later than 2 years after the first occupation, or 4 years from commencement of works to J15 (Work No8).

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

- 2.3.23 To enable the development substantial earthworks will be undertaken on the Main Site, with some areas in the western part of the site being lowered by between 8 and 10 metres from existing ground levels. This change in levels is required to establish the flat plateau required for the warehousing, and the 'cut and fill' exercise enables the creation of the bunding referred to in the context of the landscaping strategy. The approach to earthworks, including the result of the earthworks modelling, are shown on the Main Site Phasing Plan at Figure 2.3 and also forms part of the CEMP (Appendix 2.1). This demonstrates how an earthworks balance across the site will be achieved alongside the creation of large development plateau and landscape screen bunds.
- 2.3.24 The Main Site is currently used primarily for arable agriculture, and small existing structures (former agricultural buildings) will be demolished. The buildings to be demolished are identified on the Parameters Plan.

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

- 2.3.25 The proposed development includes provision of landscaping and tree planting as part of the mitigation of visual and landscape effects. The design of the main site incorporates a landscaping strategy which includes retention of existing woodland blocks within the site, as well as around parts of its boundary (such as along the M1). The landscaping strategy compliments the earthworks strategy which would create substantial landscaped mounding bunds around much of the main site perimeter, and which would form the bulk of the visual mitigation measures to substantially limit or eliminate outside views into the main site.
- 2.3.26 The strategy would ensure the establishment of a strong and cohesive framework of landscape and environmental areas. These would form one of the main elements of the overall development and would be fully integrated with the built development and infrastructure zones. In this respect it has not been designed (or should not be considered) as a separate part of the proposed development. The relationship between landscape screen bunding to the buildings and infrastructure is described on the Parameters Plan and at paragraph 2.3.9 above.
- 2.3.27 A number of key landscape and visual considerations have been identified as part of the assessment process, and full details of them, and of the key issues and benefits, are provided in Chapter 4.
- 2.3.28 The bunds will also be planted with trees, and will incorporate diverted public rights of way. The Proposed Development site currently contains a number of PROW, including six routes in and around parts of the Bypass corridor, and two footpaths which run across the main site. Further details of the existing and proposed routes are provided in the Transport Chapter, and the existing routes are also considered in the Landscape and Visual Chapter (Chapter 4). They are shown on the Access and Rights of Way plans (Document reference 2.3).
- 2.3.29 The southern part of the main site (an area of around 24ha) to the south of the existing brook is to be retained in agricultural use by the existing landowner. Peripheral areas in the south and east of this area will incorporate some landscaping and mounding as part of the strategy described above, but agricultural use of the vast majority of that land will otherwise continue.

### **Construction and Phasing**

2.3.30 It is anticipated that the general construction programme will broadly be broken down into four key components, as listed below:

- Off-site highway improvements;
  - M1 J15 & A45 improvements and link to site access
  - M1 J15A improvements
  - Roade Bypass and A508 corridor improvements.
- On-site;
  - Bulk earthworks
  - Landscaping
  - Road.
- Rail Terminal; and
- Warehouses.

2.3.31 The above works are expected to be phased over a 5.5 year period, and this forms the basis of the assumptions in the ES. Assuming the Development Consent Order is made (i.e. assuming an approval) works are assumed to begin in 2020. A 'Master Programme' setting out the anticipated programme for the construction and phasing of the development is attached at Appendix 2.3.

2.3.32 The proposed approach to the phasing of works would see initial development commence on:

- The A508 site access junction and dualling of the A508 between the site access and M1 Junction 15;
- The M1 Junction 15 and A45 improvements; and
- On-site earthworks and roads.

2.3.33 The proposals involve a commitment to the delivering of significant infrastructure early in the construction process, including rail, highway works, earthworks and landscaping. Prior to occupation of the first building on the site, assumed to be 2021/22 at the earliest, the following works will have been completed:

- The A508 site access junction and dualling of the A508 between the site access and M1 Junction 15;
- The M1 Junction 15 and A45 improvements;
- On-site earthworks and roads, outline landscaping in the first available planting season.
- Rail Terminal – the infrastructure shown in box a) of the Illustrative Rail Terminal Plan (Document 2.8)
- The Bypass will be under-construction and the applicant is committed to having completed it either within 2 years from first occupation or within 4 years of commencement of Works No 8 whichever is the earlier.

2.3.34 A Construction Environmental Management Plan (CEMP) has been prepared and is appended at Appendix 2.1. It sets out the overarching system and controls that will be adopted during the construction of the scheme to minimise any adverse environmental effects. The preparation of the CEMP follows on from and in turn informs the conclusion of, the Chapters of this Environmental Statement. In particular the mitigation means proposed during the construction of the scheme in many cases rely on the construction management regime that will be enforced through the CEMP and subsequent phase specific Construction Management Plans (P-CEMPS).

## 2.4 ALTERNATIVES

2.4.1 The 2009 EIA Regulations (as amended) required applicants to provide an outline of the main alternatives studied by the applicant and an indication of the main reasons for the chosen proposal, taking into account the environmental effects.

2.4.2 *The Infrastructure Planning (Environmental Assessment Regulations) 2017 require that an environmental statement include:*

*“A description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment”<sup>1</sup>*

*and, if relevant,*

*“A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.”<sup>2</sup>*

2.4.3 The National Policy Statement for National Networks (NPS) confirms that applicants should comply with these requirements and any other policy requirements in respect of the assessment of alternatives.<sup>3</sup>

2.4.4 The NPS also states that all projects should be subject to options appraisal with the appraisal considering “*viable modal alternatives*” and other options in light of paragraphs 3.23 to 3.27 of the NPS.<sup>4</sup> Those paragraphs refer to “*Road tolling and charging*” and are not relevant to this proposal.

2.4.5 In considering alternatives, there are therefore a number of aspects and scenarios to be taken into account. Examining alternatives should involve the consideration of alternative locations for the development, where this is feasible. It should however, also examine alternative design and mitigation approaches and where relevant alternative processes and technologies. This could include alternative approaches to construction activities. The assessments of alternative locations have been limited to the SRFI element of the proposals and does not consider the highway works which are a consequence of the SRFI.

### **Alternative Masterplanning**

2.4.6 Alternative design approaches have been considered through the iterative process of site assembly, masterplanning, assessment and consultation with the public and other consultees. The starting point has been the national requirements for SRFIs, however as an iterative process the design of the proposed scheme has undergone many changes as part of a rigorous approach to its design development. This has been underpinned by the environmental assessment process, which has been used to both inform and test the proposals.

2.4.7 The Design and Access Statement (DAS), and the separate Planning Statement, explain the evolution of the proposals, including reference to key reasons for the preferred, proposed approach to site design and layout. The proposal are intended to balance the functional needs and requirements of large scale logistics and freight distribution, to create a high quality, attractive development, while also seeking to minimise local environmental effects.

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1 Article 14 (2)(d)

2 Schedule 4 Paragraph 2.

3 Para 4.26

4 Paragraph 4.27



- 2.4.8 A key driver of the preferred approach has been to achieve good design through siting and design measures related to the existing landscape character, function and surrounding land form. The evolution of the proposals is intrinsically linked to the work to understand the landscape and visual effects of the proposal. The scheme is underpinned by a strong landscape strategy, with development plots surrounded by landscaped bunds, which will both help screen and visually contain the site. Various options were also considered regarding the size and location of the proposed warehousing 'zone' within the site to find the most efficient and appropriate disposition of uses within the site. This included consideration of various options of how to configure the rail terminal and associated infrastructure, including the head-shunt and sidings, etc. As shown in the DAS, the key components of the design of the Proposed Development evolved, with an early decision to ensure that as many buildings as possible had the potential to be directly rail connected. This approach has regard to the concerns raised by the Examining Authority in its report to the Secretary of State following the Examination into the East Midlands Gateway DCO application in 2015/16.
- 2.4.9 Overall, the option taken forward for the Proposed Development balances a range of environmental and operational considerations based on the constraints and opportunities presented by the site. The site access and design proposals reflect the need to ensure that the development minimises the environmental impacts, and maximises the potential for design and/or mitigation measures to be successful in delivering reductions in any adverse impacts and maximise any benefits from the proposals.
- 2.4.10 Details of various options and alternatives are provided in the DAS, but having considered a number of alternative approaches to site design and layout, and in light of the range of assessments undertaken to prepare the ES – and public consultation responses - the Proposed Development as submitted best achieves this balance. The following issues are seen as key to the identification of the final optimal scheme as submitted:
- It ensures no more land is taken out of agricultural use than is required, but contains sufficient land to ensure a range of new habitats and a net gain in biodiversity are provided.
  - The site and layout ensures that surface water associated with the development can be accommodated, stored and managed. This will deliver some betterment to communities' down-stream of the main SRFI site which currently experience some flood-risks from the Wooton Brook.
  - The development site includes the land required to accommodate earthworks and landscaping which appropriately screen the rail terminal and buildings, as well as landscaping and drainage features associated with the Roade Bypass and other road infrastructure. The proposed changes to the ground levels on site and the height of the proposed landscaped bunds will minimise the visual effects on nearby receptors, with many locations having views of the proposed buildings and terminal eliminated altogether.
  - The proposals also include the land required to ensure suitable mitigation for the likely highways impacts, with improvements to Junction 15 and 15A which will deliver wider benefits to users of the surrounding network.

### **Alternative Locations for the Bypass Route**

- 2.4.11 Alternatives were also considered for the proposed Roade Bypass, and public consultation was undertaken on alternative route alignments. Technical discussions with the Highways Authority and Transport Working Group were also held to help inform a decision about the most appropriate route. Details of the alternatives considered are provided in the Transport Assessment (the Transport Assessment is ES Appendix 12.2).

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

- 2.4.12 The study by an applicant of alternative locations is more generally required in respect of development where there would be a need to examine alternatives to ensure the optimal location when that location is not dictated by the nature of the development. Further, where development meets only part of a need (such as housing development) or is part of a network (such as SRFI) then alternative locations would not necessarily be addressed by a developer for the purposes of satisfying the EIA regulations. In the case of SRFI guidance, the National Policy Statement expressly seeks provision of an expanded network (ie multiple facilities) and expressly recognises that only a limited number of locations for such facilities will be suitable. Paragraph 2.56.
- 2.4.13 Nonetheless, consideration has been given to alternatives and analysis has been prepared in anticipation that the decision maker might find it helpful to have information on the applicant's view of potential alternatives.
- 2.4.14 The starting point for the consideration of alternatives is to identify the area of search. The Market Analysis Report (Document 6.8) sets out the market area that it is anticipated will be served by this proposal. See in particular Sections 7 and 8. The Market Analysis Report explains that the core catchment area of this strategic rail freight interchange is likely to be around 15km, with a secondary catchment area of around 50 km. It concludes that Northampton and locations to its south are not well served by existing SRFI's and development of an SRFI in this location would meet the needs of existing and future logistics businesses in the area and help to expand, the existing network of SRFI's in the Midlands Southwards. In this regard locations which, due to distance, could not specifically serve this market area have not been considered in this analysis.
- 2.4.15 The only sites within the area of search identified are:
- A site close to Junction 13 of the M1
  - A site being proposed for SRFI development on land between Blisworth and Milton Malsor referred to as 'Rail Central'.

### **Site at junction 13, M1**

- 2.4.16 The site close to Junction 13 of the M1 was marketed on behalf of the landowners as a potential rail-served development site in 2015 and was actively considered by Roxhill at that time. The site is potentially large enough to accommodate an SRFI, but there are considered to be several major differences which set the selected site at Junction 15 apart from this alternative.

2.4.17 Key issues and factors which informed Roxhill's view that this was not a preferable or suitable alternative include:

- Preferences by the landowners to retain some parcel of their land-ownership for residential or mixed-use development which represented uncertainty over the ability to mitigate likely impact on existing or new residents. Furthermore and importantly in terms of availability, the site is now being promoted and bought forward as residential led mixed-use development site.
- Challenging and potentially significant visual impacts on the nearby settlement of Aspley Guise and Woburn Sands exacerbated by the existing topography which would make the site very hard to screen adequately;
- Located two junctions further south on the M1 the site is considered less well located to meet the markets identified in the Market Analysis Report.

2.4.18 As a result of the above, no full comparative assessment has been undertaken. The site is not considered as a reasonable alternative because it is not available and less suitable in terms of environmental impact. In addition it will not meet the market area identified. It is therefore not treated as an alternative to the Proposed Development site.

#### **The Rail Central Site**

2.4.19 The site being proposed on land between Blisworth and Milton Malsor is referred to as 'Rail Central'. This site, would address a very similar market to Northampton Gateway. A DCO application for a Strategic Rail Freight Interchange is currently under preparation for this site.

2.4.20 The examination of Rail Central as an alternative location has been informed by the documentation produced as part of the recent Stage 2 statutory consultation. That documentation includes the draft document entitled "Alternative Site Assessment" which assessed many sites, none of which it is considered are relevant to the area of search we have identified, apart from the Northampton Gateway scheme. Further, we note that of the sites they consider, Rail Central discarded the other sites because none were comparable, in terms of suitability, to Rail Central.

2.4.21 A comparative analysis of the Rail Central proposals compared to Northampton Gateway has been undertaken having regard to the information available about the Rail Central Scheme at the time of writing. This comparative assessment is presented at Appendix 2.4. The same comparative assessment is also found at Appendix 4 of the Planning Statement. Unsurprisingly, given the proximity of the Rail Central site and the Northampton Gateway site, the sites share many of the same characteristics in relation to high level considerations such as proximity to market, and access to the strategic rail networks. Both sites have the potential to meet the physical and functional requirements for SRFI's as set out in the NPS (assuming that the delivery of key infrastructure on the Rail Central Scheme will be delivered at an appropriately early stage in the development process). However, there are some fundamental differences between the two sites, which bring us to the conclusion that Rail Central is materially inferior and is not a preferable site to Northampton Gateway.

2.4.22 It is considered that there is no material difference between the two locations in terms of access to the Strategic Rail Network. Both sites have the ability to provide access to Northampton Loop Line in both directions together with an operational intermodal terminal as part of a strategic Rail Freight Interchange.

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

- 2.4.29 Because of the inherent characteristics of the Northampton Gateway site, providing greater opportunity for landscape and visual mitigation, it is a superior location and its development will have less environmental affects, than Rail Central.
- 2.4.30 In relation to other environmental matters, a comparative assessment has been undertaken having regard to the likely environmental effects of the two schemes currently being promoted and assuming these are the most appropriate schemes for each site. Although significant elements of the Rail Central environmental assessment work remain to be completed the comparative assessment at Appendix 2.4 concludes that Rail Central is likely to have greater environmental effects on a number of matters. On some matters the degree to which Rail Central would result in greater environmental effects may only be relatively minor but on others the differences are greater. It is considered that the Rail Central site will have greater environmental effects on biodiversity, including veteran trees, on loss of best and most versatile agricultural land, and greater effects due to lighting
- 2.4.31 In terms of transportation, whilst the highway mitigation proposed for Rail Central has not yet been modelled, the implications from the work presented through the statutory consultation process is that the mitigation measures proposed would mitigate the effects of the proposed development but would not bring about any wider benefits. Northampton Gateway includes highway works that will result in significant benefits to the area, helping to address existing problems in terms of congestion and safety. These are key objectives of the NPS<sup>5</sup> and bring about significant environmental benefits. In this regard Northampton Gateway is superior to Rail Central.
- 2.4.32 The documentation produced as part of the Rail Central statutory consultation (in particular the draft 'Alternative Site Assessment') concludes that the Rail Central site is superior in terms of operational and technical aspects of the site. While there is no basis or requirement in environmental terms to assess alternatives in this way, a comparative analysis of these factors has been undertaken and is set out in Appendix 2.4. The two schemes appear to be broadly comparable overall with regard to operational and technical issues, although final conclusions are not possible because the phasing of the Rail Central scheme and any commitments to the delivery of specific infrastructure is not known. Differences may therefore include a commitment at Northampton Gateway to early delivery of significant rail infrastructure, including an aggregates terminal to accommodate the relocation of GRS from the centre of Northampton. Also, over 60% of its floorspace is capable of being directly rail connected, a higher proportion than that suggested at Rail Central.
- 2.4.33 Having regard to the matters set out above and the findings summarised in Appendix 2.4 it is concluded that the Rail Central site will have greater adverse environmental impacts than the development of the Northampton Gateway site and is an inferior location. It is not therefore a reasonable and preferable alternative.

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<sup>5</sup> NPS paragraphs 2.15 and 2.16, and Annex A, are examples regarding congestion; and, Section 3 which includes a section relating to objectives regarding maintaining and improving safety.