Comparative Assessment of Northampton Gateway SRFI and the proposed Rail Central SRFI

Appendix 2.4

Date: May 2018

Author: Oxalis Planning

Contents

1.0 Introduction

2.0 Rail Central Overview

3.0 Comparative Assessment: Environmental Impacts

3.1 Landscape and Visual Impact
3.2 Highways
3.3 Air Quality
3.4 Noise and Vibration
3.5 Lighting
3.6 Biodiversity
3.7 Agricultural Land

4.0 Comparative Assessment: Good Design

5.0 Comparative Assessment: Operational and Functional Aspects

- Comparative Table

1.0 INTRODUCTION

1.1 This comparative analysis seeks to compare an SRFI on the Northampton Gateway SRFI site (NG) with and an SRFI on the site proposed by Rail Central SRFI (RC). The basis of the assessment of the two sites are the schemes that have been proposed for the two sites. The assessment is informed by the information available about the RC scheme published in relation to its Phase 2 statutory consultation process. The Rail Central scheme is not in a finalised form and some environmental assessment work is still to be undertaken and consulted upon. Where necessary therefore in order to complete the comparative assessment judgements have been made based on the information available. Where conclusions cannot be made this has been clearly stated.

1.2 The comparative analysis includes a section comparing the environmental effects of the two schemes; it then goes on to consider the differences between the two schemes in terms of good design principles and then in terms of operational and technical aspects. Overall conclusions are drawn out in the main body of Chapter 2 of the Environmental Statement at paragraphs 2.4.19 – 2.4.33. The comparative analysis concentrates on a comparison between the two SRFI sites and not the consequential, associated, development such as highway works, although reference is made to them.

2.0 RAIL CENTRAL OVERVIEW

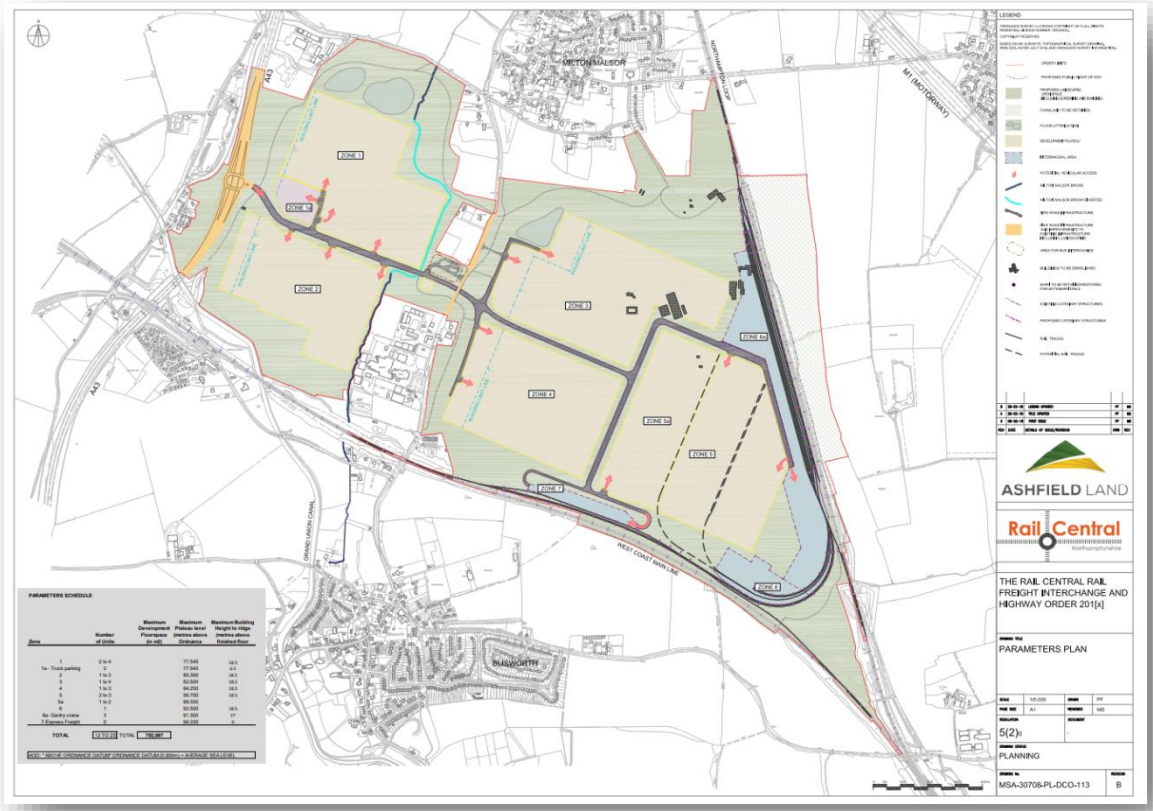
2.1 The Rail Central site is located between the villages of Milton Malsor and Blisworth. The West Coast Main line runs to its southern boundary with the Northampton Loop line of the West Coast Main line forming its eastern boundary. Access will be gained from a new junction on the A43 on the western edge of the site. The Northampton Road / Towcester Road linking Milton Malsor with Blisworth will remain, running through the centre of the site, effectively splitting the site into two discrete but linked parts. The site is currently mainly arable farmland.

2.2 The Rail Central 'Main SRFI Site' comprises the following principal elements:

- Structural earthworks and demolition of existing buildings and structures;
- An intermodal freight terminal with direct connections to the Northampton Loop Line, capable of accommodating trains of up to 775m long, including up to 3 gantry cranes, container storage, a train maintenance depot and facilities to transfer containers to Heavy Goods Vehicles (HGV);
- An express freight terminal with direct connections to the West Coast Main Line, capable of accommodating trains of up to 240m long, a freight platform with associated loading and unloading facilities;
- Up to 702,097 sq. m (GEA) of rail connected and rail served warehousing and ancillary service buildings including a lorry park, terminal control building and bus terminal;
- New road infrastructure including a new separated access point on the A43 (T), an internal site underpass (under Northampton Road) and necessary utilities infrastructure; and
- Strategic landscaping and open space including alterations to public rights of way, the creation of new ecological enhancement areas and publicly accessible open areas, flood attenuation, and the partial diversion of the Milton Malsor brook.

2.3 Key parameters for the Proposed Development at the Main SRFI Site are provided in the form of the draft Parameters Plan, there are also Illustrative Masterplans which demonstrates a means of bringing forward the proposed development. These are included below for ease of reference. An alternative 'Illustrative Masterplan' was also presented at the Rail Central Stage 2 Consultation - but is not included here.

Rail Central Parameter Plan



Rail Central Illustrative masterplan

3.0 COMPARATIVE ASSESSMENT: ENVIRONMENTAL IMPACTS

3.1 Landscape and Visual Impact

3.1.1 The RC Landscape and Visual Impact Assessment is incomplete and there are a number of concerns in relation to the judgements and conclusions reached in the draft assessment. The baseline assessment that the landscape value of the Main SRFI site is Low for example is not justified. This appears to be simply on the basis that it is not locally designated, which is not an approach supported by GLVIA3. Our assessment is that the landscape value of the RC site is likely to be Medium or Low/Medium.

3.1.2 Nevertheless a comparison exercise has been undertaken based upon information and plans included with Rail Central`s Stage 2 Consultation.

Landscape

3.1.3 Neither Main Site lies within a designated landscape and both Main Sites lie within the same National Character Area (*Northamptonshire Vales*) and both lie within Landscape Character Areas 13b (*Bugbrooke and Daventry*) and 6a (*The Tove Catchment*). A greater proportion of the Rail Central Main Site is within 13b and a greater proportion of the Northampton Gateway Main Site is within 6a. There are no overriding or significant differences in landscape sensitivity/ quality between these 2 published character areas.

3.1.4 One of the key and overriding differences between the respective proposals is the character and features of the existing landscapes at a relatively more localised scale. At this scale, the NG Site occupies a more enclosed location with urbanising areas/ elements adjoining to the east (edge of Northampton and M1 motorway etc.). The majority of the NG Site also generally falls eastwards towards the urban area and motorway/ junction 15 and away from the more rural landscape to the west.

3.1.5 By contrast, the RC Site occupies a more open and rural landscape more 'removed' from existing urbanising influences. This landscape includes the settlements of Milton Malsor and Blisworth situated close to the north and south of the Main Site.

3.1.6 These settlements are relatively more 'removed' from the NG Site and/ or can be more effectively mitigated in relation to the NG scheme.

3.1.7 There is a notable ridge of higher ground to the south of both Main Sites that allows more open and expansive views. The RC Site is notably more visible from most of the localised positions (including rights of way and properties) along this higher ground.

3.1.8 A secondary and smaller ridgeline extends northwards from this main area of higher ground through the western part of the NG Site and this small ridgeline in combination with two existing woodlands within the NG Site provide strong separation between the two respective Main Site areas and between the RC Site and the urban area and influences to the east.

3.1.9 In a similar way, it also limits the relationship and influence of the NG Site over the more rural landscape (including the RC Site and it's surrounds) to the west.

3.1.10 Whilst the A43 does impart a more active and urbanising influence over the western side of the RC Site, this road is not visible over any great distance and thus its influence is limited over the wider landscape of the RC Site.

3.1.11 In topographic terms, the RC Site occupies a rather low lying and shallow 'bowl' like area. Woodland appears to be less prevalent across this site (in comparison to that of the NG Site) and it thus forms a rather large, open and cohesive landscape area, particularly when viewed from some elevated positions to the south. By contrast, the NG site is rather more contained with existing

woodland and landform changes offering greater enclosure and localised interruptions. This assists in assimilating the proposals.

Visual

3.1.12 Both schemes will result in some significant visual impacts. It has not been possible to undertake a detailed comparison of the effects at this stage, however it is likely that the level of visual effects will be materially greater overall for the RC scheme. In particular, the visual effects upon rights of way users (west of the NG Site), residents at Milton Malsor, Blisworth and other properties between Milton Malsor and Blisworth will be greater.

3.1.13 There will be some visual effects upon residents/ receptors at Collingtree and rights of way through the NG Main Site that will inevitably be greater for the NG scheme. The Roade Bypass will also add to the visual effects of the NG scheme and will affect residents and receptors that will have no views towards the RC scheme, however, the overall visual impacts are likely to be materially greater for the RC scheme.

3.1.14 The RC scheme also includes extensive 6 metre high acoustic screen fencing surrounding a number of the development plots and notably along the southern and more visible side of the site. Whilst this fencing is significantly lower than the proposed buildings it will nevertheless add a further notable and discordant element and will add to the visual impact of the scheme. The NG scheme does not rely on such extensive acoustic screen fencing.

Green Infrastructure and Mitigation Proposals

3.1.15 There appears to be some notable differences between the two schemes in terms of the nature and likely effectiveness of the GI/ mitigation proposals. The NG scheme will include significant mounding and planting proposals to the west, north and east of the Main Site. The proposed mounding to the western perimeter will maintain the nature of the existing separation with the more rural landscape to the west. In simple terms, this proposed mounding and associated planting will perform a similar separation role to that of the existing secondary ridgeline that extends broadly north – south also through the western part of the NG Site.

3.1.16 This proposed mounding will be notably steeper and more engineered than the existing ridgeline, yet it will perform a similar separation role albeit marginally further to the west. The woodland and tree planting to the mounding will assist in assimilating the mounding and the visual screening of views from the west. It will also offer valuable connections with the conserved woodlands on the relatively higher ground within the Site and form a very strong landscape ‘buffer’ to the more rural landscape to the west.

3.1.17 Other mounding and GI proposals around the perimeter of the NG Site will form a strong and cohesive framework within which the built development will be set. The southern side of the NG Site (closest to Junction 15 and the A508) will be more open yet this will form the ‘gateway’ and principal visible ‘face’ to the development and will be designed accordingly (including office frontages and significant landscape areas and water (SUDS) features).

3.1.18 By contrast, the RC site does not present the same contextual opportunity for GI proposals which would bring about the same benefits in terms of landscape and visual mitigation. Indeed the GI proposals for RC do not appear to be as extensive or robust. The RC mounding is generally limited to the Milton Malsor side and eastern side of Northampton Rd/ Towcester Rd and there is no obvious mitigation towards Blisworth; the Grand Union Canal; PROW and rising ground to the south. Any mitigation to this side of the RC Site will inevitably be very difficult to achieve given the nature of the rising land to the south.

3.1.19 Where present, the RC earthworks proposals/ mounding appear to be less significant and extensive. The mounding is proposed to generally include relatively softer and shallower outer slopes (circa 1:5 instead of circa 1:3) than the NG mounding, yet will be less effective in screening views towards the built development.

3.1.20 In terms of the GI Parameter Plan and Illustrative Landscape Masterplan for RC, it is evident how the development will dominate the entire area between Blisworth and Milton Malsor. The embedded mitigation and the nature of the illustrative landscape proposals do not support the assertion that the scheme will be successfully mitigated and assimilated.

3.1.21 The Illustrative Masterplan for Rail Central appears to show very limited conserved trees/ planting. The proposed planting and habitats as shown also appear to be out of character with the existing and broader landscape context of the Site, which includes more regular woodland blocks and tree belts with intervening hedgerows (though accepting it is only illustrative). The NG scheme includes considerably more conserved and proposed planting.

3.2 Highways

3.2.1 The Rail Central Transport Assessment work has not been completed, including important strategic modelling work with proposed mitigation measures included. Neither has any VISSIM micro-simulation modelling been reported. It is therefore not possible to fully understand the likely residual traffic and transport impacts of RC or whether further or amended mitigation measures may be required.

3.2.2 Notwithstanding, an analysis of the mitigation measures proposed at RC and the modelling work undertaken to date, indicates that the mitigation measures proposed may be capable of mitigating effects of the scheme, in accordance with the requirements of the NPS paragraphs 5.211 – 5.218. In the absence of the completed modelling work it is difficult to draw conclusions regarding any benefits the mitigation measures may provide over and above this. However, based on the information that is currently available, any benefits are likely to be confined to M1 J15A, and they are unlikely to result in significant wider benefits over and above this.

3.2.3 In comparison NG includes highway mitigation works that will result in significant betterment compared to the current situation. In particular the works to J15 of the M1 and package of measures along the A508 corridor, including the Roade bypass, will reduce congestion, improve journey times and reliability and improve safety. The improvements will therefore benefit existing and future road users and contribute to improving economic activity in the area. The residual environmental effects of NG are therefore likely to be significantly more positive than RC. Furthermore NG is able to make a significant contribution to the vision and strategic objectives for national networks as set out at the start of Section 2 of the NPS.

3.2.4 Both NG and RC will help to encourage a shift in the movement of freight from road to rail. In doing so they will have beneficial effects on HGV mileage on the strategic road network and associated air quality benefits and reductions in carbon emissions. These benefits result from the use of rail and the extent of benefits will primarily be related to the capacity of the rail terminal, which will generate custom through association with on and off site warehousing. The main terminal of both schemes will have a capacity of 16 trains a day and significant areas for intermodal handling and storage. When fully operational the two schemes would have similar positive effects in terms of reducing HGV mileage at a national level.

3.2.5 There may however be a slight distinction between the two schemes in terms of the speed at which the use of rail may start and then grow on the two sites. The NG scheme includes a commitment to the delivery of the rail terminal very early in the development process, with an operation terminal available prior to the occupation of any warehousing. The RC scheme has not, at this stage, made such a commitment. The NG scheme includes a greater proportion of warehousing which can be directly rail connected, which will help contribute to the growth of rail. The NG scheme also

3.2.6 includes an aggregates terminal and contracts have been exchanged with GRS for them to relocate their Northampton operation from the centre of Northampton to the NG site.

3.3 Air Quality

3.3.1 The Rail Central (RC) Environmental Assessment is incomplete and it is therefore difficult to reach full conclusions. For example the Scoping Opinion refers to modelling of AQMAs, but it appears that only receptors in South Northamptonshire have been considered (not Northampton Borough). There is no explanation for this and so it appears the draft assessment is significantly incomplete given the geographic spread and distribution of likely effects and the location of AQMAs.

3.3.2 In terms of air quality benefits at a national level it is considered that both schemes will result in similar benefits. The benefits to air quality at this level result from the opportunity presented by the SRFI's to transfer the movement of goods from road to rail. The extent to which this can be achieved is then dependent primarily on the capacity of the rail freight terminal, which will generate custom through association with warehousing both on and off site. The capacity of both main terminals is broadly the same with scope for 16 trains a day.

3.4 Noise and Vibration

3.4.1 Significant elements of the draft noise assessment for the RC scheme seem unclear and incomplete. In addition, whilst the policy tests in the NPSNN are referred to, the assessment does not address them. No mention is made of the efforts made to mitigate and also minimise 'other adverse effects on health and quality of life'.

3.5 Lighting

3.5.1 The Draft chapter on lighting for the RC scheme appears to have a significant omission in that it does not apparently deal with night time visual impacts. Indeed, as set out, the bespoke methodology and approach proposed will not provide a recognisable impact assessment. Without such an assessment it is not possible to gauge the full likely environmental impact of the proposed development.

3.5.2 However, based on the information available, the following is anticipated to be the likely key differences.

3.5.3 In terms of construction effects, it is expected that some of the night-time effects resulting from the RC scheme will be Major Adverse. In contrast, for NG effects are predicted to be Moderate Adverse for just a handful of receptors until bunding is constructed, whereupon impacts are more or less fully mitigated.

3.5.4 In relation to the effects on properties during operation, night time views from many properties (e.g. parts of Milton Malsor; properties along Towcester Rd/Northampton Rd) are likely to be worse for RC than for NG. This is due to proximity and the wider extent of the RC development in the field of view, giving multiple opportunities for seeing some of the lighting. For similar reasons, any local sky glow from RC will be more intense and widespread in the field of view compared to NG.

3.5.5 In relation to the effects on users of the Canal during operation phase, we would expect the night time impacts of the RC scheme to be significant because the sense of remoteness will be lost due to the presence of some lighting effects. In contrast, NG impacts on the canal are to all intents and purposes nil.

3.5.6 In terms of the interface between lighting and ecology it appears that there may be a greater number of interfaces on the RC scheme compared to NG. Further assessment work on the RC scheme would help to clarify their impacts.

3.6 **Biodiversity**

3.6.1 It appears that significant elements of the necessary assessment in relation to Biodiversity on the RC site are incomplete. In the absence of the completion of those assessments it is difficult to fully gauge the likely impact of the proposed development.

3.6.2 From the information available to date it would appear that the overall environmental impacts resulting from RC will be similar to NG. There are a few potential differences in relation to different aspects of biodiversity as noted below.

3.6.3 In terms of habitats, the two sites are broadly similar, with a range of typical farmland habitats dominating both sites. The exception to this is the large number of veteran trees (38 no.) and ancient trees (2 no.) identified by RC as opposed to a single veteran tree identified close to the NG Roade bypass route. 26 veteran trees would be removed from the Rail Central scheme. None would be removed from the NG scheme.

3.6.4 In terms of fauna, both schemes are likely to have an impact on bats, GCN, farmland birds and badgers. There is likely to be a greater effect on badgers and GCN as a result of the NG scheme due to the presence of a main badger sett and GCN, although mitigation measures are proposed to mitigate this impact. The assemblage of farmland birds is broadly similar for both sites, although the RC scheme support a large number of nesting Barn owl (c. 4no.). Populations of bats occur, and roosts would be lost, from both main sites (four from RC and a single roost from NG).

3.7 **Agricultural Land**

3.7.1 Both RC and NG will result in the loss of agricultural land with associated environmental effects.

3.7.2 However the RC site is larger and contains a proportionally greater amount of 'best and most versatile' agricultural land. It would result in the loss of in excess of 70 ha of 'best and most versatile' agricultural land, whereas NG will result in the loss of 33 ha.

3.7.3 The impact of RC in terms of agricultural land is therefore greater than at NG.

4.0 COMPARATIVE ASSESSMENT: GOOD DESIGN

4.1 The NPS requires applicants to include design as an integral consideration from the outset of a proposal. At paragraph 4.29 it states that '*visual appearance should be a key factor in considering the design of new infrastructure, as well as functionality, fitness for purpose, sustainability and cost'.* At paragraph 4.34 it goes on to state that '*whilst the applicant may only have limited choice in the physical appearance of some national networks infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting and design measures relative to existing landscape and historical character and function, landscape permeability, landform and vegetation'.*

4.2 A comparative analysis of the NG and RC proposals in relation to these matters highlights some key differences between the two proposals. Many of the matters considered overlap with the assessment of environmental effects, in particular the landscape and visual effects, nonetheless a discrete analysis having regard specifically to these design considerations is relevant and important.

4.3 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 and environmental effects resulting from development on the sites. However NG has a particular context which means the impact of change would be significantly less

than RC. Furthermore, through scheme design and mitigation, the environmental effects of the NG scheme can be better mitigated.

4.4 The NG Main Site lies immediately adjacent to the M1 and its J15, beyond which is the edge of the Northampton Urban area. The Northampton Loop of the West Coast Main Line forms its western boundary, its south eastern boundary is formed by the A508 and its northern boundary Collingtree Road. The NG Site is contained within these physical features and together with the urban area to the east, these 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, the existing landform can be supplemented with significant landscaped bunds 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 NG scheme and are critical in ensuring that its environmental effect is acceptable and its impact on local communities minimised.

4.5 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.

4.6 The RC site is not contained to its north, with no 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 (Blisworth is at an elevated position) that views from the village to the site will be largely unhindered. Because the RC site stretches from the A43 to the Northampton Loop Line, it's built form would be 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.

4.7 As outlined above the NPS makes clear 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, landform and vegetation. These are fundamental site location and scheme design factors which affect the suitability, quality and overall environmental acceptability of development proposals. Because of the inherent characteristics of the NG site, providing greater opportunity for landscape and visual mitigation, it is a materially superior location and its development will have less adverse environmental affect, than RC.

5.0 COMPARATIVE ASSESSMENT: OPERATIONAL AND FUNCTIONAL ASPECTS

5.1 The NPS sets out a number of operational and functional requirements for SRFI's. The Compliance Statement at Appendix 1 of the Planning Statement identifies these requirements and explains how the NG scheme will fully comply with each of them. An analysis of the RC scheme indicates that it is also capable of complying with these requirements provided relevant infrastructure is secured at an appropriate time in the development of the site. At the moment there is some uncertainty in relation to the phasing of the delivery of infrastructure for the RC site.

5.2 Both sites will provide a rail terminal, including a rail network connection, appropriate sidings and a large area for intermodal handling and container storage. The NG scheme however commits to the provision of a rail terminal from the outset. There is no such commitment from RC at this stage.

5.3 The NG scheme provides the ability for warehousing to be directly rail connected from the outset, it is unclear whether this is the case for RC. Further, the proportion of warehousing which can be directly rail connected is significantly greater on the NG site and the form of connection allows for flexibility in the integration of rail directly into a warehouse plot – for example into a large yard area or directly into a warehouse building.

5.4 Both schemes will accommodate both rail and non-rail activities, NG can do this from the outset, the phasing of RC is unclear.

5.5 Both schemes provide rail infrastructure to allow more extensive rail connection within the site in the longer term.

5.6 Both schemes provide a rail terminal, (NG has committed to provide this from the outset) which are capable of handling at least four trains per day, enable trains to arrive and depart in both directions, has the ability to accommodate trains of 775 meters and minimise the need for on-site shunting.

5.7 Both schemes provide large, and flexible development plots to accommodate the varied needs of businesses (capable now or in the future of supporting their commercial activities by rail).

5.8 The scale and form of the terminal proposed at Northampton Gateway whilst delivering significant rail infrastructure from the outset, allows for flexibility in its use and expansion. This will enable the terminal to be expanded to handle 16 trains a day ultimately, but also to incorporate an aggregates terminal within the main intermodal area and allow for the future provision of a rapid rail freight facility. The RC scheme appears to allow for a similar expansion, including the future provision of an express freight facility. Its precise phasing is not yet known.

5.9 The provision of an aggregates terminal at NG (with a contractually committed end user in GRS) is an additional benefit for the NG scheme. The terminal is a direct response to a specific requirement from GRS which operates nationally and has a requirement to relocate and expand their local operation from the centre of Northampton. GRS's commitment to the NG site demonstrates the suitability of the NG site and the proposed rail infrastructure, as well as the demand for rail freight services. The relocation of GRS will move their operation from the centre of Northampton and allow for the beneficial redevelopment of their existing site. GRS currently has the ability to utilise 5 rail freight paths (although not all are utilised now) and intends to transfer these for use from Northampton Gateway.

5.10 Both schemes allow for the future incorporation of a Rapid (or Express) Rail Freight facility. The market for Rapid Rail Freight is untested and uncertain. However it is a rail freight sector that might have longer term growth potential. There are some differences in the way in which such a facility would be provided at RC compared to NG, with some pros and cons of each approach (as described in the comments on the comparative table below). Overall the differences are not material to the suitability of the sites overall, nor indeed to the functionality of the sites in relation to this specific aspect of the infrastructure.

5.11 The RC draft PEIR Chapter 3 contained a comparative analysis of certain aspects of the schemes, focussed on rail components but also including other matters. For completeness and ease of comparison this table has been reproduced here and is set out below with an additional column. Columns 1, 2 and 3 of the Table are direct copies of the Rail Central draft PEIR (text shown in *italics*). Roxhill's comments are set out in the 4th column.

	Rail Central	***Northampton Gateway***	**Roxhill Comments and Response, April 2018**
Rail Connections	*Rail Central has 4 main line access points onto two separate branches of the WCML (Fast and Slow Lines)*	*2 main line access points onto one branch of the WCML (Slow Lines)*	The arrangements for RC include access to the WCML fast lines but no details have been provided sufficient to show that the arrangements are technically acceptable having regard to track geometry or vertical alignment which may well be challenging in this location. The usefulness of this additional connection is dubious having regard to the capacity of the fast lines which means that only the slow lines will be used between 06:00 and 22:00. The potential access to the fast lines is not seen as a particular benefit: DIRFT is served satisfactorily off the Northampton Loop Line without any additional routeing options. No connectivity will be lost during engineering works. The NG scheme have committed to providing the rail terminal prior to any occupations. It is not clear from the RC information when the connection of the slow lines or the fast lines will be provided and whether it will be feasible commercially or operationally to provide both.
Rail Inter-Connectivity	*Full inter-connectively provided which Rail Central benefits from a range of routing options ensuring rail services are resilient and efficient.* *This also enables main line access to be maintained throughout when either the WCML Fast Line or Slow Line is closed for maintenance.*	*No direct interconnectivity provided between WCML Fast and Slow lines, access to Fast lines only available via at-grade crossings 4 miles to the south (Hanslope Junction) and 20 miles to the north (Hillmorton Junction)* *Northampton Gateway will lose main line access when maintenance is carried out on the WCML Slow Lines facing the site.*	
Overall Commercial Floorspace	*c.7.4m sqft warehousing space.*	*5 million sqft warehousing space + 1.6m sqft through mezzanine provision.*	It is not clear what warehousing space RC would provide. The Alternative Masterplan displayed at the consultation exhibitions which assumes cross docked warehouses more in line with market requirements shows a reduced amount of floorspace. If this is a more accurate representation of floorspace then the assessment in relation to benefits arising from scale, such as jobs, should be reduced. The absence of any provision of mezzanine space at the RC site would limit the potential of the site to accommodate a range of occupier needs and operational requirements. The NG site explicitly includes for mezzanine space.

	Rail Central	***Northampton Gateway***	**Roxhill Comments and Response, April 2018**
Trains per day and capacity for growth	*First phase of rail operations with 4 trains per day in and out of site, growing commensurate with warehousing and interchange facilities. The GB Freight Model (used in NR Freight Market Study as endorsed by NPS) indicates that 7.4m sqft of floorspace would generate the equivalent of 13 intermodal trains per day in and out of site.*	*Rail Operation Report suggests that 4 trains per day each way will be achieved growing to up to 16 trains per day as the critical mass of development grows.* *On a like-for-like comparison, the GB Freight Model output suggests the equivalent level of rail freight traffic from 5m sqft of floorspace would be 9 trains per day in and out of the site.*	The analysis/comparison provided in RC Table 3.2 is misleading by suggesting that rail movements/volumes are solely related to on-site floorspace. In practice, businesses on-site would form only part of the demand for rail freight services at the terminal. This is explained in more detail in the Market Analysis Report.
Rail Connected Floorspace	Approximately 2.22m sqft	Approximately 3.3m sqft	The provision of more opportunity for units to be rail connected at NG provides flexibility for the proposed occupiers either initially or in the future. Approximately 60% of the site compared to around 30% for RC. The NG scheme also has flexibility in the form in which rail is connected to each warehouse plot, for example into a large yard area or directly into a warehouse unit. The rail connections to units shown by RC as drawn indicate very tight gradients and curves, the feasibility of which would need to be demonstrated. We also note the absence of any engine release facility for the sidings leading to the units, which would be required.
Electrification	*Electrified access at an early stage of development*	*The draft Rail Ops Report, submitted in support of the Stage 2 Consultation confirms that Northampton Gateway "will be able to accommodate electric freight trains when the […] market requires".*	The RC Table 3.2 is out of date. At NG electrification is proposed from the outset. The Phasing of rail infrastructure at RC is not known.
Express Freight Terminal	*Rail Central has direct and dedicated electrified access on WCML (Fast Lines) for express freight trains, allowing trains to arrive and depart in either or both directions with no intermediate*	*Northampton Gateway requires intermediate shunting of all express freight trains between the main line and the terminal, significantly slowing the processing of trains through the*	NG provides the opportunity for rapid rail freight in the future should there be interest in that logistics model. To date there is no such business model of any consequence. The rapid rail freight provision will piggy back on the rail infrastructure being provided which will enhance the commercial feasibility of its provision. This is a potential advantage of the NG approach.

	Rail Central	***Northampton Gateway***	**Roxhill Comments and Response, April 2018**
	shunting. *Internal electrified access to the WCML Slow Lines provides continuity of access when the Fast Lines are closed for maintenance.*	*terminal.*	The only suggested benefit of RC in respect of the rapid rail freight relies on the provision of the connection to the WCML fast lines. We are not aware of any commitment to deliver that connection by RC which may rely on the feasibility of a still unproven logistics model to fund it and the extensive rail infrastructure required to serve it on the RC proposals.
Sidings	*Rail Central has 8 x 775m sidings (6 accessible by cranes with 2 electrified)*	*Northampton Gateway has 6 x 775m sidings (5 accessible by cranes assuming outer line in electrified)*	RC only have two reception sidings which incoming electric trains can arrive on and when they do so other operations on the terminal will be constrained. The provision of 6 x 750m unloading sidings appears excessive and suggest some of them (Phase 2) will in reality not be provided. NG has three reception sidings.
Other rail-related facilities	*Rail Central proposes a Train Maintenance Depot allowing trains to be stabled, maintained and fuelled on site rather than at off-site locations. This reduces the need for trains to be moved off site, maximising the efficient use of available mainline capacity.* *Operational Control Room*	*Operational Control Room*	The RC facility referred to appears to comprise a heavy engineering facility. As with other SRFI, NG would not wish to propose such a facility in a rail freight terminal. The usual cripple sidings and related facilities will be provided which include fuelling.
Aggregate Rail-head	*Not provided*	*Provided*	As a significant sector in the rail freight market, this is a clear benefit of the NG proposals in terms of meeting a range of rail freight market requirements. In the local context, the relocation of an existing rail connected aggregates facility to the NG site will have environmental and regeneration benefits in central Northampton.
GRIP Feasibility	*Network Rail has informed the design of the rail infrastructure and main line connections; the assessment to GRIP2 validating technical and operational feasibility of the main line connections*	*No reference has been currently been provided to any GRIP feasibility work having been undertaken with/by Network Rail*	Technical and GRIP work is ongoing with NR in relations to both schemes. No information is provided of the RC GRIP 2 output. The detail required for GRIP 2 can vary. In view of the challenges to the WCML fast lines connection for RC there is a need for RC to demonstrate that the track geometry and vertical alignment will be acceptable.

	Rail Central	***Northampton Gateway***	**Roxhill Comments and Response, April 2018**
Transport Access	*Direct access onto the A43 (T) and then onto J15 of the M1. The A43(T) provides alternative strategic route on the trunk network to surrounding towns such as Towcester*	*Direct access on the J15~~a~~ of the M1*	There is an error in the information in RC Table 3.2. NG has direct access to Junction 15, not 15A and RC has access via A43 to 15A, not 15.
Road to Rail	*Rail Central would lead to reduction of just under 53 million HGV-km per annum when compared to a road connected development with the same quantum of floorspace at the same location; this approximately is a 20% reduction. Rail Central will generate around £19 million of wider environmental benefits per annum.*	*Once operational, the SRFI could accommodate an average maximum throughput of around 1,384 containers a day which would equate to a mode shift from road freight to rail freight of 928 HGV loads or 1,856 two way HGV movements per day.*	The RC Table 3.2 does not include a like for like comparison. In HGV mileage terms, NG is assessed as likely to remove 92 million HGV miles per year from the national network, equivalent to 969 loads per day. This is presented and explained in the NG ES (Transport, and Air Quality chapters). Using the DEFRA 'damage cost' approach, NG would deliver benefits to society of up to £23million to 2035.
Economic Benefits	*Estimated 8,100 gross full time equivalent (FTE) jobs. This takes account of:* *The lower employment densities typically seen in rail-connected warehouses due to the need to accommodate rail infrastructure ; and* *The absence of detailed design and layout information at the current point in time, with internal arrangements dependent upon the operational requirements of the end user.*	*Estimated 7,547 FTE jobs accommodated through provision of 623,000sqm floorspace. This takes account of:* *The absence of rail-connected warehouses from the published masterplan, which has enabled the application of higher employment densities in warehouses which are not directly connected to the rail line; and* *The proposed mezzanine, albeit a lower employment density has been assumed for this space (155,000sqm).*	See above queries regarding RC floorspace. The NG illustrative masterplan does show rail connected warehouses, with rail infrastructure serving warehousing in Zones A2, A3 and A4. Furthermore NG are committing to providing the rail tracks for the buildings along with the rail terminal to maximise the opportunities for usage. NG has a far higher proportion of its warehousing which is capable of being directly rail connected.