NORTHAMPTON GATEWAY
STRATEGIC RAIL FREIGHT INTERCHANGE

APPLICANT'S RESPONSES TO OTHER PARTIES DEADLINE 3 SUBMISSIONS

DOCUMENT 8.11

The Northampton Gateway Rail Freight Interchange Order 201X

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THE NORTHAMPTON GATEWAY RAIL FREIGHT INTERCHANGE ORDER 201X

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1. This document sets out the Applicant's responses to other parties' submissions to the ExA made at **Deadline 3**.

2. No attempt has been made to respond to every single submission. The responses have focused on issues thought to be of most assistance to the ExA. Where points have been raised by various parties, the Applicant has responded only to one particular party, but the responses are applicable to all parties who have made the same point.

3. The Applicant does not seek to respond to all the points made where the Applicant's response is already contained within:

    a. the Application; or

    b. submissions made since the Application was accepted, including:

        i. the Applicant's Response to Relevant Representations (**Document 8.3**, REP1-022);
        ii. the Applicant's Responses to the ExA's first written questions (**Document 8.2**, REP1-020 and REP1-021) submitted at **Deadline 1**;
        iii. the Applicant's Responses to Local Impact Reports (**Document 8.6**, REP2-009);
        iv. the Applicant's Responses to written representations and other parties' responses to the ExA's first written questions (**Document 8.7**, REP2-010);
        v. the Applicant's Responses to the various submissions made by Ashfield Land Management Limited and Gazeley GLP Northampton s.a.r.l. in respect of Rail Central at **Deadline 1** (**Document 8.8**, REP2-011);
        vi. the Applicant's Responses to other parties' **Deadline 2** submissions (**Document 8.9**, REP3-009); or
        vii. the Applicant's Responses to the submissions made by Ashfield Land Management Limited and Gazeley GLP Northampton s.a.r.l. in respect of Rail Central at **Deadline 2** (**Document 8.8A**, REP3-008),

    save where it is thought helpful to repeat or cross refer to the information contained in the above documentation.

4. The Applicant's responses to submissions made by Ashfield Land Management Limited and Gazeley GLP Northampton s.a.r.l. in respect of Rail Central at **Deadline 3** (REP3-016) are dealt with separately in **Document 8.8B**.

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South Northamptonshire Council (SNC) [PINS Ref: REP3-014]	Para 6: In the response to comments made by the Northampton Rail Users Group, on page 19 the applicant comments :- *"The WR suggests that in ES table 8.19 the Applicant has established significant adverse effects but has made no proposals to mitigate them. This is incorrect. Where potentially significant adverse effects or other adverse impacts have been identified as a result of the Proposed Development, specific appropriate measures have been proposed to avoid, mitigate and minimise them as required by Government Policy as indicated in Table 8.19. The exception are potential significant effects associated with the railway noise maximum noise levels. For this impact, no specific measure is proposed because as set out in paragraph 8.6.11 "Work is being carried out at a European level to reduce the noise from freight trains and it is likely that by 2043, quieter rolling stock will be in use compared with that assumed for this assessment. Therefore, the potential significant adverse effect would be mitigated by the use of quieter rolling stock." Therefore, measures are in place to address all the identified potential significant effects".* *This applicant is thus clearly relying on external agencies to implement measures to resolve the*	The Applicant has discussed this comment with SNC and the Applicant proposes amendments to requirement 23 to deal with noise monitoring in 2032 and to secure any mitigation which may be required as a result of that monitoring. This is to address the situation, which SNC agree is unlikely, of trains failing to get quieter as anticipated. This wording of the additional requirements has been discussed with SNC and is included in the updated requirements contained in the dDCO submitted for **Deadline 4**. Please see DCO Tracker (**Document 3.4B**) submitted for **Deadline 4** in relation to requirement 23 for a more detailed explanation.

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	significant adverse noise effect identified rather than proposing mitigation with the proposal. Given this effect in identified to occur in the future identified other measures may emerge to reduce the noise effect however if the anticipated scenario does not unfold, the proposal should include measures now that would be implemented to mitigate this significant effect remain.	
Andrew Bodman [PINS Ref: REP3-019]	Comment of Mr Bodman on paragraph 3.3 and 3.5 of the Applicant's Document 8.7 – on page 7 of submission – regarding the site access, modelling and driver behaviour. Comment of Mr Bodman on paragraph 6.5,6.6 and 6.8 of the Applicant's Document 8.7 – on page 7 of submission – regarding a concern regarding the accuracy of the forecast traffic volumes on minor roads referred to by Rail Central at public consultation for the Rail Central scheme.	The differing behaviours of drivers and vehicles are simulated in VISSIM. This includes different parameters for cars and HGVs, including acceleration/deceleration and speed limits. Cars and HGVs are also modelled with different gap acceptance at priority junctions. HGVs have higher gap acceptance requirements, to replicate the longer gaps in traffic required for HGVs to pull out. Therefore, the assessment already takes into account the points raised by Mr Bodman. A cornerstone of the Northampton Gateway highway mitigation strategy has been to provide improvements to the principal and strategic road network (A508 corridor upgrade including the Roade Bypass, the M1 Junction 15 and 15A improvements), thereby attracting traffic away from the local roads and onto the principal and strategic road network. The forecast reduction in traffic passing through Blisworth is entirely reasonable and consistent with this strategy.

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		It is difficult to comment on the specific modelling comments reported to be made by Rail Central at their statutory consultation as the Applicant is not aware of the context of the comments. However, on the Northampton Gateway project the strategic model (NSTM2) underwent specific model calibration and validation on the local roads to the south of the M1 to ensure that it met the required validation criteria. This included undertaking traffic counts on 39 local roads to the south of the site. It is correct that there can be more variation (as a percentage of actual flow) in the model predictions for lightly trafficked roads which is why the GEH statistic is used, as explained at paragraphs 9.3.3 and 9.3.4 of the NSMT2 Local Model Validation Report (LMVR), which is Appendix 22 of the Transport Assessment (TA), ES Appendix 12.1. The GEH statistic takes account of the fact that, when traffic flows are low, the percentage difference between observed and modelled flows may be high, but the significance of this difference is small. As reported in the NSMT2 LMVR, it was demonstrated that the NSTM2 is a suitability accurate representation of base year traffic flows in the vicinity of the Northampton Gateway site. As such, it meets the required criteria for forecasting and scheme assessment. The LMVR report was prepared by WSP, independent of the Northampton Gateway project team. The conclusions of the report and the suitability of

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		the NSTM2 for assessment of the traffic impact of the Northampton Gateway SRFI has been agreed by Highways England and Northamptonshire County Council.
Stop Roxhill Northampton Gateway (SRNG) [PINS Ref: REP3-015]	SRNG Response to Applicants Document 8.7 Part B, paragraph 2, concerning capacity of the A508 SRFI access roundabout	The Applicant does not agree that the layout of the SRFI site would impact on the A508 roundabout for the reasons stated in the Applicant's response to the SRNG written representation set out in **Document 8.7** (REP2-010). The Applicant can confirm that the Toucan crossing on the A508 and site access exit are represented in the VISSIM modelling and therefore the assessment takes into account interruptions to traffic due to the use of the crossings. The 640 vehicles referred to in Transport Assessment Appendix 27 para 5.1.5 (Table 1) are just the development light vehicles (cars). The figure of 838 development vehicles quoted is the total arrivals comprising both cars and HGVs. Table 1 does not include HGVs, which are shown in Table 3. Also, Tables 1 and 3 show the journey times for selected routes only, these being the M1 north and south, A45, A508, A43 and A5123. Hence not all development traffic is included in these tables. However, the VISSIM traffic flow matrix includes for all development traffic and is consistent with the Northampton Gateway development traffic generation given at Technical Note 2 (TA Appendix 5). The Applicant can confirm that the table titles at TA Appendix 27 are correct. The assessment year is 2031.

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	SRNG Response to Applicants Document 8.7 Part B, paragraph 3, concerning VISSIM modelling	The Applicant does not agree with the statement that the site access would be unsafe. The layout and operation of the proposed site access junction, in combination with the A508 dualling and M1 Junction 15 improvements, have be agreed and approved by the relevant highway authority, Northamptonshire County Council and/or Highways England, and this process has included a Stage 1 Road Safety Audit (See Transport Assessment, paragraphs 4.94 to 4.95). As reported above, the Toucan crossing on the A508 and site access exit are represented in the VISSIM modelling and therefore the assessment takes into account interruptions to traffic due to the use of the crossings. The VISSIM modelling was audited by Highways England's term consultant Aecom, whom employ professional VISSIM modellers. Highways England therefore have the appropriate expertise to review the modelling, as confirmed by Mr Kazi Hussain from Highways England at the ISH2. The VISSIM modelling was also reviewed by Northamptonshire County Council's VISSIM modeller. With regard to the comments on the Applicant's response to Relevant Rep RR-742, the ExA were directed to the verbal response given at the ISH2 to a similar question. In summary: • The visualisation and the VISSIM modelling are separate.

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		• The visualisation was developed for the Stage 2 Statutory Consultation to seek to provide a 3D visual means for members of the public to more easily understand the proposed changes to the highway network. It has not been used to demonstrate the suitability of the scheme in traffic engineering terms. • The traffic flows shown in the visualisation were based on those taken from the VISSIM assessment at that time. For the reasons explained at the Applicant;s response to RR-742, the method of rendering the VISSIM traffic flow data in the 3D visualisation led to a small number of minor graphical errors where a vehicle could be seen 'passing' through another vehicle. This does not represent a collision or invalidate the VISSIM assessment. • The modelling software for the Northampton Gateway project (PTV VISSIM) is used globally in the transport engineering industry. However, as is true with all modelling packages, it has its quirks, and one of these has been observed to be the occasional, partial 'overlapping' of vehicles. In a select few, very particular situations vehicles can only 'see' the front of another vehicle (based on the location of the front axle) but not the back. This can lead to isolated incidents where a vehicle appears to overlap the back end of another vehicle. • When constructing models, visual assessments is used to keep instances of overlapping vehicles to a minimum. This ensures vehicle flows and junction capacity outputs are realistic, and that all resultant

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		evaluation data is reliable. However, it is acknowledged that there can still be some occasional instances of visually overlapping vehicles that occur. This is not to say that this issue was present on the Northampton Gateway project, but it is why in response to RR-742, we acknowledge that it cannot be entirely ruled out, by stating that overlapping vehicles does not 'normally' occur in VISSIM modelling. • Nevertheless, to account for these isolated instances, when a VISSIM model is used for its primary purpose of providing empirical assessment of a scheme's impact and operation, the model is run several times (the standard approach is 20 times in the UK, as has been used in this case). This allows the reported model results to take into account greater variability and provide more realistic figures, whilst mitigating against any measurable effect of any occasional, visual quirks. Therefore, the impact of such instances of partial overlapping, if present, is of no consequence to the overall results or reported operation of the junctions assessed as part of the Northampton Gateway SRFI scheme. As noted above the Applicant does not agree that the layout of the SRFI site would impact on the A508 roundabout.
	SRNG Response to Applicants Document 8.7 Part B, paragraph 4, concerning capacity of site road network.	For the avoidance of doubt, the Applicant can reconfirm that the traffic flows used in the assessment include for traffic generated by both the aggregates terminal and Rapid Rail Freight operations.

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	SRNG Response to Applicants Document 8.7 Part B, paragraph 5, concerning layout of J15.	The layout as proposed does not require drivers to change lanes around the junction. Gantry mounted dedicated lane signs are to be provided on both the M1 approaches and the A45 approach, and verge mounted dedicated lane signs will be provided on all other approaches, and these will be supplemented by lane markings. The signage strategy can be found within the Geometric Design Strategy Record, which is Appendix 28 of the Transport Assessment. This signage strategy has been derived to enable drivers to select the relevant lane on the approach to the junction and then follow that lane to the relevant exit. The A508 is an emergency diversion route and the Transport Assessment shows that, currently, a number of bottlenecks and pinch points hamper its function as such a route. Improvements to the corridor, and the provision of the Roade bypass will provide resilience to the A508 when required to be an emergency diversion route. Whilst there will be development traffic added to it, the worst case would be a southbound closure of the M1, in which case you would get southbound traffic diverting down the A508. However, it would be a significantly improved A508. In such a scenario without the development and with the M1 shut, the M1 southbound from J15 would be predicted to carry around 6,000 vehicles during a peak hour which would be diverted onto the A508 southbound. The additional development traffic in that scenario would be an

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	SRNG Response to Applicants Document 8.7 Part B, paragraph 6, concerning aggregates traffic.	extra 200 vehicles and so would be a very small percentage of additional traffic onto a much improved route. Transport Assessment Appendix 10 covers the development of the design of the improvements to M1 J15 and assessed options for the Grange Park access in detail. The layout as presented on the Highway Plan (Document 2.4B) contains further refinements of the design from that considered in Transport Assessment Appendix 10. The addition of the aggregates facility was the subject of an additional statutory consultation and has been included in the assessment of the scheme. GRS confirmed that currently their site within Northampton town centre generates around 70 two-way HGV movements per day. These HGV trips are already on the wider highway network and therefore these trips would be relocated to the Northampton Gateway SRFI site and away from the town centre. GRS estimate that, once relocated to the Northampton Gateway SRFI site, the number of HGV trips for the aggregate terminal is forecast to increase by 30 two-way HGVs, to be an average of 100 two-way HGVs per day. The trip generation calculations were prepared prior to the inclusion of the aggregate terminal at the SRFI site. The calculations include allowance for the SRFI site operating at 16 trains per day (excluding the 12 trains per day for the

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		Rapid Rail Freight). In total, the 16 trains per day was forecast to generate 1938 two-way HGV trips per day, or roughly 121 HGVs per train. It was therefore concluded that, as the aggregates terminal would not result in an increase in the number of trains per day at the SRFI, the aggregate traffic simply replaces traffic already accounted for in the assessment and no modification to the traffic generation calculations was required. This approach was discussed and agreed with Highways England and Northamptonshire County Council at the Transport Working Group meeting held on 17 November 2017, who recognised that it would be appropriate to move the existing facility out of the town centre and that the SRFI site is a more appropriate location for the facility.
	SRNG Response to Applicants Document 8.7 Part B, paragraph 7, concerning Watering Lane.	The key point is one of road safety and traffic lights would provide a far safer environment for road users than retaining the existing short merge (which the Applicant notes is well below the standard required for a motorway slip road). The lights would operate using technology that adjusts the timings to suit the traffic levels. The operation of the Watering Lane junction with the A45 is assessed as part of the VISSIM modelling reported at Chapter 10 of the Transport Assessment, and also as a standalone junction assessment at paras 10.71 to 10.74 of the Transport Assessment. These assessments, which

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		have been agreed with Northamptonshire County Council and Highways England, confirm the satisfactory operation of the junction.
	SRNG Response to Applicants Document 8.7 Part B, paragraph 8, concerning A45 speed limit.	Average (mean) speeds at peak times at this section of the A45 are already below 50mph. Overall average (mean) speeds, measured at traffic loops near the BP garage at the extremity of the proposed 50mph speed limit, are 49.2mph and 47.9mph northbound and southbound respectively. The Applicant does not agree that imposition of a 50mph speed limit would increase journey times and the proposals clearly demonstrate that there would be a significant reduction in journey times for users of the A45. A 50mph limit is proposed as this is the most appropriate speed limit based on the road geometry and environment, this is considered in full within the Geometric Design Strategy Record (Transport Assessment Appendix 28).
	SRNG Response to Applicants Document 8.7 Part B, paragraph 9, concerning Knock Lane – Stoke road.	The extent of the highway works to Knock Lane / Blisworth Road was agreed with Northamptonshire County Council. Between Stoke Road and the northern boundary of Roade village a length of approximately 42% of Knock Lane / Blisworth Road is to be improved. Although there would be a large percentage increase in traffic using the road, actual traffic volumes remain low. The predicted traffic flows do not warrant wholescale widening of Knock Lane and Blisworth Road.

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	SRNG Response to Applicants Document 8.7 Part B, paragraph 10, concerning Knock Lane/Blisworth Rd.	The Applicant does recognise that there may be a need for further localised maintenance on the section of road that is not to be improved, and hence monies are to be paid to the local highway authority under the provisions of a s.106 obligation for that purpose. SRNG make statements regarding the NSTM2 modelling, including points relating to validation and the GEH statistic, and traffic flows on Knock Lane. These points have been addressed previously in the Applicant's responses in DCO **Document 8.7** (REP2-010) and are therefore not repeated. The NSTM2 is Northamptonshire County Council's approved traffic model. It has undergone local validation specific to the Northampton Gateway development. That work was independently undertaken by WSP, who confirmed that the model is fit for purpose. The model inputs and outputs have been scrutinised by the Transport Working Group over a 2 year period. As part of that process, the NSTM2 outputs were subject to a sense checking process with Northamptonshire County Council (see Transport Assessment paras 8.161 to 8.162) and sensitivity tests were undertaken as required. The NSTM2 is approved by Northamptonshire County Council and Highways England as an appropriate basis to assess the development impacts and the effects of the proposed highway mitigation on the highway network, as confirmed by the Statements of Common Ground with each authority (DCO documents 7.5 and 7.1, respectively).

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		SRNG refer to paras 10.11 and 10.12 of the Transport Assessment and conclude that the differences discussed in these paragraphs have been ignored. This is not the case, as explained at para 10.16 of the Transport Assessment. The Applicant does not follow the SRNG assessment of the traffic flows at the 6th paragraph of this section of their response. They correctly identify a flow of 198 pcus on Stoke Road NB (heading towards Blisworth) in the AM peak hour in the 2031 D1 Reference Case (Transport Assessment Appendix 23, page 49) and seek to contrast that with flows in the PM peak hour. However, SRNG do not appear to identify the correct flow. The correct equivalent flow in the PM peak hour on Stoke Road NB (heading towards Blisworth) is 575 pcus (Transport Assessment Appendix 23, page 50). The corresponding flows on Stoke Road SB (heading away from Blisworth) are 466 pcus in the AM and 294 pcus in the PM. Hence the forecast flows are consistent to the tidal flows expected during the AM and PM peak hours. SRNG note that the traffic flows on Knock Lane increase in the 2031 J1d 'with Development and highway mitigation' scenario. The flows referenced by SRNG are correct but they have mixed up the directions of travel in the AM peak hour (the 318 pcus in the AM peak are travelling eastbound on Knock Lane and are therefore travelling away from Blisworth, not towards it, and the 47 pcus are travelling westbound on Knock Lane and are therefore travelling

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		away from Roade, not towards it as stated by SRNG). The forecast flows are consistent with the effect of the highway mitigation of encouraging traffic to switch from using Stoke Road to using Knock Lane, to access the A508 via the new roundabout on the Roade Bypass. This point has been previously addressed in Document 8.7, with a full detailed assessment provided at paragraphs 10.93 to 10.104 of the Transport Assessment. SRNG are concerned that two locations they identify on Courteenhall Road appear to *"forecast some inexplicable traffic movements"*. The locations to which SRNG refer are model 'loading points' (a location with the NSTM2 where traffic for a zone is loaded onto the highway network). SRNG have incorrectly (but perhaps understandably) assumed that these loading points represent the Thorpewood Farm Office complex and the Prospect Court Office complex. This is not the case. The loading point zone towards the eastern end of Courteenhall Road represents a potential future development site (South Northants Roade Masterplan – the traffic from which is already included for in the traffic modelling). The loading point zone towards the western end of Courteenhall Road represents a larger area than just Prospect Court Office, which is where the zone is show as connected to the existing road network. WSP have confirmed that the loading points conform with standard practice within transport modelling and further disaggregation of the zones into additional loading points

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		would not materially alter the outputs from the NSTM2 modelling. SRNG comment on differences in traffic flows on Courteenhall Road in the D1 Reference Case between those shown in Transport Assessment Appendix 13 and the final assessment flows shown in Transport Assessment Appendix 43. SRNG note differences of 100 eastwards and 39 westwards in the AM peak. This is not correct, the differences are +40 and -39, respectively. The final assessment data presented in Appendix 43 was produced following all corrections to the NSTM2, including the correction for the loading point in Roade (Transport Assessment para 8.30), which accounts for these small differences in traffic flows. Fundamentally, the objective of the highway mitigation strategy for the Proposed Development is to attract traffic back onto the improved A508 corridor and away from using the local routes as rat runs to avoid an otherwise congested A508. Therefore, although minor changes in traffic flows on the local roads can be observed between different versions of the NSTM2, in all cases the trend demonstrated by the impact of the highway mitigation strategy on the local road network was the same. This therefore provides further confidence in the robustness of the overall conclusions. Traffic that, in the 'Reference Case', is shown to travel westbound along Courteenhall Road and pass through Blisworth as a rat run, is forecast to no longer use this route

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	SRNG Response to Applicants Document 8.7 Part B, paragraph 11, concerning para 6.9 NSTM2 Interpretation. SRNG Response to Applicants Document 8.7 Part B, paragraph 12, concerning para 6.10 NSTM2 Interpretation.	once the highway mitigation including the changes to the A508/Courteenhall Road junction are in place, as it will not be possible to turn right from the A508 into Courteenhall Road. For example, traffic that was previously routing from the A508 via Courteenhall Road and Blisworth to access the A43, is shown to use the A5076 Ring Road and travel via M1 J15A to access the A43. Figures 10.11 and 10.12 of the Transport Assessment support the view that more traffic would switch from Stoke Road to Knock Lane in the morning than in the evening. Hence this is not disputed. However, the same figures show that, overall, there is a reduction in traffic on Stoke Road in both the morning and evening peak hours. As explained in the Applicant's response to this point in **Document 8.7** (REP2-010), this is because the highway improvements associated with the Proposed Development remove the congestion on the A508, meaning that existing traffic, that would have otherwise used the Stoke Road/Northampton Road corridor to avoid congestion on the A508, assign back to the A508. This leads to a reduction in traffic on Stoke Road, through Blisworth and on Northampton Road between Blisworth and Milton Malsor. SRNG question why there would be right turning traffic from the Roade Bypass/Knock Lane/Blisworth Road roundabout to access Roade, when access could be taken from the southern Roade Bypass roundabout. Residents living within the western part of Roade would be likely to use the Roade Bypass/Knock Lane/Blisworth Road roundabout

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		rather than use the southern roundabout and have to travel through Roade. Hence the modelling output reflects this.
Vivian Blyth [PINS Ref: REP2-023]	Response to Applicants Document 8.3 response to relevant representation 700 – reference to access	As part of the proposed highway mitigation works the A508/Blisworth Road (Courteenhall) junction that is located just to the north of the Nursery would become a left-in, left-out only junction, with no right turn movements into or out of the junction possible. This will help reduce the potential for accidents along this section of the A508, as it will remove congestion and queuing on the A508 that currently exists at this location. The proposed highway mitigation works also include the provision of a new footway/cycleway along the western side of the A508 that will provide a much-improved link between Roade and the Nursey for pedestrians and cyclists. The geometric design of the A508 Route Upgrade (Transport Assessment Appendix 29) has been approved by Northamptonshire County Council Highways, who have not raised concerns regarding the predicted increases in traffic using the improved A508.
Dr John P Davis [PINS ref: REP2-024]	Response to Applicants Document 8.3 response to relevant representation 742 – limitations on traffic simulation modelling	Please see reference to SRNG paragraph 3 above. In addition, the Applicant notes that Dr Davis' response on this matter states that he observed a conflict between a bicycle and a car. However, the visualisation did not include bicycles and hence the Applicant is not sure what visualisation Dr Davis was reviewing.

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Network Rail (NR) [PINS Ref: REP3-017]	NR explains its position on the protective provisions.	The Applicant's position in is unchanged from that set out in its responses to written representations and other parties responses to ExQ1 (see **Document 8.7**, REP2-010, pages 10 &11). However, in order to address NR's concerns in respect of the proposed dispute resolution mechanism in the protective provisions, and as indicated at CAH1, the Applicant provided Network Rail with some amended wording to paragraph 22 of the protective provisions on 11 December 2018. It is felt that wording should overcome their concern however a response is awaited. Please also refer to the entry in relation to Part of Schedule 13 in the DCO Tracker (**Document 3.1B**) submitted for **Deadline 4**.
Highways England (HE) [PINS Ref: REP3-018]	HE explains that it considers the Applicant's comments in **Document 8.7** (REP2-010) did not accurately reflect the position in respect of deemed approval.	This is dealt with in the Applicant's Point of Clarification on page 3 of **Document 8.9** (REP3-009) submitted at Deadline 3.
Andrew Bodman [PINS Ref: REP3-019] Mark Redding [PINS Ref: REP3-020] and Blisworth Parish Council	Concerns re assessment of alternatives [Submissions not repeated due to length].	A number of respondees to **Deadline 3** continue to question the approach to the assessment of alternative sites. This includes Blisworth Parish Council, Mr Redding and Mr Bodman. It is suggested that alternative sites in other regions should be considered and/or a more detailed examination of the Hinckley International proposed SRFI as a potentially suitable alternative should be undertaken.

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[PINS Ref: REP3-021]		The starting point for the consideration of alternatives was the identification of the market area that will be served by this proposal. The Market Analysis Report (**Document 6.8A**, REP1-004) contains an explanation of the research undertaken to inform an understanding of this market area (see in particular Sections 7 and 8). The Market Analysis Report explains that the core catchment area of this strategic rail freight interchange is 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 be expected to serve this market area have not been considered in this analysis. It is considered therefore that it is not appropriate or necessary to consider alternative sites located in other regions of the country or sites which are located in other parts of the East Midlands which would clearly serve a different core market area. The proposed Hinckley SRFI is located over 50km to the north of the Northampton Gateway site. It would therefore serve a different core market area and, whilst it might be capable of adding to the network of SRFI's in accordance with the NPSNN, it would not expand the network in the same way as a scheme at Northampton Gateway would.