NORTHAMPTON GATEWAY
STRATEGIC RAIL FREIGHT INTERCHANGE

UPDATED COMPARATIVE ANALYSIS OF NORTHAMPTON GATEWAY AND RAIL CENTRAL

APPENDIX 2.4 TO ENVIRONMENTAL STATEMENT (DOCUMENT 5.2)

The Northampton Gateway Rail Freight Interchange Order 201X

UPDATED COMPARATIVE ANALYSIS OF NORTHAMPTON GATEWAY AND RAIL CENTRAL | 8 JANUARY 2019

www.northampton-gateway.co.uk

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Updated Comparative Analysis of Northampton Gateway SRFI and the proposed Rail Central SRFI

Date: January 2019

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EXECUTIVE SUMMARY

1. 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 markets and access to the strategic rail network. Both sites have the potential to meet the physical and functional requirements for SRFI's as set out in the National Planning Statement for National Networks (NPSNN) (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 leads to the conclusion of this assessment that the Rail Central site is materially inferior, and is not a preferable site, to Northampton Gateway.

2. 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 the Northampton Loop Line in both directions together with an operational intermodal terminal as part of a strategic Rail Freight Interchange.

3. In relation to access to the strategic road network, it is considered that Northampton Gateway has a superior access to the M1 than Rail Central. This is to some limited degree balanced by the Rail Central access onto the A43.

4. The NPS recognises that, due to their operational requirements, SRFI's may need to be located in the countryside (para 4.85). Northampton Gateway and Rail Central are both 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 the combination of that context, scheme design and mitigation, the environmental effects of the Northampton Gateway scheme can be better mitigated.

5. The reasons for this, in summary, are that 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 the western boundary of the site, the south eastern boundary is formed by the A508, and the northern boundary by Collingtree Road. The Northampton Gateway Main Site is contained within these physical features and existing topography, 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, significant landscaped bunds can be provided to minimise and, to a large extent, fully screen views of the development from these villages. The topography and 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.

6. 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.

7. The reasons for this, in summary, are that the Rail Central 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 that views from the village to the scheme will be largely unhindered because Blisworth is in an elevated position. In addition, because the Rail Central site stretches from the A43 to the Northampton Loop Line it's built form is positioned in two distinctly separate areas on either side of Northampton Road/Towcester Road. This results in a degree of sprawl, further reducing the degree to which the impact of the development is capable of being contained.

8. As a result the Rail Central development would have a greater landscape and visual effect. Furthermore, because of its proximity to, and relationship with, Milton Malsor and Blisworth, the effects from noise and light will be greater from Rail Central than from Northampton Gateway.

9. The NPS makes it 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. As a result 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 adverse environmental affects, than Rail Central.

10. In terms of transportation, the differences between the two proposals are significant, with the current Rail Central mitigation scheme not appropriately mitigating the traffic impact of the scheme and failing to deliver the overarching transport strategy that is suggested. This contrasts starkly with the Northampton Gateway highway works which are agreed with the highway authorities and 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 (see para Section 2 Government's vision and strategic objectives for the national networks) and bring about significant environmental benefits. In this regard the Northampton Gateway scheme as proposed is superior to Rail Central.

11. 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. 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 and likely to be significant. It is considered that the Rail Central site will have greater adverse environmental effects on biodiversity, including veteran trees, on loss of best and most versatile agricultural land, and greater adverse effects due to lighting and noise.

1.0 INTRODUCTION

1.1 This comparative analysis seeks to compare an SRFI on the Northampton Gateway SRFI site (NG) with an SRFI on the site proposed by Rail Central SRFI (RC). Appendix One contains a Plan which identifies the location of both the Northampton Gateway site and the Rail Central site. The basis of the assessment of the two sites are the schemes that have been proposed for the two sites. The assessment is an update of an earlier assessment, dated May 2018, and follows the submission and acceptance of an application for Rail Central SRFI. The earlier assessment was informed by the information available about the RC scheme published in relation to its Phase 2 statutory consultation process. This assessment is based on the RC scheme as accepted for Examination. Details of the Rail Central application documents can be found on the Pins website through the following link:

https://infrastructure.planninginspectorate.gov.uk/projects/east-midlands/rail-central-strategic-rail-freight-interchange/

1.2 A review of the Rail Central application documentation has therefore been undertaken by the Northampton Gateway application team. This review identifies a number of short comings in the Rail Central application material and some of these concerns, where relevant to a comparative assessment, are drawn out here. Where necessary therefore, in order to complete the comparative assessment, judgements have been made based on the information available.

1.3 The comparative analysis considers the differences between the two schemes having regard to the policies of the National Planning Statement for National Networks (NPSNN) with a focus on particular aspects where comparative differences are notable. The assessment therefore considers differences in terms of good design principles, in terms of operational and technical aspects and it then goes on to compare the environmental effects of the two schemes in relation to environmental matters where differences are considered relevant. 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:

- 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 square metres (sqm) (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 Rail Central development at the Main SRFI Site are set out on a Parameters Plans and an Illustrative Landscape Masterplan demonstrates a means of bringing forward the proposed development. These are included at Appendix Two and Three respectively, for ease of reference.

3.0 COMPARATIVE ASSESSMENT: GOOD DESIGN AND SITE CHARACTERISTICS

3.1 The NPSNN 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'.*

3.2 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.

3.3 The NPSNN recognises that, due to their operational requirements, SRFI's may need to be located in the countryside (para 4.85). 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 the combination of that context, scheme design and mitigation, the environmental effects of the NG scheme can be better mitigated.

3.4 The reasons for this, in summary, are that 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 the western boundary of the site, the south eastern boundary is formed by the A508 and the northern boundary by 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. The topography and 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.

3.5 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.

3.6 The reasons for this in summary are that 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 impact of development on the site can be contained.

3.7 As outlined above the NPSNN makes it 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. As a result 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 effects than RC.

3.8 These fundamental location and design factors flow directly through to the comparative environmental effects of the two schemes as described below. In particular the RC scheme will have significantly greater adverse environmental impacts on key receptors in relation to landscape and visual effects as well as greater adverse effects in terms of noise and light pollution.

4.0 COMPARATIVE ASSESSMENT: OPERATIONAL AND FUNCTIONAL ASPECTS

General Matters

4.1 The NPSNN sets out a number of operational and functional requirements for SRFI's in paras 4.83 – 4.89. 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.

4.2 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). 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. This is considered to be a commercial and operational advantage.

Rail

4.3 Both sites will provide a rail terminal, including a rail network connection, appropriate sidings and a large area for intermodal handling and container storage. Both schemes commit to the provision of a rail terminal from the outset.

4.4 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. 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 floorspace on the NG site has the ability to be directly rail connected 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 on the Parameters Plan and Illustrative Landscape Masterplan indicate very tight gradients and curves, the feasibility of which would need to be demonstrated.

4.5 Both schemes will accommodate both rail and non-rail activities and both schemes provide rail infrastructure to allow more extensive rail connection within the site in the longer term. Both schemes include electrification of the rail access.

4.6 Both schemes provide a rail terminal, which is 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.

4.7 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 if the market for such provision develops. The RC scheme appears to allow for a similar expansion, including the future provision of an express freight facility.

4.8 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 the 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.

4.9 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. The rapid rail freight provision at NG 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 because it will make the future provision of such a facility more viable. In the case of RC there would be a need to build extensive rail infrastructure which would have to be justified on the basis of the Rapid Rail Freight facility alone. 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. NG are not aware of any commitment to deliver that connection by RC which, as indicated, 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. 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.

4.10 The arrangements for RC include access to the WCML fast lines but no details have been provided within the application documentation 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 has committed to providing the rail terminal prior to any occupations. There is no commitment in the RC application to the delivery of the connection to the fast lines at any point. The stated benefits are therefore uncertain as it is doubtful whether it will be feasible commercially or operationally to provide the connections.

4.11 The RC proposal includes the potential provision of a Train Maintenances Depot, which 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 in both schemes, which include fuelling.

5.0 COMPARATIVE ASSESSMENT: ENVIRONMENTAL IMPACTS

5.1 Landscape and Visual Impact

Consideration of the Rail Central Environmental Statement.

5.1.1 The landscape and visual impact assessment contained at Chapter 15 of the Rail Central ES does not appear to include any fundamental flaws, although there are a number of matters in relation to the methodology and subsequent judgements that are not considered to be correct or justifiable.

5.1.2 In terms of the methodology, this is broadly in line with the relevant guidelines (GLVIA3), although it does include some misinterpreted or misapplied detailed points. It is also evident that the subsequent assessment does not follow the stated approach in places.

5.1.3 It is notable that the assessed Landscape Value of the RC Main SRFI site and its environs has been changed from '*Low*', within the Stage 2 RC ES chapter to '*Medium'* within the final submitted RC ES chapter. There is no explanation for this change but the '*Medium*' Landscape Value judgement is considered to be fair. For reference, NG has assessed the Landscape Value of the NG Main SRFI site and its immediate context to be '*Low/ Medium'*. This is an important difference in comparative landscape terms.

5.1.4 The RC ES assessment confirms that the proposed Rail Central development will have a Significant effect upon local landscape character at the site-specific level during construction and at years 1, 7 and 15 (ie at every assessed stage). For reference, NG has assessed the proposed NG development as having a Significant effect upon the landscape of the site and its immediate context during construction and at year 0 (ie completed development and the equivalent of Rail central`s year 1) but not at year 15. Again, this is considered to be a fair and important distinction between the two schemes.

5.1.5 A comparative review of all the assessed effects upon the landscape and visual receptors has been undertaken. In visual terms, the RC ES assessment identifies the following Significant visual effects for the proposed Rail Central development:

- 30 (of 61) Receptor locations experiencing a Significant visual effect during construction;
- 31 (of 61) Receptor locations experiencing a Significant visual effect at year 1; and
- 13 (of 61) Receptor locations experiencing a Significant visual effect at year 15.

5.1.6 By comparison, NG's assessment of the proposed NG development identifies the following Significant visual effects;

- 17 (of 62) Receptor locations experiencing a Significant visual effect during construction;
- 8 (of 62) Receptor locations experiencing a Significant visual effect at year 1; and
- 0 (of 62) Receptor locations experiencing a Significant visual effect at year 15.

5.1.7 This supports the NG analysis (set out below) that the NG site is more visually contained and the proposed NG development will encompass a more effective visual mitigation approach that will mitigate and screen views at year 1 and increasingly over time.

5.1.8 In terms of the most relevant plans within the RC submission, these include the Parameter Plan and the Illustrative Landscape Masterplan, attached at Appendix two and three to this Assessment. The former appears as a development plot led layout and consequently includes a number of awkward 'pinch points', where the green infrastructure appears too narrow/ limited (eg north west corner Zone 1). By contrast the green infrastructure, including landscape screen bunds, formed an early and fundamental component of the NG design process.

5.1.9 In respect of the RC Illustrative Landscape Masterplan the proposed woodland/ structural planting is limited in places and appears sporadic. It does not indicate a well-connected and strong wooded/ planted setting to the new buildings and infrastructure.

5.1.10 Overall, the RC assessment includes a number of concerns in terms of its methodology and a number of under estimated effects for some landscape and visual receptors. However, it does acknowledge that the site is rural in character and of Medium Landscape Value and that the proposed development will give rise to a significant effect upon the landscape of the site and its environs at every assessed stage of the project. It also appears to recognise that in cumulative landscape and visual terms, the RC development would have a greater relative effect than the NG development should both come forward.

Landscape

5.1.11 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.

5.1.12 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 the local 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.

5.1.13 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.

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

5.1.15 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.

5.1.16 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.

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

5.1.18 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.

5.1.19 In topographic terms, the RC Site occupies a rather low lying and shallow 'bowl' like area. Woodland is less prevalent across this site (in comparison to that of the NG Site) and it thus forms a rather large, open 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 and mitigating the NG proposals.

Visual

5.1.20 Both schemes will result in some significant visual impacts. However, the level of visual effects will be materially greater overall for the RC scheme, see comparison above in relation to significant visual effects. 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 significantly greater.

5.1.21 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 will be materially greater for the RC scheme.

5.1.22 The RC scheme also includes extensive acoustic screen fencing, the precise scale and location of which will be determined at the detailed design stage. This could involve 6 metre high 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

5.1.23 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.

5.1.24 This proposed mounding will be 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.

5.1.25 Other mounding and green infrastructure 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).

5.1.26 By contrast, the RC site does not present the same contextual opportunity for green infrastructure which would bring about the same benefits in terms of landscape and visual mitigation. Indeed, the GI proposals for RC are less extensive and 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.

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

5.1.28 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.

5.1.29 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. The NG scheme includes considerably more conserved and proposed planting.

5.2 Highways

Accessibility

5.2.1 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 light traffic and 955 of HGV traffic from the NG site will travel to and from the site via Junction 15 of the M1. It is considered that NG has a superior access to the M1 than Rail Central. The NG site access is a little over 500m from M1 Junction 15 whereas the RC site access is nearly 2km from Junction 15A of the M1. This is to some limited degree balanced by the RC access onto the A43 which provides a link to the M40, which is around 20 miles to the south. RC assumes, however that only a small proportion of their traffic will travel south along the A43, with the vast majority travelling north towards M1 J15A.

RC Transport Assessment Work

5.2.2 The Rail Central Transport Assessment acknowledges that further work is requires on the phased delivery of the highway mitigation and the assessment of cumulative impact work. It is not therefore fully completed. It also raises a number of significant issues regarding the appropriateness of the mitigation measures proposed. NG's conclusion based on the review the NG team has undertaken, is that the work now proposed at J15A (which is a smaller scheme than proposed previously by RC) will not be sufficient to accommodate the traffic impact of the RC scheme.

5.2.3 The Rail Central TA presents both detailed LinSig modelling and VISSIM microsimulation modelling of the final RC M1J15A scheme. The LinSig modelling shows that, with RC in place, there would be mean maximum queues of 138 pcus (2021) and 177 pcus (2031) on the A43 approach in the PM peak hour. The stated mean maximum queue lengths would equate to circa 830 metres and 1060 metres.

5.2.4 It is noted that the LinSig model is incorrect and over estimates the capacity of the A43 approach to J15A, as it shows 2 left turn lanes when the scheme proposes only 1. When this is corrected, the queuing would increase further. The NG team have recreated the Rail Central LinSig model, and with a single left turn lane, it shows that this queue would be 256 pcus long (or circa. 1,536 metres) in the PM peak hour. The proposed RC Grade Separated Junction site access is located approximately 1700 metres south of J15A. Therefore, during the PM peak hour the maximum queue length would reach back as far as the site access junction (reported queue lengths are averages of the max queue over multiple cycles so, for oversaturation arms such as is the case here, the actual max queue would be twice as long during some cycles).

5.2.5 The VISSIM assessment report, at Appendix W of the RC TA, states, at para 6.4.3, that, during the 2021 and 2031 PM peak periods, not all demand traffic can enter the network on the A43 and RC site access approaches. No queue length data or screenshots are provided within the VISSIM report. However, it must be assumed that vehicles are prevented from entering the network due to queueing on the A43 approach to J15A, as suggested by the LinSig modelling.

5.2.6 The VISSIM report states that there would be 9,621 unreleased vehicles in the 2031 with mitigation PM peak model. This suggests that there is significant congestion on all routes into the network. For reference, the VISSIM assessment undertaken for Northampton Gateway shows almost zero unreleased vehicles.

5.2.7 VISSIM and LinSig models are detailed models and therefore give a better representation of capacity and queueing than strategic models. This suggests that the strategic modelling

undertaken by RC overestimates the capacity of the proposed RC improvement scheme at M1J15A. The strategic modelling is therefore showing more traffic drawn into the junction than the junction could in reality cope with. Therefore, whilst the proposed improvements to M1J15A may provide a nil detriment improvement compared to the RC 'do nothing' scenario, it would result in significant queueing on the A43 which would deter vehicles from using this corridor and could prevent vehicles exiting the Rail Central site access.

5.2.8 Fundamentally, this raises the question of whether the RC mitigation strategy to draw traffic onto the A43 in order to avoid impacts on the surrounding local roads and villages could be achieved. This is a potentially significant detrimental impact of the RC scheme.

5.2.9 At the suggestion of RC a meeting was held between the NG and RC transport consultants on 12 December 2018 to discuss these issues. At that meeting RC's consultants were invited to provide information to address the above concerns, however, whilst it was said that work was in hand, the consultants declined to make it available to NG. RC were advised that, unless further information was provided, this comparative assessment (and the cumulative impact assessment being carried out concurrently) would therefore be based only on the material submitted with the RC application. No further information has been forthcoming.

Transport Impacts and Betterment.

5.2.10 In comparison to RC NG includes highway mitigation works that will not only adequately mitigate its own impact but 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 will therefore be a significant positive benefit, compared to the potential negative effects of 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.

Public Transport.

5.2.11 The NG scheme includes a comprehensive public transport strategy which has been discussed and agreed with bus operators and the County Council. The RC public transport strategy does not appear to be finalised, with little information on how services will be routed and delivered, where they will serve, their potential frequency and likely hours of operation. There does not appear to be agreement with local bus operators that services can be diverted onto the site. It is therefore currently difficult to assess the adequacy of public transport provision and this compares poorly with the approach for NG.

Modal Shift

5.2.12 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.

5.2.13 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 greater proportion of warehousing which can be directly rail connected, which will help contribute to the growth of rail. The NG scheme also 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. 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 commits to the construction of a terminal but does not commit to it being available for use.

5.3 Air Quality

5.3.1 The general quality of the Rail Central Air Quality Assessment is reasonably robust and is based on the latest relevant guidance. However, the assessment does not include two key assessments:

- An assessment of the developments impact and compliance with Air Quality Directive limit values for the East Midland Zone; and
- An air quality emissions mitigation assessment of Rail Central as required under the Northampton Low Emission Strategy (2017-2025)[1]. As a result, it is difficult to conclude whether the RC scheme will result in significant adverse environmental effects.

Without this assessment it is difficult to conclude whether the RC scheme is comparable to NG in relation to air quality.

5.3.2 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.

5.4 Noise and Vibration

Consideration of the Rail Central Environmental Statement

5.4.1 The methods used in the Rail Central Environmental Statement to identify and assess potentially adverse and significantly adverse noise and vibration effects as required by the NPSNN contain several weaknesses, summarised as follows.

- The approach used to identify and implement LOAELs (Lowest Observed Adverse Effect Levels) and SOAELs (Significant Observed Adverse Effect Levels), key concepts in current Government policy on the effective management of environmental noise, is incomplete, inconsistent, and disconnected from the evidence base, making it impossible to draw meaningful conclusions on the potential noise effects of Rail Central in terms of Government policy;
- No predictions of railway noise or vibration have been carried out and therefore meaningful conclusions on any potential impacts and effects from these sources cannot be made;
- One set of receptors has been used for the assessment of all noise types, and when considering road traffic noise, it appears that these do not represent those adjacent to roads and potentially worst affected, resulting in a likely underestimate of any potential impacts and effects;
- Not all the relevant sources of operational sound have been adequately considered in the assessment, in particular, the operation of freight trains within the SRFI site ;
- It is stated that out-of-hours construction works will not take place which is clearly contradicted by the draft DCO; and
- Limited information has been provided on the baseline noise and vibration survey methodology, making it unclear whether the results can be considered representative of the receptors considered in the assessment, particularly where the monitoring positions are a large distance from the receptors they are meant to represent.

5.4.2 Due to these shortcomings it is considered that the RC ES Noise & Vibration chapter does not provide a sufficiently robust assessment to identify the likely potentially adverse and significantly adverse noise and vibration effects, as required by the NPSNN. The comparative assessment of the RC and NG schemes, set out below, is therefore undertaken within this context.

Comparative Assessment

5.4.3 As the likely operation of both the NG and RC will have a certain level of similarity, it is expected that certain potential effects, such as railway noise and vibration from trains travelling on the rail network, may not be significantly different.

5.4.4 In terms of road traffic noise on the road network, a basic evaluation may again indicate similar effects from the two schemes. However, the Roade Bypass proposed as part of the NG scheme will mitigate noise from vehicles that may travel on the A508 through Roade and reduce the high levels of existing road traffic noise that are experienced by the adjacent residential receptors. Part of the A508 running through Roade is a Noise Action Plan Important Area, for which the NPSNN states that applicants should consider opportunities to address the associated noise issues. The NG assessment indicates that there would be a reduction of about 70% in the number of these receptors with noise exposures above the SOAEL. While adverse impacts are expected at some residential receptors to the west of Roade, closer to the route of the bypass, none of these are predicted to result in significant effects, and extensive bunding and fencing has been proposed to mitigate and minimise these effects in accordance with Government policy aims.

5.4.5 Regarding operational sound from activities taking place at the two SRFI sites, the NG proposal has several key advantages. Directly to the east of the NG SRFI site is the M1 motorway. Because of the high levels of road traffic noise in the area around the M1, no adverse effects from operation of the SRFI are expected at receptors in Collingtree. The NG SFRI site is largely screened from other nearby receptors by extensive landscape bunding, particularly at the north and west of the site where it reaches heights of around 16 to 19 m. This provides a significant level of screening from SRFI operational sound to those receptors further from the M1, particularly the village of Milton Malsor to the north-west and the more isolated receptors to the north and west of the site. The use of bunding allows greater heights to be achieved than with fencing (and therefore greater attenuation of sound).

5.4.6 The RC scheme is in a generally quieter area, and also makes proposals for the mitigation of operational sound using screening. Limited bunding has been proposed, compared to NG, the highest of which is around 10m high next to Unit 2 at the north-east of the SRFI site to the south of Milton Malsor. The rest of the proposed screening is provided by various sections of 6 m high fencing around areas such as warehouse service yards and the on-site railway track. The effectiveness of acoustic screening is directly linked to its height. The approach taken indicates that screening of operational sound was not considered as a key feature of the overall RC design strategy. As the proposed fencing is considerably lower than the height of the warehouses, this provides a likely reason why the RC assessment has identified sound from rooftop mechanical plant installations as particularly problematic, i.e. because the proposed screening does not mitigate this sound source.

5.4.7 While the assumptions used for the prediction of operational sound is slightly different in the RC assessment to the NG assessment, the results indicate that higher levels of operational sound will occur from SRFI activities on the RC site at the two receptors broadly shared by both assessments, by 3 and 5 dB during the day and by 4 and 6 dB during the night, indicating greater adverse impacts. In this regard, it is considered that the RC scheme will, overall, have a greater adverse impact as a result of noise and vibration than NG.

5.5 Lighting

Consideration of the Rail Central Environmental Statement

5.5.1 The full RC external lighting impact assessment is split between Chapter 19 Lighting and Chapter 15 Landscape and Visual, while ecology effects are touched on in Chapter 14 Biodiversity

5.5.2 Chapter 19, which was prepared by a lighting specialist (Hoare Lea), is only concerned with those aspects of light pollution that are measurable or calculable. These are light spill (lux), glare (candelas) and upward light emission (as % of total light). Chapter 15, which was prepared by a landscape specialist, deals with the visual effects of lighting associated with the development.

5.5.3 The conclusions reached in Chapter 19 are that: effects due to light spill, glare and upward light emission will be negligible. This is not surprising given that the external lighting will be designed in accordance with national guidance, which gives recommended limits for these three types of light pollution.

5.5.4 NG also assesses effects from these three types of light pollution as being negligible in respect of the NG proposals.

5.5.5 Operational phase night time visual effects are dealt with in Chapter 15, supported by several night time photomontages.

5.5.6 It appears that night time visual effects have been assessed by relying on the night time photomontages. However, the only effects they have considered are those caused by light presence, that is the appearance of light sources and other lit elements in dark views. Local sky glow is not mentioned, even though it is likely to be significant. This is all the more surprising

given that the chapter's review of baseline conditions repeatedly notes the prevalence of this form of light pollution in the area.

5.5.7 Night time photomontages were requested in the Planning Inspectorate's Scoping Opinion for the Rail Central project. While they do assist with envisioning the impact of the development at night, in our view they have limitations that can affect the robustness of the impact assessment.

5.5.8 For example, it is extremely difficult to represent night time visual effects with any degree of realism and none of the photomontages depict any local sky glow from the SRFI and yet this will inevitably be present in every view to a greater or lesser extent. Indeed, this is likely to be the most prevalent form of light pollution.

Comparative Assessment

5.5.9 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.

5.5.10 In relation to the effects on properties during operation the effects of the RC scheme will be significantly greater than the NG scheme. This is mostly due to the topography and proximity of the Rail Central site in the context of the surrounding settlements and residential properties, with the site sitting lower in the landscape than many surrounding receptors and in a more exposed and open area of countryside close to large parts of the boundaries of both Milton Malsor and Blisworth. The likely effects will be visual, in the form of increased light presence and local sky glow. Night time views from many properties (e.g. parts of Milton Malsor; properties along Towcester Rd/Northampton Rd) will 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.

5.5.11 In relation to the effects on users of the Canal during operation phase, the night time impacts of the RC scheme will 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.

5.5.12 In terms of the interface between lighting and ecology it appears that there will be a greater number of interfaces on the RC scheme compared to NG.

5.5.13 This is therefore considered to be a material difference between the effects of lighting from the RC scheme compared to NG.

5.6 Biodiversity

Consideration of RC ES

5.6.1 There appears to be some significant gaps in the RC Ecology ES Chapter, with a number of protected species surveys being incomplete or inadequate. On the basis that there are significant gaps in the information provided it is considered that RC's conclusion, that with the implementation of appropriate mitigation there will be minor and/or minor negligible residual effects related to loss of veteran trees, important hedgerow features and bats, is premature and may be misleading.

5.6.2 It is also considered that the conclusions of the biodiversity assessment detailed in the Biodiversity off setting Report are misleading because it fails to include or take account of some fundamental aspects of the methodology used that may indicate that the change, overall, is negative.

5.6.3 Habitats within the Rail Central site are similar to those within the NG site, with a network of hedgerows, some areas of woodland and scrub and wetland features, including ponds watercourses and a section of canal. Additional features present within the RC site include frequent veteran trees. Based on a broad assessment of the habitats and available local records, it is evident that the Rail Central site supports a similar range of fauna to that identified within the NG site.

5.6.4 From the information available it would appear that there are a few potential differences in relation to different aspects of biodiversity as noted below.

5.6.5 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 or ancient trees (25 no.) identified by RC as opposed to a single veteran tree identified close to the NG Roade bypass route. Four ancient and ten veteran trees would be removed from the Rail Central scheme. A single veteran tree would be removed from the NG scheme due to the presence of disease.

Fauna

6.6.6 In terms of fauna, both schemes are likely to have an impact on bats, GCN, farmland birds and badgers. On the basis of the existing information (some of which is not complete for the RC scheme) 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).

5.7 Agricultural Land

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

5.7.2 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.

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

5.8 Archaeology

5.8.1 Neither the NG site or RC will have a direct impact on any designated archaeological assets, such as Scheduled Monuments. It is also considered that there will be no setting impacts on Scheduled Monuments; therefore, impacts relating to both developments will be on site specific

buried archaeological remains which would be mitigated through a programme of excavation. The archaeological investigations carried out on both sites identified archaeological remains predominantly relating to late Prehistoric and Romano-British activity. The proposed mitigation, i.e. archaeological excavation, recording, assessment and publication is the same for both sites.

5.8.2 There are not therefore considered to be any significant differences between the two sites in terms of effects on archaeology.

5.9 **Heritage**

5.9.1 Overall, the RC scheme is considered to be more harmful in built heritage terms than NG because of the permanent effects during the operational phase of the proposed RC development as a whole compared to NG. There are a greater number of designated heritage assets identified as facing permanent effects from the RC scheme compared with NG, and these assets will be affected to a greater degree, with as many as six built heritage assets having potential to sustain a moderate adverse significance of effect from the RC scheme. In addition, all of these assets are designated heritage assets (ie. listed buildings and conservation areas), of medium sensitivity. Of these, several are also situated within the site boundary of the RC scheme (designated assets associated with the Grand Union Canal).

5.9.2 By comparison, overall the NG scheme will result in at most a permanent minor-moderate significance of effect to any built heritage assets. A minor-moderate significance of effect will be sustained during the construction phase as a consequence of demolition of the two non-designated barns within the site boundary. Whilst these effects will be direct (and the RC scheme will not result in any direct impacts), these are non-designated assets of low sensitivity. Furthermore, NG has only one designated heritage asset within the order limits (Courteenhall War Memorial): there will be only minor changes within the wider setting of this asset and its importance will not be not be materially affected by the proposals.

5.9.3 The RC and NG schemes both have potential to impact upon the Milton Malsor Conservation Area and Mortimers (listed building); however, the RC scheme has a visual and proximate relationship with these designated heritage assets. Part of the northern boundary of the RC site directly adjoins the boundary of the Milton Malsor Conservation Area. Consequently, the primary and most apparent impact on these assets will arise from the RC scheme.

5.9.4 The NG scheme offers potential heritage benefits, whereas the RC scheme offers no meaningful heritage benefits. Construction of the Roade Bypass under the Northampton Gateway scheme will draw traffic away from the centre of the Roade Conservation Area, resulting in a minor beneficial significance of effect to this designated asset.

5.10 **Drainage**

5.10.1 From a surface water perspective, both the NG and RC schemes propose a restriction on runoff to pre development greenfield rates, with attenuation provided on site. In this regard the overall effects of the schemes are comparable. The RC strategy however relies heavily on below ground storage in attenuation tanks, whereas best practice for sustainable drainage is to provide as much as possible in open basins or ponds which offer greater opportunity for biodiversity/landscape enhancement, as NG.

5.10.2 Flood risk from both sites is managed to ensure that proposed development remains outside of the floodplain post construction, however NG provides a downstream betterment in peak flood levels whilst it is not clear if this is apparent for RC.

6.0 CONCLUSIONS

6.1 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 markets and access to the strategic rail network. Both sites have the potential to meet the physical and functional requirements for SRFI's as set out in the NPSNN. However, there are some fundamental differences between the two sites, which lead to the conclusion of this assessment that the Rail Central site is materially inferior, and is not a preferable site, to Northampton Gateway.

6.2 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 the Northampton Loop Line in both directions together with an operational intermodal terminal as part of a strategic Rail Freight Interchange.

6.3 In relation to access to the strategic road network, it is considered that Northampton Gateway has a superior access to the M1 than Rail Central. This is to some limited degree balanced by the Rail Central access onto the A43.

6.4 In relation to a large number of environmental 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 adverse environmental effects on biodiversity, including veteran trees, on loss of best and most versatile agricultural land, and greater adverse effects due to lighting and noise.

6.5 In terms of transportation, the differences between the two proposals are significant, with the current Rail Central mitigation scheme not appropriately mitigating the traffic impact of the scheme and failing to deliver the overarching transport strategy that is suggested. This contrasts starkly with the Northampton Gateway highway works which are agreed with the highway authorities and 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 and bring about significant environmental benefits. In this regard the Northampton Gateway scheme as proposed is superior to Rail Central.

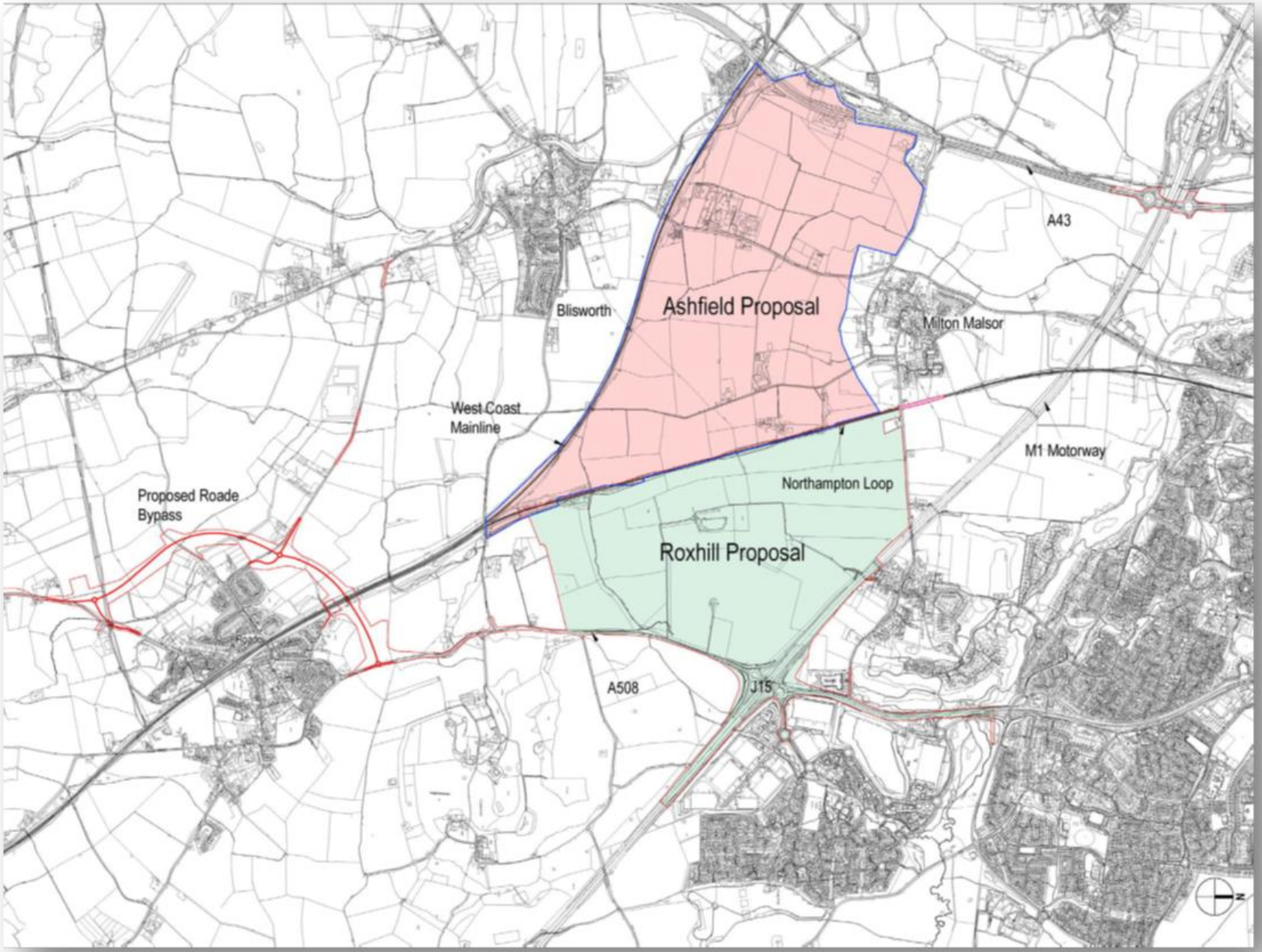
6.6 Northampton Gateway and Rail Central are both located in the countryside, where there will be loss of countryside. However, Northampton Gateway has a particular context which means the impact of change would be significantly less than Rail Central. Furthermore, through the combination of that context, scheme design and mitigation, the environmental effects of the Northampton Gateway scheme can be better mitigated.

6.7 The Northampton Gateway Main Site is contained within the physical features of the M1 and its J15, the Northampton Loop line to the west and A508 to the south east. These features and existing topography 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. 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 Rail Central 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 that views from the village to the scheme will be largely unhindered because Blisworth is in an elevated position. In addition, because the Rail Central site stretches from the A43 to the Northampton Loop Line it's built form is positioned in two distinctly separate areas on either side of Northampton Road/Towcester Road. This results in a degree of sprawl, further reducing the degree to which the impact of the development is capable of being contained. 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.

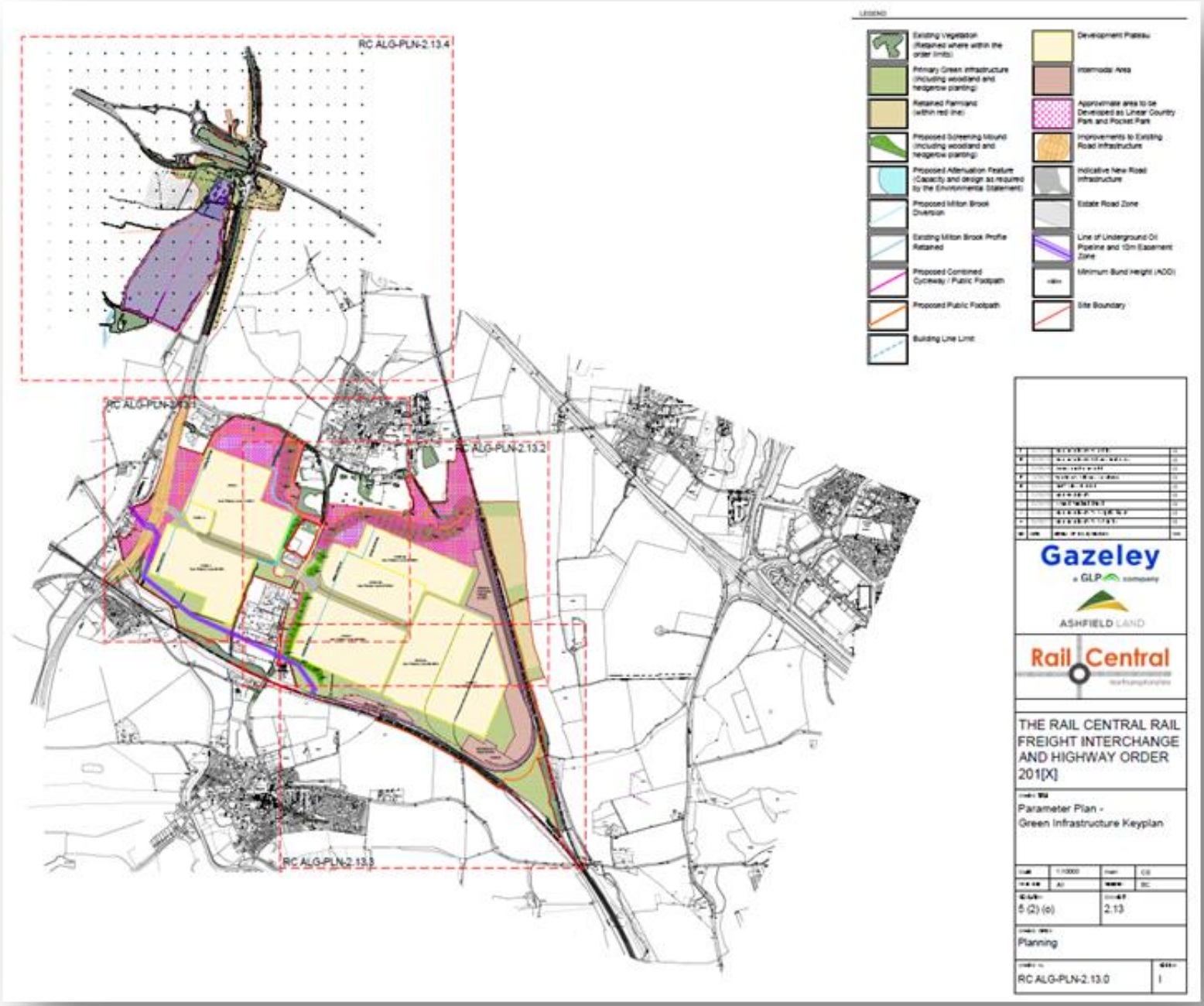
6.8 Because of the existing topography of the area, and the approach to the Northampton Gateway scheme layout, significant landscaped bunds can be provided to minimise and, to a large extent, fully screen views of the NG development from nearby villages. The topography and landscape and earthworks measures 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.

6.9 The NPS makes it 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. As a result 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 adverse environmental effects than Rail Central.

APPENDIX ONE:
COMPARATIVE PLAN SHOWING THE LOCATION OF THE NORTHAMPTON GATEWAY PROPOSAL AND THE LOCATION OF THE RAIL CENTRAL PROPOSAL


Ashfield Proposal
Roxhill Proposal
Blisworth
Milton Malsor
A43
West Coast
Mainline
M1 Motorway
Northampton Loop
Proposed Roade
Bypass
A508
J15
N

APPENDIX TWO:
RAIL CENTRAL SCHEME PARAMETER PLAN


RC ALG-PLN-2.13.4
RC ALG-PLN-2.13.1
RC ALG-PLN-2.13.2
RC ALG-PLN-2.13.3
LEGEND
Existing Vegetation (Retained where within the order limits)
Primary Green infrastructure (including woodland and hedgerow planting)
Retained Farmland (within red line)
Proposed Screening Mound (including woodland and hedgerow planting)
Proposed Attenuation Feature (Capacity and design as required by the Environmental Statement)
Proposed Milton Brook Diversion
Existing Milton Brook Profile Retained
Proposed Combined Cycleway / Public Footpath
Proposed Public Footpath
Building Line Limit
Development Plateau
Intermodal Area
Approximate area to be Developed as Linear Country Park and Pocket Park
Improvements to Existing Road Infrastructure
Indicative New Road Infrastructure
Estate Road Zone
Line of Underground Oil Pipeline and 15m Easement Zone
Minimum Bund Height (AOD)
Site Boundary
Gazeley
a GLP company
ASHFIELD LAND
Rail Central
THE RAIL CENTRAL RAIL FREIGHT INTERCHANGE AND HIGHWAY ORDER 201[X]
Parameter Plan - Green Infrastructure Keyplan
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Planning
RC ALG-PLN-2.13.0
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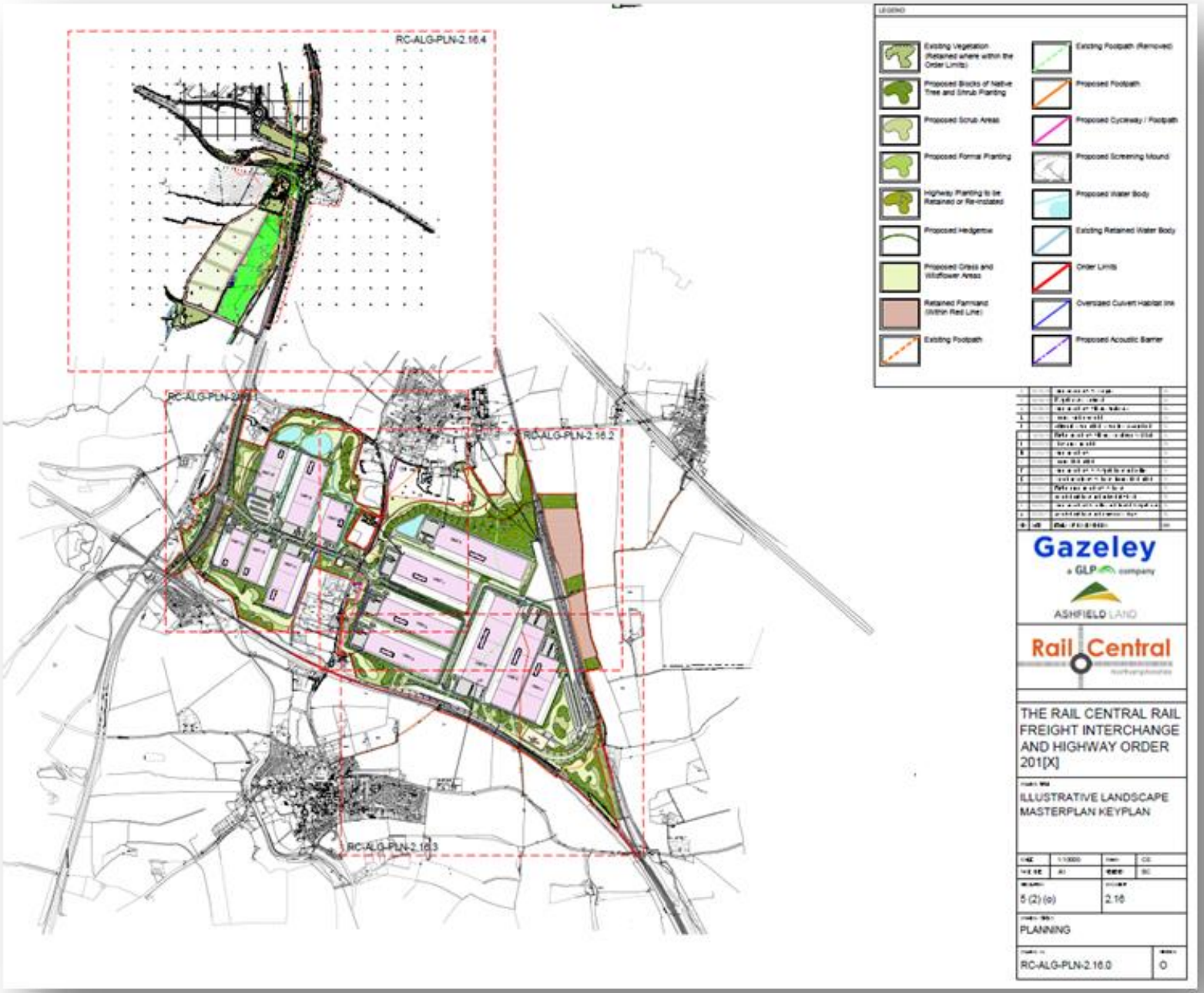
APPENDIX THREE:
RAIL CENTRAL SCHEME ILLUSTRATIVE LANDSCAPE MASTERPLAN


RC-ALG-PLN-2.16.4
RC-ALG-PLN-2.16.1
RC-ALG-PLN-2.16.2
RC-ALG-PLN-2.16.3
LEGEND
Existing Vegetation (Retained where within the Order Limits)
Proposed Blocks of Native Tree and Shrub Planting
Proposed Scrub Areas
Proposed Formal Planting
Highway Planting to be Retained or Re-instated
Proposed Hedgerow
Proposed Grass and Wildflower Areas
Retained Farmland (Within Red Line)
Existing Footpath
Existing Footpath (Removed)
Proposed Footpath
Proposed Cycleway / Footpath
Proposed Screening Mound
Proposed Water Body
Existing Retained Water Body
Order Limits
Oversized Culvert Habitat link
Proposed Acoustic Barrier
Gazeley
a GLP company
ASHFIELD LAND
Rail Central
THE RAIL CENTRAL RAIL FREIGHT INTERCHANGE AND HIGHWAY ORDER 201[X]
ILLUSTRATIVE LANDSCAPE MASTERPLAN KEYPLAN
5 (2) (o)
2.16
PLANNING
RC-ALG-PLN-2.16.0
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