



SEGRO (Junction 15) Limited

Northampton Gateway SRFI DCO Amendment

Application Statement

May 2025

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1.0 INTRODUCTION and APPLICATION CONTEXT

- 1.1 This Statement is submitted in support of an application to amend the Development Consent Order ('the DCO') for the Northampton Gateway Strategic Rail Freight Interchange (SRFI) project (reference 2019/No.1358 The Northamptonshire Gateway Rail Freight Interchange Order 2019).
- 1.2 The DCO was made on 9th October 2019, and came into force on 30th October 2019, and consented the development of the Northampton Gateway SRFI which includes the following:
- Up to 468,000 sq.m. (excluding up to 155,000 sq.m. mezzanine space) of rail served distribution warehousing;
 - A new rail freight terminal and new rail infrastructure with connections to the Northampton Loop of the West Coast Main Line railway;
 - Highways infrastructure and improvements including an upgrade to Junction 15 of the M1 motorway, improvements to the A508 including works to deliver a new site access, and a bypass to the village of Roade;
 - Other on and off-site infrastructure to enable the site to be developed and occupied as consented, including earthworks and landscaping on-site, and a range of off-site highways improvements.
- 1.3 The granting of the DCO in October 2019 followed a period of Examination of the proposal and application documents, including the Environmental Statement, and associated technical reports and assessments. A non-material change to the DCO was approved in 2023 to allow for the occupation of some of the warehousing floorspace in advance of the rail connections to the West Coast Main Line (delivered by Network Rail, not by the Applicant).
- 1.4 Roxhill (Junction 15) Limited were defined as an undertaker in the DCO having the benefit of the DCO. On 7 December 2021 Roxhill (Junction 15) Limited changed its name to Segro (Junction 15) Limited, in recognition of Segro taking over the development of the site. It remains the same company but with a changed name.
- 1.5 This application (for a non-material change) is therefore submitted on behalf of Segro (Junction 15) Limited ('the Applicant').
- 1.6 The Applicant's delivery of the consented scheme is ongoing and an overview of the work underway or complete is included in Section 2 of this Statement.
- 1.7 The submission of this application for a non-material change to the DCO is to secure a change to allow additional mezzanine floorspace on the site.
- 1.8 The rationale and need for this change is set out in Section 4 of this Statement, but in simple terms, it would enable the Applicant to respond to the changing needs of strategic distribution

and logistics occupiers, many of whom now increasingly require additional mezzanine space to maximise the efficiency of their buildings. Mezzanines can be accommodated within standard height distribution buildings, and the proposed amendment does not seek to change the maximum heights as defined through the DCO. Mezzanine spaces are increasingly used to accommodate plant or other automated equipment which serves to deliver more efficient storage and processing of goods, but without requiring significant numbers of additional employees. The transport and traffic implications of mezzanine space is therefore significantly reduced from standard floorspace, and the impacts of this proposed change with regard to transport is set out in the appended Statement prepared by ADC Infrastructure (**Appendix 6**), and discussed in Section 5 of this Statement along with a wider assessment of any other likely significant environmental impacts.

- 1.9 However, in summary, the nature of the proposed change – to allow additional mezzanine space within buildings across the remainder of the site – would have limited impacts in terms of additional traffic generation. The proposed change would require minor changes to the site access infrastructure (described later in this Statement and shown on plans submitted), and is shown to have no severe traffic impacts, and no new or materially different likely significant environmental effects as compared to the scheme as consented. The potential for changes to the air quality and noise impacts associated with the additional mezzanine floorspace has also been assessed, as set out in this Report at **Appendix 7**. This also concludes that there are no new or materially different likely significant environmental effects from the proposals.
- 1.10 Therefore, as set out in Section 5, the proposed change is considered non-material having regard to the relevant guidance including having had regard to the likelihood of potential associated environmental effects.
- 1.11 The minor highways works proposed would be secured as an additional element to DCO Works 7, defined as ‘Works 7A’, and shown on plans which form part of this application. An addition to DCO Requirement 6 is proposed to secure delivery of these works including an appropriate trigger for delivery, as well as an amended Parameters Plan.
- 1.12 This proposed non-material change is considered a pragmatic response to the changing needs of the market, and in ensuring maximum use is made of the consented employment site in accommodating strategic distribution buildings in close proximity to rail.

Statement of Consultation

- 1.13 The Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 (as amended) (the “2011 Regulations”) sets out requirements for consultation on non-material change applications to DCOs. Regulation 7A requires that the applicant provides the Secretary of State with a statement setting out details of the steps the applicant has taken to comply with these consultation requirements.

- 1.14 **Appendix 1** of this Statement sets out how the Applicant has publicised and consulted on the proposed DCO Amendment in accordance with the 2011 Regulations.

2.0 THE SITE, PROGRESS WITH PROJECT DELIVERY AND NEED FOR NON-MATERIAL CHANGE SOUGHT

- 2.1 The main SRFI site has an area of approximately 220 hectares, and the total application area (Order Limits) covers an area of approximately 290 hectares incorporating all of the land required for the off-site highways improvements.
- 2.2 The Northampton Gateway SRFI site is located adjacent to Junction 15 of the M1 motorway in Northamptonshire, and the western edge of the built-up urban area of Northampton is located to the immediate east of the site. The A508 road forms the site's eastern and south-eastern boundary, with the site also contained by the Northampton Loop railway line which runs to the west of the site.
- 2.3 The site is well contained by existing infrastructure and other features on the ground, including a watercourse which defines the southern extent of the proposed built development. The site was in agricultural use prior to development beginning in January 2021. It includes two established areas of plantation woodland which are being retained and form part of the extensive on-site green infrastructure and landscaping approved as part of the scheme.
- 2.4 Construction of the site commenced on 4 January 2021 following the approval by the local authority (or other relevant highways or other body¹) of all pre-commencement DCO Requirements.
- 2.5 Extensive progress has been made on the main site, with the majority of the site wide earthworks complete, and many phases of structural landscaping now complete with the final works ongoing this year. On-site drainage, estate roads and other infrastructure is now complete, including the rail terminal and associated rail infrastructure and landscaping, as well as the main site access from the A508 and the internal road network.
- 2.6 There is considerable market interest in the site, and the first completed building (on Plot 4) will be occupied for fit out by the occupier (Yusen) from May 2025. Other plots have detailed consent, and Plot 7 is also under construction. The highway improvements to Junction 15 of the M1 are also complete, as is the Roade Bypass. The photographs set out in **Appendix 2** help show the progress made in delivering the approved scheme as at March 2025.
- 2.7 The Rail Operator is the same operator who established, and is operating, the very successful rail terminal at East Midlands Gateway, which was also developed by the Applicant pursuant to a DCO².
- 2.8 There is substantial demand from occupiers, and it is increasingly clear that while the site is able to meet the requirements of large footprint, strategic distribution buildings, the amount of

¹ Some DCO Requirements require details to be agreed by bodies other than the local planning authority – for example, the local highways authority, or lead local flood authority.

² The East Midlands Gateway Rail Freight Interchange and Highway Order 2016

mezzanine space consented on the site is a constraint on the ability of the site to fully accommodate the needs and requirements of many in the sector. It's clear from dialogue with occupiers, as illustrated by those who are already now committed to the site, that mezzanine space is increasingly seen as essential to accommodate the required plant and other operational systems which characterise these strategic distribution buildings. By illustration, two major buildings already approved on the site (and both under-construction) on plots 5 and 7 include notable amounts of mezzanine space. Accordingly, the change to the DCO is sought to allow additional mezzanine space to allow similarly modern and efficient operations on the remaining plots across the site. For information, the latest Illustrative Masterplan is enclosed at **Appendix 3**.

3.0 FLOORSPACE COMMITMENTS IN SRFI DCO AND WIDER MARKET CONTEXT

- 3.1 The DCO provides consent for 468,000 sq.m. of rail served distribution warehousing plus up to 155,000 sq.m. mezzanine space., as noted on the approved Parameters Plan.
- 3.2 Work to deliver buildings for specific occupiers is now underway (on Plots 4 and 7), with a number of ongoing conversations with prospective occupiers for other plots within the site. It is clear that if the site is to fully respond to the changing requirements of occupiers, the ability to deliver additional mezzanine within buildings will be vital.
- 3.3 With regard to the objectives of the National Policy Statement for National Networks, it is considered desirable that all remaining plots within the site are able to accommodate modern buildings which can deliver mezzanine space if the full potential and benefit of delivering strategic-scale distribution warehousing adjacent to a rail freight terminal is to be realised. In the absence of changes to the mezzanine space allowed it is feasible that the site effectively under-performs in terms of maximising the modal shift and economic development benefits offered by this rail-served site.
- 3.4 In addition, ensuring this strategic, consented site is able to fully deliver plots and buildings in response to market requirements will help reduce the risk that the current shortfall in distribution employment space identified by West Northamptonshire Council is not increased.

Wider market context

- 3.1 The logistics and distribution sector has seen a significant period of growth. There have been consistent with trends of growth over recent years driven by structural and consumer changes in the economy, but the Covid-19 pandemic, and Brexit, both further exacerbated or accelerated a number of economic and wider societal changes.
- 3.2 As a key example, the move towards online retail and 'e-commerce' has been steadily increasing over recent years, well in advance of the Covid-19 pandemic. The UK is considered one of the most mature economies with regard to increasing adoption of e-retail, and consequences of the Covid-19 pandemic related 'lockdowns' and other restrictions were an increasing move online and away from more traditional high-street retail. In order to respond to ever growing demand, existing online retailers are requiring additional and/or larger storage and distribution facilities, and other more traditional retailers are increasingly expanding their online presence in order to stay competitive and respond to consumer expectations, including with regard to next day or same day delivery, and efficient returns processes. This has further fuelled a need for large-scale distribution and logistics floorspace from the retail sector.

- 3.3 Similarly, in order to guard against any negative implications from changes to international border controls and customs regimes associated with the UK's departure from the EU, many companies with international supply chains are increasing their UK based storage capacity (a trend sometimes known as 'near-shoring' or 're-shoring'). Additional 'friction' and uncertainty at international borders has undermined previous 'just in time' approaches to the distribution of goods or parts from manufacturers or other suppliers to their customers. This too is increasing demand for strategic distribution floorspace in the UK as retailers and manufacturers seek to ensure more resilience in their supply chains and distribution networks.
- 3.4 The strength of demand for floorspace has seen repeated 'record' years for demand and take-up of distribution space which were widely reported by multiple sources of market data and monitoring. Where 2020 was a 'record year' for take-up across the sector, 2021 then exceeded it, and 2022 saw continued record high levels of market need and demand. While market activity has plateaued since, market demand and take-up has remained strong and above pre-Covid levels, creating often notable shortages in supply of sites capable of accommodating strategic distribution operations. There are numerous sources of such evidence but just a small sample are provided here for information³. These provide a sense of the increasing importance of 'logistics' and distribution floorspace to overall UK economic activity, but also include interesting intelligence regarding the way the market is changing.
- 3.5 Key trends identified in the various sources of market monitoring include a trend towards larger buildings, with demand for larger units increasing and the average unit size now considerably bigger than it was even as recently as five years ago. As described in Section 2 of this Statement, part of the move towards large units has included an increasing requirement for mezzanine space as part of highly efficient operations and systems in distribution buildings, often involving elements of automation and significant plant or other machinery to either store or move the goods within and through the building.
- 3.6 Another key trend is the move towards new, purpose built and high-quality buildings as more occupiers prioritise 'Environmental, Social and Governance' (ESG) issues and look to increase the sustainability of their operations and reduce the carbon footprint.
- 3.7 The June 2022 '*Future of Freight*' report from the Department for Transport was a helpful and directly relevant statement of a number of the key challenges facing the 'freight' sector, as well as helping underline the sector's importance to the wider UK economy. A focus of the report is on actions or measures which government will implement or pursue to help support and enable further success of the sector, including the move towards carbon net zero. In doing so, the report also underlines the important role of multi-modal interchanges (such as SRFIs) in

³ January 2022 'Big Shed Briefing' article by Savills: https://www.savills.co.uk/research_articles/229130/323880-0; Savills 'Logistics Market: Nationwide Overview', January 2025: https://www.savills.co.uk/research_articles/229130/371305-0

enabling a shift from road to rail for more of the long-haul journeys. Since the Future of Freight, a number of other national statements or policies have been produced which further recognise the role and importance of the logistics and distribution sector, most recently including the updated NPPF of December 2024.

4.0 THE PROPOSED DCO AMENDMENT

- 4.1 As referred to above, in simple terms, the application will seek to increase the amount of mezzanine space across the site, which is currently secured by reference to the amount of floorspace on the Parameters Plan.
- 4.2 There is no proposal to change or increase the height or parameters of the warehouse units or zones – the increase can be accommodated within those existing parameters – the proposal is only to change the floorspace figures noted in the table/schedule on the parameters plan.
- 4.3 This Section of the Statement explains how these changes are proposed to be secured through amendments to various elements of the DCO and approved plans.

Proposed floorspace amendment

- 4.4 DCO Schedule 1 and the associated Parameters Plan controls the amount of floorspace permitted. Works No. 3 as defined in Schedule 1 refers to the rail-served warehousing and cross-refers to the Parameters Plan, while Works No. 7 refers to the site access infrastructure on the A508 road.
- 4.5 The approved Parameters Plan (Reference Reg 5(2)(o), Plan 4054/R007 Rev S2) states that the consented development consists of:
- A maximum total floorspace of 468,000 sq.m. across Zone A of the site;
 - In addition, up to 155,000 sqm (1,688,420 sqft) of floor space can be provided in the form of mezzanine floor space to units within Zone A
- 4.6 The change which is applied for is to replace the above requirement with an increased total floorspace, equivalent to an additional 111,483 sq.m. (1.2m sq.ft) of mezzanine floorspace. This would make the total mezzanine permitted 266,483 sq.m.
- 4.7 A draft Amendment Order capturing these changes is included in **Appendix 4** and the revised Parameters plan referred to is included in **Appendix 5**.

Proposed access amendment

- 4.8 As referred to above, Works 7 within the approved DCO include the site access roundabout from the A508. The proposal is to add a new works package (Works No. 7A) dealing with minor amendments now required to mitigate the additional traffic generated by the increased mezzanine space proposed. The new works are described as follows:

Works to the A508 roundabout that forms the access to the main site (constructed as Works No. 7) the general arrangement of which is shown on the highway plans (Document 2.4V) including—

- a) works to signalise the A508 southbound entry-arm to the roundabout;*
- b) relocation of controlled pedestrian crossing; and*
- c) relocation of the maintenance hardstanding within the central island of the roundabout.*

- 4.9 A new works plan identifying the new works package is therefore added to the list of plans and documents to be certified and the key plan has been updated to reflect this new sheet number.
- 4.10 A new highway general arrangement plan is also added the list of plans and documents to be certified and the key plan has been updated to reflect this new sheet number.
- 4.11 Requirement 6 is also amended insert a trigger for the completion of the highway works so that they must be completed before increased floorspace may be occupied – the trigger is therefore that no more than the floorspace permitted by the original DCO may be occupied until those works have been completed.
- 4.12 The Amendment Order also amends the protective provisions for the benefit of the local highway authority (Part 3 of Schedule 13) which deals with the delivery of the works, by adding reference to the new works package to the definition of “county highway works” so that they can be delivered as a “phase” under those protective provisions.
- 4.13 Subject to the proposed minor improvement scheme at the SRFI site access roundabout on the A508, the submitted TA Addendum note concludes that the transport impacts arising from the increased mezzanine floor space would continue to be mitigated by the consented highway infrastructure, and that the residual impacts are reduced to acceptable levels. Accordingly, there should be no objection to the proposed DCO amendment on the grounds of traffic impact.

Summary of the rationale and reasons for the proposed DCO amendment, and Scope of the amendment Order

- 4.14 The preceding sections of this Statement have set out the context for, and the key reasons behind, the proposed amendments to the DCO which is described above.
- 4.15 In summary, the Applicant is proposing to amend the DCO because strategic occupiers require increasing amounts of mezzanine floorspace in modern, efficient distribution buildings, and based on current market requirements and trends, the current DCO limit of 155,000 sq.m. might potentially constrain the ability to maximise the advantages and benefits of locating strategic distribution operations at this rail-served site.

4.16 The proposed change can be incorporated without significant additional highways impacts in terms of traffic, and infrastructure or other mitigation requirements, because of the nature of mezzanine space and its use. This is explained in further detail in Section 5, and with reference to the Transport Assessment Addendum appended at **Appendix 6**.

4.17 The amendment Order therefore proposes:

- An amendment to the Parameters Plan;
- A new work number (and works plan) describing the minor changes to the access roundabout;
- A new highway general arrangement plan reflecting those minor highway works;
- A requirement to deliver those new highway access works before the additional floorspace is occupied;
- Inclusion of the highway works in the protective provisions for the benefit of the local highway authority;
- Amendments to Requirements 25 and 26 for certainty that these requirements relating to contamination risk do not apply to Works No 7A since they have already been applied to the same land prior to the delivery of Works No. 7;
- An amendment to Requirement 28 to carve out the new works package. It is considered unnecessary to require an employment scheme for the new highway works on the basis of the very minor scale of the works;
- Appropriate amendments to definitions and certified documents.

5.0 ASSESSMENT OF THE PROPOSED CHANGE AND ITS MATERIALITY

- 5.1 This section of the Supporting Statement sets out an assessment of the proposed amendment and of any effects it might have and then considers the materiality of the change.
- 5.2 The proposed change to increase the amount of mezzanine space allowed within buildings across the site would have limited environmental impacts. There would be no physical change to the scale, scope or extent of the approved built development as a result of this change, with the only physical change being to the site access.
- 5.3 The appended Statements confirm there would be limited new residual (longer-term) effects or implications overall with regard to air quality, or noise, and that the traffic changes have a minimal impact on the road network.
- 5.4 The below headed sections address some impacts which, consultation suggests, may be of concern:

Impact on Traffic and Transport

- 5.5 As part of the DCO for Northampton Gateway, a comprehensive package of highway mitigation measures is approved and consented. The highway improvement measures include a major upgrade to M1 Junction 15 and the A45, improvements to M1 Junction 15A, a bypass for the village of Roade, the implementation of environmental weight restrictions, improvements along the A508 as part of the A508 route upgrade, and financial contributions towards other improvements (including to the A45 Queen Eleanor Interchange, and junctions along the A5076), and a Knock Lane and Blisworth Road maintenance and minor works fund. Walking and cycling strategies were also approved and are being delivered both on and off-site to enhance wider connectivity.
- 5.6 The construction of offsite highway works commenced in 2021 and are now largely complete. The new site access roundabout on the A508 Northampton Road, dualling of the A508 between the new site access roundabout and M1 Junction 15, the significant enlargement and reconfiguration of M1 Junction 15, the Roade Bypass, and the upgrade of M1 Junction 15A are all open to traffic. Except for works on the A508 associated with the access to the Courteenhall Estate, all the A508 route upgrade highway works are also complete and open to traffic.
- 5.7 As explained in further detail in the appended Transport Assessment Addendum, mezzanine space does not generate the same traffic pro-rata as 'conventional' floorspace. It tends to be used less intensively in terms of human resources, and while its role in accommodating plant and machinery can increase efficiency of operations, the number of HGVs is controlled (limited) by the number of HGV 'docks', and so increased mezzanine space does not directly lead to additional HGV traffic.

- 5.8 The approved Transport Assessment (TA) recognised this role and these characteristics, and applied a reduced (50%) traffic generation to mezzanine floorspace. This approach was agreed with both National Highways, and WNC Highways. Indeed, this treatment of mezzanine space has become increasingly common in applications for strategic distribution development (including at East Midlands Gateway and elsewhere).
- 5.9 As set out in Section 3 of the appended TA Addendum, the proposal to increase the mezzanine floor space allowance at the SRFI site could increase the off-site vehicle trips by 105 two-way trips in the morning peak hour (equivalent to less than 2 additional vehicles per minute), and 128 two-way vehicle trips in the evening peak hour (equivalent to just over 2 additional vehicles per minute). In total, the change would be an additional 1,601 vehicle trips over a 24-hour period (an average of just over 1 extra vehicle per minute over the 24 hrs), and this is worst-case as it assumes no consideration of travel plan measures which will enable travel by modes other than the car.
- 5.10 The assessment shows that the increase in traffic does not require any additional works, nor create any material deterioration of performance at the now improved Junction 15 of the M1.
- 5.11 However, as referred to above and as set out in Section 5 of the appended Transport Technical Note and TA Addendum, to facilitate an increase in the amount of permitted mezzanine floor space, a minor improvement scheme is required to provide additional capacity at the site access junction and ensure its continued efficient operation. Following an iterative design and modelling exercise, the optimum solution was found to be upgrading the A508 southbound approach to traffic signal control on the entry and circulating carriageway. This solution significantly increases capacity on the southern A508 arm of the roundabout and creates gaps on the northbound approach which allows traffic to enter regularly. Pedestrian crossing facilities can be retained but relocated.

Potential Environmental Effects

- 5.12 The traffic changes described in the ADC Statement have been assessed with regard to Air Quality, and Noise as set out in the Appended report (**Appendix 7**).
- 5.13 **Air quality** is shown by locally collected data to be comfortably within the annual mean objective levels for NO₂ in the nearest AQMA areas, and at many air quality monitoring locations data shows an improvement as compared to the baseline used at the time of the original DCO application. Indeed, two previous AQMAs have been revoked since the original ES was prepared.
- 5.14 Based upon the Air Quality Modelling Assessment and improved baseline air quality concentrations in the vicinity of the Site, it is not anticipated that the increase in traffic will result

in any new, or materially different, likely significant effects on the environment with respect to air quality.

- 5.15 In terms of **noise**, the updated assessment also revisits the original DCO Assessment. The updated assessment shows that the additional traffic generated by the proposed additional mezzanine space does not lead to any increases in road traffic noise of 1.0 dB or more are predicted, and no changes to the predicted effects are indicated when compared with the results of the original DCO assessment, i.e., there are no new, or materially different, likely significant effects on the environment with respect to noise.
- 5.16 In summary, the proposed change to increase mezzanine space on the site will have no additional or significant environmental effects.

Materiality

- 5.17 The Government Guidance on whether a change which is being sought to a DCO should be considered a material or non-material change is contained in the document titled “Planning Act 2008: Guidance on Changes to Development Consent Orders” dated December 2015.
- 5.18 Paragraphs 9 to 16 provide guidance on what is relevant as to what might be considered to be a material or non-material change. The factors referred to are:

Environmental Statement – a change would be considered material if it would require an updated Environmental Statement to take account of new, or materially different, likely significant effects on the environment.

Habitats and Protected Species – a change would be material if it would invoke a need for a Habitats Regulations Assessment.

Compulsory Acquisition – a change would be material if it would authorise the compulsory acquisition of any land or rights over land not authorised by the existing DCO; and

Impact on business and residents – the impact of a change on local people and businesses may be a consideration in some cases dependent upon the circumstances of a particular case.

- 5.19 The change sought to the DCO does not change the physical description, appearance or scale of the built development consented – it seeks additional internal mezzanine space, and would not affect or change the external appearance or height of buildings. As referred to earlier in this Statement, the building height parameters are not affected by this proposed change. It therefore has no additional landscape or visual impacts, or other impacts on, for example, local habitats or protected species, all of which was considered as part of the existing DCO consent.
- 5.20 The appended Statements provide an assessment and narrative regarding the likely environmental impacts of the change, and confirm there are no new or likely significant

environmental effects. The change is incremental in terms of impact, and results in negligible impacts with no implications on the conclusions of the EIA which informed the DCO originally.

- 5.21 The minor access changes require no compulsory acquisition – all land required for the access changes is within the existing adopted highway, or under the control of the Applicant.
- 5.22 The changes would generate benefits for local businesses in terms of ensuring the site can accommodate buildings which maximise the efficient use of this consented site, and its role in moving freight from road to rail. Local residents would still benefit from the improved local transport infrastructure at Junction 15, and on the A508 corridor including at Roade, with the proposed change not materially affecting the performance of the road network.
- 5.23 The proposed change will not lead to conflict with the identification of the development as an NSIP within the scope of section 26 of the Act.
- 5.24 The conclusions from the assessments submitted as part of this application show that there would be no new or materially different likely significant environmental effects (as compared to the conclusions of the original ES). These assessments therefore strongly support the view that the proposed change to the DCO is non-material, and that the proposed change is acceptable and should be approved.

