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3 July 2025

FAO: [redacted]
West Northamptonshire Council
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Via email

Dear [redacted],

NORTHAMPTON GATEWAY SRFI DCO AMENDMENT TO INCREASE MEZZANINE FLOOR SPACE (2025/187/DCO)

We refer to our Teams meeting on 1 May 2025 and our ongoing correspondence since that time with regards to West Northamptonshire Council's (WNC) comments on the Transport Assessment (TA) Addendum submitted on 19 September 2024. As noted in the meeting, we only received a copy of WNC comments on 11 April 2025, despite them being prepared in October 2024.

During the meeting we discussed that since the September 2024 submission, a further version of the TA Addendum was prepared (v3), which was submitted to WNC on 28 January 2025, along with the additional supporting information that was submitted to National Highways in response to queries raised by National Highways on the 19 September 2024 submission. The 28 January 2025 submission to WNC also included confirmation that National Highways have no objection to the proposed amendment to the DCO to increase the mezzanine floor space.

During our Teams meeting we discussed WNC's comments on the TA Addendum, and we agreed to submit additional information in response to your queries. As part of that we agreed to undertake a comparison of the traffic flow data included within the DCO (and used to inform the assessment included in the TA Addendum prepared to support the DCO Amendment), to the traffic flow data from the latest version of the NSTM.

You provided the traffic flow information from the latest version of the NSTM on 4 June 2025. As you are aware, this has highlighted that the latest version of the NSTM forecasts substantial reductions in the future year (2031) background traffic flows near to the site on the A508 and at M1 Junction 15. WNC noted this position in the consultation response to PINS dated 6 June 2025, which also provided an update to WNC's previous comments.

Segro have recently completed the significant infrastructure upgrades to the A508 and M1 Junction 15 (and M1 Junction 15a) that were demonstrated via the DCO to accommodate the much greater traffic flows than are now forecast. It therefore follows that the completed highway improvements will provide significantly more headroom on the highway network to accommodate additional traffic than was assessed in the TA Addendum.

The purpose of this letter is to assess the impact of this new traffic flow information on the proposed DCO amendment, and specifically whether there would remain the requirement for the proposed minor improvement works at the site access junction.

Our assessment demonstrates that with the materially lower traffic flows that are now forecast, the existing site access junction would operate satisfactorily including for the additional traffic associated with the proposed increase in mezzanine floor space. Hence there is no requirement for the minor improvement works that were propose in the DCO amendment. Segro therefore intend to amend the DCO amendment to exclude the minor improvement works at the site access.

This letter and appendices present the new assessment based on the latest traffic flow information. The attached tables summarise the findings and provide additional information and responses with regards to the other comments and queries raised in the WNC consultation response letter of 6 June 2025.

Note that because the minor highway works at the site access are no longer required, there is no requirement for the Road Safety Audit. Hence, WNC comments on the RSA have been omitted from the table.

We trust that the above and enclosed are satisfactory for your purposes. However, should you have any questions, please do not hesitate to contact me.

Yours sincerely,

[redacted]
Director
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Cc: [redacted] WNC (via email)
[redacted] WNC (via email)

Enc: Tables with response to WNC comments
Appendix 1 Revised impact assessment in response to WNC comments
Appendix 2 Technical Note 3 – HGV Distribution

General	
WNC comment	**Response**
The proposals seek to increase the mezzanine floor space by 111,480 sqm at the already approved Northampton Gateway Strategic Rail Freight Interchange (SRFI) development site.	Correct.
The current proposals include an improvement scheme at the site access roundabout on the A508 (partial signalisation).	Further to assessment based on the new traffic flow information from the latest version of the NSTM the minor improvement works at the site access are not required and will be removed from the DCO amendment (see **Appendix 1**)
It is noted that the Northampton Gateway SRFI development was granted permission in October 2019 (Development Consent Order 2019) and that the supporting Transport Assessment (TA) was dated May 2018. The NSTM model would likely have been based on 2015 baseline data. This data and assessment from the previous TA are now several years old and therefore any reliance on its data / assumptions would be questioned as part of the review process for a new planning application	Assessment has been carried out using the latest version of NSTM and traffic data.
The approved Northampton Gateway SRFI scheme includes 468,000 sqm of warehousing and ancillary building with 155,000 sqm of mezzanine floor space (includes HGV parking of approximately 120 spaces).	Correct.
As part of the approved schemed a package of highway mitigation measures was secured. The highway improvement measures included an 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 improvements to the A45 Queen Eleanor Interchange, and junctions along the A5076, and a Knock Lane and Blisworth Road maintenance and minor works fund	Correct. These improvement works were designed based on the traffic flow forecasts from the original NSTM, which have been shown to be materially higher than the forecasts from the latest version of the NSTM. It therefore follows that the completed highway improvements will provide significantly more headroom on the highway network to accommodate additional traffic than was assessed at the time of the DCO.
The phased construction of the offsite highway works described above commenced in 2021 and are now reported to be largely complete.	The highway works are now complete.
Walking and cycling measures / strategies were also secured both on-site and off-site in order to help improve connectivity to residential areas within the walking and cycling catchments.	Correct.
As part of the approved development, a public transport strategy was developed which includes the introduction of a new bus service specifically serving the SRFI site, as well as building on the existing local bus network and providing additional bus stops on the A508 to the north and south of the A508/site access roundabout.	Correct. It should be noted that the new bus service will directly serve the site, entering via the new site access with bus stops provided along the length of the estate road within the site.

The approved Northampton Gateway SRFI was forecast to generate 1,044 two-way vehicle trips in the morning peak hour, 1,303 two-way vehicle trips in the evening peak hour, and 16,531 vehicle trips over a 24-hour period.	This is the forecast traffic prior to the impact of the Travel Plan. Accounting for the impact of the Travel Plan (year 5 target) the approved Northampton Gateway SRFI was forecast to generate 889 two-way vehicle trips in the morning peak hour, 1,096 two-way vehicle trips in the evening peak hour, and 14,116 vehicle trips over a 24-hour period.
The proposed increase in mezzanine floor space is reported to increase the off-site vehicle trips by 105 two-way trips in the morning peak hour, 128 two-way vehicle trips in the evening peak hour and 1,601 vehicle trips over a 24-hour period. This equates to a 10% increase in off-site traffic as a result of the proposals. However, these numbers are based on the application of a 50% reduction factor which has not been suitably justified (as discussed further below).	These are the vehicle trips prior to the impact on the Travel Plan. The 50% factor is discussed in the Vehicle Trip Generation table below.
The proposed extensions and resulting trip generation should be accounted for within not just a revised TA but also the supporting documents such as the Travel Plan (TP), Service and Delivery Management Plan (SDMP), Car Parking Design and Management Plan (CPDMP) and Construction Traffic Management Plan (CTMP).	The requirement for these documents is already conditioned via the DCO. The additional mezzanine floor space would be contained within an existing permitted unit, which is required to conform with the requirements of the DCO, including preparation of a Travel Plan for the unit based on the approved Framework Travel Plan, and details of the car parking design and management. Hence no additional information is required to support the amendment to the DCO.
The impact of the proposals on the site car and cycle parking strategy, forecast accumulation / demand and parking supply have not been discussed in this submission.	Parking at the site is dealt with via the DCO and the additional mezzanine floor space, secured via an amendment to the DCO, would continue to be captured by this. Hence no additional information is required to support the amendment to the DCO.
It is noted that there was a variation to the DCO in 2023. Any implications as a result of the variation should be considered as part of this assessment.	The 2023 DCO amendment does not impact the proposed amendment to mezzanine floor space. The 2023 DCO amendment was to allow occupation on units ahead of the rail terminal being open. The amendment was made to avoid a potential situation where occupiers would not sign up to units at the site due to concerns that delay by Network Rail in providing the necessary rail connection would mean they could not operate from the site. In the event, this has not been required, as the rail connection was made in Easter of 2025 and the first unit at the site is not yet operational.

Mezzanine Floor Space / Trip Generation	
WNC comment	**Response**
Reference is made to the acceptance of the 50% reduction factor for HGV trips as part of the approved scheme. However, this scheme was approved as part of a separate application and assessment that was undertaken in 2018 (approximately	See Vehicle Trip Generation table below.

6 years ago). Therefore, as mentioned above, the application of any trip reduction factors should be based on current available data and justification	

Vehicle Trip Generation	
WNC comment	**Response**
Vehicle trip rates for the proposed B8 warehousing extension has been extracted from the previously consented scheme with a 50% reduction factor being applied to take account of the mezzanine floorspace	Correct.
Paragraph 3.6 states that *'HGV generations are typically related to the number of loading bays, which are located on the ground floor and hence do not increase when mezzanine levels are introduced.'* However, this statement does not seem to acknowledge that increased turnover of the loading bays, afforded by increased storage space, would also be a contributing factor towards potential HGV trip generation numbers.	Do not agree. The 50% factor is also applied to HGV generations, therefore recognising that increased turnover could results in increased HGV movements.
In relation to trip generation forecasts, it is acknowledged that mezzanine floorspace would not generate trips on a pro-rata basis with conventional floor space. However, the application of any reduction factors would need to be evidenced based and fully justified. In this instance, a 50% factor was applied but the robustness / suitability of this significant level of reduction is queried.	The 50% factor was agreed with WNC (formerly Northamptonshire Council Council) and National Highways as acceptable and appropriate as part of the DCO. WNC accepted this position as recently as 2022 as part of the new planning application for Plot 7 at Northampton Gateway. National Highways continue to accept this approach and do not object to the proposed amendment to the DCO.
An assessment of the forecast trip generation rates and associated reduction factors for the proposed extension should be based on current available data (e.g. survey data of comparable sites / comparable TRICS sites).	This has been undertaken, see **Appendix 1**.
Once the above has been undertaken a comparison could be made with the previously used rates to provide assurance that a reliable and robust assessment has been undertaken.	This has been undertaken, see **Appendix 1** and demonstrates that the assessment is reliable and robust.
WNC update	
It is noted that following a meeting with the applicant on 1st May 2025, the applicant referred to new survey data of other comparable sites which they intend to use in their justification of vehicle trip rates related to the proposed additional mezzanine floor space. The applicant was to provide further details of this analysis in order to justify the rates / reduction factors used in their assessment. We await this further information	See above. Whilst the work presented in **Appendix 1** demonstrates a reliable and robust assessment, additional assessment work has also been undertaken as part of **Appendix 1** of this letter, as follows: 1. Trip generation in accordance with DCO trip rates assumptions (50% factor for mezzanine floor space) 2. Trip generation based on observed survey data for warehousing units with mezzanine floor space (ITP trip rates) 3. A sensitivity test, in which the DCO trip rates are applied at 100%.

Person Trip Generation	
WNC comment	**Response**
Similar to the comments made above, an all-mode trip generation exercise should be undertaken for the proposed expansion, based on current available data.	An all-mode assessment is included in the TA Addendum. This has been updated within **Appendix 1** to also consider the alternative trip rate scenarios described above. The assessment concludes that the pedestrian, cyclist and public transport improvements identified and implemented as part of the DCO will accommodate the addition trips by sustainable modes.

Trip Distribution and Assignment	
WNC comment	**Response**
Vehicle trip distribution for the proposed extension has been based on the 2018 TA. The NSTM model would likely have been based on 2015 baseline data. This is not accepted due to the age of the previous data / assessment.	The development vehicle trip distribution was agreed with WNC and National Highways as part of the DCO. The light vehicle trip distribution was based on the NSTM, adjusted to appropriately represent trips to and from the M1 South. The HGV distribution is based on a bespoke HGV distribution. This point has been further discussed with WNC via email exchanges and WNC have confirmed that the continued application of the development light vehicle trip distribution agreed as part of the DCO remains appropriate. WNC have requested details on the bespoke HGV distribution. The agreed position was set out in Appendix 7 of the 2018 TA, which is attached at **Appendix 2** of this letter.
The current proposals should be based on more recent traffic background data, growth rate, trip generation, committed / allocated land use and infrastructure assumptions	**Appendix 1** provides an assessment based on information from the latest NSTM.
The assessment should utilise the Northamptonshire Strategic Transport Model (NSTM) which is a tool that is currently used in the assessment of large-scale development proposals which would potentially have wider scale / strategic impacts. The NSTM utilises 2026 and 2031 design year land use and infrastructure assumptions contained with the 'Uncertainty Log.' This would need to be verified and updated as necessary for the specified study area	**Appendix 1** provides an assessment based on information from the latest NSTM.
It is noted due to other schemes within the surrounding area the NSTM has been recently updated (validated/calibrated). Hence, this would help streamline and minimise the length of time taken for the utilising the NSTM to test the proposed development scenarios.	**Appendix 1** provides an assessment based on information from the latest NSTM.
To initiate the use of NSTM please contact WNC's Highways Development Management team directly.	Traffic flow data and development select link analysis have been provided from the latest NSTM.

The relevant PCU conversion factors used in the development of the traffic flow diagrams should be clarified.	The same PCU conversion factor as used in the DCO have been applied to the development traffic flows. This is 1 HGV equals 2.3 PCUS, which is in accordance with the factor used in the NSTM.
WNC update	
It is noted that following a meeting with the applicant on 1st May 2025, the applicant had initiated the use of the NSTM in order to obtain flow difference plots and junction turning movements for the 2031 reference case model (for site access and M1 Junction 15 only) such that a direct comparison can be made of the forecast baseline network flows between the superseded and current versions of the NSTM. Noting that the applicant's assessment was based on the older / superseded model version.	**Appendix 1** provides an assessment based on information from the latest NSTM. Note that this assessment includes consideration of three different assumptions regarding trip rate and traffic generation: 1. Trip generation in accordance with DCO trip rates assumptions (50% factor for mezzanine floor space) 2. Trip generation based on observed survey data for warehousing units with mezzanine floor space (ITP trip rates) 3. A sensitivity test, in which the DCO trip rates are applied at 100%.
The model plots indicate that the current version of the NSTM has materially lower network flows near the application site during both the AM (up to 760 two-way vehicles lower on the A508) and PM (up to 616 two-way vehicles lower on the A508) weekday peak periods.	Noted. **Appendix 1** provides an assessment based on information from the latest NSTM. This concludes that with the materially lower traffic flows the minor highway works that were proposed at the site access are not required to accommodate the additional traffic from the proposed increase in mezzanine floor space at the site.
Based on the above, the LHA have concerns regarding the accuracy and suitability of the impact analysis conducted by the applicant due to the use of the outdated model and its significantly higher network baseline flows.	As above, updated assessment is provided at **Appendix 1**.
The incorrect use of higher baseline network flow could be seen as a robust assessment. However, the LHA question the forecast performance of the highway network as well as the justification and proportionality of the proposed highway mitigation (noting that an agreement on forecast trip rates and traffic generation has not yet been achieved).	As above, updated assessment is provided at **Appendix 1**. This concludes that with the materially lower traffic flows the minor highway works that were proposed at the site access are not required to accommodate the additional traffic from the proposed increase in mezzanine floor space at the site. The assessment includes consideration of three different assumptions regarding trip rate and traffic generation.
We cannot properly determine the impact of the proposals nor the requirement / suitability of the highway mitigation measures until an updated modelling / traffic impact assessment is undertaken.	See the updated assessment is provided at **Appendix 1**.
The above, relates to the site access and M1 Junction 15 only. Further NSTM 'select link' analysis outputs are currently being produced to help better understand the potential wider network implications of the proposals.	Segro have recently completed the significant infrastructure upgrades to the A508 and M1 Junction 15 (and M1 Junction 15a) that were demonstrated via the DCO to accommodate much greater traffic flows than are now forecast. It therefore follows that the completed highway improvements will provide significantly more headroom on the highway network to accommodate additional traffic than was assessed in the DCO.

Assessment of Impacts	
WNC comment	**Response**
The impact assessment of the submission cannot be agreed until the fundamental issues raised above have been addressed (e.g. trip generation and distribution).	The points around trip generation and distributed have been addressed.
The TA addendum has limited its assessment to the A508 access roundabout and M1 Junction 15. The study extent cannot be agreed until the issues raised above have been addressed.	The points around trip generation and distributed have been addressed.
The 2031 baseline flows have been derived from the 2018 TA which is not considered appropriate. Reference should be made to the current version of the NSTM (which has a material difference in network flows).	Updated assessment based on the traffic flows from the latest NSTM has been provided.
The suitability of using isolated LinSig model is queried considering the potential interaction of adjoining junctions. The suitability of this approach would be informed by current data / surveys / NSTM and junction model outputs. Though it is noted that the current submission suggests that this would not be an issue.	The updated modelling provided in **Appendix 1** demonstrates that there is no blocking back or interaction between the site access and M1 J15. This was also demonstrated to be the case in the DCO. The site access and the M1 J15 and A45 improvements that have been implemented as part of the Northampton Gateway SRFI scheme were designed based on the materially greater traffic flows assessed in the DCO. As per WMC's observations, the traffic flows on the A508 have reduced by 760 two-way trips in the AM peak hour and 616 two-way trips in the PM peak hour, as compared to the traffic flows assessed in the DCO. The additional mezzanine floor space would add 105 two-way trips and 128 two-way trips in the AM and PM peak hour. Hence, even allowing for this additional traffic, if can be seen that there is still a material reduction in overall traffic levels at the site access and M1 J15 as compared to that assessed in the DCO and for which it was agreed with National Highways and WNC that the highway improvements now implemented as part of the DCO would mitigate against. No further improvements are therefore required.
Clarification is sought as to what is the anticipated opening year of the proposed development with extensions. The modelled design years should also account for the realistic year of opening.	The amendment to increase mezzanine floor space has been made in response to changing market conditions, as occupiers now require much greater volumes of mezzanine floor space than was previously the case. This will not in itself change the opening year associated with the development. The first unit at the site is under construction and is expected to open in late 2025. The DCO considered a 5 year build out period and hence the 2031 assessment year remains appropriate and robust.

Due to capacity issues identified an improvement scheme has been put forward at the A508 site access roundabout which involves partial signalisation of the A508 southbound approach arm and circulating carriageway.	Based on the updated traffic flow information, the minor highway improvement at the site access is not required and will be removed from the amendment to the DCO.
Increases in delay and queuing were also identified at the M1 Junction 15 using an isolated LinSig model. However, no mitigation has been put forward as the impact was not categorised as severe although there are reported negative values of Practical Reserve Capacity (PRC).	National Highways have confirmed no objection to the proposed amendment to the DCO based on the submitted assessment and concluded that there would not be any adverse impact of the operation of M1 J15 resulting from the proposed DCO amendment.
We do not necessarily agree with the above, but will await a full response/ revised assessment addressing the issues raised in this note.	See above.
Full model summary results covering all scenarios have not been provided within the TA addendum.	See response to below point.
The LinSIg model output file for the Site Access / A508 roundabout only covers the '2031 with mitigation' weekday AM and PM scenarios. The 'without extension,' 'with extension without mitigation' and 'with extension with mitigation' scenarios should be provided for the AM and PM peak hour periods for all design years. Similar comments apply for the M1 Junction 15 model where only the 'with extension' scenario was presented	The minor highway works are no longer required and therefore this falls away. The assessment of the existing site access roundabout that is provided in **Appendix 1** considers both the forecast operation without the additional mezzanine floor space and the operation with the additional mezzanine floor space.
The above would help inform of the suitability / proportionality of any forms of mitigation proposed. The acceptability of net additional impact is fundamentally based on a comparison of different scenarios and hence this should be included as part of the submission.	See above.
Fully scaled, annotated and dimensioned layout plans of the modelled junctions and the geometric parameters used should be provided to help in the review / audit process of the traffic models.	These are provided at Appendix C and D of **Appendix 1** to this letter. For M1 J15, the assessment uses the National Highways approved LinSig model from the DCO but updated based on the as-built drawings and configs provided by National Highways. It should be noted that National Highways reviewed and accepted the updated J15 model.
A Stage 1 Road Safety Audit should be provided in relation to proposed works on the public highway. The RSA would need to be undertaken by pre-approved independent auditors with the RSA brief agreed by the relevant authorities (LHA/NH). The RSA should be compliant with DMRB GG119: Road Safety Audit.	As the minor works are no longer proposed there is no requirement to undertake a RSA.
Update	
A Draft Stage 1 RSA was submitted on 30th May 2025 with the final version yet to be issued. The Draft RSA document raises issues and provides recommendations to address the concerns.	As the minor works are no longer proposed there is no requirement to undertake a RSA.
We await the final version of the Stage 1 RSA to be issued alongside the Designer's Response to the issues raised and any subsequent design revision.	As the minor works are no longer proposed there is no requirement to undertake a RSA.