

NORTHAMPTON GATEWAY RAIL FREIGHT INTERCHANGE

LOCAL IMPACT REPORT November 2018

Prepared by South Northamptonshire Council.

Planning Inspectorate Reference TR050006

IP Reference NGR-SP074

Contents

Section One	Introduction
Section Two	Proposed RFI Development
Section Three	Local Impact Report – Purpose
Section Four	Site Description
Section Five	Planning History of the Site
Section Six	Planning Policy
Section Seven	Relevant Development Proposals
Section Eight	Local Area Characteristics Designations and Landscape Character
Section Nine	Consideration of Local Impacts <ul style="list-style-type: none">• Landscape & Visual Impacts• Socio- Economic Impacts• Noise, Vibration and External Lighting• Land Contamination• Air Quality• Heritage and Archaeology• Transport
Section Ten	Compliance with Local Level Policies

1. Introduction

2. The Examining Authority set up for the proposed Northampton Gateway Rail Freight Interchange Development Consent Order application has requested the Council submit a Local Impact Report to assist the examination.
3. The Local Impact Report (LIR) is prepared in accordance with the provisions of the Planning Act 2008 (the Act) as amended by the Localism Act 2011. The document also takes into account the advice set out in The Planning Inspectorate's (PINS) Advice Note One: Local Impact Reports (Version 2 April 2012).
4. This LIR is the Council's response to the application by Roxhill (J15) Limited for a Development Consent Order (DCO) authorising the construction, operation and maintenance of a rail freight interchange and warehousing ('Northampton Gateway') on land to the east of the West Coast Main Line Northampton Loop (WCMLNL) railway and to the north west of Junction 15 of the M1 motorway, the 'SRFI site'; with associated development comprising the provision of a new road to the west of Roade to bypass the village, the 'bypass site'; and a programme of highway improvement works to the existing strategic and local road networks.

2. Proposed Rail Freight Interchange Development

5. The proposed development would consist of the following elements : -
 - An intermodal freight terminal comprising connection to the WCML Northampton Loop railway, rail sidings and headshunt with the capacity to accommodate the unloading and loading of freight trains of up to 775m in length with container storage areas, a mineral aggregates loading facility and new access roads to connect to the strategic road network and a heavy goods vehicle parking facility.
 - Up to 468,000 sq.m (approximately 5 million sq.ft) (gross internal area) of warehousing and ancillary buildings, with additional floorspace provided in the form of mezzanines;
 - A secure, dedicated, HGV parking area of approximately 120 spaces including driver welfare facilities to meet the needs of HGVs visiting the site or intermodal terminal;
 - New road infrastructure and works to the existing road network, including the provision of a new access and associated works to the A508, a new bypass to the village of Roade,
 - improvements to Junction 15 and to J15A of the M1 motorway, the A45, other highway improvements at junctions on the local highway network and other related traffic management measures;
 - Strategic landscaping and tree planting, including diverted public rights of way;
 - Earthworks and demolition of existing structures on the SRFI site

6. The built development of the SRFI site will be required to conform to parameters set out for each of the zones on the Parameters Plan.
7. The main parameters defined and fixed at this stage include the site access, the disposition of the proposed uses including the intermodal freight terminal, the rail and road corridors within the site, the built development zones containing the proposed warehousing, and the strategic screening landscaping earthworks. The maximum height of buildings above ordnance datum (AOD) is fixed, as are the relative heights of the bunds and the minimum development plateau levels. The defined parameters have been used to explain and test the proposals in relation to economic, social and environmental assessment criteria.
8. The Northampton Gateway is proposed as a Nationally Significant Infrastructure Project (NSIP) as the project involves the construction of a rail freight interchange with highway related development, falling within the definitions set out in Sections 14(1) (h) and (l) as well as 22(2) and 26 of the Act.
9. The application for a Development Consent Order for the proposed development has been submitted to the Planning Inspectorate who will examine the application and submit a recommendation to the Secretary of State for Transport for determination. Elements of the development which are not directly referenced will be characterised in the order applied for as 'Associated Development'.

3. The Purpose of the Local Impact Report

10. Section 104 of the Act requires the Secretary of State to have regard to Local Impact Reports (LIR) in deciding applications. Section 60 (3) of the Act defines an LIR as *"a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)."* PINS Advice Note One gives guidance on the content of the LIR but stresses that the content is a matter for the local authorities and should cover any topics considered relevant to the impact of the proposed development on their area.
11. This Advice Note suggests that through the LIR :
 - The local authorities can use local knowledge and evidence on local issues in order to present a robust assessment to the Examining Authority. As such, it should draw on local knowledge and experience. It should identify, positive, negative and neutral impacts but it does not need to set out a balancing exercise on impacts as this will be the responsibility of the Examining Authority.
 - Provide the Examining Authority with the local authority's views on the *"relative importance of different social, environmental or economic issues"* and the impact of the scheme on them and on the DCO articles, requirements and obligations.

- Reference can be made to National Policy Statements (NPS) where these are relevant but the local authorities are advised not to undertake assessment of proposals against NPS as this is the role of the Examining Authority.
12. This LIR considers the following matters using local knowledge and evidence and taking into account local concerns and representations received with respect to the proposed development
- Landscape & Visual Impacts
 - Socio- Economic Impacts
 - Noise, Vibration and External Lighting
 - Land Contamination
 - Air Quality
 - Heritage and Archaeology
 - Transport
 - Local Planning Policy

4. Site description and surroundings

13. The area which is the subject of this DCO lies primarily within the administrative area of SNC with small areas, mainly required for highway works along existing roads or pathways, falling within the administrative area of Northampton Borough Council. The total land area within the Order limits is some 290.5 ha, some 219 ha of this is the main SRFI site.
14. The site includes farms and the land use is predominantly agriculture, mainly arable with some pasture, fields are bounded by hedgerows, these are bolder alongside the existing rail and road corridors. Public rights of way cross the site.
15. The SRFI site is a gentle undulating landscape falling to a valley basin, with two wooded areas within the south western part, offering broad panoramic views of open fields with mature tree and hedgerows with that follow the contours. Although primarily characterised by open fields the site is confined by existing motorway and rail infrastructure which confines the site and provides the immediate context on two sides.
16. The RFI site is traversed by two footpath public rights of way, KX13 and KX17. Both of these are proposed to be diverted around the perimeter of the proposed development; this will result significant deviation from the original routes. The Roade bypass will bisect the routes of public footpath RZ3 and bridleway KZ10.
17. The Northampton Loop of the WCML forms the western boundary of the SRFI site with further open fields beyond and the villages of Blisworth and Milton Malsor to the south and north respectively. The M1 forms the eastern boundary with Collingtree and the urban fringe of Northampton beyond, J15 M1 lies to the east with the Grange Park industrial area beyond, the A508 forms the south east border with the registered historic park and garden of Courteenhall beyond. The Roade Cutting SSSI on the WCML to the south is within the bypass site and will be bridged by the proposed new road.

18. The Northampton South Sustainable Urban Extension is an allocation within the adopted West Northamptonshire Joint Core Strategy (Policy N5) for the development of up to 1000 dwellings with associated infrastructure; this is located to the north of the SRFI site on land within Northampton Borough to the east of the M1.
19. Hyde Farmhouse with Dovecote, both Grade 2 statutorily listed buildings, is situated close to the proposed bypass site.
20. Courteenhall is a statutory registered historic park and garden, situated on the opposite side of the A508 to the south east of the SRFI site. (Historic England List Entry Number: 1001029).

5. Planning History of the Site

21. Agriculture is, and has been, the predominant use of the land. There is little history of planning applications having been made with respect to the SRFI site and the bypass site, these are listed below.

Reference	Location	Description	Date received	Decision	Date decided
S/1975/1481/P	Op 62 Off Barn Lane Milton Malsor	Continuance of present extraction of railway ballast and the tipping of clean spoil and hardcore.	18/12/1975	Approved	10/02/1976
S/1990/0663/PO	LAND AT COURTEENHALL GRANGE FARM AND NORTH WEST AND SOUTH OF ROADE	Office Park With Business Exchange,hotel,golf Course, Country Park & New Highways Inc. J15 M1 improvements & Roade Bypass.	07/06/1990	(10) Refusal	05/11/1990
S/2014/2468/EIA	Land west of M1 Junction 15 and west of the A508, south of Collingtree	248,200 sq m of employment (B1 & B8) development for new 'campus' facility for Howdens, with off-site highway improvements, landscaping and earthworks.	15/12/2014	Withdrawn	04/06/2015

6. Planning Policy

The Development Plan

22. The National Policy Statement for National Networks 2014 (NSPNN) is the primary national policy guidance relevant to nationally significant (transport related) infrastructure projects. This includes specific reference to strategic rail freight interchanges, however it must be considered as a whole to ensure proposals are assessed in accordance with all relevant regulatory regimes.
23. The National Planning Policy Framework 2018 (NPPF) is identified within the NSPNN as likely to be an important and relevant consideration in decisions on

nationally significant infrastructure projects (NSIP) to the extent it is relevant to the project.

24. The NPPF provides the framework for the preparation of local Development Plans. In considering any proposed NSIP, the Examining Authority and the Secretary of State are required to take into account potential benefits, adverse impacts and measures to compensate for these. In doing so consideration should be afforded to environmental, safety, social and economic benefits and adverse impacts at national regional and local levels; with respect to the latter the Development Plan which sets out local policies and proposals should be afforded consideration.
25. The current Development Plan comprises the West Northamptonshire Joint Core Strategy Local Plan Part 1 (JCS), the saved Policies of the South Northamptonshire Local Plan 1997.
26. There is also the emerging South Northamptonshire Local Plan Part 2; this will eventually form part of the development plan for South Northamptonshire sitting alongside the West Northamptonshire Joint Core Strategy, Local Plan Part 1.
27. Public consultation on the Local Plan Part 2 - Draft Submission Plan is to be held from Thursday 4 October to noon (GMT) on Friday 16 November 2018.
28. The Draft Submission Plan is based on up-to-date evidence and covers a broad range of local policies that will guide decisions on planning applications and development in the District up to 2029. The Draft Submission Plan takes forward the draft version consulted on in September 2017. This may be a consideration where it is relevant to the DCO development.

West Northamptonshire Joint Core Strategy (JCS):

29. The West Northamptonshire Joint Core Strategy (JCS) was adopted in 2014 and sets out the strategic planning policy framework for South Northamptonshire, Daventry and Northampton up to 2029. The Plan sets out both the required scale and appropriate locations for both the housing and employment needs of the area.
30. The main objectives of the strategic employment policies are to retain and diversify the local economic base, whilst maintaining a broad balance between new homes and jobs. The development proposal represents a significant increase in employment provision and this is likely to lead to increased pressure on housing with this area over and above provision identified in the JCS.
31. The JCS contains justified proposals for employment to meet local needs making provision for employment development in several strategic locations including at Junction 16 M1 and to meet associated housing growth.
32. It also recognises the specific wider national and regional requirements of the logistics sector through the expansion of the Daventry International Rail Freight

Terminal (DIRFT). The impact of this nationally significant infrastructure extends across the sub-region e.g. the labour force catchment extends into the local authority areas of Daventry, Rugby, Northampton and beyond into Harborough and Coventry. As

33. DIRFT is some 18 miles distant from the proposed Northampton Gateway RFI and the labour force catchment will overlap that for DIRFT. The NSPNN makes clear that the “existence of an available and economic local workforce is an important consideration”. The Examining Authority should therefore ensure this aspect is robustly assessed.
34. This proposed development has the potential to undermine the adopted WNJCS in terms of both the scale and the distribution of development. The harm that will arise from the contradiction with the Development Plan in terms of the distribution of development and the balance of land uses will not be mitigated through the development proposal.
35. Review of the JCS Part 1 Plan is programme to commence in 2018. This will include a review of both the housing and employment needs of the District in the future.. Unless it is clearly demonstrated that this proposal is required now to meet national identified needs and that cannot be met elsewhere; this would present an opportunity to consider the proposal and associated impacts.
36. The above, notwithstanding the JCS, has an up to date evidence base and is in conformity with requirements for plan making set out in the NPPF. The policies in the plan are relevant to the proper planning of the area. The proposed development should be assessed against plan objectives and policies to ensure appropriate measures are included to mitigate significant local impacts.
37. The JCS sets out Spatial Objectives which include:
To ensure new development promotes the use of sustainable travel modes
To strengthen and diversify West Northamptonshire’s economy by taking advantage of our internationally well-placed location, strategic transport network and proximity to London and Birmingham.
38. JCS policies that may be relevant to this proposed development include :-
Policy S1: The Distribution of Development
Policy S7: Provision of Jobs
Policy S8: Distribution of Jobs.
Policy S10: Sustainable Development Principles.
Policy S11: Low Carbon and Renewable Energy –
Policy C1 Changing behaviour and Achieving Modal shift
Policy C2: New Developments
Policy C3: Strategic Connections
Policy C4 Connecting Urban Areas.
Policy RC2 Community Needs
Polict E4 – Daventry International Rail Freight Terminal (DIRFT)
Policy E6 – Education, Skills and Training
Policy BN1– Green Infrastructure Connections

Policy BN2 – Biodiversity
Policy BN3 – Woodland Enhancement and Creation
Policy BN5: The Historic Environment and Landscape .
Policy BN7A – Water Supply, Quality and Wastewater Infrastructure
Policy BN7 – Flood Risk
Policy BN9 – Planning for Pollution Control
Policy BN10 – Ground Instability
Policy INF1 – Approach to Infrastructure Delivery
Policy INF2 – Contributions to Infrastructure Requirements

39. South Northamptonshire Local Plan 1997 – Saved Policies relevant policies:
Policy EV7 - Special Landscape Areas
Policy EV8 - Important Local Gaps
Policy EV21 - Hedgerows, ponds & landscape features
Policy EV24 - Species Protection
Policy EV29 - Landscape Proposals
40. The SRFI site is within the area identified in Policy ENV8 - A as an important local gap significant to maintaining the separate identities of local settlements on the edge of the urban area of Northampton.
41. Emerging South Northamptonshire Local Plan Part 2 – Draft Submission Plan relevant policies:
- Policy EMP1: Supporting skills
Policy EMP3: New employment development
Policy SDP1: Design Principles
Policy INF4: Electric Vehicle Charging Points
Policy HE1: Significance of Heritage Assets
Policy HE2: Scheduled Ancient Monuments and Archaeology
Policy HE3: Historic Parks and Gardens
Policy NE 2: Special Landscape Areas
Policy NE 3: Green Infrastructure Corridors
Policy NE 4: Trees, Woodlands and Hedgerows
Policy NE 5: Biodiversity and Geodiversity

7. Relevant Development Proposals.

42. The Northampton South Sustainable Urban Extension is an allocation within the adopted West Northamptonshire Joint Core Strategy (Policy N5) for the development of up to 1000 dwellings with associated infrastructure. This is situated to the north of the SRFI site on land within Northampton Borough immediately to the east of the M1.
43. DIRFT Phase 3 has Development Consent and will provide 731,000 square metres (7.86 million sqft) of rail connected warehousing / distribution floorspace

and an new enlarged rail freight terminal to replace the existing terminal at Dirft which is currently the largest SRFI in the UK. This is located only 18 miles distant from the proposed Northampton Gateway Rail Freight Interchange and the market area served and the labour force catchment areas overlap. Rail access is also from the WCML NLL railway and thus it will compete directly for freight train paths with the propose development.

8. Local Area Characteristics Designations and Landscape Character

44. There are no landscape designations that directly affect the SRFI site. There are recognised designations within a kilometre of the site. To the South-East of the SRFI site is the Courteenhall Park & Garden which is included on Register of Historic Parks and Gardens by English Heritage for its special historic interest.
45. To the South of the site where the railway network joins towards Roade is a Site of Special Scientific interest, the Roade cutting which is of geological interest.
46. The Current Landscape Character Assessment for Northamptonshire (CLCAN), is derived from a detailed review of Northamptonshire Landscape Character at 2003.
47. The Proposed Development site is located within the Landscape Character Areas of 6a, 6b and 13b. the Landscape Character 6a is The Tove Catchment which forms part of the Undulating Claylands landscape typology. Landscape Character 6b is the Hackleton Claylands which also falls within the Undulating Claylands landscape typology. The landscape Character 13b, Bugbrooke and Daventry falls is located within the Undulating Hills and Valleys landscape typology.

9. Consideration of Local Impacts

48. The submitted Environmental Statement (ES) and supporting documentation provides assessment of the development proposal, its impacts and proposed mitigation measures. Chapters of the ES address the range of issues that are of a local concern to the Local Authorities. The following section sets out the Local Authorities view of the local impacts of the development

Socio- Economic Impacts

49. The Northampton Gateway RFI will offer the potential to secure objectives of the NSPNN and the Council's strategy for economic growth and offer positive economic benefits for South Northamptonshire and wider area. The proposed development would bring a range of new employment opportunities and provide a significant number of jobs and improvements to the transport network including :

- An intermodal terminal to facilitate use of the rail network for freight shipment to reduce road based haulage movements across the country.
 - Opportunity to broaden the employment offer as the logistics sector now involves many companies in secondary processing and assembly that constitutes modern manufacturing.
 - Securing improvements to Junction 15 and 15A will improve connections for wider range of businesses on the motorway and strategic road network.
 - Secure a by-pass for Roade addressing a 'pinch point' on the local highway network.
50. Effective use as an inter-modal freight terminal will be essential to ensuring these benefits. A failure to attract rail related businesses could lead to warehousing occupied by businesses that are dependent only on road transport; this would negate the environmental benefits not only from modal shift from road to rail transport but also of measures included to mitigate impacts to the strategic and local road networks.
51. The economic impact of the proposal would extend to major urban areas across the region. These are already subject to demands from logistic facilities at DIRFT and Milton Keynes.
52. Given the scale of the proposed development the rate of demand for labour could experience a step change which, with the existing high levels of employment within in SNC, could create challenges for the local labour pool with the risk demand would outstrip supply posing recruitment difficulties for local businesses.
53. South Northamptonshire has been able to develop the economic opportunities from growth in the logistics sector in line with other economic and social priorities. This has allowed growth in any one sector to be balanced against a range of other factors, including the distribution of development, capacity within the transport network and vehicle trips (especially HGV) to manage impacts for resident, visitors and business with respect to the quality of life, protected environments and habitats. The proposed logistics development would significantly alter this balance within South Northamptonshire.
54. The Council commissioned the South Northamptonshire Logistics Study in 2017. This examined the existing logistics sector and the opportunities and risks associated with growth within sector for South Northamptonshire. The report may be viewed at [South Northamptonshire Logistics Study 2017](https://www.southnorthants.gov.uk/downloads/file/3037/logistics-study-2017) (<https://www.southnorthants.gov.uk/downloads/file/3037/logistics-study-2017>)
55. This identified an established 'hierarchy' of logistics activity within the sub-region and the M1 corridor. DIRFT is an established national distribution hub, with significant capacity for further growth and the focus for the future logistics activity within the Northamptonshire. Milton Keynes also provides a major focus for logistics activity in the wider Local Economic Partnership area.

56. Logistics activity within South Northamptonshire is currently mainly within the second tier, attracting a mix of third party and direct distribution activities that have a mixed focus between regional and national distribution. The nature of this logistics activity has enabled a balance to be struck locally between the economic opportunity and other priorities.
57. The study recognises that South Northamptonshire is strategically well positioned, in terms of existing transport infrastructure, to take advantage of growth in logistics, however to do so will require proactive interventions to develop an appropriate skilled and trained labour force and the local supply chain.
58. Future growth in South Northamptonshire should also be balanced with a range of factors, including the impact on the quality of life, open space and protected habitats, junction capacities and the impact on local employment in the area. These are critical considerations as there are significant risks to the wider economy of the District of not managing growth of the logistics sector.
59. Many businesses are attracted to the area as a result of the quality of life on offer to their workers as well as the availability of a highly skilled, highly motivated workforce. Providing significant amounts of new distribution space could over a longer term have negative impacts on both the perceived quality of place and the availability of labour.
60. The proposed development would result in the loss of 33.3 ha of Best and Most Versatile agricultural land. The loss of this agricultural land is not mitigated in the proposal. The significance of the loss of this area, within the context of agriculture across South Northamptonshire might be considered neutral, however the cumulative impact of this with any further loss of agricultural land in this locality would be a significant local negative impact.
61. The Roade bypass is expected to reduce the number of vehicles travelling through the village. Local, business especially those that cater for 'passing trade' have concerns that this would have a negative economic impact. The provision of appropriate signage to sign post village services would provide mitigation. The effect could be offset through improvement in the quality of the village environment which may attract new customers, this effect is not assessed.

Landscape & Visual Impacts

Landscape Character

62. The existing landscape within the SRFI site will be almost entirely replaced with the urban form of the buildings, roads and rail infrastructure. The loss of this pleasant landscape together with the diversion of public footpaths would result in a significant adverse effect on the amenity afforded to users of the public footpaths. This is a negative impact on both the landscape character and for views into the site and within the site.

63. The M1 is a strong barrier dividing the urban fringe of Northampton from the rural landscape and the proposed development through its green screening that runs along either side; the proposed development will transcend this to create a development presence within the hitherto simple agricultural landscape to the west of the M1.
64. The proposal will involve considerable investment in the green infrastructure. Earth mounding, structural landscaping to the boundaries and new tree planting will provide the opportunity to provide new habitats and amenity space around the routes of public footpaths within these areas. The visual mitigation afforded by the green infrastructure will be enhanced if the built form appears to sit naturally within it, rather than the green infrastructure is squeezed around the built form..
65. The retention of existing wooded areas with the SRFI site is a positive impact that will assist the integration of the built form. This benefit will be negated if existing trees fail to thrive. The development involves the significant lowering of the existing ground level across the SRFI site. The resulting contouring close to retained areas must not compromise the longer term retention of the existing trees within these retained wooded areas through adverse effects through any lowering of ground water levels.
66. Infrastructure required to meet engineering requirements e.g. storm water attenuation areas, should where possible be designed as 'Landscape Elements' as an integral part of the green infrastructure. This approach will ensure an aesthetic quality related to the A508 corridor and in conjunction with a considered management approach will create an environmental asset to the area.

Visual Impact

67. The RFI site is a shallow enclosed landform setting with the general aspect towards the existing urban edge of Northampton and the motorway junction. The relatively higher land along its western side and to the south (the Courteenhall – Blisworth ridge of higher ground), separate it in localised terms from the landscapes further to the west and south.
68. The principle local views into the site are thus from the edge of Blisworth, the A508 travelling northwards, Junction 15 of the M1. More distant views of the development will be possible, e.g. from the St. Crispin area of Northampton
69. The scale of the roof scape with the rectilinear form of the buildings layout and taller elements such as the gantry crane will create a strong visual presence until the mitigation elements have matured to achieve their full effect
70. Despite the external lighting strategy there will be residual lighting glow effects due to the 24 hour operational needs of the development which will extend into

the relatively undeveloped landscape west of the M1 which reducing the extent of local dark skies.

71. The proposed visual impact mitigation relies significantly on the use of extensive earthworks with associated planting to enclose the development area. This extensive green infrastructure offers the opportunity for provide diverse habitats and enhance the environmental quality of the area. This would provide an environmental asset in addition to the visual impact mitigation.

Ecology

72. The proposal will result in the loss a number of arable fields. This loss farmland habitat will have an impact on a range of birds including some associated with the Upper Nene Valley Gravel Pits SPA/Ramsar. The loss of suitable farmland habitat is not mitigated within the proposals. This effect is considered to be more than the negligible conclusion within the ES, but not significant.
73. Other species affected by the proposal include Badgers, Bats, Barn Owl and Great Crested Newts. Small areas of woodland will also be lost. There will also be loss of connectivity for wildlife, between habitat areas isolated within the RFI site and the bypass would be a barrier for wildlife dispersal to the north and west of Roade; this impact could be offset through appropriate measures to facilitate movement across infrastructure barriers.
74. Measures to mitigate adverse effects are proposed, including the translocation of hedgerows and grassland, the retention of existing woodland areas, and provision of new ponds, if these ambitious measures are implemented successfully, these would offset the adverse effects.

Noise, Vibration and External Lighting

75. There are a few sensitive receptors (dwellings) close to the RFI site within South Northamptonshire who may be likely to experience effects from noise or vibration during construction or when the site is operational and the M1 motorway, a significant noise generator, separates the site from receptors within Northampton.
76. The relatively high baseline levels of ambient noise experienced at the SRFI site will make significant construction noise effects unlikely for most receptors. Temporary construction noise effects at nearby receptors will vary as work moves around the site, and will be worst in advance of the boundary screen earthworks being in place. These will be delivered early in the process, and will help to screen noise meaning no significant effects are likely from the works to deliver the buildings. .

77. No significant adverse impacts are expected as a result of the potential change in railway noise or railway induced vibration associated with the Proposed Development in the future year scenarios for most of the relevant receptors.
78. The Council however does have a concern with the approach adopted in respect of assessing the L_{Amax} values for potential impulsivity characteristics of the proposed sound sources underestimates the BS4142 assessment of operational noise(s) from SRFI Main site. Whilst a +3dB penalty has been applied to the industrial noise sources to “account for features that may be readily distinctive; the correction that needs to be applied to the “specific sound source(s) being assessed depends on the perceptibility of the sound(s), this could be as much as +18 dB if it includes any tones, impulsivity, or has any other distinguishable acoustic features that may be recognisable in the context of the receiving environment (Section 9 of BS4142:2014 Method for Assessing and Rating Industrial and Commercial Sound).
79. The Roade Bypass will deliver beneficial reductions in noise in the centre of the village but receptors close to the bypass will experience moderate to major adverse effects; these will noticeable (but not significant) increases in noise. Mitigation measures, including earthworks and acoustic fencing, are proposed to minimise these effects; however the resulting effect, with proposed mitigation in place, will still exceed the night-time noise criteria recommended in the World Health Organisation (WHO) Night Noise Guidelines for Europe at a number of receptors. close to the bypass It is acknowledged the WHO guidance has not been formally adopted in the UK
80. The areas surrounding the site are classed as lighting zone E2 defined as Rural, Low District Brightness, thus there are likely to be residual effects from sky glow due to external lighting of the development. Providing the external lighting strategy proposed is implemented the impact would be minimised and significant adverse effects avoided at the SRFI site.
81. Street lighting around the Roade Bypass roundabouts will be visible to the surrounding properties. Lowered lamp mounting heights as well as baffles fitted to the lights are proposed, however properties surrounding the roundabouts will still be likely to experience negative adverse impacts.
82. A Construction Environmental Management Plan will be in place to control impacts during the construction phase and this is required to be approved by the Local Planning Authority (LPA). Subject to the inclusion of appropriate measures the impact of noise and external lighting would not be significant during the construction phase.
83. Details of the permanent external lighting proposed for the site will also have to be approved by the LPA, this would provide the opportunity to ensure the lighting effects relating to the Roade Bypass are minimised.

Land Contamination

84. No significant effects with respect to contamination or ground conditions have been identified.

Air Quality

85. The Proposed Development is anticipated to have a *Negligible* impact on annual mean NO₂ concentrations in all years, in most study areas. However some locally significant impacts are predicted in 2021 and the interim period ahead of key mitigation measures being in place.
86. This significant for Roade. The Proposed Development includes a bypass to re-route the A508 out of the centre of Roade, thereby reducing traffic, congestion and hence pollution levels in the village.. The A508 bypass is not however due to be operational until after 2021, and the centre of Roade is expected to see increases in traffic flows in the short-term as the proposed development opens.
87. The overall impact of the proposed development in Roade in the absence of the bypass mitigation is considered to be **Negligible Adverse** in 2021, following the provision of the bypass mitigation the impact is predicted to be **Moderate Beneficial** in 2023.
88. The Roade bypass is considered overall to be a significant positive local impact in terms of risks for air quality.

Heritage and Archaeology

89. The ES identifies the proposed development will have a number of minor / moderate adverse effects for heritage assets, this includes the loss of two non-designated heritage assets (barns) within the RFI site and adverse effects on heritage assets located close to the line of the Roade bypass. Overall it is not considered the development of the RFI site will result in significant impacts on heritage assets.
90. With respect to archaeology the Council is concerned that the appropriate investigation is undertaken prior to determination of the application to ensure there will be no significant adverse impacts.
91. It understands the County Archaeologist considers the extent of Cultural Heritage assessment in relation to below ground archaeology that has been undertaken so far is not adequate to provide appropriate information on the presence, extent, preservation and significance of any archaeological deposits and considers that additional archaeological evaluation trenching is required to provide confidence that significant local adverse impacts will not arise from the proposal.

Transport

92. The overall scheme is fundamentally reliant upon the successful delivery of the A508 Roade Bypass. This in combination with the added capacity at J15 of the

M1 and the removal of constraints on the A508 to the south of the site result in the assignment of traffic (both development and forecast background traffic) onto the A508 rather than through more minor roads. This is a beneficial effect as without the delivery of the A508 Road bypass and the associated works there will be likely adverse impact from increases in traffic on the village communities within South Northamptonshire

93. The Road Bypass and A508 junction improvements will not be available to traffic for the first two years that the development is open. During this period additional traffic travelling to/from the A508 (south) will therefore travel through Road. A low proportion of development traffic is expected to use the A508 (south) and this is unlikely to have a significant detrimental impact. The A508 however currently experiences congestion and it is likely there will therefore be some increase in this prior to completion of the bypass road and this will be a negative impact, albeit one that is time limited.
94. The Council would highlight the following points related to the trip generation used in the Transport Assessment (TA). Variation in these could result in adverse local impacts.
95. Table 1 of Technical Note 2 in the Environmental Statement includes a summary of trip rates from 12 sites and presents an average trip rate using data from all 12 sites. It is noted that the Swan Valley trip rates (i.e. those used in the TA) are higher than the average from all 12 sites. However, it is also noted that the Swan Valley trip rates are lower than those obtained from the Grange Park, Marston Gate, EuroHub and DIRFT sites. These four sites have a similar geographical location to the proposed SRFI and the development mix at these sites is more representative of the proposed SRFI than the other sites listed in Table 1 of Technical Note 2.
96. The TA adopts indicative shift patterns of 06:00-14:00, 14:00-22:00 and 22:00-06:00. The time periods assessed in the TA are the 'typical' highway peak hours of 08:00-09:00 and 17:00-18:00. Background plus development flows may be higher at shift changeover times than during 'typical' highway peak hours. This leads to a query over whether junctions have been assessed at the busiest times, particularly the site access (which is shown to operate close to capacity). If shift patterns were to coincide with highway peak hours, trip generation could increase significantly.
97. The TA indicates the number of daily arrival and departure light vehicle trips (circa 6,100 arrivals and 6,100 departures) and indicates that single occupancy vehicle trips represent a 92% share of total development trips. Based on the development providing in the region of 7,500 jobs, the daily number of vehicle trips seems lower than would be expected for a development where 92% of trips are made by single occupancy vehicle ($7,500 * 92\% = 6,900$). In addition to trips by employees, there would also be expected to be trips from visitors and other site users.
98. The significance of the above is for the capacity of the junction at the site entrance. The TA indicates a Ratio of Flow to Capacity (RFC) value of 0.82 on

the A508 (north) and 0.85 on the site access arms of the junction in the AM peak hour. RFC values above 0.85 can indicate that there will be periods when congestion will occur, and overall performance of the junction becomes unstable. The site access is therefore shown to be operating at capacity at the 2031 assessment year. Given this is the only vehicle access point the site access design must safely accommodate the traffic flows.

99. Comments received by the Council from parish councils and others highlight existing frustrations with a perceived increase in the number of times congestion is experienced on the local road network within South Northamptonshire arising from incidents that close or interrupt traffic flows on the strategic road network. This highlights the importance of ensuring the site access has the resilience to meet the resulting site traffic flows.
100. The highway improvement scheme at the A508/Pury Road junction does not appear to provide nil-detriment. This would be a negative effect.
101. The A508 corridor improvements are predicted to result in an increase in traffic flows along Knock Lane with decreases in flows along Courteenhall Road. Knock Lane is for the most part narrower than Courteenhall Road. The package of highway improvements includes the widening of a section of Knock Lane to facilitate the safe movement of traffic. Traffic using Knock Lane will however enter Blisworth via Stoke Road, this is a narrow road as it enters Blisworth which is often further constricted by parked vehicles. The restriction of right turn movements at Courteenhall Road could result in larger vehicles that need to access the local area using Knock Lane and Stoke Road, this would be a negative local impact. Measures to encourage such vehicles to travel via Courteenhall Road rather than Knock would minimise this. Appropriate signage and highway design at the Knock Lane and Courteenhall junctions to deter the use of Knock Lane and to encourage the use of Courteenhall Road would be a positive effect.
102. The SRFI site is currently poorly served by public transport provision. A limited number of bus services utilise the A508, and there are no stops within the vicinity of the development. Bus travel provides the best opportunity to ensure the sustainability of the development and presents the most realistic alternative to the car for employees.
103. The proposed public transport mitigations are therefore welcome and the extensions to existing services and provision of a commercially sustainable bus service to the site will be a positive impact providing these are a 'realistic and attractive' and affordable alternative to the car, and not merely a 'reasonable' alternative, or 'relatively affordable, which are the somewhat less ambitious objectives in the Public Transport Strategy.
104. The provision of pedestrian access from Collingtree Road via public footpaths and the cycle access into the site via the M1 overbridge from Collingtree would be a more positive impact with the provision of a pedestrian footway (to link the existing footways at Milton Malsor recreation ground to the west and the Collingtree Road / M1 overbridge to the east) and a cycle route along

Collingtree Road between Milton Malsor and Collingtree to improve walking and cycle access from this direction.

10. Compliance with Local Level Policies

105. The application site is within the important local gap identified under Saved Policy EV8 of the SNLP 1997 between the urban fringe of Northampton and settlements within South Northamptonshire. The local gaps were identified to ensure that the new development would not comprise the identity and character of existing settlements through infilling of gaps that separate them. The proposal by virtue of the location and scale of development would be contrary to this saved policy.
106. The emerging SNLP Part 2 plan will eventually replace the Saved Policies of the SNLP 1997. The emerging SNLP Part 2 plan does not include a specific policy to identify important local gaps. A generic policy, Policy SS2, however seeks to ensure sustainable well designed development will respect the context in which it will be set. This policy continues to recognise the importance of maintaining the individual identity of towns and villages and the significance of the open countryside between settlements to this. The emerging SNLP Part 2 was the subject of public consultation earlier this year and the Submission Draft is currently the subject of Regulation 19 statutory consultation prior to submission this consultation will close on 16th November 2018.