



Northamptonshire County Council

Northampton Gateway Strategic Rail Freight Interchange

Local Impact Report

November 2018

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1. Introduction

- 1.1. This Local Impact Report has been prepared by Northamptonshire County Council at the request of the Examining Authority as part of the Secretary of State's consideration of the application made by Roxhill (Junction 15) Limited for a Development Consent Order to permit the construction of the Northampton Gateway Strategic Rail Freight Interchange.
- 1.2. This Report has been prepared in line with *Advice note one: Local Impact Reports* published by The Planning Inspectorate in April 2012 to give details of the likely impact of the proposed development on the authority's area.
- 1.3. The proposed site of the Rail Freight Interchange, including construction of a rail freight terminal, rail-served warehousing and rail and road access to the site is located south of Northampton to the south-west of Junction 15 of the M1. Associated highway mitigation works are also proposed, including construction of a bypass to the village of Roade. All the works covered by the Development Consent Order are contained within the administrative area of Northamptonshire County Council.

2. Highways

Location

2.1. The proposed site of the Northampton Gateway Strategic Rail Freight Interchange is immediately south-west of M1 Junction 15. Access to and from the site is proposed from the A508, which links M1 Junction 15 with the A5 at Old Stratford to the north of Milton Keynes. The A508 passes through the villages of Roade and Grafton Regis.

2.2. At Junction 15, the A508 meets:

- the M1 motorway, connecting London and south-east England to the midlands and the north; and
- the A45 which as well as providing one of the main accesses to Northampton, connects the M1 to the A14 east-west corridor providing access to the port of Felixstowe and the A1.

2.3. At Junction 15A, some 2½ miles north of Junction 15, the M1 intersects with the A43, providing a through route to the M40, A34 and south coast ports.

2.4. A minor road to the north of the site connects the A45 with the villages of Collingtree and Blisworth. A minor road to the south of the site connects the A508 with the village of Milton Malsor.

2.5. The M1, A5, A43 south of Junction 15A and A45 north of Junction 15 are trunk roads managed by Highways England. All other adopted roads in the area of the development are roads for which the County Council is highway authority.

Current traffic situation

2.6. As one of the main road access to and from Northampton, and the junction of two strategic roads, M1 Junction 15 regularly experiences congestion at peak times. The combination of traffic leaving and approaching Northampton in all directions, and the consequent cross-movements at the junction, mean that queuing can be experienced on all approaches in both morning and evening peaks.

2.7. Although now a trunk road, the A45 was constructed by Northampton Borough Council and Northamptonshire County Council to act as an integral part of Northampton's New Town highway infrastructure. As such it provides the main road access to the New Town-era expansion areas to the south and east of the town. It also provides the main access to the Brackmills industrial estate to the south-east of the town centre.

2.8. While congestion can occur in both directions in morning and evening peaks on the section of the A45 between Junction 15 and the A428

Bedford Road, the tendency is for the most significant queuing in the morning peak to be experienced approaching Junction 15 and in the evening peak approaching the A428 Bedford Road (Barnes Meadow) junction.

2.9. While certain sections of the A508 have been upgraded in relatively recent years (eg River Tove Bends and Yardley Gobion Bypass), much of the road remains on its historic alignment leading to relatively slow journey times. The village of Roade is a long 'street' village, with a relative pinch point at the railway bridge where it can be difficult for two large vehicles to pass. The village of Grafton Regis largely lies to the east of the A508, and the relatively straight alignment of the A508 has led to speed enforcement issues. At the south end of the A508, there has been regular queueing approaching the A5 junction at Old Stratford, although it is hoped that current works by Highways England will largely address this problem.

2.10. The various east-west roads connecting the A45/A508 and A43 are liable to be used by people cutting across between the principal roads, a problem exacerbated when there is congestion on those roads or the M1. There is currently traffic calming on Rowtree Road in East Hunsbury and in the village of Blisworth and Milton Malsor to try and reduce this problem.

Current development and highway proposals

2.11. The West Northamptonshire Joint Core Strategy¹, which provides development proposals for the area around Northampton to 2029, contains proposals for two Sustainable Urban Extensions at Northampton South (Collingtree) and Northampton South East (Hardingstone) in vicinity of the proposed SRFI.

2.12. The two SUEs will generate additional traffic volumes, as will other development in and around the town. To mitigate the impacts of this growth, Highways England and other local authorities have formulated the A45 Northampton Growth Management Scheme², which seeks to implement improvements at the various junctions on the A45 within Northampton. It is intended that the first improvements at the Queen Eleanor interchange will be implemented in 2019, with improvements at the Brackmills interchange following in 2020, and other junctions following as funding is secured.

2.13. Highways England have recently completed the upgrade of M1 Junction 16 to Junction 19 to Smart Motorway standard, including all-lane running. Work started on a similar upgrade of the section

¹ <http://www.westnorthamptonshirejpu.org/connect.ti/website/view?objectId=2737424>

² <http://www.westnorthamptonshirejpu.org/connect.ti/website/view?objectId=201555>

between Junction 13 and Junction 16 in June 2018, with completion expected by March 2022³.

- 2.14. In January 2016, Northamptonshire County Council's Cabinet considered a review of its Major Road Schemes⁴ which recommended that in the medium-term (post 2026) continued traffic growth was likely to require consideration of improvements to the A508 between Junction 15 and the A5, including exploring the possibility of a bypass for Roade.

Impacts of Northampton Gateway proposals

- 2.15. The County Council has worked with the applicant and Highways England through the Transport Working Group to determine the impact of the development and appropriate mitigation proposals.

- 2.16. Appropriate trip generation and distribution has been agreed and tested through a locally-validated version of the County Council's Northamptonshire Strategic Transport Model. These model runs show that the development would lead to a significant increase in traffic on the A508, M1, A45 and Northampton Southern Ring Road.

- 2.17. The initial modelling showed traffic redistributing away from the principal road network and on to inappropriate routes (such as through local villages) due to congestion on the principal network. The modelling also showed a significant increase in HGV movements on the A508 through the village of Roade and the potential for increased HGV movements on inappropriate minor routes, particularly through local villages.

- 2.18. To mitigate these issues, the developers have proposed a series of highway improvement works, mainly comprising junction mitigation, but also the construction of a Roade Bypass. The developers have also proposed a series of complementary traffic calming works, including some which address the potential negative impacts of other highway mitigations. Due to a possible increase on traffic on Knock Lane due to Roade Bypass and other mitigations proposals, a financial contribution has also been agreed for possible future maintenance works to Knock Lane.

- 2.19. Both the development proposal itself and the proposed Roade Bypass will require alterations to the Public Right of Way network. The development will generate demand for walking and cycling trips to

³ <https://highwaysengland.co.uk/projects/m1-junction-13-to-junction-16-smart-motorway/>

⁴

<https://cmis.northamptonshire.gov.uk/cm5live/MeetingsCalendar/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/2462/Committee/399/Default.aspx>

and from the development, predominantly from the north and south of the site.

- 2.20. The development will generate the requirement for convenient and relevant public transport services to access the development.
- 2.21. The construction of the development will generate a significant number of construction vehicle movements over a long period of time.
- 2.22. As set out in the Statement of Common Ground between the applicant and the County Council in relation to highway matters (Doc 7.5, AS-006), the County Council accepts that the proposed highway works are necessary and appropriate to mitigate the impact of the proposed development.
- 2.23. It is proposed that the majority of mitigation works will be delivered by the applicant using the powers sought in the Development Consent Order. However, the County Council has agreed with the applicant that works to the Queen Eleanor junction, the southern ring road and Knock Lane would be more appropriately delivered via a section 106 contribution so that they can be implemented as part of more comprehensive improvement schemes at the respective locations, should that be desirable.

3. Rail services

Location

- 3.1. The proposed site of the Northampton Strategic Rail Freight Interchange is to the east of, and proposed to be served from, the 'slow lines' of the West Coast Main Line, also known as the 'Northampton Loop' which diverge from the 'fast lines' at Roade to the south of the site (although the 'junction' between the fast and slow lines is at Hanslope further south) and pass through stations at Northampton, Long Buckby and Daventry International Rail Freight Terminal near Crick, before rejoining the 'fast lines' at Rugby.
- 3.2. The proposed site is located on an adverse gradient for southbound ('up') trains as trains climb out of the Nene valley from Northampton towards Roade. This gradient, believed to be 1 in 200, provides a major constraint to the performance of freight trains as they have to accelerate from a speed restriction under West Bridge immediately south of Northampton station. An examination of Network Rail's working timetables shows a timing of 8 minutes from Northampton to Hanslope Junction of a passenger train stopping at Northampton, and at least 11 minutes for freight services.
- 3.3. Although the West Coast Main Line is electrified, at the standard system of 25kV ac overhead, many freight services are hauled by diesel locomotives. The lower power output of these locos means that they are further restricted in their performance on the adverse gradient.

Current rail services

- 3.4. The 'fast lines' are used principally by Virgin Trains services, operating at up to 125mph, together with some London Northwestern Railway services from London Euston to Crewe. The 'slow lines' are used by London Northwestern Railway services, usually operating between London Euston, Northampton and Birmingham New Street, together with freight services.
- 3.5. The current (May – December 2018) timetable sees a standard Monday – Saturday off-peak services of three trains per hour running between Birmingham New Street, Northampton and London Euston. Additional trains run between Northampton and London Euston during Monday-Friday peak hours, providing up to 6 trains per hour for London commuters. Additionally, on Monday-Friday, Virgin Trains operate one non-stop morning peak service from Northampton to London Euston and one late evening service from Birmingham New Street to London Euston stops to set down only at Northampton.

NCC rail service aspirations

3.6. Northampton has long suffered from not being located on the main West Coast Main Line. Despite improved journey times introduced in December 2012 under London Midland's Project 110, rail services from Northampton to London remain slower than those from places of equivalent size located further away, but served by faster services.

3.7. The following table compares journey times in the standard off-peak hour to London from Northampton with those from other nearby places on the West Coast Main Line.

	Population	Fastest Journey time (minutes)	Distance (miles)	Average speed (mph)
Northampton	212,100	55	66	72
Milton Keynes Central	207,057	35-36	50	83-85
Rugby	63,323	50	82	98
Coventry	315,700	61-62	94	90-92

Note: population figures shown are the best available information for the town/city in 2011.

3.8. The County Council considers that improved rail connections to London, Birmingham and other large cities are vital to ensuring the county town's growth and economic prosperity, and the Rail Strategy (January 2013)⁵ which forms part of the Local Transport Plan therefore supports a **step change** in the rail service provided for Northampton.

3.9. The rail service aspirations for Northampton set out in the Rail Strategy are as follows:

Policy RAIL 7

The minimum train service at Northampton station should be:

- At least a half-hourly fast service to London Euston, stopping only at Milton Keynes Central, and reaching London in around 45 minutes.
~ With additional peak commuter services to match capacity
- At least a half-hourly semi-fast service to Wolverton, Milton Keynes Central, Bletchley, Leighton Buzzard, Berkhamsted, Hemel Hempstead, Watford Junction and London Euston.
- Good connections for services via the West London line to South Croydon
~ On Monday to Saturday this service should be increased to half-hourly frequency and extended to Gatwick Airport
~ The Sunday service should be extended to run between Milton Keynes Central and Gatwick Airport.

⁵ <https://www3.northamptonshire.gov.uk/councilservices/northamptonshire-highways/transport-plans-and-policies/Documents/Northamptonshire%20Rail%20Strategy.pdf>

- Good connections at Milton Keynes Central and Bletchley with future east-west rail services to Oxford, Reading, Aylesbury and High Wycombe.
- At least a half-hourly service to Long Buckby, Rugby, Coventry, Birmingham International and Birmingham New Street, reaching Birmingham in around 50 minutes
- At least an hourly through service to Rugby, Nuneaton, Atherstone, Tamworth, Lichfield Trent Valley, Rugeley Trent Valley, Stafford and Crewe
- Hourly connections to Chester, Liverpool, Manchester, Preston, Lancaster, Carlisle and Glasgow with no more than one change of train and with journey time no more than the current journey times from those stations to London Euston.
- Hourly connections to Derby, Leicester, Nottingham and Sheffield with no more than one change of train at Nuneaton or Tamworth

Current rail industry proposals

- 3.10. A new rail line, High Speed Two (HS2), is planned, initially from London Euston to Birmingham and the West Midlands (Phase One), with later extensions to Crewe (Phase 2a) and to Manchester and Leeds (Phase 2b). Capacity constraints on the southern end of the West Coast Main Line, which Network Rail had identified as being close to capacity, were a major reason for the promotion of Phase One.
- 3.11. The Act for HS2 Phase One received Royal Assent in February 2017, and advance construction works are now underway, with main construction due to start in 2019 and opening planned for 2026. The Bill for Phase 2a is currently passing through Parliament, with that for Phase 2b due to follow. Opening of Phases 2a and 2b is scheduled for 2027 and 2034 respectively.
- 3.12. The opening of HS2 will result in the transfer of many long-distance passenger services from the southern end of the West Coast Main Line. Both HS2 Limited and Network Rail have identified Northampton as a location that should benefit from additional services enabled by the consequent released capacity on the existing network.
- 3.13. Rail industry timetabling processes mean that timetables for the southern end of the West Coast Main Line will not be drawn up until much closer to the opening dates for HS2. However, both Network Rail/Passenger Focus in *Future Priorities for the West Coast Main Line: Released capacity from a potential high speed line* (January 2012) and the Department for Transport/HS2 Ltd in *The Economic Case for HS2: Assumptions Report* (October 2013) have identified that most or all Northampton – London services post-HS2 will use the West Coast Main Line ‘fast’ lines.

- 3.14. The Long Term Planning Process is Network Rail's procedure for identifying the long-term capacity and investment needs of the rail network. The study work for the southern end of the West Coast Main Line is still ongoing. However, in their emerging West Coast Capacity Plus Study, Network Rail identified a significant future constraint in capacity between Denbigh Hall North Junction and Milton Keynes Central in particular, but also over the entirety of the Northampton Loop, such that increasing freight services over the Loop might require a reduction in the passenger service to Northampton.
- 3.15. Warwickshire County Council are promoting a new station, to be known as Rugby Parkway, between Long Buckby and Rugby. Should this station be opened, it is expected to result in a slight lengthening of journey times for passenger trains between Northampton and Birmingham stopping at the new station.

Impact of Northampton Gateway proposals

- 3.16. The Environmental Statement (Doc 5.2, APP-116) submitted by the Applicant does not include any analysis of the impacts of the proposal on the rail network. However, a series of Rail Reports have been submitted by the Applicant as part of their application (Doc 6.7, APP-378). These reports conclude that there is sufficient capacity on the rail network to accommodate the extra freight services from the proposed Rail Freight Interchange.
- 3.17. Addleshaw Goddard LLP, in their representation on behalf of Network Rail (RR-572), state "The ability of the RFI to realise its optimal rail service throughput will require detailed capacity studies to be undertaken and, until further capacity studies have been carried out, Network Rail's position on the DCO application is neutral in this regard."
- 3.18. At the Preliminary Meeting, Network Rail stated that they were negotiating a Statement of Common Ground in relation to (rail) capacity issues.
- 3.19. As explained in more detail in our Written Representation, the County Council consider that at the current time there is insufficient verified information available on which to judge the impact of the Northampton Gateway development on the rail network. The County Council looks forward to further information being published, and the opportunity to respond to that information, in due course.

4. Archaeological Impact

Location

4.1. The application area is within a predominately rural landscape with small villages set in an agricultural landscape. The northern extent is formed by the M1 and the western by the Northampton to Roade railway. The M1 represents an effective boundary between the rural environment of the proposed development area and the urban environment around Northampton to the north.

Archaeological knowledge of the surrounding area

4.2. The County Historic Environment Record contains information on both designated and undesignated archaeological assets within Northamptonshire. The adjacent villages of Blisworth, Collingtree and Milton Malsor have designated conservation areas within which lie a number of listed buildings. Courteenhall House with its Registered Park, Grade II lies to the south east of the site. The designation covers a later 18th century landscape park with some improvements undertaken in the 1790s by Humphry Repton.

4.3. The Historic Environment Record also contains records of undesignated activity within the landscape surrounding the application area. The Record contains references to potential sites as identified by aerial photograph, cropmarks, metal detecting and documentary evidence. The area around the application area contains evidence of multi period activity ranging from the early prehistoric through to the medieval and post medieval periods.

4.4. The limitations of the Historic Environment Record are that it is based on current knowledge only. It is only by the undertaking of archaeological assessment; both non-intrusive and intrusive that the information within the Historic Environment Record can be adequately tested. It has also been demonstrated when undertaking fieldwork within Northamptonshire that using more than one archaeological assessment technique usually provides a better and more informed assessment of archaeological potential.

4.5. Archaeological assessments were carried out to the north of the proposed Rail Freight Interchange in advance of development at Grange Park and more recently in advance of the Northampton South (Collingtree) Sustainable Urban Extension. These identified Iron Age, Roman and, in the case of Grange Park, Saxon activity.

4.6. Archaeological evaluation undertaken by the developers of Rail Central has identified 15 archaeological sites representing areas of Iron Age, Roman and medieval farming remains and settlements mainly located on a band of sand running east-west to the south of Milton Malsor. Trial trenching of this area found sites not identified by

the geophysical survey and also highlighted that some of the geophysical activity was not archaeological in nature

Archaeological knowledge of the Northampton Gateway site

4.7. The archaeological background of the proposed application area is contained within the Environmental Statement Chapter 10 Cultural Heritage (Doc 5.2, APP-113) and is also detailed within the Statement of Common Ground relating to Archaeology.

4.8. There was no information held on the Historic Environment Record for the area of the proposed Rail Freight Interchange prior to an archaeological assessment being undertaken in advance of a planning application for a distribution centre on part of the site, subsequently withdrawn.

4.9. Minimal intrusive archaeological assessment has been undertaken for the main Rail Freight Interchange site, involving 58 trial trenches in a 155 hectare site. This represents a less than 1% sample. No trial trenching has been undertaken for the Roade Bypass corridor.

4.10. Such a low percentage of trenching may result in a lack of identification of archaeological remains or sites. It does not provide confidence that the development area does not contain undesignated heritage assets of equivalent status to designated assets.

4.11. The applicant has suggested that the site contains only sites of regional significance but the County Council consider this has not been demonstrated, and that current level of assessment makes it impossible to provide an informed comment on the potential impact on archaeological remains/ heritage assets within the area.

Impact of construction of the proposed development

4.12. The site is currently under cultivation and as such any heritage assets are already subject to some level of disturbance, but those that are located in the area below the subsoil can generally be expected to survive in the long term.

4.13. The construction of a rail freight interchange will involve extensive earth movements and other activities which can be expected to detrimentally impact on any below ground archaeological assets. This could potentially result in the destruction of significant but as yet undiscovered heritage assets which, due to the lack of assessment, have not been identified.

4.14. Furthermore, the current application has determined locations for rail track, buildings, roads, etc without being adequately informed as to any archaeological constraints. Without the flexibility to change the location of these parameters in the light of the outstanding

archaeological assessment it will be difficult to avoid any significant archaeological activity subsequently found. This could result in a negative impact on the archaeological resource.

- 4.15. As set out in our Written Response, the County Council considers that in order for the Examining Authority to make an informed decision about the archaeological impacts of the development and a suitable mitigation strategy, it is necessary for the applicant to undertake the full assessment as recommended by the County Archaeological Advisor.

5. Flood Water Management and Drainage

Location

- 5.1. The main site lies within the Upper Nene catchment and within Flood Zone 1. Several Ordinary Watercourses, including a network of land drainage ditches, flow through the site. There are also several small ponds within the site boundary.
- 5.2. Apart from a few isolated buildings the site is a Greenfield site.
- 5.3. The site has a high point of 102m above Ordnance Datum towards the west and a low point of 80m in the east. The main site falls generally towards the motorway and Collingtree which lie at 75-85m, except the far north western corner which falls towards Milton Malsor which lies typically at 75 – 85m.
- 5.4. Two areas of existing woodland in the west lie relatively elevated within the site at approximately 95 – 98m.
- 5.5. The north-eastern part of the site drains east to a tributary of Wootton Brook in Collingtree. The south and south-eastern part of the site drains to a tributary of Wootton Brook upstream of Grange Park. The north-eastern part of the site drains to a tributary of the Milton Malsor Brook, which itself is a tributary of Wootton Brook.
- 5.6. The whole site is therefore within the catchment of Wootton Brook.

Existing and Historic Flood Risk

- 5.7. The site is at negligible risk of ground water flooding except the southern boundary which is at very low risk from groundwater flooding due to spring flow.
- 5.8. Within the site, surface water flooding is indicated adjacent to the watercourses for the 1 in 30 year event, with flooded areas expanding beyond the site around Deepings Wood and into Grange Park east of the motorway with property at risk. Beyond Cheaney Drive (300m from site boundary) is an area of Flood Zone 2 and 3 to which this watercourse flows.
- 5.9. In addition to isolated pockets of flooding, a surface water flow route projects from the centre of the site towards the M1 and to Collingtree.
- 5.10. For a 1 in 30 year event a surface water flow path is identified from the western site boundary in the vicinity of Rathvilly Farm to the watercourse that flows through Milton Malsor. Flooding is indicated adjacent the watercourse within the village with numerous properties at risk.

- 5.11. A 1 in 100 year event increases slightly the area affected by surface water flooding with isolated pools consolidated forming flow paths.
- 5.12. There are a number of records of surface water flooding occurring on the M1 immediately adjacent to the site. There are capacity issues within the Wootton Brook immediately downstream of the site through Grange Park with a number of reported flood incidents. There is also a history of flooding in Milton Malsor downstream of the site due to lack of capacity in the watercourse which flows through the village.

Current development and water course proposals

- 5.13. The West Northamptonshire Joint Core Strategy⁶, which provides development proposals for the area around Northampton to 2029, contains proposals for two Sustainable Urban Extensions at Northampton South (Collingtree) and Northampton South East (Hardingstone) in vicinity of the proposed Rail Freight Interchange and Wootton Brook.
- 5.14. It is currently proposed within the drainage strategy for the Hardingstone development to discharge surface water runoff to soakaways and Anglian Water surface water sewers with no impact on Wootton Brook.
- 5.15. It is currently proposed within the drainage strategy for the Collingtree development to discharge surface water runoff, via attenuation basins, to Wootton Brook at greenfield runoff rate. The strategy ensures that flood risk is not increased by the development.
- 5.16. The Environment Agency, in partnership with Northampton Borough Council and Northamptonshire County Council, are proposing a Green Infrastructure project for the Wootton Brook urban corridor, to improve the corridor's resilience to climate change, manage flood risk and increase biodiversity through natural / soft measures that will improve habitat and expand wetland. This will include natural flood management techniques to slow the flow of water in the upstream catchment with a view to mitigating flood risk further downstream; delivering increased resilience to flood risk for business and residential properties to the impacts of climate change; and providing improved amenity through improved management of the vegetative urban areas. The majority of the proposals are within the north-eastern side of the Wootton Brook catchment.

⁶ <http://www.westnorthamptonshirejpu.org/connect.ti/website/view?objectId=2737424>

Impact of the proposed Rail Freight Interchange

- 5.17. The proposed development will result in a significant increase in the proportion of the site that will be impermeable to the infiltration of rainfall, through the construction of roads and buildings on land which is predominantly greenfield. Impermeable areas of the development will increase runoff rates and volumes from the site, which would increase the risk of surface water flooding downstream of the site without mitigation. This is further exacerbated by the site being located within the catchment of the Wootton Brook, which already has capacity issues. There is however the potential for the development to incorporate additional mitigation measures which could benefit the catchment by reducing runoff rates and/or volumes below existing quantities.
- 5.18. In February 2018, the applicant submitted to the County Council as Lead Local Flood Authority a draft Flood Risk Assessment [NGW-BWB-EWE-XX-RP-YE-0005_FRA rev P1 dated February 2018], which was supported by calculations and hydraulic modelling, and prepared based on those pre-application discussions. This Assessment was approved by the Lead Local Flood Authority, and forms the basis of the Flood Risk Assessment and Sustainable Drainage Statement that are included in Appendix 7 of the Environmental Statement (Doc 5.2, APP-182/183). A Drainage Statement of Common Ground has been reached between the applicant and the County Council on the basis of this Flood Risk Assessment to cover surface water management matters at this stage.
- 5.19. It is deemed that all potential impacts of the development on local flood risk and surface water drainage can be mitigated through appropriate design, the principles of which are set out in the approved Flood Risk Assessment. The detailed design of the surface water drainage scheme will need to be submitted to and approved by the County Council in order to ensure it provides adequate mitigation. .
- 5.20. There is a network of land drainage ditches and watercourses across the site. Development in, over or near these watercourses has the potential to increase the risk of flooding within the site and elsewhere if not appropriately designed to include mitigation. Consent will be required for all works within 9m of an ordinary watercourse to ensure appropriate design and adequate mitigation.