



NORTHAMPTON
GATEWAY
STRATEGIC RAIL FREIGHT INTERCHANGE

APPLICANT'S RESPONSES TO LOCAL IMPACT REPORTS

DOCUMENT 8.6

The Northampton Gateway Rail Freight Interchange Order 201X

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1. This document sets out the Applicant's responses to the **Local Impact Reports (LIR)** by: South Northamptonshire Council (SNC), Northampton Borough Council (NBC), and Northamptonshire County Council (NCC).
2. The Applicant does not seek to respond to all the points made where the Applicant's response is already contained within the Application or submissions made since the Application was accepted, including the Applicant's Response to Relevant Representations (**Document 8.3**, REP1-022) and the Applicant's responses to the ExA's first written questions (**Document 8.2**, REP1-020 and REP1-021) submitted at **Deadline 1**.
3. The responses to the LIR are dealt with in tabular form in the following pages.

Response to the SNC Local Impact Report (LIR) (REP1-037)

The LIR covers a range of matters with regard to the Proposed Development. Section 5 provides a useful summary of the limited Planning History of the site, including reference to the withdrawn application of 2014 for a new 'campus' HQ for Howdens Joinery Co – this represents the Applicant's only previous planning application or proposals for the site.

The LIR sets out the SNC's assessment of likely impacts following a review of the ES and other documents, including the outcomes from professional advice provided by external expertise with regard to key potential local issues including Landscape & Visual impacts, and Transport/Highways. These are summarised below together with the Applicant's comment or responses:

ES Topic/Potential Impact	Summary of LIR	Applicant comment or response
Socio-Economic	<p>The LIR recognises the role of Northampton Gateway in realising national and local economic objectives and delivering economic benefits (paragraph 49), including the significant employment and investment in the transport network. With reference to the Council's own Logistics Study the LIR also recognises that the District is well positioned strategically to take advantage of Logistics growth, with labour and skills actions identified as being relevant (paragraph 57).</p> <p>The LIR also includes a number of assertions and statements expressing some concerns or potential future concerns. These include with regard to the potential for future challenges for local labour supply (paragraph 52), and the further growth of the logistics sector which might lead to economic 'imbalance' (paragraph 53). Also, general policy issues with regard to increased demand for housing (paragraph 30).</p>	<p>The Applicant welcomes the recognition of the strategic context and opportunities presented by the area's logistics sector strengths.</p> <p>Issues raised regarding labour supply were addressed in the Applicant's response to Relevant Representations (Document 8.1, REP1-019), and the ExA's first written questions (Document 8.2, REP1-020 and REP1-021) (e.g. ExQ1.10.2; ExQ1.10.6). Issues regarding potential demand for housing were also addressed (ExQ1.10.11).</p>

ES Topic/Potential Impact	Summary of LIR	Applicant comment or response
Landscape	While noting the loss of 'pleasant' agricultural landscape and negative landscape change on the site's landscape specifically, the LIR identifies positive effects with reference to the significant investment proposed in green infrastructure which will result in a positive, beneficial 'asset' for the area, with positive impacts which aid integration of the new landscape through retention of existing woodland areas on-site (paragraphs 64 - 66).	The Applicant welcomes the conclusions reached and recognition of the significant investment in green infrastructure assets to the local area, and notes that these conclusions were reached following advice from external consultants employed by SNC.
Visual	In terms of the visual impacts, the LIR recognises the site's enclosed landform and general aspect facing towards the urban area, with the site separated from nearby villages by the Courteenhall – Blisworth ridge of higher ground (paragraph 67). The LIR recognises change to the local lighting context, but no direct effects, and concludes that the extensive green infrastructure will enhance the environmental quality of the area, providing an asset as well as visual impact mitigation (paragraph 71).	The Applicant welcomes the conclusions reached and recognition of the site's context and relationship with existing receptors, and the visual mitigation provided by the proposed measures.
Ecology	Notes loss of habitat and impact on some birds associated with the Upper Nene Valley Gravel Pits SPA/Ramsar site, but agrees the effect is not significant. Loss of other habitats and connectivity noted, but acknowledges that impacts can be offset by mitigation measures to facilitate movement across imposed barriers. Concludes adverse effects would	The Applicant welcomes the conclusions reached. Confirmation that there is no association with the Upper Nene Valley SPA/Ramsar have been addressed through a SoCG with Natural England.

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	be offset by the ambitious measures proposed (paragraph 74).	
Noise, Vibration and Lighting	<p>Recognises the baseline conditions of the site and many receptors with the M1 an existing source of noise (paragraph 75 and 76), and the low potential for the site to generate significant construction noise effects in this context. The role of the CEMP in mitigating construction effects is recognised (paragraph 82), as is noise mitigation provided by the landscaped earthwork bunds (paragraph 76).</p> <p>Agrees no significant adverse railway noise or vibration effects are likely (paragraph 77).</p> <p>Agrees no significant lighting effects would be created (paragraph 80).</p> <p>Raises new questions or concerns about the noise methodology, including with reference to WHO Guidelines (paragraphs 78 and 79).</p>	<p>The Applicant welcomes the conclusions reached with regard to the existing baseline conditions, and the likely effectiveness of key mitigation measures during construction and operational phases.</p> <p>Some new issues are raised regarding the noise assessment methodology. Please see the Applicant's response to the SNC written representation (Document 8.7).</p>
Air Quality	Refers to locally significant potential effects in the interim period (2021), but to the longer-term negligible and beneficial effects, with an emphasis on Roade as a consequence of the proposed bypass (paragraph 88).	The Applicant welcomes the conclusions reached and recognition of the likely negligible and beneficial overall effects.
Heritage/ Archaeology	Refers to loss of non-designated assets on-site, and to adverse effects on assets close to the bypass, and	The Applicant welcomes the recognition that no significant effects on heritage assets are likely.

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	<p>concludes that overall the effects on heritage assets will not be significant.</p> <p>The LIR also refers to views expressed by the County Archaeologist.</p>	<p>Heritage and archaeology issues were discussed at the first Issue Specific Hearing (ISH1), and through written questions.</p> <p>Also, please see the Applicant's response to the NCC written representation (Document 8.7) relating to archaeology.</p>
Transport	<p>The LIR recognises the beneficial effects on local roads and villages from the package of transport mitigation works (paragraph 92). Notes the interim (temporary) potential adverse effects in Roade in advance of the bypass, and the beneficial overall effect of the bypass once delivered. Welcomes the proposed public transport improvements (paragraph 102- 103).</p> <p>Questions capacity of the proposed site access junction (paragraph 98).</p> <p>Repeats earlier issues regarding some of the local highways improvements (Pury Lane (paragraph 100); Knock Lane (paragraph 101).</p> <p>Suggests a new footway link along Collingtree Road to link the site with Milton Malsor.</p> <p>The LIR raises new questions and concerns regarding some technical aspects of the TA including regarding</p>	<p>The Applicant welcomes the conclusions reached and recognition of the likely beneficial effects with reduced through-traffic in many villages.</p> <p>Whilst the points raised are dealt with in the TA submitted with the Application, the opportunity has been taken to respond in some detail to the points raised, to ensure that SNC are aware that these matters have been considered with Highways England and Northamptonshire County Council and taken into account.</p> <p><u>Trip Rates for Warehousing (para 95)</u></p> <p>SNC query at paragraph 95 the trip rates and other technical elements of the TA and modelling with reference to the suitability of Swan Valley as a comparison. The approach is described in Technical Note 2 (TN2) (TA Appendix 5) (paragraph 5.8 to 5.14). It explains that trip rates were adjusted upwards to ensure a robust assessment. This is relevant to SNC's concerns about the site access capacity. The AM peak hour arrival rate is 0.128. This is equivalent to the 81st percentile arrival trip rate based on all of the sites given in Table 1, including the sites referenced by SNC.</p>

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	<p>trip generation, and assumed shift patterns (paragraphs 95-97), and about the capacity of the proposed site access junction (paragraph 98-99).</p>	<p>TN2 and the resulting trip rates and traffic generation for the Proposed Development are appropriate, as confirmed by Northamptonshire County Council and Highways England within the respective Statements of Common Ground. Similarly, the design of the proposed site access roundabout is therefore appropriate to accommodate the forecast traffic flows. The layout, design and operation and has been agreed by Northamptonshire County Council.</p> <p><u>Assessment at busiest times (para 96)</u></p> <p>As explained at para 5.8 of TN2, the Swan Valley site includes some 12hr (0700hrs - 1900hrs - 0700hrs) shift patterns and is therefore not just limited to the standard 0600hrs – 1400hrs – 2200hrs shift pattern.</p> <p>Further, as explained at para 5.24 of TN2, the pre and post shoulder peak hours for the Proposed Development traffic were found to generate higher light vehicle traffic than the traditional 1700 to 1800 hours highway network peak hour. Therefore, to ensure a robust assessment, the higher shoulder peak hour traffic flows for light vehicle trips was used for assessment purposes, resulting in an evening peak hour two-way trip rate of 0.19 (which is greater than all equivalent trip rates for the sites given in Table 1). The shoulder peak was not an issue in the morning peak hour and hence no adjustment was required.</p>

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		<p>Whether junctions have been assessed at the busiest times was considered by the Transport Working Group at the meetings held on 17 August 2016 and 27 September 2016. The ATC traffic data at M1 Junction 15 (TA Appendix 37), was used to understand the daily profile of background (or base) traffic movements on the highway network at M1 Junction 15. Overlaid on this was the base traffic flows + the Proposed Development traffic flows. It demonstrated that the background traffic flows on the highway network are low in the early morning and late evening periods, and therefore even allowing for the greater Proposed Development traffic that would occur during the 0600hrs shift change period, total traffic flows during the shift changes would be significantly lower than the 0800 to 0900hrs and 1700 to 1800hrs peak hour traffic flows used for assessment purposes. Northamptonshire County Council and Highways England agreed that the traffic flows and assessment periods were therefore appropriate for assessment purposes.</p> <p><u>Vehicle trip generations compared to employee numbers (para 97)</u></p> <p>SNC have focused on only light vehicle trips to provide an indication of the number of employees associated with the Proposed Development. However, as detailed within the 'Prologis Technical Insight – Jobs' document provided at Appendix C of TN2, HGV drivers account for 7.86% of employees. Based on the 7,457 full time equivalent employees that are assessed in TN2, this equates to 586 employees as drivers. Therefore, it is reasonable to assume that 586 of the 2120 HGV arrivals and 2125 HGV departures are employees associated with the Proposed Development. Subtracting</p>

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		<p>the 586 HGV drivers from the 7,457 full time equivalent employees, leaves 6,871 employees.</p> <p>Not all employees would be present on site during a typical day, for example due to leave, sickness, or being away from site due to meetings, training events etc. Assuming a nominal 10% value for all of these factors combined leaves 6,184 full time equivalent employees present on site during a typical day. Applying the 92% single occupancy driver modal share to this figure, gives a total of 5,689 light vehicle drivers. Table 7 of TN2 shows that the TA is based on 6,191 light vehicle arrivals and 6,095 light vehicle departures. These figures therefore included for additional trips from visitors and other site users.</p> <p>The daily traffic generation for the Proposed Development is therefore consistent with the forecast number of jobs.</p> <p><u>Capacity of site access (para 98)</u></p> <p>The operation of the site access junction is assessed in the 2031 future assessment year.</p> <p>The 2031 future year traffic flows include all committed and allocated development and are not constrained to TEMPro. As explained at para 8.19 of the TA, this means that there is robust traffic growth for the South Northamptonshire area (particularly in the AM peak hour).</p> <p>The Proposed Development traffic flows are agreed with Northamptonshire County Council and Highways England.</p>

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		<p>However, no account of the effect of Travel Plan and Public Transport Strategy in reducing single occupancy vehicle trips associated with the Proposed Development has been made in the assessment. The light vehicles trips are therefore 20% greater than would be expected.</p> <p>The combined impact of the above provide for a robust assessment.</p> <p>2031 future year assessments are undertaken using VISSIM microsimulation (TA para 10.51 and TA Appendix 27) where the operation of the site access is assessed as part of an overall network in conjunction with M1 Junction 15. The site access is also assessed as a standalone junction (TA paras 10.68 to 10.70 and Table 10.9). Both assessments demonstrate that the site access would operate within capacity, without significant queuing or delay to through traffic using the A508.</p> <p>Further, as discussed at paragraph 10.36 of the TA and shown at Figure 10.5 of the TA, the VISSIM assessment demonstrates that queuing traffic on the A508 on the approach to M1 Junction 15 in the AM peak hour would reduce from around 1.6km in the 2031 Reference Case, to around 15 metres in the 2031 Development Case. The free flow of traffic on the A508 would therefore be significantly improved as a result of the Proposed Development and highway mitigation. This is evidenced by the journey time comparison provided at Table 10.1 of the TA, which shows that morning peak hour journey time for car drivers heading north on the A508 (from the south of the site access junction) to the A45, is forecast to reduce from 9 mins and 30 seconds in the 2031</p>

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		<p>Reference Case to 3 mins and 53 seconds in the 2031 Development Case.</p> <p>The operation of the site access junction is also assessed in the 2021 opening year (TA paras 11.20 to 11.21 and Table 11.4), which demonstrates that in the opening year the A508 arms of the junction would operate with a Ratio of Flow to Capacity (RFC) of 0.59 (north) and 0.47 (south) in the AM peak hour.</p> <p>The design of the proposed site access roundabout is therefore appropriate to accommodate the forecast traffic flows. The layout, design and operation and has been agreed by Northamptonshire County Council.</p>

Response to the NBC Local Impact Report (LIR) (REP1-089)

The LIR comments outline potential impacts with regard to five ES topics considered to be of most relevance to NBC and its communities. The comments made are summarised below.

The introductory sections refer to the application site and its containment by road and rail infrastructure (paragraph 4.1), and the lack of any landscape designations affecting the site (paragraph 4.4). The Air Quality Management Area (AQMA) on the M1 between junctions 15 and 16 is referred to as part of the local context (paragraph 4.6). Section 5 refers to the Planning History with reference to promotion of the site via the Joint Core Strategy process, and summarises reasons for it not having been allocated (paragraph 5.1).

The assessment of local impacts (Section 7 of the LIR) is summarised below together with the Applicant's comment or responses:

ES Topic/Potential Impact	Summary of LIR	Applicant comment or response
Socio-Economic	<p>The LIR quotes the ES with regard to likely job creation and economic value of the proposals. It recognises the contribution the proposals would make to the objective of the NPS, as well as the Council's strategic objectives regarding economic growth and job creation (paragraph 7.3). It notes that benefits would be negated if no rail-related occupiers are attracted to the site (para 7.4). It recognises the potential to reduce current out-commuting from Northampton to further afield, but also raises questions over whether there may also be labour supply challenges, creating new commuting flows or increased demand for housing in due course (paragraph 7.5).</p> <p>Local Planning policies (the WNJCS) are due to be reviewed in 2018 and is expected to consider the proposed development as part of the regional and local economy.</p>	<p>The Applicant welcomes the recognition of the strategic context and opportunities presented by the proposed development with regard to national and local economic objectives.</p> <p>Issues regarding labour supply were addressed in the Applicant's response to Relevant Representations, (Document 8.1, REP1-019), and the ExA's first written questions (Document 8.2, REP1-020 and REP1-021) (e.g. ExQ1.10.2; ExQ1.10.6). Issues regarding potential demand for housing were also addressed (ExQ1.10.11).</p>
Landscape & Visual	<p>Confirms that the main development is outside of NBC's area, with the nearest receptors in Collingtree, with the main landscape changes to the south in SNC's area. Those highway works in the Borough will not significantly alter the character of the area. Only a very small proportion of properties on the western side of Collingtree will experience views of the earthworks mounding and landscaping and only upper parts of some buildings from (paragraph 7.10).</p>	<p>The Applicant welcomes the conclusions reached and recognition of the limited and negligible effects.</p>

ES Topic/Potential Impact	Summary of LIR	Applicant comment or response
	Agrees that negligible effects on the Conservation Area are likely (paragraph 7.12).	
Air Quality	Identifies Collingtree as the nearest receptor, and refers to local concerns raised about Air Quality. Confirms that the methodology for the Air Quality Assessment was agreed with NBC (paragraph 7.14), and concurs with the overall likely effects identified in the ES, including the scope for some interim adverse effects ahead of the proposed mitigation measures (paragraph 7.17). Includes recognition of the positive contribution towards national air quality objectives and priorities. The LIR cross-refers to the SoCG with NBC, including mitigation actions agreed in the context of the Low Emissions Strategy (paragraph 7.19).	The Applicant welcomes the conclusions reached and recognition of the limited local effects, as well as the positive contribution at the strategic level with regard to air quality.
Noise, Vibration, Lighting	The LIR refers to the ES conclusions regarding residual effects, and refers to the importance of considering potential 'noise deflection' impacts on the nearest receptors at Collingtree (paragraph 7.21). The role of the earthworks and landscaping in mitigating such potential effects is recognised (paragraph 7.22), as is the role of the CEMP to control effects during construction and to ensure no significant effects (paragraph 7.23). NBC identify no issues regarding lighting effects in the context of the landscaping and other mitigation proposed (paragraph 7.24).	The Applicant welcomes the conclusions reached and recognition of the limited effects following the proposed mitigation.

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<p>Transport and Highways</p>	<p>The LIR identifies concerns by NBC that the potential impacts of additional traffic have not been taken fully into account regarding planned and committed housing growth nearby (paragraph 7.26). Measures should be taken to prevent HGVs 'rat-running' through residential areas (with reference made to West Hunsbury).</p> <p>NBC repeats earlier concerns regarding potential adverse effects on passenger rail traffic (paragraph 7.27), with reference to the context of the Oxford-Cambridge growth corridor (paragraph 7.28) and potential new settlements on the rail corridor north of Northampton. NBC is concerned such potential additions have not been considered in the submitted Rail Reports, and confirms that the Council would not support any diversion of trains from the slow lines that would result in a reduction of passenger services calling at Northampton (paragraph 7.30).</p> <p>NBC recognise the positive contribution of the proposed Travel Plan, bus service, and walking/cycling measures (paragraph 7.32).</p>	<p>The submitted TA uses Northampton County Council's (NCC) strategic transport model which includes all committed development sites and allocations. A SoCG has been agreed with NCC Highways (Document 7.5, AS-006 and Document 7.5A, REP1-009). The approach is explained in the Application documentation (Chapter 12 and associated TA and Appendices).</p> <p>The Highways Mitigation includes several new HGV environmental weight restrictions and Document 2.6 (APP-054) gives the geographical extent of these weight restrictions.</p> <p>Issues regarding passenger rail are addressed in responses to the ExA's first written questions (Document 8.2, REP1-020 and REP1-021) – for example, see ExQ1.11.15. Further to the Applicant's response to the ExA's first written questions, the response of Network Rail to ExQ1.11.15 (REP1-050) is also of direct relevance in confirming that new freight trains would not be at the expense of passenger trains – it states that <i>“any freight services which are added to the network will not be at the expense of passenger services and, accordingly, Network Rail confirms that the Proposed Development will not affect passengers”</i>.</p>

Response to the NCC Local Impact Report (LIR) (REP1-036)

The LIR comments on the potential impacts with regard to four topics considered to be of most relevance to NCC. The comments made are summarised below together with the Applicant's comment or responses:

ES Topic/Potential Impact	Summary of LIR	Applicant comment or response
Highways	<p>The LIR confirms some of the existing challenges regarding congestion and delay at and around Junction 15 of the M1, including on the A45 and A508, as well as some committed developments and infrastructure improvements already planned nearby (paragraphs 2.6 – 2.14).</p> <p>The impacts are set out in paragraphs 2.15 – 2.23, with reference to the work of the Transport Working Group established for the Project, and which agreed trip generation and distribution. The LIR summarises the package of mitigation measures to reduce adverse local effects, including through-traffic in villages. Cross-reference is made to the SoCG agreed with the Applicant and NCC's agreement that the proposed highway works including the Roade Bypass are necessary and appropriate.</p>	The Applicant welcomes the conclusions reached and recognition of the limited and negligible effects.
Rail	The LIR provides a descriptive narrative of the local rail network and context, including NCC aspirations for more and faster passenger services to Northampton, and rail industry proposals or commitments (paragraphs 3.1 – 3.15).	<p>The SoCG with Network Rail was completed and was been submitted to the ExA at Deadline 1 (Document 7.13, REP1-016).</p> <p>Further to the Applicant's response to the ExA's first written questions (Document 8.2, REP1-020 and REP1-021), the response of Network Rail to ExQ1.11.15 (REP1-050) is the response of Network Rail to ExQ1.11.15 is also of direct relevance in confirming</p>

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	<p>Paragraphs 3.16-3.19 are titled '<i>Impact of Northampton Gateway proposals</i>' but does not identify any impacts or issues. It refers to the work by the Applicant to prepare a SoCG with Network Rail, and to the importance of this further information in due course to help inform a judgement about likely impacts.</p>	<p>that new freight trains would not be at the expense of passenger trains – it states that “<i>any freight services which are added to the network will not be at the expense of passenger services and, accordingly, Network Rail confirms that the Proposed Development will not affect passengers</i>”.</p>
Archaeology	<p>The LIR provides a summary of the baseline evidence and knowledge base included in the Historic Environment Record (HER) (paragraphs 4.2 – 4.6), including with reference to the Rail Central site assessment. The LIR confirms that part of the HER evidence base for the site is provided by an archaeological assessment undertaken in the context of the earlier withdrawn planning application covering much of the Main Site (paragraph 4.8). The LIR repeats earlier points and concerns raised by NCC regarding the extent of the intrusive archaeological assessment on the main site, and the absence of any intrusive work at the bypass site, and a lack of confidence that the site does not contain significant undesignated heritage assets (paragraph 4.10). The LIR refers to a range of potential impacts from construction of the Proposed Development which may come to pass, and suggests that the Proposed Development has had no regard to potential archaeological constraints (paragraph 4.14). NCC feel more intrusive work is required in order to</p>	<p>NCC has previously raised these concerns as discussed at the first Issue Specific Hearing. Reference is also made to archaeology in NCC's written representations. Please see the Applicant's response to those representations (Document 8.7).</p>

ES Topic/Potential Impact	Summary of LIR	Applicant comment or response
	demonstrate no significant undesignated assets are on-site.	
Water Management and Drainage	<p>The LIR provides an overview of the local hydrological and drainage context in paragraphs 5.1 – 5.16. It confirms that the proposed approach to the nearby Northampton South SUE would not increase local flood-risk, and refers to a planned programme of green infrastructure works in the Wootton Brook corridor by NCC, NBC, and the Environment Agency with flood-risk, climate change resilience, and biodiversity benefits (paragraph 5.16).</p> <p>The LIR confirms that NCC as lead local flood authority was consulted on, and agreed, the Northampton Gateway Flood Risk Assessment and Sustainable Drainage Statement, and refers to the agreed SoCG (paragraph 5.18). The LIR confirms all potential impacts can be mitigated.</p>	The Applicant welcomes the conclusions reached and recognition of the limited and negligible effects.