NORTHAMPTON GATEWAY
STRATEGIC RAIL FREIGHT INTERCHANGE

APPLICANT'S RESPONSES TO WRITTEN REPRESENTATIONS AND OTHER PARTIES RESPONSES TO ExQ1

DOCUMENT 8.7

The Northampton Gateway Rail Freight Interchange Order 201X

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AND OTHER PARTIES RESPONSES TO ExQ1 | 20 NOVEMBER 2018

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Applicant's Responses to Written Representations and Other Parties Responses to ExQ1 – Document 8.7

1. This document sets out the Applicant's responses to:

    a. the **written representations** (WR) submitted for **Deadline 1** by several parties; and

    b. responses to **ExA first written questions** (ExQ1) made by various parties for **Deadline 1**.

2. No attempt has been made to respond to every single submission, which is not feasible in the time available for responses to be formulated (9 days). The responses have therefore focused on issues thought to be of most assistance to the ExA. Where points have been raised by various parties, the Applicant has responded only to one particular party, but the responses are applicable to all parties who have made the same point.

3. The Applicant's responses to various submissions made by Ashfield Land Management Limited and Gazeley GLP Northampton s.a.r.l. in respect of Rail Central are dealt with separately in **Document 8.8**.

4. 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**.

5. The responses to the WR and responses to ExQ1 are dealt with in tabular form in the following pages.

Local Authorities

Identity and PINS Reference	Applicant's Response
South Northamptonshire Council (SNC) [PINS Ref: REP1:-039]	**Response to Written Representation (WR):** As referred to in the Applicant's Responses to Local Impact Reports (**Document 8.6**), the SNC LIR (REP1-037) raises issues in relation to specific methodological issues associated with the noise assessment, and with the Transport Assessment (TA). SNC also submitted a Written Representation. It repeats much of the same content as the LIR, but includes some specific, additional issues. The Applicant does not repeat its responses to issues raised in the LIR in this document, but responses to the additional issues is set out below. <u>Transport:</u> SNC's suggestion (at paragraph 23 of the WR) that the Pury Road improvement is not 'nil detriment' is considered at TA para 10.91. In respect of the footpath and cycle access to Collingtree (paragraph 26), the proposals as submitted include the provision of a public footpath connecting the network of footpaths around the main site to Collingtree Road, near the railway bridge. This is shown on the Access and Rights of Way Plans (**Document 2.3A**, APP-021). Whilst the Applicant understands that there may be a local desire for improved cycle connectivity along Collingtree Road itself, it is considered that this is a matter beyond the scope of the proposed scheme. <u>Noise:</u> The LIR and WR query use of corrections to the noise assessment assumptions with reference to BS 4142:2014. For this assessment, the choice of a +3 dB correction for the assessment of operational sound from SRFI activities at the Main Site is discussed in Chapter 8 of the ES at Paragraph 8.5.127. Chapter 8 of the ES also includes a separate assessment of predicted night-time maximum noise levels (LAmax) from potentially impulsive sources of sound likely to be generated by operational activities taking

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	place at the SRFI (Paragraphs 8.5.161-165). The results of this indicated that no significant adverse effects or adverse impacts are expected at any receptor. SNC refer to the WHO Night Noise Guidelines, although is unclear regarding which criterion they are considering in their response. However, the noise assessment shows that the values mentioned in the WHO Night Noise Guidelines for Europe are already met or exceeded by road traffic noise alone at almost every relevant receptor around the Roade Bypass now (in the 2015 baseline), and in the 'Do-Minimum' scenarios in both 2021 and 2031 – in other words, the WHO Night Noise Guidelines are exceeded in Roade in the absence of the Northampton Gateway development. Part of the A508 running through the centre of Roade is a road traffic noise Important Area as identified through the noise action planning process, and the National Policy Statement for National Networks (NPSNN) states that Applicant should consider opportunities to address the associated noise issues in these areas. As mentioned in the SNC submissions, the potential adverse impacts of the predicted change in road traffic noise due to the Roade Bypass have been mitigated and minimised as required by Government Policy. The relevant assessment in Chapter 8 of the ES in that no significant adverse effects are predicted. <u>Rail Central</u> Attached at **Appendix 1** to this document is the Agenda Item for the consideration of Northampton Gateway proposals by SNC for a meeting which took place on 1 November 2018. The discussion at the meeting has informed the LIR, which is referred to in paragraphs 6 and 7 of the Agenda. The Agenda also refers to the Rail Central application in the context of cumulative impacts (see paragraphs 33 – 36). The Applicant would wish to draw attention to paragraph 47 of the report which states: "*The available evidence concerning the impacts leads the LPA to conclude that the Northampton Gateway proposal would be preferable to the Rail Central and that for both to be imposed would have significant and long-lasting adverse impacts on a substantial number of people and across a wide area."*

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	Responses to SNC Responses to ExQ1: **ExQ1.8.9:** Government policy is expressed in terms of the extent of the effect of the noise impact. As implied by that policy, it is helpful to determine the noise exposure at which adverse effects would be expected to occur (LOAEL) and at which significant adverse effects would be expected to occur (SOAEL). The values shown in Table 8.1 are those thresholds. They are not limits. Furthermore, not everyone experiencing those exposures would necessarily be adversely affected or significantly adversely affected. As indicated, the thresholds used for LOAEL are external values and have been derived by considering the advice in Table E.1 of Annex E of BS 5228-1:2009+A1:2014, as well as the likely effects that those levels would have on people inside their homes. It should be noted that the values in Table E.1 provide "example thresholds of potential significant effect at dwellings". The supporting text states that before concluding that a significant effect is occurring, other project-specific factors needed to be taken into account. These include the number of receptors affected and the duration and character of the impact. Policy requires that significant adverse effects are avoided within the context of government policy on sustainable development. It is appropriate, therefore, to set the SOAEL thresholds at exposures which might be used to trigger eligibility for mitigation in the form of sound insulation treatment and hence avoid a significant adverse effect. With regard to Annex E5, the Technical Guidance quoted has now been superseded by the Planning Practice Guidance for Mineral Extraction. Having said that, similar values are quoted in that guidance. However, those values originated over 20 years ago and tend to reflect exposures which are now regarded as being at or around LOAEL. This of course means that higher levels can occur, and the relevant policy requirements still be met. The response notes the observation that "*The predicted construction noise levels are comparable to existing ambient noise from the M1 and so unlikely to be audible (para 8.5.6 [of the ES])"*. If a sound is not audible, it is arguably having no effect and certainly not an adverse effect.

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	ExQ1.8.12: Please see response to ExQ1.8.12 (**Document 8.2**, REP1-020 and REP1-021).
Northampton Borough Council (NBC) [PINS Ref: REP1-088]	**Response to Written Representation (WR):** The WR repeats much of the same content as the LIR (REP1-089). It is noted that the WR cross-refers to the SoCG between the Applicant and NCC Highways (**Document 7.7**, REP1-011), and NCC's conclusions regarding the effectiveness of the proposed highways mitigation. In paragraph 5.13 NBC acknowledge that the highway mitigation measures have been agreed with the County Council as local highway authority. They have also been agreed with Highways England. However, in paragraph 5.14, NBC expresses concern regarding the impacts of additional vehicle movements on the local road network, suggesting that they have not been fully taken into account in the context of planned and committed housing growth. NBC are not specific as to their concerns, other than a reference to traffic congestion and rat-running by HGVs. The highway mitigation measures include the provision of a number of environmental weight restrictions preventing HGV movements on inappropriate roads. **Document 2.6** (APP-054) gives the geographical extent of these weight restrictions. They are provided in addition to the existing environmental weight restrictions through Collingtree which will be retained and associated signage at the A45 improved. NBC also refer to a concern regarding impact on the availability of paths for passenger trains (paragraph 5.15). Issues regarding passenger rail are addressed in the Applicant's response to the ExA's first written questions (**Document 8.2**, REP1-020 and REP1-021 – see ExQ1.11.15). 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 "*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*."

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Northamptonshire County Council (NCC) [PINS Ref: REP1-036]	The WR repeats much of the same content as the LIR (REP1-036) and uses the same headings, with new headings added regarding Compulsory Acquisition, and other comments about the dDCO. The WR also elaborates on the issues raised in the LIR with reference to Archaeology in particular. The Applicant's comments on these additional points raised in the WR are set out below. Highways: In paragraph 3.8 NCC refer to the outstanding issue in relation to the protective provisions referred to in the SoCG with NCC (**Document 7.7**, REP1-011 paragraph 7.1 and 7.2, relating to paragraph 6 of the protective provisions (Schedule 13 Part 3 of the dDCO)). There are two issues relating to paragraph 6 as follows: (i) The issue of the extent of liability for maintenance during the defects period; and (ii) The issue of length of the defects and maintenance period. The usual period for maintenance i.e. the period between the completion of the highway works and them becoming the responsibility of the highway authority, is 12 months. That is the period within the protective provisions for both the local highway authority and Highways England in the East Midlands Gateway Order. It is also the period in the agreed Highways England protective provisions contained in Part 2 of Schedule 13. It is understood that NCC have relatively recently decided to seek a 24 month maintenance period rather than a 12 month maintenance period. Clearly the longer the period, the more onerous the burden on the developer and the more of the routine maintenance of highways, unrelated to the development, is funded by the developer rather than the relevant highway authority. The suggestion that a 24 month period is required to allow for the outcome of a Stage 4 Road Safety Audit is not accepted. The responsibility for complying with the outcome of the Stage 4 Road Safety Audit is with the undertaker (as provided for in paragraph 6(3) of the protective provisions), irrespective of the length of the defects and maintenance period. Therefore the assertion that a 12 month period "*exposes*

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	the County Council to too great a risk of having to undertake remedial action at its own expense" is unfounded. (paragraph 3.8). Rail: NCC appear concerned as to the potential impact on rail passenger movements. Issues regarding passenger rail are addressed in the Applicant's response to the ExA's first written questions (**Document 8.2**, REP1-020 and REP1-021 – see ExQ1.11.15). 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 "*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*." Archaeology: The SoCG entered into with NCC with regard to Archaeology (**Document 7.8**, REP1-012) sets out the position of the Applicant with regard to the extent of trial trenching carried out to date. The Applicant is clear that the work undertaken accords with paragraph 5.127 of the NPSNN and is sufficient to identify the likely significant effects on archaeology. With regard to the extent of trial trenching, the parties have effectively agreed to disagree. However, in paragraph 5.9 reference is made to the percentage of trial trenching carried out. In the representation submitted prior to ISH1, reference was made by the archaeological advisor to her involvement in the "DIRFT Interchange" and "*as such I understand the constraints of such a project*" (email of 27 September 2018, AS-031). The extent of trenching carried out by the Applicant on the main site, referred to in paragraph 5.9 of the WR was approximately 0.38% of the main site. This is broadly equivalent to the 0.42% carried out on the DIRFT main site. This is very different to the extent of trenching sought by the archaeological advisor and emphasises the extent to which there is no standard approach to the extent of trial trenching.

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	The continued references by NCC's advisor to the "potential" for significant assets to be on site is not accompanied by any sense of the likelihood of this outcome. Evidence from both the invasive work targeted at the areas of most potential and in blank areas, and from the neighbouring Rail Central programme of trenching suggests strongly that the geophysical survey results are providing a high degree of reliability. This reliability is recognised in paragraph 5.15 of the WR. In paragraph 5.15 the suggestion that the correlation with the geophysical survey was because the trenching was targeting areas already identified in the geophysical surveys, fails to reflect in fact that there were a number of areas for trenching specifically targeted on blank areas, or anomalies considered by the geophysical surveys team not to be archaeological, where trenching either encountered no archaeological features or confirmed that the anomalies identified were present, but were not archaeological in origin (e.g. were as a result of changes in geology). With regard to the suggestion in paragraph 5.21 and elsewhere that further trenching will be too late, the Applicant is confident in its assessment that the staged approach undertaken (desk based assessment, geophysical survey of the entirety of the main site and the bypass scheme and trial trenching) undertaken to date has identified the main concentrations of archaeological activity within the proposed scheme and that there will be no significant effects (in EIA terms) on buried archaeological remains. Any concentrations of archaeological remains encountered can be dealt with through programmes of archaeological excavation and dissemination in the same way as is proposed for those areas of archaeological potential already identified. Accordingly, the comments in paragraphs 5.27 – 5.29 regarding the appropriateness of requirement 14 are rejected. In addition the ExA is referred to the Applicant's Response to ISH1:107 (Appendix 1 to **Document 8.1**, REP-019). Notwithstanding all this, the Applicant has taken steps to provide NCC with more comfort and, with the benefit of the access it now has to land within the Bypass corridor, has arranged to carry out additional trial trenching along that corridor in accordance with a written scheme of investigation which has been

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	discussed with the advisor to NCC. Detail of the outcome of the further trial trenching which is currently underway will be provided by no later than **Deadline 4**. <u>Food Water Management and Drainage</u> The Sustainable Drainage Statement (SDS), (Appendix 7.3 of the Environmental Statement (**Document 5.2**)), contains the key requirements for the drainage design and the drainage design must be in accordance with this. This is secured by requirement 18 of the dDCO. With reference to the following paragraphs within the NCC written representation the Applicant confirms that: • **NCC Para 6.5**: The detailed drainage design for the main site is to be submitted to NCC (as lead local flood authority) for approval under requirement 18 • **NCC Para 6.6**: The design is to comply with the requirements for the Upper Nene catchment, as confirmed by paragraph 2.9 of the SDS • **NCC Para 6.7**: The design is to follow the hierarchy for sustainable drainage, as confirmed by paragraphs 2.1 to 2.6 of the SDS and also requirement 18 • **NCC Para 6.8**: The peak run off form the site is restricted to greenfield run off rates, as confirmed by paragraphs 2.19 and 2.20, together with table 2.1, of the SDS • **NCC Paras 6.10 and 6.11**: Sustainable drainage measures including treatment trains are proposed as set out in the drainage strategy and the SDS • **NCC Para 6.12**: The climate change allowance, current at the time of the Application, is to be complied with, as confirmed by paragraph 2.9 of the SDS • **NCC Paras 6.13 – 6.15**: The calculations for attenuation, provided in the appendices to the SDS, use rainfall data acquired from the Flood Estimation Handbook (FEH) and this will be carried into the detailed design • **NCC Para 6.16**: Infiltration testing will be undertaken in accordance with BRE standard 365, this is confirmed within the revised wording of requirement 18 (NCC para 6.16) In response to the concerns raised about consents to drain into a watercourse (para 6.22), Article 21 of the dDCO has been amended to make it clear that detailed approval of such works needs to be obtained under Article 21 from the lead local flood authority (LLFA). This updated draft has been shared with NCC

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	and is agreed (see **Document 7.7**, REP1-011). The revised Article is included within the updated dDCO issued for **Deadline 2** (**Document 3.1B**). The Applicant notes that NCC, as the LLFA, may wish to consult the Bedford Group of Internal Drainage Boards to assist them in their statutory role. However, the consents under Article 21 need to be formally provided by the LLFA and not the Bedford Group of Internal Drainage Boards, and hence only the LLFA is referred to in the dDCO.

Statutory Organisations

Identity and PINS Reference	Applicant's Response
Addleshaw Goddard LLP on behalf of Network Rail (NR) [PINS Ref: REP1-051]	**Written Representation**: It is noted that Network Rail have no objection in principle to the development (paragraph 1.4 WR). <u>Compulsory Acquisition</u> NR refers to various parcels of land in paragraph 2.2 of its WR. In relation to 2.2 (a) – (c), the compulsory acquisition sought (if any) relates only to third party rights in NR land (and not NR land interests) or land owned by other parties with whom the Applicant has not reached voluntary agreement (see Appendix 13 of the Applicant's Responses to ExQ1 (**Document 8.2**, REP1-020 and REP1-021)). With regard to 2.2(d), the Applicant refers to its previous submissions made in the Application (Statement of Reasons (**Document 4.1**, APP-073), and in its responses to ExQ1. Notwithstanding, as the Statement of Common Ground with Network Rail states (**Document 7.13** REP1-016, paragraph 35), discussions are ongoing with regard to the necessary agreements with Network Rail.

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	The objection of Network Rail to the compulsory purchase rights is noted, however Network Rail have agreed protective provisions which acknowledge that the Applicant should be able to exercise compulsory purchase powers with its consent (see below). <u>Protective Provisions</u> The protective provisions currently prevent the Applicant exercising compulsory acquisition powers, and other powers, without the consent of Network Rail, such consent not to be unreasonably withheld (paragraph 4). As noted by NR, in paragraph 4.4 of their WR, the outstanding issue on the protective provisions relates to the resolution of any disputes, specifically in the context of Network Rail refusing consent to the Applicant to exercise compulsory powers under the dDCO referred to in paragraph 4 of the Protective Provisions (Schedule 13 Part 1). The Applicant has accepted the constraints on the exercise of powers which have been added to paragraph 4 of the Protective Provisions only on the basis that any dispute regarding the reasonableness of any consent withheld by NR is subject to resolution within a certain and sensible timeline. The Applicant has therefore added an expert determination provision providing such a mechanism, similar to that contained in the other protective provisions. Without a mechanism, which drives parties through to a conclusion of a dispute within a certain timeline, delivery of the development may be significantly impacted, bearing in mind that the Applicant is committed to providing both rail and road infrastructure at early stages of the development. <u>Asset Protection Agreements</u> The Applicant is aware that an APA will be required, as is standard practice. However, it is not considered necessary for them to be completed at this stage. As the Statement of Common Ground with Network Rail indicates, certain work will follow post DCO approval – see Document 7.13, para 23. and both paragraphs numbered 34. Such agreements are necessary before the works start but not at this stage. This is consistent with the approach taken at East Midlands Gateway, currently under construction.

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Highways England (HE) [PINS Ref: REP1-115]	**Written Representation**: 1. Drainage The HE have raised a concern in relation to drainage only very recently. The concern relates solely to drainage from the main site and not drainage of the highway works. The Applicant considers that HE has misunderstood the drainage strategy contained in the Sustainable Drainage Statement (Appendix 7.3 of the Environmental Statement, **Document 5.2**). There is no intention to connect the drainage from the main site into the "highway drainage system" which the Applicant is aware would be contrary to DfT Circular 02/2013. The drainage from the main site will discharge into existing watercourses which are culverted under the trunk road network. The Applicant would highlight the important distinction between the two. Culverted watercourses are not part of the "highway drainage system". Efforts are being made to discuss the situation with the HE and the Applicant is confident that, once it has understood the position, it will be content. However, in the meantime, a response is provided to its concerns, dealing with the two outfalls mentioned by HE in turn: *Collingtree village culvert under the M1 Motorway*: The existing pipe under the M1 Motorway is a culverted minor watercourse. The Applicant's drainage strategy confirms that the flow into this culverted watercourse will not increase as a result of the development and there will therefore be no impact on the existing asset. The drainage connection will be upstream of the M1 boundary and therefore upstream of the existing pipe. The discharge of water into the pipe would not increase and no physical works to the pipe are required. *Wootton Brook (Culvert under the west side of the M1 Motorway Junction 15):* Appendix 10 of the Sustainable Drainage Statement and the highway plans (**Document 2.4B**, APP-028) show that a new culvert will be provided for the watercourse. Therefore no assessment of the existing culvert has been undertaken as it will no longer form part of the watercourse.

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	In addition to the points made above, at the request of HE, an additional paragraph was added to the, normally standard, article dealing with discharge of water (Article 21). Please see the relevant entry in the dDCO Tracker (**Document 3.4A**). <u>2. Deemed Approval</u> HE states its WR that it "*strongly objects to being the subject of the proposals of deemed approval that appear in the articles of the dDCO and the Protective Provisions*." The Applicant notes that the SoCG agreed with HE in this regard does not state that the deemed approval provisions in the articles of the dDCO are not agreed (see **Document 7.1C**, REP1-007). The Applicant had understood that the principle of deemed approval within the articles was agreed with HE (as mentioned in the Applicant's response to ISH1:18 and noted in the SoCG itself (paragraph 5, **Document 7.1C**, REP1-007)), albeit that HE were seeking a period of 56 days, in response to which the Applicant has increased the period for deemed approval within the articles from 28 days to 42 days, which is considered to be very reasonable, particularly given that most DCOs containing deemed approval provisions allow 28 days as the standard period. The Applicant also notes that HE does include the same deemed approval provisions (with 28 days) in its own DCOs. The Applicant does understand that HE have an objection in principle to the inclusion of deemed approval provisions in the protective provisions, as set out in paragraph 7 of the SoCG (**Document 7.1C**, REP1-007). The Applicant considers that deemed approval provisions are absolutely required to ensure that the Applicant is able to continue the development and not be stalled or unduly delayed from doing so due to the failure of engagement from the relevant body from whom consent is required. The Applicant refers to its response to ISH1:18 in this regard. It now seems that HE are objecting to deemed approval within the articles and the protective provisions, notwithstanding the content of the SoCG. This is surprising having regard to the inclusion by HE of deemed approval provisions within their own DCOs. Reference is made to two recently approved HE DCOs: (i) The M20 Junction 10a DCO (2017) includes deemed approval provisions in articles 14, 18, 20, 39 and 47 relating to approvals from other bodies obtained for the benefit of HE; and (ii) The A19 Testo's

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	Junction Improvement DCO (2018) includes deemed approval provisions in articles 12, 16, 17 and 19. These all operate deemed approval within 28 days. HE set out in paragraphs 1 – 7 the concerns in relation to deemed approval, but in doing so, it is clear that they have misunderstood the purpose of the deemed approval provisions. The provisions are not designed to impose upon HE a design, specification or action which is unacceptable, nor do they do so. The deemed approval provisions are designed to ensure that there is engagement by HE in the approval process within a certain period, and only failing that engagement does the deemed approval provision operate. No design, specification or other approval can be imposed upon HE because they can simply refuse to approve that within the relevant period, thus preventing the deemed approval applying. The whole purpose of the deemed approval provision is to ensure that there is reasonably prompt action in response to a request for a consent. If it is felt a positive decision cannot be made within the days before a deemed consent is triggered, then a response refusing consent will prevent the deemed consent applying. The driver behind the provision is to secure engagement within a timely period. <u>a. Signage</u> The reference to signage in the HE WR refers to the outstanding issue identified in paragraph 2.3 of the Highways Addendum SoCG with HE (**Document 7.1A**, REP1-005). The two departures concerned are with HE for consideration and an outcome is expected soon. <u>b. Land Acquisition</u> To assist the ExA, the reference in HE's representation to "plot 806" is to an old plan. This is now shown as parcel 1/15 on the Land Plans (**Document 2.1A**, APP-006). This is consistent with the Applicant's update on negotiations submitted for **Deadline 1** (Appendix 13 of **Document 8.2**, REP1-020 and REP1-021).

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	Responses to ExQ1: HE's responses to the relevant ExQ1 are also covered by their WR and the Applicant's responses are therefore dealt with above. The Applicant notes that the table used in the response to ExQ1 is that from ISH1 and the question numbers therefore refer to ISH1 and not ExQ1: 18, 22, 25 and 31 relate to the principle of deemed approval and the time period for such – this is addressed above. 29 relates to drainage, which is also addressed above.

Parish Councils

Identity and PINS Reference	Applicant's Response
Collingtree Parish Council [PINS Ref: REP1-040]	The comments made about the Short Explanatory Document of October 2017 are now out of date, and addressed through finalisation and submission of detail in a number of other submitted reports, including the Environmental Statement (**Document 5.2**), and the Market Analysis Report (**Document 6.8A**, REP1-004). Issues regarding Air Quality and Transport are addressed in full in the Applicant's responses to Relevant Representations (**Document 8.3**, REP1-022), and to the ExA's first written questions (**Document 8.2**, REP1-020 and REP1-021).
Blisworth Parish Council (PINS Ref: REP1-079]	The issues and queries raised were raised previously and the Applicant provided responses to these in the response to Relevant Representations submitted at **Deadline 1** (**Document 8.3**, REP1-022). Many issues were also addressed in full in the Applicant's responses to the ExA's first written questions (**Document 8.2**, REP1-020 and REP1-021).

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	In addition, the WR includes a number of factual errors or misunderstandings, some of which are referred to below: • The Representation states that the Applicant has "*made a number of unsuccessful attempts to develop*" the application site (Executive Summary paragraph ES5, and Section 7.3). Other Written Representations have also referred inaccurately to the planning history. In fact, the Applicant made one previous planning application to deliver a new campus HQ for Howdens Joinery, a major Northampton employer keen to expand its operations in the area. Howdens do not use rail directly as part of the supply chain, and the proposal was for a standard road based logistics site and HQ facility. This application was withdrawn, not refused, as stated in paragraph 7.3.2. Howdens has since secured a site in East Northamptonshire where planning permission for 93,341 sq.m. (over 1 million sq.ft) has been approved and is now coming forward. Howdens were forced to relocate as a response to the lack of strategic employment sites in and around Northampton, and having judged DIRFT too far from Northampton and from suitable sources of labour. • The Representation claims the Applicant has not provided any information about alternatives (ES6 and Section 7.1). This is inaccurate. Both the ES (**Document 5.2**), and Planning Statement (**Document 6.6**, APP-376), as well as the Design & Access Statement (**Document 6.9**, APP-379), provide details about alternatives considered. The Market Analysis Report (**Document 6.8A**, REP1-004) also provides a context for consideration of alternatives in the context of the market being targeted by the proposals.

Non Statutory Organisations

Identity and PINS Reference	Applicant's Response
Royal Mail	The written representation submitted on behalf of Royal Mail is similar in approach to representations submitted by Royal Mail in respect of other Orders (such as The East Midlands Gateway Rail Freight Interchange and Highway Order 2016 and The York Potash Harbour Facilities Order 2016). The

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	similarities are that the representation asserts concerns on behalf of the Royal Mail of a generic nature without specific engagement with the traffic assessment work which has been undertaken. Royal Mail is one of many users of the strategic road network and the parties best placed to balance the different needs of users are Highways England the local highway authority. Accordingly, the interests of all highway users, including Royal Mail, are safeguarded through the protective provisions contained in Parts 2 and 3 of Schedule 12. For example, both HE and NCC have to approve any traffic management measures relating to their network and a scheme for stakeholder liaison is required to be agreed with HE.
England's Economic Heartland	The response from England's Economic Heartland supports rail freight, seeing it as most beneficial when taken forward with improvements to passenger services. The key point made is that assurances are required from Network Rail and others that were any additional freight services to infringe on existing rail capacity it will be met by increased investment to protect and enable passenger services. The representations confirms that the planned East-West rail initiatives retain the ability to accommodate existing rail freight, and 'Phase 2' is designed to accommodate additional rail freight. Issues regarding passenger rail are addressed in the Applicant's response to the ExA's first written questions (**Document 8.2**, REP1-020 and REP1-021 – see ExQ1.11.15). 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 "*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*.
Northampton Rail Users Group	The Users Group Written Representation repeats many of the same key points as made in earlier Relevant Representations, some of which was also covered in the first Issue Specific Hearing. The Applicant has provided responses to the key issues regarding rail capacity, and potential conflict or a reduction in passenger rail services. 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 also of direct relevance in confirming that new freight trains would not be at the expense of passenger trains – it confirms explicitly

Identity and PINS Reference	Applicant's Response
	that "*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*". The written representation includes a number of detailed criticisms or comments regarding the assessment of noise effects – several of the comments made are incorrect, or based on a misunderstanding of the regulatory and/or methodological context for noise assessments, and the Applicant felt it necessary to respond: • The WR comments on ES paragraph 8.3.71 stating that the interpretation of WHO guidelines is incorrect, and queries why the Applicant is trying to establish a higher night time noise level than appropriate in the assessment. This statement is incorrect. The threshold value of 45 dB(A) refers to the short-term, maximum noise level that might occur inside a bedroom at night from a particular external noise source. The indicator used for this maximum noise level is LAFmax. This level corresponds to an external value of 60 dB(A) assuming the 15 dB attenuation through an open window. The threshold value of 30 dB(A) mentioned in the WR refers to the overall internal noise exposure averaged over the 8 hour night-time period (LAeq,8h). The corresponding external value is 45 dB(A), LAeq,8h, assuming the 15 dB attenuation through an open window. Both these thresholds are used in the assessment and are consistent with the WHO Guidelines for Community Noise. Consequently, the Applicant has not tried to establish a higher night-time threshold than is appropriate. • The WR comments on ES paragraph 8.5.103 and use of Leq16 i.e. the noise averaged out over 16 hours. Concern is expressed that averaging out noise over such a long period misleads, as individual periods, or single, high noise emissions, which may be significant effects, become indiscernible through averaging. In fact, it has been long established that it is appropriate to assess the impact of road traffic noise during the daytime and evening period by the use of an average noise indicator. The Noise Insulation Regulations 1975 uses the level exceeded for 10% of the time averaged over the 18 hour period between 0600 and midnight. More recently, the LAeq,16h indicator has tended to be used for the assessment of road traffic noise. Such averaging is supported by guidance documents published by the former Highways Agency (now Highways England).

Identity and PINS Reference	Applicant's Response
	• The WR suggests that in ES table 8.19 the Applicant has established significant adverse effects but has made no proposals to mitigate them. This is incorrect. Where potentially significant adverse effects or other adverse impacts have been identified as a result of the Proposed Development, specific appropriate measures have been proposed to avoid, mitigate and minimise them as required by Government Policy as indicated in Table 8.19. The exception are potential significant effects associated with the railway noise maximum noise levels. For this impact, no specific measure is proposed because as set out in paragraph 8.6.11 "*Work is being carried out at a European level to reduce the noise from freight trains and it is likely that by 2043, quieter rolling stock will be in use compared with that assumed for this assessment. Therefore, the potential significant adverse effect would be mitigated by the use of quieter rolling stock*." Therefore, measures are in place to address all the identified potential significant effects. • The WR suggests that in paragraph 8.5.169 the ES suggests that the significant effects in table 19 exist even after the "inbuilt" mitigation has been considered. Accordingly, the WR suggests there are unmitigated significant effects. That statement is not correct. Table 19 shows the outcome before the consideration of additional mitigation. Once that additional mitigation is taken into account there are no residual significant effects. That position is summarised in Table 8.21. • The WR criticises the ES on the basis that the modelling of rail operations is understood to be as "*a continuous main line operation*" which does not reflect the nature of terminal operations. In fact, this is not how the terminal operations were modelled. The assumptions used in the modelling of noise from passenger and freight train movements on the West Coast Main Line and Northampton Loop lines include the acceleration and deceleration of the freight trains serving the SRFI as they approach and depart the Main Site, and any periods when freight locomotives are likely to be on-power. The assumptions used in the modelling of freight train movements within the SRFI are described in detail in Appendix 8.5 of the ES and are considered representative of movements of this type. Note that noise from freight train movements within the SRFI is considered a component of operational sound from SRFI activities and is included in the assessment of that source.

Identity and PINS Reference	Applicant's Response
	• The WR refers to Para 8.5.127 and references to +3dB as a conservative allowance. The WR suggests that +5 dB is the usual consideration for tonal or other such characteristics of noise emissions, and criticises the ES for not being conservative in attempting to justify higher noise limits than British Standards specify. The WR again refers to WHO guidelines and suggests that these have been misinterpreted and that the ES understates the significance of noise impacts. In fact, BS 4142:2014 requires any corrections applied to be based on the acoustic characteristics of the source as they might be perceived at the receptor. As stated in paragraph 8.5.127 of the ES, the use of a +3 dB correction represents a cautious approach. As discussed above, the assertion regarding the use of the WHO Guidelines for Community Noise is incorrect.
Stop Roxhill Northampton Gateway Action Group (SRNG)	The comprehensive representations made including **Part A** of the SRNG WR are not responded to in this submission. The ExA are referred to the other responses on behalf of the Applicant, and in particular to the response to Dr Andrew Gough, below. The Applicant felt that a focussed response to **Part B** of the WR might assist the ExA in assessing the various issues raised in relation to traffic impact by SRNG and others who raise effectively the same points. A response to **Part B** is therefore set out below. For the avoidance of doubt this response is not intended to respond to every point contained within **Part B** of the SRNG written representation, as the Applicant has already provided a response to many of the issues raised within the responses to the Relevant Representations (**Document 8.3**, REP1-022). The purpose of this response is to respond to any additional points made within the SNRG written representation that are not covered in the Applicant's Response to the Relevant Representations, as well as providing comments on key points within the SRNG WR that are viewed to be incorrect or misleading. In the responses cross references are made to the Transport Assessment (TA) which is found at Appendix 12.1 of the Environmental Statement (**Documents 5.2**). The response is provided in a tabular form using the paragraph numbering provided in the SRNG written representation Part B.

Identity and PINS Reference	Applicant's Response

SRNG Written Representation Part B paragraph reference	Area of concern within the SRNG Written Representation Part B	Applicant's Response
3.3 and 3.5; 3.12, 3.13	Capacity and operation of the roundabout for the Main Site of the SRFI	The site access junction is assessed in the 2031 future year 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. The site access roundabout was included in the visualisation shown at the Stage 2 Consultation exhibitions. The VISSIM modelling demonstrates that there would be sufficient gaps in development traffic arriving at the site for northbound traffic using the A508 to enter the roundabout. 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 with Northamptonshire County Council. As discussed at paragraph 10.36 of the TA and shown at Figure 10.5 of the TA, the VISSIM assessment

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			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 Reference Case to 3 mins and 53 seconds in the 2031 Development Case.
	3.4	VISSIM modelling	See the Applicant's response to RR-742 (**Document 8.3**, REP1-022, (page 55)).
	3.6 - 3.9	Capacity and operation of the road network within the Main Site of the SRFI	SRNG have analysed the road layout of the SRFI as shown on the Illustrative Masterplan and have raised concerns about its operation. In response, • Firstly the Applicant would note that the illustrative masterplan is just that, illustrative, and the detailed road layout, nor any accesses into any of the warehousing plots, are fixed. All of this detail is subject to detailed design approval under requirement 8 of the DCO. • Secondly, the road as indicated on the illustrative masterplan is of sufficient width to allow right turn lanes to be provided into development plots

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			meaning that vehicles turning right will not block vehicles continuing on the road. • Thirdly, there will be strict controls on parking within the estate and we are providing a large HGV park to enable HGVs to have a safe and secure parking area and • Fourthly, it is clearly not in the Applicant's interest to construct a road layout within the SRFI that would experience the sort of congestion envisaged by SRNG, occupiers would simply not move to the site if this were the case. For all of the above reasons the Applicant does not share the concerns raised by SRNG and very simply does not agree with the assertion that the operation of the road layout within the estate would result in congestion issues on the A508 let alone at Junction 15.
	4.3, 4.4	Layout of works to M1 Junction 15 and its operation	The Applicant agrees that the layout and operation of Junction 15 is poor at present; hence why a significant improvement is proposed, which includes providing sufficient width for HGVs to navigate the junction without having to cross into different traffic lanes as they do at present. The Applicant does not agree that progress would be slower as a result of the works, the opposite is in fact true. Details on the significant improvements that are forecast to journey times are provided at Table 10.1 of the TA.

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			The detailed layout of the junction has been agreed with Highways England, including a signage strategy for the junction which is found within the M1 J15 & A45, and J15A, Geometric Design Strategy Record (TA Appendix 28). Agreement to this is reflected in the Statement of Common Ground with Highways England, (**Document 7.1A**, REP1-005).
	4.6	Traffic for aggregate terminal	The presence of the aggregate terminal does not increase the maximum number of trains per day that could be accommodated at the Proposed Development. Therefore, traffic movements associated with the aggregate terminal simply replaces vehicle trips that are already accounted for in the trip generation assessment of the Rail Terminal based on a maximum capacity of 16 trains per day.
	5.2	A45 / Watering Lane junction signalisation	Various options were considered for the Watering Lane junction as explained in the M1 Junction 15 Options Report (TA Appendix 21). The Applicant does not consider that retaining the current 'slip road' type arrangement would be safe with the downstream "lane drop" on the A45, and hence the junction is proposed to be signalised. The Applicant's view is that providing a signal junction for Watering Lane will improve road safety and will also benefit pedestrians and cyclists who are crossing Watering Lane. Agreement to the layout as proposed is reflected in the Statement of Common Ground with Highways England, (**Document 7.1A**, REP1-005).

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	5.3	A45 speed limit	A detailed review of the speed limit on the A45 has been carried out, along with an assessment of the character of the road and geometric design. This is contained within the M1 J15 & A45, and J15A, Geometric Design Strategy Record (TA Appendix 28). The change to the speed limit has been agreed with Highways England as reflected in the Statement of Common Ground, (**Document 7.1A**, REP1-005).
	6.5, 6.6 and 6.8	Knock Lane and Blisworth Road (Roade), Stoke Road in Blisworth	The scheme proposals include widening of the Knock Lane and Blisworth Road (Parish of Roade) corridor in three locations, namely on the approach to the bypass roundabout, on the approach to Stoke Road and at the bend approximately midway between these two points. The widening at the bend is due to the reduced visibility in this area, it is not agreed that this would create a hazard but would remove the hazard – we note that SNRG are of the view that the existing bends are blind and dangerous. The strategic transport modelling undertaken as part of the TA (ES Appendix 12.1) demonstrates that the overall effect of the proposed highway mitigation works (with the development in place) is a reduction in two-way traffic passing through Blisworth village. This includes Stoke Road past the Doctor's Surgery. The reductions in traffic flows in the morning and evening peak hour periods are shown on the flow difference plot extracts at Figures 10.11 and 10.12 of the TA.

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	6.7	Knock Lane and Blisworth Road (Roade)	The NSTM2 Local Model Validation Report (LMVR) is provided at Appendix 22 of the TA. That report confirms the suitability of the NSTM2 to assess the impacts of the Proposed Development, as agreed with Northamptonshire County Council and Highways England. Section 9 of the LMVR sets out the local area calibration and validation that was undertaken to ensure an accurate replication of traffic patterns on the highway network within the NSTM2. Section 9.3 explains the modelling acceptability criteria, including the GEH statistic. Para 9.3.3 and 9.3.4 of the LMVR state: *9.3.3 "The GEH statistic takes account of the fact that when traffic flows are low the percentage difference between observed and modelled flows may be high but the significance of this difference is small. A GEH value greater than 10 indicates that closer attention is required as the match between observed and modelled flows is poor, while a GEH of less than 5 indicates a very good fit."* *9.3.4 "It is important that the model reproduces the observed volumes of traffic. The DMRB criteria for comparing the performance of the model traffic counts are reproduced in Table 9.3. Modelled flows are expected to be within a certain tolerance of the*

Identity and PINS Reference	Applicant's Response		
			observed values and this goodness of fit is measured using the GEH statistic." Section 9.4 and 9.5 of the LMVR detail the local count data calibration and validation process based on 2-week ATC and permanent TRADS traffic count data. Figures 9.1 and 9.3 of the LMVR demonstrate that Knock Lane achieves a GEH value of less than 5 in both the AM and PM peak hours, and therefore there is a very good fit between the observed and modelled traffic flows on Knock Lane. Full details are provided at Appendix D of the LMVR, including the 2015 base year observed and modelled flows on Knock Lane, which are as follows. See table below. SRNG have undertaken a 2-day traffic count on Knock Lane in October 2017. It is noted that both the SRNG AM and PM peak hour recorded traffic flows are greater than the observed values determined from the 2-week ATC data used by WSP. Nevertheless, SRNG's concern is the apparent poor correlation of the flows from their traffic count with the 2031 Reference Case flows from the NSTM2 modelling that are provided at the table at para 4.2 of TN8 (TA

	Observed flow (two-way)	Modelled flow (two-way)
AM peak	138	96
PM peak	64	46

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			Appendix 13). They concluded that because the 2031 Reference Case flows given in TN8 are lower than their 2017 traffic count, the NSTM2 future forecast modelling is misleading. However, as reported at paragraph 8.33 of the TA, the NSTM2 outputs (including the 2031 Reference Case flows) given in TN8 were superseded for the reasons given at paras 8.26 to 8.32 of the TA. The final NSTM2 assessment flows are presented at Chapter 9 of the TA. Table 9.1 of the TA references the 2031 Future Year traffic flows, including the 2031 Reference Case traffic flows (D1 scenario), which are provided at TA Appendix 43. The 2031 Reference Case (D1 scenario) traffic flows are given at pages 25 to 35 of TA Appendix 43. The two-way 2031 Reference Case traffic flows are given below: | | 2031 Reference Case (two-way) | | AM peak | 139 | | PM peak | 132 | As can be seen, the forecast 2031 Reference case traffic flows are consistent with expected growth in traffic on Knock Lane between the NSTM2 base year and future year. As confirmed at para 8.33, and 8.132 of the TA, the assessment of Knock Lane and Blisworth Road was undertaken using the final NSTM2 data. Paras 10.93

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			to 10.104 of the TA are the relevant sections of the TA that assess the Proposed Development impact on Knock Lane and Blisworth Road using the final NSTM2 traffic flow data.
	6.9	Interpretation of NSTM2 outputs	SRNG are concerned that the traffic volumes shown on the figure at para 3.16 of TN8 (TA Appendix 13) do not appear to add up. They compare the reduction of 180 vehicles westbound on Courteenhall Road to the increases on the other routes into Blisworth and conclude there is a shortfall. This is not correct because 38 and 19 vehicles from the 180 vehicle reduction are associated with traffic that would have previously passed through Blisworth along Courteenhall Road and then Chapel Lane/Gayton Road and Towcester Road, respectively. Hence the total reduction in traffic destined for Blisworth is 123 vehicles (180 – 38 – 19). The total flows entering Blisworth from routes other than Courteenhall Road is also 123, (78 from Northampton Road and 45 from Stoke Road). Hence all flows are accounted for and the assessment demonstrates that the proposed left-in, left-out junction at A508 will assist in reducing rat running traffic passing through Blisworth village.
	6.10	Interpretation of NSTM2 outputs	The relationship between the flow changes on Stoke Road and Knock Lane are explained at paras 10.97 to 10.102 and Figures 10.11 and 10.12 of the TA. In summary, most of the forecast increase in traffic on Knock Lane is due to existing traffic switching to use Knock Lane to access the A508 via the new bypass

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			rather than accessing the A508 via Stoke Road and passing through Stoke Bruerne. In addition, there is an overall reduction in traffic flow on other parts of Stoke Road, as the highway improvements associated with the Proposed Development remove the congestion on the A508, meaning that existing traffic that would have otherwise used the Stoke Road/Northampton Road corridor to avoid congestion on the A508, assign back to the A508. This leads to a reduction in traffic on Stoke Road, Northampton Road and through Blisworth.
	7.9	A508 Rookery Lane / Ashton Road	Northamptonshire County Council raised a concern that the provision of the SRFI and the Roade Bypass may result in additional traffic at the A508 Rookery Lane / Ashton Road junction and that minor highway realignment should be examined. This is exactly what is now proposed, together with the improvement to the capacity and operation of the junction itself. The junction layout has been agreed with NCC as reflected in the SoCG (**Document 7.5**, AS-006 **and 7.5A**, REP1-009).
	7.11, 7.12, 7.13	Scoping Opinion	The NSTM2 'actual flow' traffic data at TA Appendices 43 to 45 provides traffic flow information for the roads and locations listed at paragraph 3.77 of the Scoping Opinion. The impact of the Proposed Development on those roads and locations is provided via the flow difference plots provided at TA Appendix 24. The impact of the Proposed Development was considered based on this information and the study area for

Identity and PINS Reference	Applicant's Response
	detailed assessment agreed with the highway authorities. The agreed study area for detailed assessment is shown at Figure 6.1 of the TA. Locations beyond the study area did not require detailed assessment.

Individuals

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Andrew Gough [PINS Ref: REP1-065]	A number of representations question the need for an SRFI in this location. Many consider that the scheme will not expand the Network of SRFI's because no more SRFI's are needed in the Midlands, whereas others consider this is not the right location to reinforce the network of SRFI's in the Midlands, instead advocating a potential site at Hinckley. The majority of these points have been raised previously at relevant representation stage, to which the Applicant has responded (**Document 8.3**, REP1-033). The Applicant's case in relation to the market considerations is set out in the Market Analysis Report (**Document 6.8A**, REP1-004) and the Planning Statement (**Document 6.6**, APP-376). The ExA's first written questions to which the Applicant has responded, also cover many related points (see (**Document 8.2**, REP1-020 and REP1-021)). A response to these matters is not therefore repeated here. However, it is considered helpful for the Applicant to provide a response to the work undertaken and presented by Dr Gough who has undertaken his own assessment exercise and made a number of assertions. Some of the points he has made are also made by others and one of his assertions has been cross referred to by Andrea Leadsom MP. Our response therefore addresses these same or similar points made by others.

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	Dr Gough's representations seek to bring into question some of the work undertaken by the applicant, in particular in relation to the need for an SRFI in this location at this time. His position is supported by his own assessments, which in turn are based on his own assumptions and conclusions. In a number of important instances, these assumptions are inaccurate and the conclusions drawn selective and misleading. These matters are set out below. Under a section titled 'Competition with Rail Central and other schemes' Dr Gough refers to a number of potential 'competing schemes'. It is important to note that a number of these are not committed schemes, notably East Midlands Intermodal Park, Hinckley International and Rail Central. In the section titled 'A need for rail-connected warehousing' reference is made to forecasts of rail freight volumes and rail-connected facilities, by MDS Transmodal (MDST) for Network Rail. The Applicant's views on forecasts and their relevance is set out in the Market Analysis Report. It should be noted that Paragraph 2.50 of the NPSNN makes clear the relevance of forecasts and it is within this context that they have been referred to in the application documentation. Dr Gough brings into question the use of forecasts but then refers specifically to figures produced by MDST (set out in his Table 1) in suggesting that Northampton Gateway represents a 145% over- provision of rail served warehousing. This point has been specifically referred to by Andrea Leadsom MP at Paragraph 2.9 of her representation (REP1-087). It is important therefore to understand more fully the basis of this conclusion, which on closer analysis, does not reflect the figures presented by MDST nor have any regard to the purpose of those figures. Dr Gough, correctly, explains that the floorspace figures set out in his Table 1 are the assumptions used by MDST to help it set out rail freight forecasts. They are not intended to dictate or control the amount or location of new SRFI's / rail served warehousing. In this regard use of the figures by Dr Gough and Mrs Leadsom to indicate an oversupply of 145%, is extremely mis-leading. Furthermore, closer scrutiny of the figures show that 4 figures are presented for each site/area; current, 2023/4, 2033/4 and 2043/4. Dr Gough has chosen to only use the 2033/4 figure to present a very misleading headline. The figure up to 2043/4 for South Northampton is 457000 sqm of floorspace, a similar figure to that now being brought forward at Northampton Gateway. A comparison with East Midlands Gateway is helpful on this point. The MDST table, which refers to East Midlands Gateway as 'Kegworth' contains exactly the

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	same figures, over the 4 dates, for 'Kegworth' as it does for South Northampton. The East Midlands Gateway site gained consent for 557,414 sqm of floorspace, despite being significantly greater than even the 2043/4 figure in the MDST Table. It is also perhaps worth noting that the Table assumes floorspace will come forward at a number of possible locations, where there are currently no active proposals. This includes at Milton Keynes (the same floorspace figures as for 'Kegworth' and 'South Northampton' over the 4 dates) which would be within the market catchment area for Northampton Gateway. Dr Gough includes a section on Alternatives in which he utilises an assessment methodology undertaken by Aecom to present his 'Independent Assessment of Alternative Sites'. For context, it is important to understand that the Aecom study (2010) titled 'Strategic Distribution Site Assessment Study for the Three Cities Sub Area of the East Midlands' was specifically commissioned to assess the need for and potential sites to accommodate an SRFI in that specific sub-area of the East Midlands. It did not cover Northamptonshire and therefore is not relevant to the application. It would not have been appropriate for the Applicant to make reference to it as suggested by Dr Gough. It is also important to note that the Aecom Study included 3 stages, Dr Gough has sought to adopt the first two stages to assess the comparative merits of Northampton Gateway, Rail Central and a potential SRFI scheme at Hinckley, but does not undertake the third and final stage, which for the Aecom study was a more detailed assessment including consultation with developers and statutory bodies. Dr Gough has deemed it appropriate to consider the potential SRFI scheme at Hinckley as a suitable alternative. The Applicant does not agree that this is an alternative site because it could not address the markets which the Northampton Gateway scheme is intended to serve. Details of this are set out in the Market Analysis Report and the Alternative Site Assessment. Notwithstanding, it is important to highlight a number of inaccuracies in the assumptions used by Dr Gough to undertake his assessment and which inform his conclusion.

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	Firstly, it is relevant to note that although the potential site at Hinckley is within the sub-area assessed by Aecom, it was not one of the sites considered in that assessment. The Applicant is not aware of the reasons why Aecom did not consider the site as a potential location for an SRFI. The assessment methodology employed by Aecom at their stage two, and used by Dr Gough at his Annex C, is relatively high level. It is based on general assumptions having regard to a site's general location rather than a detailed understanding of a particular site and SRFI scheme. The purpose of the Aecom Study was to sift potential sites rather than as a methodology to assess the suitability of a planning application. The scoring mechanism is rather coarse and the output wholly dependent on the assumptions made about each location. In this regard there are a number of assumptions made by Dr Gough which are clearly inaccurate and many others where there appears to be a high level of bias. For example, throughout Dr Gough scores the potential Hinckley site considerably higher than Northampton Gateway in relation to access criteria. However, his scoring clearly inaccurately downplays the quality of access to Northampton Gateway because of the short link between the site access and J15 of the M1 (which in commercial and operational terms is not a disadvantage) and ignores the fact that the M69 Junction into which the Hinckley site could connect, currently only has north facing slip roads. This together with many other assertions to which the Applicant would strongly disagree, combines to present a misleading and inaccurate comparison between Northampton Gateway and the potential site at Hinckley. Dr Gough also concludes (at the top of page 21), that the high ranking for the Hinckley site is attributed to enhanced connectivity to Felixstowe and a potential for modal shift being next to the A14 corridor. In relation to the latter point this is clearly inaccurate as the Hinckley site is adjacent to the M69 not the A14. Indeed, it is no closer to the A14 than Northampton Gateway. In the section titled operational superiority Dr Gough claims that rail is *'generally competitive over distance of 250km'.* Whilst it is correct that rail becomes competitive when it is able to do the primary haul or main trunk haul, the distance at which this is economical depends on a range of factors. The reasons for the growth of rail freight and the economics of rail freight are explained in the Market Analysis Report, sections 5 and 7. In this section Dr Gough also refers to improvements to the freight network up to 2024 on the Felixstowe to Nuneaton route and the route from the West Midlands to Southampton. He claims that the implications of

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	these improvements are that Northampton Gateway will be bypassed by investment. He then has regard to this in his 'Aecom' assessment. His analysis of this particular set of improvements is again highly misleading. These are works on particular lines to help train operating companies run longer trains and improve capacity. These are part of the ongoing improvements to the network generally, they are in no way 'bypassing' Northampton Gateway. It is interesting to note that in the Summary of findings, Dr Gough advocates a strategy which gives priority '*to filling gaps in the national network of SRFI's',* such as '*Hinckley NRFI and West Midlands Interchange'*. This runs counter to the case put forward by many other objectors who suggest that the Midlands is adequately provided for with SRFI's and new SRFI's should only be located in other regions. It is noteworthy too that Dr Gough, at figure 9, utilises the same core catchment areas, he terms them 'primary catchment areas', as those adopted by the Applicant in its Market Analysis Report. For the reasons set out in the Market Analysis Report it is the Applicant's view that further SRFI's are required in the Midlands to meet the demand for and growth of rail freight and to expand the network of SRFI's into areas currently inadequately served by existing SRFI's. Northampton Gateway will expand the existing network to the south east, as East Midlands Gateway will expand the network to the north east and the West Midlands Interchange has the potential to expand the network to the north west.

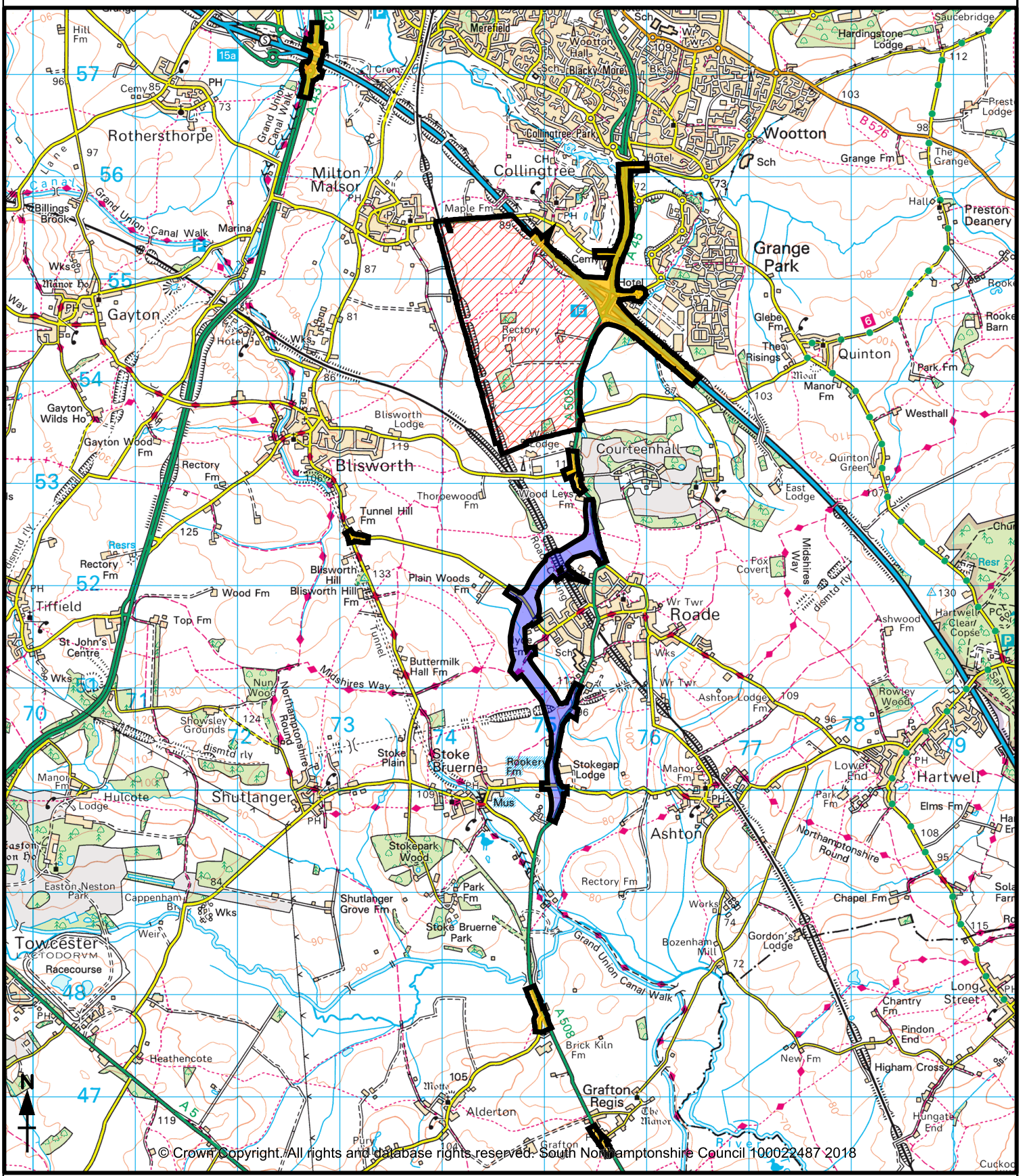
Appendix 1

SNC Agenda Item to Committee 1 November 2018

Application Number: P/2018/0001/DCO

Parish: Grafton Regis, Roade, Rothersthorpe, Blisworth, Milton Malsor, Courteenhall, Grange Park, Stoke Bruerne

South Northamptonshire Council



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Town\Village: Between Milton Malsor and Courteenhall

Site Area: 289.6251 Ha

Grid Location: SP: 74830 54684

Map Scale: 1:50000

Site

SRFI site

Bypass site

Highway works sites

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Application Number : S/2018/0001/DCO
Application expiry date : 26 April 2019

Parish : Grafton Regis Roade Rothersthorpe Blisworth

Case Officer : Denis Winterbottom

Applicant : Roxhill (Junction 15) Limited

Location : -
Land west of J15 M1,east of the Northampton loop railway line (between Milton Malsor and Courteenhall)

Description : -
Application by Roxhill (Junction 15) Limited for an Order Granting Development Consent for the Northampton Gateway Rail Freight Interchange

RECOMMENDATION –

1- THIS REPORT AND APPENDIX, COMPRISING A REPRESENTATION ON BEHALF OF THE LOCAL PLANNING AUTHORITY, BE SENT TO THE EXAMINING AUTHORITY.

2- TO ENDORSE THE DRAFT OF THE LOCAL IMPACT REPORT APPENDED TO THIS REPORT

Executive Summary

1. This report summarises the proposed development applied for, the key local impacts and planning policy considerations with regard to the proposed Northampton Gateway Rail Freight Interchange and submits a representation to the Examining Authority for the proposed Northampton Gateway Rail Freight Interchange Development Consent Order (DCO) application to register the view of the Council on this proposal.

2. This proposed development is beyond the scope of the adopted WNJCS in terms of both the scale and the distribution of development. The proposal represents a significant increase in employment provision which has the potential to lead to increased pressure for additional new housing over and above provision identified in the JCS .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.

3. The proposed development will rely fundamentally upon the delivery of the A508 Roade Bypass. It is predicted that 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 will result in the re-assignment of traffic, both associated with the proposed development and general traffic (which is forecast to increase even without the development), onto the A508 rather than to minor roads.

4. This is a consequential benefit of the Northampton Gateway proposal that would not emerge from the Rail Central proposal given the highway mitigation would be more focused on the strategic road network.

5. The improvements to the local highway network which are necessary to facilitate the proposed Northampton Gateway SRFI development, and which are not otherwise programmed, would offer significant beneficial effects for Roade, for other villages and for the wider local economy. This would support the delivery of other Council priorities such as for economic growth.

Introduction

6. The Examining Authority (ExA) has requested the Council submit a Local Impact Report (LIR) to assist the examination. The LIR is prepared in accordance with the provisions of the Planning Act 2008 (the Act) as amended by the Localism Act 2011.

7. The LIR is an overview of the local impacts for South Northamptonshire and identifies positive, neutral or negative impacts for relevant matters. These have been assessed by Council officers, by external consultants where relevant expertise was required and through discussion with the Highway Authority. Parish councils and local groups have also been invited to identify local impacts to assist preparation of the LIR. Key local impacts identified so far are summarised in this report. The draft LIR is appended to this report

8. The DCO Examination commenced on 9 October 2018 and the deadline set by the ExA for submission for representations and for the Local Impact Report is 6th November 2018.

Northampton Gateway Rail Freight Interchange - Proposed Development

9. The development as proposed in the DCO submission documents consists of the following elements : -

- An intermodal freight terminal comprising connection to the WCML Northampton Loop railway, rail sidings and head shunt track with the capacity to unload and load freight trains of up to 775m in length, container storage areas, a mineral aggregates loading facility, a heavy goods vehicle parking facility with internal site access roads to connect to the strategic road network.
- Up to 468,000 square metres (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

10. 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.

11. The main parameters defined and fixed at this stage include the position of 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.

12. The Northampton Gateway SRFI 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 Ac Planning Act 2008.

13. 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. Elements of the proposed RFI development that are not specifically referenced will be characterised in the order applied for as 'Associated Development'.

Purpose of the Local Impact Report

14. Section 104 of the Planning Act 2008 requires the Secretary of State to have regard to Local Impact Repots (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.

15. The Advice Note advises 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.

Scope of the Local Impact Report

16. The 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 Mail 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.

17. The 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:

- Site description and surroundings
- History of the site
- Development Plan Policy
- Relevant development proposals in the locality
- Local Area Characteristics Designations/Landscape character
- Consideration of local impacts and mitigation proposed including
    - Socio-Economic Impacts
    - Landscape and Visual Effects
    - Ecology and Nature Conservation
    - Transport
    - Air Quality
    - Noise, Vibration and External Lighting
    - Heritage and Archaeology

- Cumulative effects

Key Local Impact Considerations

18. A development of the scale proposed will have a significant adverse impact on the existing landscape character by virtue of the fact that the land in question is currently mostly undeveloped. The impact of the resulting urban form has to be assessed in the context of the relationship of the proposal with other urban forms of development which here would include the M1 motorway, the West Coast Mainline Northampton Loop railway and the urban areas to the east of the M1, (soon to be extended through Northampton South Sustainable Urban Extension), which form the edge of the Northampton conurbation. The bypass site is also currently mostly undeveloped land to the west of Roade village.

19. For the RFI site, earthworks will lower ground levels and form boundary mounding, landscaping, new planting and the retention of existing wooded areas within the site, would mitigate the visual impact of the proposed rail freight terminal, warehousing and associated infrastructure on the RFI site. The retention of existing woodland area will soften the visual impact with respect to views from the south west from the outset, however the full effect of the visual mitigation will not however be fully realised until the new landscape and planting has matured, which will take time. New planting must therefore be programmed to be implemented at the earliest practicable time within the construction of a development.

20. Highway improvements are proposed to the strategic road network around Junctions 15 and 15A of the M1, as well as parts of the A45 and A508, the latter would also include the provision of a new road to bypass Roade.

21. These highway mitigation works would have a significant beneficial impact on to improving traffic flows on both the strategic and local highway networks by addressing current congestion issues. The use of rail for movement of freight, if this replaces freight movements by HGV's, could have a beneficial impact at the regional and national levels; the effective use of the rail terminal for freight will be required to achieve this.

22. The provision of a bypass for Roade would remove through traffic from the village centre this would alleviate congestion associated with current 'pinch points'. The bypass, together with the motorway junction improvements, will have a beneficial impact for other local villages by reducing traffic that currently uses local village roads as 'rat runs' to avoid peak time congestion on the major roads. This traffic is predicted to revert to using the major roads, including the A508 and A43, as journey times on these will be reduced.

23. The reduction in vehicles travelling through Roade would also reduce risk to air quality. Roade has been previously been identified as a sensitive air quality area due to the volume of traffic and the congestion which exacerbates the risk to air quality from vehicle emissions.

24. The impact on Air Quality within Roade is assessed with the Environmental Statement; this considered Negligible Adverse (without the bypass), once the Roade bypass is opened the effect on air quality is assessed as Moderate

Beneficial. The bypass is thus critical to the local impact in this part of South Northamptonshire.

25. The Roade bypass will be provided within two years of the first warehouse being occupied or within 4 years of the commencement of the junction improvements to J15 M1. Until the bypass is open, additional traffic will be generated (an increase of 131 two way peak hour traffic movements is predicted for the A508 south of the site access in the assumed opening year of 2021), and until all the highway improvements have been delivered the beneficial effects for Roade and other villages are unlikely to be realised in full.

26. Notwithstanding this short term effect, from a highways perspective, it is important to reiterate that 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 re-assignment of traffic both associated with the proposed development and general background traffic (which is forecast to increase even without the development), onto the A508 rather than to minor roads. Without the delivery of the proposed highway works including A508 Roade bypass there is likely to be an adverse traffic impact on the village communities within South Northamptonshire.

27. The proposed Northampton Gateway SRFI will offer economic benefits for South Northamptonshire and the wider area, with the potential to secure objectives in the Council's strategy for economic growth. The proposed development would offer a range of new employment opportunities and provide a significant number of jobs, the improvements to the highway network which through addressing current traffic issues would also benefit the local economy as a whole.

28. Local employment schemes could ensure the developer maximises opportunities for the local workforce in the construction (where possible) and later for local people to access jobs once the site is operational, also to encourage training through partnerships with local education establishments. These may be appropriate matters for Development Consent Obligations (similar to a Section 106 Agreement) with relevant stakeholders, including local authorities.

29. There are a few sensitive receptors (dwellings) close to the SRFI site within South Northamptonshire that are likely to experience effects from noise or vibration during construction or when the site is operational. The M1 motorway, a significant noise generator, separates the site from receptors within Northampton.

30. The areas surrounding the site are classed as lighting zone E2 defined as Rural, Low District Brightness, thus there will be residual effects from external lighting of the development. Providing the external lighting strategy proposed is implemented the impact would be minimised and significant adverse effects avoided for the SRFI site. Street lighting around the Roade Bypass roundabouts will be clearly visible to the surrounding properties. Lowered lamp mounting heights as well as baffles fitted to the lights are proposed, however

some properties surrounding the roundabouts will still be likely to experience a significant adverse impact.

31. 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.

32. 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.

33. The cumulative impact of the proposal, together with other developments either existing, permitted or that can reasonably be foreseen, is also matter that must be examined. A significant consideration in the assessment of the cumulative impact is the existence of the similar Rail Central SRFI proposal on adjacent land.

34. The Environmental Statement submitted for the Northampton Gateway DCO assesses the cumulative impacts if both proposals were to be implemented. With respect to landscape character and visual impact this considers there would be significant adverse effects, identified as being Moderate to Major Adverse.

35. With respect to cumulative highway impact, the assessment does not give a sufficient level, depth or likely accuracy to provide a robust understanding of the full highway and transport impacts resulting from both sites being delivered. This is unsurprising given the level of information available for the Rail Central proposal at the time this was prepared. A full review of the cumulative impact of the two proposed SRFI sites is essential to a robust assessment of either proposal this must be a priority for the Examining Authority.

36. The absence of a robust assessment of the cumulative highway impacts and of a highway mitigation scheme developed specifically to accommodate both developments has resulted in assumptions having to be made as to the package of highway improvements that might be implemented from within both schemes, in order to undertake assessments of cumulative impacts in related matters, such as Air Quality. This is unrealistic, as the package of highway mitigation measures required, should both schemes be implemented will in all probability differ from that of any one scheme.

Planning Policy Considerations

37. 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, it must however be considered as a whole to ensure proposals are assessed in accordance with all relevant regulatory regimes.

38. 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.

The Development Plan

39. The West Northamptonshire Joint Core Strategy (JCS) includes objectives to retain and diversify the local economic base, whilst maintaining a broad balance between new homes and jobs.

40. 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

41. 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. 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” This consideration should be a priority for the Examining Authority.

Conclusion

42. This proposed development is beyond the scope of the adopted WNJCS in terms of both the scale and the distribution of development. The proposal represents a significant increase in employment provision which has the potential to lead to increased pressure for additional new housing over and above provision identified in the JCS .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.

43. From a highways perspective the proposed development relies fundamentally upon the 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 will result in the re-assignment of traffic, both associated with the proposed development and general traffic (which is forecast to increase even without the development), onto the A508 rather than to minor roads

44. However in the context of the need for nationally significant infrastructure of this type and in this location being clearly established through examination, then the improvements to the local highway network which would be necessary to facilitate the proposed Northampton Gateway SRFI development, and which are not otherwise programmed, would offer significant beneficial effects for Roade, for other villages and for the wider local economy. This would support the delivery of other Council priorities such as for economic growth.

45. This consequential benefit of the Northampton Gateway proposal is one that is unlikely to emerge with the Rail Central proposal given the highway mitigation would be more focused on the strategic road network.

46. Given the scale of this proposal and the scale of the Rail Central proposal, and the fact that neither was envisaged by the adopted WNJCS, in principle neither scheme is supported by the Local Planning Authority (LPA). Notwithstanding this, the LPA is asked to identify and to carefully consider the local impacts, of the Northampton Gateway proposal. In the interests of good planning, a comprehensive approach has been taken to also consider the likely impacts of the Rail Central proposal, based on the information currently available. Having identified significant visual and highways impacts in particular, it is considered that the package of related mitigation measures offered by the Northampton Gateway proposal is superior to that of Rail Central, it is noted that the relative benefits of each proposal in terms of jobs created are similar.

47. The LPA has not sought either proposal, both come forward outside of the adopted development plan for the area, nonetheless they do fall to be considered by the LPA, if only as a consultee and not the decision making body. The available evidence concerning the impacts leads the LPA to conclude that the Northampton Gateway proposal would be preferable to the Rail Central proposal and that for both to be imposed would have significant and long-lasting adverse impacts on a substantial number of people and across a wide area.

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NORTHAMPTON GATEWAY RAIL FREIGHT INTERCHANGE

DRAFT LOCAL IMPACT REPORT OCTOBER 2018

Planning Inspectorate Reference TR050006

IP Reference NGR-SP074

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Contents

Introduction

1. 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.

2. 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).

3. 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 Mail 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.

Proposed Rail Freight Interchange Development

4. 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

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5. 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.

6. 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.

7. 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.

8. 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'.

The Purpose of the Local Impact Report

9. Section 104 of the Act requires the Secretary of State to have regard to Local Impact Repots (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.

10. 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.

11. 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

    - Site description and surroundings
    - History of the site
    - Development Plan Policy
    - Relevant development proposals in the locality
    - Local Area Characteristics Designations/Landscape character

    - Consideration of local impacts and mitigation will include the following matters:

    Socio-Economic Impacts
    Landscape and Visual Effects
    Ecology and Nature Conservation
    Air Quality
    Noise, Vibration and Lighting
    Land Contamination
    Heritage and Archaeology
    Transport

Site description and surroundings

12. 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 with 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.

13. 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.

14. 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.

15. 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

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development; this will result significant deviation from the original routes. The Roade bypass will bisect the routes of public footpath RZ3 and bridleway KZ10.

16. 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.

17. 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.

18. Hyde Farmhouse with Dovecote, both Grade 2 statutorily listed buildings, is situated close to the proposed bypass site.

19. 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).

Planning History of the Site

20. 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 receivec	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

The Development Plan

21. 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.

22. 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.

23. 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.

24. 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.

25. 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.

26. 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.

27. 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.

<u>West Northamptonshire Joint Core Strategy (JCS):</u>

28. 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.

29. 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

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pressure on housing with this area over and above provision identified in the JCS.

30. 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.

31. 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

32. 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.

33. 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.

34. 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.

35. 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.

36. 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.

37. 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

38. 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

39. 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.

40. 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

Relevant Development Proposals.

41. 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.

42. DIRFT Phase 3 will provide 731,000 square metres (7.86 million sqft) of rail connected warehousing / distribution floorspace. Initial earth works have been undertaken however there appears now to be a hiatus in the provision of the new rail infrastructure.

Local Area Characteristics Designations and Landscape Character

43. 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.

44. 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.

45. The Current Landscape Character Assessment for Northamptonshire (CLCAN), is derived from a detailed review of Northamptonshire Landscape Character at 2003.

46. 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.

Consideration of Local Impacts

47. 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

48. 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.

49. 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.

50. 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.

51. 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.

52. 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.

53. 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)*

54. 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.

55. 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.

56. 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.

57. 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.

58. 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.

59. 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.

60. 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

Local Area Landscape Character Designations

61. No designations directly relate to 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.

62. 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.

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63. The Current Landscape Character Assessment for Northamptonshire (CLCAN), is derived from a detailed review of Northamptonshire Landscape Character at 2003.

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Landscape Character

65. 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 significant negative impact on both the landscape character and for views into the site and within the site.

66. 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.

67. 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 afford 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..

68. 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 comprise the longer term retention of the existing trees within these retained wooded areas through adverse effects through any lowering of ground water levels.

69. 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.

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Visual Impact

71. 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.

72. 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

73. 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

74. 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.

75. 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

76. 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.

77. 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.

78. 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.

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Noise, Vibration and External Lighting

79. 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.

80. *Further noise comments awaited from EP*.

81. The areas surrounding the site are classed as lighting zone E2 defined as Rural, Low District Brightness, thus there will be residual effects from external lighting of the development. Providing the external lighting strategy proposed is implemented the impact would be minimised and significant adverse effects avoided for the SRFI site.

82. Street lighting around the Roade Bypass roundabouts will be clearly visible to the surrounding properties. Lowered lamp mounting heights as well as baffles fitted to the lights are proposed, however some properties surrounding the roundabouts will still be likely to experience a significant adverse impact.

83. 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.

84. 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

85. No significant effects with respect to contamination have been identified.

Air Quality

86. The Proposed Development is anticipated to have a *Negligible* impact on annual mean NO_2 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.

87. 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.

88. 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.

89. The Roade bypass is thus considered to be a significant positive local impact in terms of risks for air quality.

Heritage and Archaeology

90. 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 within the RFI site. Overall it is not considered the development of the RFI site will result in significant impact on heritage assets.

91. The ES also concludes there would be no significant adverse impacts with respect to the Bypass site. This is considered to be likely outcome. There is concern however that some heritage assets identified with respect to the Bypass site not have been visited, if this is the case, confidence in the significance attributed to impacts for these assets would be reduced.

92. With regard to the impact on archaeology the concerns of the County Archaeologist that insufficient trial trenching has been undertaken across the whole. The Council is concerned that proper archaeological investigation in accordance with current legislation and regulations is undertaken prior to determination to ensure there will be no significant negative impact.

Transport

93. 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 Roade bypass and the associated works there will be likely adverse impact from increases in traffic on the village communities within South Northamptonshire

94. The Roade 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 Roade. 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.

95. 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.

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96. 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.

97. 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.

98. 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.

99. 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.

100. 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.

101. The highway improvement scheme at the A508/Pury Road junction does not appear to provide nil-detriment, if so this would be a negative 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.

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