

The Northampton Gateway Rail Freight Interchange DCO

date 26/2/2019

South Northamptonshire Council Response to ExAQ2 issued on 05/02/2019.

1. ExQ2 -2.1.9 and 2-1-20. - The Council understands the Applicant will provide details of dust control mitigation measures within the CEMP and the P-CEMP(s) that will be submitted for approval for each phase of the proposed development. The Council would recommend that a statement(s) should be included within the CEMP to provide clarity of the framework regarding how the CEMP will be implemented. The Council CEMP should include the following
 - A statement in the CEMP that the Community Liaison Group will be the forum through which the Applicant will discuss planned construction works, schedules, controls and measures that will be employed for forthcoming construction activities including noise/dust/vibration and to respond to environmental issues raised.
 - A provision within the CEMP that each P-CEMP will include noise/vibration and dust and Air Quality impact assessments and include any mitigation measures, these shall be undertaken in accordance with the relevant applicable procedures and noise/vibration/dust criteria, these are currently set out in :-
 - BS 5228:2009+A1:2014 Code of Practice for Noise and Vibration Control on Construction and Open Sites (Nb. Annex E of this guidance provides the relevant noise criteria that need to be applied),
 - BS 6472-1 provides best available information on the application of methods of measuring and evaluating vibration in order to assess the likelihood of adverse effects
 - BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground borne vibration
 - Institute of Air Quality Management (IAQM) Guidance on Assessment of Dust from Demolition & Construction 2014 (Nb. This provides the risk assessment that needs to be undertaken for each phase of the construction phases and what mitigation measures are required).
 - Institute of Air Quality Management (IAQM) Guidance on Air Quality Monitoring in the vicinity of Construction & Demolition Sites 2018 (Nb. This provides the dust emission levels that should be complied with and details of the type/extent of dust monitoring required).

2. ExQ2 2.1.23 SNC as a District Council has no responsibility for transport matters it thus has a limited capability to influence force the outcomes of the Public Transport Strategy.

With regard to mechanisms and sanctions, Transport for London guidance recommends that travel plans should ideally be secured through a Section 106 agreement to ensure that all the key elements of the approved travel plan are effectively protected and to facilitate monitoring and compliance with the outcomes anticipated. It would thus be appropriate for mechanisms and sanctions to be included within the S106 agreement with the authorities that have responsibility for transport

3. ExQ2 -2.1.21 With regard to dust mitigation measures for the proposed aggregates terminal, we would concur with request for clarification of the measures to be implemented. This should reflect the assessment of risk and mitigation measures recommended in the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Mineral Dust Impacts for Planning May 2016 and demonstrate measures proposed are appropriate for the level of risk involved.

4. ExQ2 2.1.24 - - (i) See response for ExQ2 2.1.23.

(ii) See response for ExQ2 2.1.23.

(iv) The objective would be clearer if it included a reference to a specific date by which the objective is to be achieved to provide a definitive period. This could either replace the existing drafting or sit alongside the existing objective to provide an alternative fixed period.

(v) See response for ExQ2 2.1.23.

5. ExQ2- 2.1.25 – This would be clarified by a use of a reference term that encompasses all those who are ‘engaged in working at the site’

6. ExQ2 - 2.1.32 With regard to monitoring we note the Applicant proposes to be secure this through the Requirements and in Section 106 Agreements, as appropriate. The Council has discussed with the Applicant the monitoring arrangements in respect noise impacts from operational noise and from the rail traffic post development and these are detailed in the Statement of Common Ground. The Council wil expect to these measures to be reflected in Requirement 23 within a revised dDCO, the Council reserves comment until this is made available.

7. ExQ2.1.34 - The proposed development will be unlikely to cause air quality objectives to be exceeded within South Northamptonshire, providing the full package of mitigation is delivered. The provision of the new bypass for the village of Roade, where at times traffic congestion is experienced, is a significant element in the mitigation necessary to ensure levels of nitrogen dioxide remain below the Annual Average objective limit of 40µg/m³

8. ExQ2 2.11.2 - The Council is content with the proposed approach set out n paragraph 6.4.2 of ES Chapter 6 (Geology, Soils and Groundwater) (Doc 5.2 [APP-092] with respect to the discounting of works on six outlying junctions

9. ExQ2 – 2.15.2. Refer to comments on EQxQ2 2.1.9 and 2-1-20 above. The Council understands the Applicant will submit a revised CEMP. The Council will review this version when this is made available. This may resolve the conflict however the inclusion of a paragraph to clarify the precedence of the Requirements and the CEMP would avoid uncertainty.
10. ExQ2 - 2.15.3. We would agree that in principle the requirements should make clear the details, including timing, or if for subsequent approval, set out clearly where the relevant detail will be provided and approved, to avoid any conflicts.
11. ExQ2 - 2.15.5. It would provide clarity if a reference to “shortly” in para.6.15 is replaced with a reference to specific time periods e.g. ‘no more than xx’ minutes before or after the times specified in para.6.12’.