

**PINS Reference TR050006 - Northampton Gateway RFI**

**IP REF. SP074** - South Northamptonshire Council      SNC ref 20190319/wr/ish4

(submitted by email to [NorthamptonGateway@pins.gsi.gov.uk](mailto:NorthamptonGateway@pins.gsi.gov.uk)) Date – 19 March 2019

**South Northamptonshire Council – Written Submission pursuant to  
ISH 4 – Cumulative and Interaction Issues.**

1 Pursuant to the Issue Specific Hearing 4 held on 12 March 2019 the Council provides the following submission .

**Socio-Economic matters**

1. The scale of the proposed Northampton Gateway and Rail Central RFI developments will significantly increase the number of jobs within the area. This would be in addition to the planned for growth in employment and housing set out within the West Northamptonshire Joint Core Strategy which balances housing and employment growth, ( this includes the RFI expansion at DIRFT Phase 3).
2. The Labour Market Study Areas (LMSA) identified for both NG and RC proposals include the areas of South Northamptonshire, Daventry, Northampton, Wellingborough, and Milton Keynes; the NG LMSA also includes Kettering, (this is not included in the RC LMSA), whilst the RC LMSA includes Coventry,(which is not included in the NG LMSA); neither LMSA include Rugby. The areas are thus broadly similar.
3. The labour market assessment within the Northampton Gateway ES identifies a residual pool of unemployed people within the Study Area identified; the size of this pool is however only a little more than the total number of jobs the Northampton Gateway RFI is likely to generate. The Rail Central RFI, being larger, is likely to create even more jobs than Northampton Gateway; the demand for labour from both however will fall on broadly the same labour market supply area.
4. The cumulative effect of this substantial additional employment growth, in terms of the supply of labour would pose a challenge for the local labour market. If demand significantly outstrips supply, recruitment issues could extend to the existing local businesses with resulting adverse effects for the stability of the local economy.

## **Landscape and Visual matters**

5. The development of both the proposed NG RFI and RC RFI would result in the complete urbanisation of the entire swathe of largely undeveloped and mainly agricultural land lying between the M1, the A43, and the villages of Blisworth and Milton Malsor, a total area of around 600 hectares. This would be a significant Major Adverse effect on the landscape character that cannot be mitigated.
6. There would also be significant combined visual effects from both proposals for properties on the southern edge of Milton Malsor, to the north of RC main site and for properties on Courteenhall Rd to the south of NG main site, and for users of the public rights of way that cross both sites. These cumulative visual effects would vary up to Major Adverse.
7. Both proposals would contribute to the combined visual effect. The effect from each will vary with the relative position of the receptor to each site. The existing topography of the land is significant in influencing the extent to which the proposed developments would be visible.
8. The RC site is situated in a depression, the land falls from the higher ground at Milton Malsor to the north to the lower ground at the WCML before rising again to the Blisworth village which sits on the ridge to the south. The topography presents an open aspect to the surrounding higher land. The Courteenhall Rd runs along the Blisworth Ridge and offers unrestricted views over the adjacent sloping land and the Rail Central site beyond. Views over the NG site are limited by higher ground at the NLL railway and the existing woodland on the NG site, which would be retained. These features limit the views from the east over the RC site.
9. The NG main site land generally falls from higher ground in the north and west to lower ground in the south and east with higher ground to the west and the east. The rising Blisworth ridge limits views from the south west, The site is characterised by woodland areas on the western side and linear mature tree planting associated with the M1 landscaping to the east The topography presents a more enclosed aspect than the RC site, with views into the site predominantly from the south east.

## **Dust Mitigation**

10. There is no reference in the actions with respect to how any dust risk will be assessed or what type of monitoring will be undertaken that from my perspective would assist the contractors or local planning authority to determine

what measures will be required from the list in point 7.6 of the Draft CEMP. The Institute of Air Quality Management have published guidance on this and which is widely used in the construction industry and as we ordinarily require in respect of CEMPs.

- Institute of Air Quality Management (IAQM) Guidance on Assessment of Dust from Demolition & Construction 2014.
- Institute of Air Quality Management (IAQM) Guidance on Air Quality Monitoring in the vicinity of Construction & Demolition Sites 2018.

This guidance sets out a logical framework for assessing the level of risk as based on site specific circumstances and details what dust control measures and monitoring should be required.

11. We would therefore recommend the revisions **marked red below**, iare made to paragraphs 7.2, 7.4 and 7.5. in the CEMP V3 as set out in Appendix 2.1 to ES (Doc. 5.2).
12. Paragraph 7.2 - “Many construction activities increase the risk of dust nuisance. Each P-CEMP will be required to set out the details of a dust risk assessment and dust management plan setting out the methods to be used to control **and monitor** dust and other emissions to air. These should accord with the principles set out below”.
13. Paragraph 7.4 - “**Each P-CEMP must include a dust risk assessment undertaken in accordance with the procedures detailed in the Institute of Air Quality Management (IAQM) Guidance on Assessment of Dust from Demolition & Construction 2014. The detail of what mitigation measures will be employed will be as a minimum as based on the recommendations made in that guidance and which may include some of the measures outlined in 7.6 below.**
14. Paragraph 7.5 – “. The contractors will be advised to discuss their arrangements with the Environmental Health Officer (EHO)”. **As a minimum the PCEMP will need to include an inspection for visible dust emissions in the vicinity of the site boundary (internal and external) should be conducted at least once on each working day. The results of this inspection should be clearly recorded in a clear and unambiguous manner. When sensitive receptors are in close proximity to the site and sources of dust generation then the contractor should undertake dust assessment as recommended in the Institute of Air Quality Management (IAQM) Guidance on Air Quality Monitoring in the vicinity of Construction & Demolition Sites 2018”**

15. Subject to the above, the CEMP and the required PCEMPs will enable appropriate dust mitigation for the NG proposal. and to minimise any cumulative effect with the RC proposal. The above thus provides the SNC response to query raised by the ExA in ISH4 - Action point 6.