

## 4. Overview of Consultation & Scoping

- 4.1 This chapter provides an overview of the consultation that has informed this PEIR. Full details will be provided within a separate Consultation Report.
- 4.2 Consultation includes non-statutory consultation undertaken by the Applicant, as well as statutory consultation in accordance with the PA2008 (**Ref. 4.1**). Statutory consultation carried out under the 2008 Act includes:
- Statement of Community Consultation (SoCC); and,
  - Section 47 Community Consultation as set out in the SoCC.
- 4.3 Non-statutory consultation has included (for example):
- Informal discussions with statutory consultees, local authorities and landowners, in preparation for formal consultation under Section 42.
- 4.4 In line with the requirements of the PA2008, the Applicant has been undertaking a structured and comprehensive programme of pre-application consultation with the local community and stakeholders.
- 4.5 The Applicant has been in dialogue with a number of stakeholders over a period of several years as it has investigated the potential for the Proposed Development. These discussions have taken place in order to raise awareness and provide initial information on the Proposed Development and the planning process, and to establish basic scheme feasibility and to ensure that the Applicant could bring forward an application for Development Consent in line with the requirements of the NSIP process and the PA2008.
- 4.6 These discussions included engagement with Network Rail to assess feasibility, capacity and viability matters (the opportunity to connect into the existing rail network being a core aspect for the scheme). The Applicant also entered into discussions with South Northamptonshire Council and Northampton Borough Council at that time so that the opportunity and potential for the scheme could be recognised. Similarly, the Applicant commenced discussions with Northamptonshire County Council and Highways England with regard to highway matters.
- 4.7 The benefit and outcome of these early engagement meetings was to establish awareness of the scheme and start a dialogue that could then continue into the formal, statutory consultation stage.
- 4.8 Following the early meetings and engagement activities, the Applicant commenced (from November 2015) meetings and briefings with relevant stakeholders as part of an increasing programme of consultation. Initially this was non-statutory consultation and subsequently the first round of statutory consultation was held. This is explained in further detail below.

#### **Local stakeholder briefings (2015 – early 2016):**

- 4.9 The Applicant provided informal, introductory briefings to key stakeholders from 2015, which provided an opportunity to inform stakeholders about the proposals and explain the overall approach to 'Phase One' consultation planned for Spring 2016.
- 4.10 Briefings were held with:
- South Northamptonshire Council, Northampton Borough Council and Northamptonshire County Council – following a sequence of meetings and other contact with officers, emails were sent to relevant councillors in November 2015 to introduce them to the proposals;
  - Chris Heaton-Harris MP (Conservative, Daventry) – a briefing meeting was held on 24 November 2015;
  - Milton Malsor Parish Council – a briefing meeting was held with parish councillors on 8 December 2015 (this was open to the public);
  - Northamptonshire Enterprise Partnership – a briefing meeting was held on 17 December 2015;
  - Rt Hon Andrea Leadsom MP (Conservative, South Northamptonshire) – a meeting was held on 17 December 2015 (with assistant only);
  - Blisworth Parish Council – a briefing meeting was held with parish councillors on 4 January 2016 (this was open to the public); and
  - South East Midlands Local Enterprise Partnership – a briefing meeting was held on 28 January 2016.
- 4.11 In addition, in January 2016, summary telephone briefings were provided to a representative of each of the parish councils near the site including: Tiffield Parish Council; Shutlanger Parish Council; Stoke Bruerne Parish Council; Collingtree Parish Council; West Hunsbury Parish Council; Hunsbury Meadows Parish Council; Rothersthorpe Parish Council; Grange Park Parish Council; Courteenhall Parish Council and Wootton & East Hunsbury Parish Council, as well as Easton Neston Parish Meeting.
- 4.12 Local awareness of the project was raised through media briefings and updates that have helped to ensure local communities are aware of the project and the planned consultations, and the contact details and website address for further information.
- 4.13 The project team has provided (and continues to provide) information and comments to support local press reporting on the proposals (print, broadcast and online media). An initial briefing was also provided to the Northampton Chronicle & Echo on 9 February 2016 (with reporter Nick Spoons).

- 4.14 Engagement with local media is continuing throughout the process with an expectation that media reporting and coverage will assist in making people aware of the proposals for Rail Central and how they can participate in the planning process should they wish to.

**Introductory project leaflet (January 2016):**

- 4.15 A summary introductory leaflet (“An introduction to Rail Central”) was produced and sent to more than 2,500 local addresses near the site in January 2016. Recipients included Royal Mail registered postal addresses in Milton Malsor, Blisworth and Roade. The leaflet was also available via email on request and published on the project website, [www.railcentral.com](http://www.railcentral.com).
- 4.16 The leaflet provided introductory information to local residents and businesses about the project and the national need for SRFIs, as well as identifying the site being brought forward. It also explained the approach to consultation and promoted the planned consultation in the Spring. The contact details for the project team were provided in order to answer any questions.

**Initial landowner and occupier briefings (January – February 2016):**

- 4.17 The Applicant identified all landowners and occupiers with an interest in the land to which the application site relates. As members of the local community, these individuals and organisations are able to participate in Section 47 consultation and will be separately consulted as part of the Section 42 consultation (carried out in ‘Phase Two’ Consultation).
- 4.18 The Applicant hosted a briefing for landowners and occupiers, which was held on 3 February 2016. Since then, liaison with landowners and occupiers has continued.

**Local Liaison Group (LLG) (from February 2016):**

- 4.19 A LLG was established in February 2016. It is envisaged that the LLG will remain in place throughout the pre-application, submission and examination period.
- 4.20 The following stakeholders were invited to become members of the Local Liaison Group: a representative from at least 15 local parish councils immediately surrounding the site including Milton Malsor Parish Council, Blisworth Parish Council and Roade Parish Council; the four South Northamptonshire Council representatives for the two site wards; the Northamptonshire County Council electoral division representative of the site; the seven Northampton Borough Council representatives for the four local site wards adjacent to the M1; and representatives from the community group Stop Rail Central.
- 4.21 At the initial stage, the LLG has two primary responsibilities that serve as the core areas of focus, though flexibility has been built in to allow other appropriate matters to be discussed.
- 4.22 Its purpose is to:
- Provide a forum for discussing detailed issues relating to the proposals, enabling questions and matters to be raised with the Applicant so that answers can be provided and solutions achieved.

- Provide an appropriate and effective structure through which information about the emerging proposals can be shared and coordinated.
- 4.23 An initial LLG discussion workshop was held on 16 March 2016. This was the first meeting of the LLG. The purpose of the workshop was to establish the LLG and how it will operate as well as to discuss and seek views from LLG representatives on aspects of the potential scheme design where there is scope to adjust the design in line with feedback.
- 4.24 Since then, regular updates have been provided to the LLG through either a meeting or an email update. In Summer 2017, the LLG membership was reviewed to take account of the extent of highway works.
- 4.25 The Applicant has/is consulting on Preliminary Environmental Information during two periods, as summarised below.

**Section 47 Consultation ('Phase One') (April – October 2016):**

- 4.26 As part of the Phase One of Section 47 Consultation, the Applicant consulted on 'baseline' environmental information. The draft preliminary environmental information report (PEIR) and a non-technical summary document (NTS PEIR) (**Ref. 4.2**) were made available to view at the consultation events, on the project website (**Ref.4.3**) and at identified public viewing locations throughout the consultation period.
- 4.27 The Phase One consultation programme was specifically designed to ensure that people who wanted to get involved could easily do so by using a mix of different approaches. This included:
- Public Exhibitions: the Applicant held a series of public exhibitions at local venues close to the site.
  - Project website: the Applicant established a project website ([www.railcentral.com](http://www.railcentral.com)) that hosted all consultation materials, along with general background details and an online feedback form.
  - Direct information letter and invitation to the public exhibitions: the Applicant wrote directly to households and businesses within the defined consultation area around the site, providing details for the consultation and public exhibitions (and other ways to get involved). This consultation area includes approximately 2,500 properties.
  - Attending local meetings: during this phase of consultation, briefings were provided to a range of local stakeholders and organisations, building on those carried out in advance of the consultation opening. Briefings and presentations were offered to Youth Councils and local schools.
  - Advertising: the consultation and the public exhibitions were advertised locally. Local press advertisements were placed in the Northampton Chronicle & Echo

and the Northampton Herald & Post, while posters and leaflets were provided to Parish Councils for use with local notice boards.

- Documents available to view at local venues: all consultation documents were made available at local deposit locations.

#### **Third community newsletter (July 2016):**

- 4.28 In July 2016, the Applicant published its Summer community newsletter. This was sent to all addresses within the Consultation Zone (approximately 2,500) and published on the website. It was also emailed to members of the LLG so that it could be distributed widely.

#### **Supplementary consultation materials (August 2016):**

- 4.29 Updated illustrative plans and new visual material was published as part of the Phase One community consultation.

#### **Fourth community newsletter (December 2016):**

- 4.30 Following the close of the consultation, a community newsletter was prepared, summarising the headline outcomes of the Phase One consultation and reporting on the next steps. This was sent to all addresses within the Consultation Zone (approximately 2,500) and published on the website. It was also emailed to LLG members so it could be distributed widely.

#### **Fifth community newsletter (April 2017):**

- 4.31 The fifth newsletter provided an update on the consultation timescales, explaining to readers that Phase Two Consultation was now scheduled to take place in September. The newsletter provided a summary of what information would be presented for consultation and provided an update on progress with the technical assessments. As with other newsletters, this Spring 2017 newsletter was published on the project website and issued to all properties within the consultation zone.

#### **Sixth community newsletter (September 2017):**

- 4.32 The sixth newsletter provided an update on the detailed surveys and technical work and explained the progress made with highway modelling. The newsletter stated that because of this work, the programme had re-adjusted and thus Phase Two Consultation was expected to take place in early 2018. This was so that consultation could happen when there was comprehensive detail across all key areas on which to consult. This Autumn 2017 newsletter was issued to all properties within the consultation zone and published on the project website.

#### **Interim informal consultation (October 2016 – Early 2018):**

- 4.33 Since the close of the Phase One Consultation in October 2016, the Rail Central team has continued to engage with local residents and stakeholders. This has included providing feedback on the Phase One Consultation, providing updates on the development of the plans and answering enquiries. Engagement has included:

- Local stakeholder meetings and update briefings with South Northamptonshire District Council, Rt Hon Andrea Leadsom MP, Towcester Primary School, Milton Malsor Parish Council, Roade Parish Council, SEMLEP and Gayton Parish Council;
- Community newsletters published and issued to local addresses in December 2016 (which included a summary of feedback and themes from the Phase One Consultation) and in April 2017 (which provided an update on the highway works and the consultation schedule);
- Landowner and occupier discussions continued throughout the period;
- LLG engagement continued with regularly newsletters or meetings. With respect to meetings, a detailed highway briefing took place in May 2017 and a detailed rail briefing took place in July 2017;
- Website updates were provided as appropriate during this period to ensure the website provided accurate and up to date information.

#### **Section 42 & Section 47 Consultation ('Phase Two') (March – April 2018):**

- 4.34 As part of the Section 42 and Section 47 consultation (Phase Two), the Applicant is consulting on further details, which includes the preliminary conclusions of the draft EIA (this PEIR), including any likely significant effects of the project on the environment and any mitigation proposed. A non-technical summary has also been produced and made available to the public.
- 4.35 This two-stage process has enabled further surveys, data and consultation comments to be collected and considered to inform the evolving scheme design.
- 4.36 Further information regarding the Phase Two consultation will be provided in a separate Statement of Community Consultation, and is not therefore summarised here.
- 4.37 Consultation regarding the EIA has also been undertaken in accordance with the EIA Regulations 2017 (**Ref. 4.4**) in relation to Scoping (consultation was undertaken in preparing the Scoping Report, and in responding to comments provided by the Planning Inspectorate in their Scoping Opinion (as set out below)).
- 4.38 Ongoing consultation has also been undertaken with statutory and non-statutory consultees in relation to the scope of the technical assessments and the methods to be used. This is reported in full in the technical topic chapters, **Chapters 9-25**, and is not therefore repeated here.

## **EIA Screening**

- 4.39 The Applicant considered that in the absence of mitigation the Proposed Development has the potential to result in likely significant effects on the environment. On 10 October 2015 the Applicant submitted written confirmation (**Ref. 4.5**) to PINS pursuant to Regulation 6(1) of the EIA Regulations 2009 (**Ref. 4.6**) that an EIA would be completed for the project. The EIA is therefore being undertaken on a voluntary basis (at the time of writing the Applicant is submitting further written confirmation to PINS, pursuant to Regulation 8(1) of the EIA Regulations 2017, re-confirming that an EIA will be completed for the project).

## **EIA Scoping**

- 4.40 The purpose of scoping is to obtain from the Secretary of State an agreed list of matters upon which the ES should be based along with any matters to be ‘scoped out’. The scoping process focuses the EIA on the environmental issues and potential impacts that are likely to result in significant effects.
- 4.41 An EIA Scoping Report (**Ref. 4.7**) was submitted to The Planning Inspectorate on 10 December 2015.
- 4.42 The Planning Inspectorate issued an EIA Scoping Opinion in January 2016 (**Ref.4.8**). This, along with the non-prescribed and late consultee responses, is included as **Appendix 4.1**.
- 4.43 A summary of the key points in the Scoping Opinion and a summary of key comments received from statutory and non-statutory consultees during the EIA Scoping Process are summarised below. Non-prescribed consultees and late responses are also included where comments were provided.
- 4.44 Matters specific to each topic area are set out within separate tables in the relevant technical chapters (**Chapters 9-25**). This includes, for example, where matters have subsequently been ‘scoped out’ with the agreement of consultees. **Table 4.1** does not, therefore, replace the topic-specific considerations set out in the technical chapters.
- 4.45 For the purpose of this PEIR **Table 4.1** provides details of where the comments/themes identified either have been addressed, or will be addressed as further information becomes available as the project progresses.

**Table 4.1: Scoping Opinion January 2016, Overview of Key Comments**

Sub-section / paragraph / reference	Summary of Overarching Comment / Theme	Where the comment has been / will be addressed
<b>SoS Comments</b>		
Appendix 1 ‘Presentation of the Environmental Statement’ (with cross-reference to corresponding elements of the Main Text of the Scoping Opinion as appropriate)		
Indicative Contents	Provision of an ES in accordance with the relevant EIA Regulations, including compliance with Schedule 4.	The PEIR as a whole. Details of the EIA Regulations, and Schedule 4 requirements, are summarised at <b>Chapter 7</b> ‘EIA Assessment Methodology’
Balance	Provision of a balanced ES; importance of considering cumulatives and inter-relationships; provision of clearly defined scheme parameters, and clarity on scope of flexibility; consideration of maximum potential adverse impacts.	All requirements stated are addressed throughout this PEIR. Both inter and intra cumulative effects have been considered, and further assessment will be provided as part of the final EIA.
Scheme Proposals; flexibility; and para. 2.41 of the Main Text	Clarity on maximum and other dimensions. Confirmation that changes to parameters would not result in significant impacts not previously identified. Clarity required on element of the scheme yet to be finalised.	<b>Chapter 5</b> ‘Project Description’ sets out key parameters.
Scope; and para. 3.9 of Main Text	Physical scope of study areas to be defined, and scope to include at least the whole of the application site and all off-site works. The extent of the study areas (within each technical chapter) should be on the basis of recognised professional guidance, whenever such guidance is available. The study areas should also be agreed with the relevant consultees and, where this is not possible, this should be stated clearly in the ES and a reasoned justification given. The scope should also cover the breadth of the topic area and the temporal scope, and these aspects should be described and justified.	<b>Chapters 9-25</b> identify Study Areas and agreements reached.

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Breadth of Topic Area	Range of matters to be considered to be explained under each topic	<b>Chapters 9-25</b> set out the matters to be considered and identify the reasonable worst case.
Temporal Scope. Mitigation Measures; and para. 2.40 of Main Text	<p>Environmental impacts to be considered during construction works, completion/operation (and where appropriate a number of years after completion, e.g. traffic growth), and decommissioning. Decommissioning to give early consideration to how structures can be taken down, to minimise disruption, to re-use materials, and to restore the site or put it to a new use. A suitable time period for the assessment should be agreed with consultees. Standard terminology for short-term etc should be defined.</p> <p>Best practice to outline in the ES the structure of the environmental management and monitoring plan, and safety procedures which will be adopted during construction and operation and may be adopted during decommissioning.</p>	<b>Chapter 5</b> ‘Project Description’ sets out the relevant context. <b>Chapters 9-25</b> address all phases of the Proposed Development.
Baseline; and paras. 3.7 and 3.8 of Main Text	Baseline environment to be consistent, explained, relevant, up to date, and with survey dates, data sources. Timing and scope of all surveys should be agreed with relevant statutory bodies and appropriate bodies wherever possible, as well as methodologies to be used.	<b>Chapters 9-25</b> address baseline conditions, including the ‘do nothing’ and future baseline scenarios, and in relation to other projects (cumulative assessment). Sources of data are given.
Legislation and Guidelines	Best practice and standards to be referenced. Licenses and permits to be identified.	<b>Chapters 9-25</b> address topic-specific legislation, policy, guidance, best practice and standards in a consistent manner, and identify permits and licences where sought/required.
Assessment of Effects and Impact Significance; and para.3.7 and 3.16 of	<p>Significant effects to be defined, and significant impacts clearly identified.</p> <p>Assessment of effects to be reported under its own heading as opposed to under the methodology heading.</p>	The approach is set out at <b>Chapter 7</b> ‘EIA Methodology’, and is identified on a topic-specific basis within <b>Chapters 9-25</b> , with assessments and significant

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Main Text		impacts and effects stated in a consistent manner with reference to all phases of the Proposed Development, including cumulative impacts.
The inter-relationships between environmental factors. Cumulative Impacts.	Inter and intra relationships to be considered as set out in the Opinion.	The approach is set out at <b>Chapter 7</b> 'EIA Methodology', and is identified on a topic-specific basis within <b>Chapters 9-25</b> . <b>Chapter 26</b> 'Cumulative Effects Summary' provides a complete summary. PINS Advice Note 17 has informed the approach.
Related Development	Proposed Development for which development consent is sought, and any other development, to be made clear. Development which is related to the Proposed Development to be given equal prominence.	<b>Chapter 5</b> 'Project Description' sets out the Proposed Development. <b>Chapters 9-25</b> provide reasonable worst case assessments.
Alternatives; and para. 2.18 of Main Text.	An outline of the main alternatives to be provided.	<b>Chapter 3</b> 'Reasonable Alternatives' provides a description of the reasonable alternatives studied by the Applicant and an indication of the main reasons for the option chosen. Further details are provided in a separate 'Alternative Sites Assessment'.
Mitigation Measures	Mitigation measures to be identified to prevent, reduce and where possible offset any significant adverse effects. Any proposed mitigation to be discussed and agreed with consultees. Measures must be firm and deliverable.	Embedded and adaptive mitigation measures are identified comprehensively within <b>Chapters 9-25</b> , and shall be cross-referred to within

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Cross References and Interactions	All specialist topics should cross-reference other relevant disciplines. Technical difficulties should be identified.	specific DCO provisions/requirements.  <b>Chapters 9-25</b> make appropriate cross references within the Introduction, and Intra-relationships sections, and elsewhere within the assessments as appropriate. The limitations of the assessments are expressly stated towards the end of each chapter. Further assessment will be provided as part of the final EIA.
Consultation	It is recommended that any changes to the scheme design in response to consultation should be addressed in the ES.	Addressed within <b>Chapter 3</b> 'Reasonable Alternatives'.
Transboundary Effects	It is recommended that consideration should be given in the ES to likely significant effects on the environment of other EEA Member States (in particular discharges to air and water, migratory species and impacts on shipping and fishing areas).	<b>Chapter 7</b> provides proportionate consideration of transboundary effects.
Summary Tables; and para. 3.10 of Main Text	Summary tables are recommended in relation to: residual impacts; consultation; mitigation; HRA, where required.	All suggested summary tables are provided within <b>Chapters 9-25</b> . In relation to HRA, a No Significant Effects report has been prepared.
Terminology and Glossary of Terms	Common terminology and a glossary should be included in the ES.	The PEIR provides a glossary and a list of abbreviations.
Presentation	Paragraphs, appendices, figures to be numbered and referenced. Figures to clearly show the site application boundary.	A consistent approach has been applied across the PEIR as a whole.
Bibliography	Bibliography to be included in the ES	All relevant PEIR chapters include a bibliography.

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Non-Technical Summary	Non-Technical Summary required, supported by appropriate figures, photographs and photomontages.	Separate Non-Technical Summary provided.
<b>Main Text (pages 3-37)</b>		
Executive Summary and paras. 3.17 and 3.20	<p>Executive Summary and para. 3.7: <i>“Matters are not scoped out unless specifically addressed and justified by the applicant, and confirmed as being scoped out by the Secretary of State”.</i></p> <p>Para.3.20: <i>“The Secretary of State has not agreed to scope out any other topics or matters on the basis of the information provided within the Scoping Report. However, this does not prevent the applicant from subsequently agreeing with the relevant consultees to scope out other topics or matters from the ES. In order to demonstrate that topics have not simply been overlooked, where topics are scoped out prior to submission of the DCO application, the ES should still fully explain the reasoning and justify the approach taken”.</i></p>	Justification for any matters that are not taken forward for further assessment is set out within <b>Chapters 9-25</b> .
1.6	The SoS will take account of relevant legislation and guidelines (as appropriate) and will not be precluded from requiring additional information if it is considered necessary in connection with the ES submitted with that application.	The PEIR addresses current legislative requirements and provides further justification where applicable.
1.12	The SoS recommend that a table is provided in the ES summarising scoping responses from the consultation bodies and how they are, or are not, addressed in the ES	<b>Table 4.1</b> (this table) of <b>Chapter 4</b> , and separate summary tables of the Scoping Opinion provided within <b>Chapters 9-25</b> .
2.19-2.22	Suggests that construction, operation, decommissioning and access information should be supplied.	<b>Chapter 5</b> ‘Proposed Development’ provides information regarding all phases of the Proposed Development.
2.24	The SoS expects the Site Description to identify the context of the proposed development, any relevant designations and sensitive receptors. It should identify	Addressed within <b>Chapter 2</b> ‘The Site and Surroundings’; <b>Chapter 5</b> ‘The

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	<p>land that could be directly or indirectly affected by the proposed development and any associated auxiliary facilities, landscape areas and potential off site mitigation. Further detailed baseline information should be provided within topic specific chapters of the ES where relevant.</p>	<p>Proposed Development’; and <b>Chapters 9-25</b>.</p>
2.25 - 2.26	<p>The applicant should ensure that the description of the application site and surroundings is accurate and consistent throughout the ES.</p>	<p>Addressed throughout the PEIR.</p>
2.28 – 2.31	<p>The applicant should ensure that the description of the proposed development that is being applied for is as accurate and firm as possible.</p> <p>The SoS recommends that the ES should include a clear description of all aspects of the proposed development at the construction, operation and decommissioning stages. This should include details of the locations and dimensions of all proposed permanent elements of the NSIP.</p> <p>If a Draft DCO is to be submitted, the applicant should clearly define which elements of the proposed development are integral to the NSIP and which are either ‘associated development’ under the PA 2008 or an ancillary matter.</p> <p>Any proposed works and/or infrastructure required as associated development or as an ancillary matter, (whether on or off site) should be assessed as part of an integrated approach to environmental assessment.</p>	<p>The phases of the Proposed Development and other details are set out at <b>Chapter 5</b> ‘The Proposed Development’ and <b>Chapters 9-25</b>. Application plans are also relevant. Associated Development is also clarified in the Draft DCO.</p>
2.33	<p>The SoS considers that the ES should contain information on construction, including (but not limited to):</p> <p>Land use requirements, construction programme, including phasing if appropriate, construction working hours, construction methods and activities associated with each phase, site preparation (including movement of spoil and the need to import or export material), access routes, the location of any stopped up or diverted highways, footpaths or other rights of way, lighting equipment/requirements, number of workers during construction (including details on full/part time and shift work), the number, movements and parking of construction vehicles.</p>	<p>See construction section of <b>Chapter 5</b> ‘The Proposed Development’; assessment sections of <b>Chapters 9-25</b>; <b>Chapter 19</b> ‘Highways and Transportation’.</p> <p>Public Rights of Way plan and other Application plans are also relevant.</p>

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2.24 – 2.36	<p>Information on the operation and maintenance of the proposed development should be included in the ES and should cover (but not be limited to):</p> <p>Operational land use requirements, operational activities, the location of any stopped up or diverted highways, footpaths or other rights of way, the location and nature of landscape works , number of full/part time jobs and operational hours and shift patterns, the year of operation and the ‘life’ of the development.</p>	<p>See construction section of <b>Chapter 5</b> ‘The Proposed Development’; assessment sections of <b>Chapters 9-25; Chapter 19</b> ‘Highways and Transportation’.</p> <p>Public Rights of Way plan and other Application plans are also relevant.</p>
2.37-2.39	<p>The ES should provide further details on the road works, including on the phasing of their completion, and these details should be included in the Project Description chapter of the ES, as well as the Highways and Transportation chapter.</p> <p>Locations to provide vehicular access to the site and any other highway improvements required should be identified on plans within the ES. The applicant is reminded that all works should be located within the red line boundary if they are intended to be included within the DCO application. The ES should also detail how the application site would be accessed during the construction phase.</p>	<p>See <b>Chapter 5</b> ‘The Proposed Development’ and <b>Chapter 19</b> ‘Highways and Transportation’ and associated drawings.</p>
3.4	<p>Consideration of Directive 2014/52/EU.</p>	<p><b>Chapter 6</b> ‘Legislation and Policy Context’ and <b>Chapter 7</b> ‘EIA Assessment Methodology’ address the relevant EIA Directive and Regulations.</p>
3.18 - 3.19	<p>With regard to matters to be scoped out, the SoS does not agree that the noise and vibration impacts referenced in the Scoping Report (para 16.61) can be scoped out of the EIA due to insufficient information to justify this.</p>	<p>See <b>Chapter 18</b> ‘Noise and Vibration’</p>
3.21-3.128 (Topic-specific advice)	<p>Topic-specific comments/advice provided.</p>	<p>Specific technical comments identified by the Scoping Opinion are summarised in more detail of the consultation sections of <b>Chapters 9-22</b> and addressed accordingly in those</p>

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3.21-3.35 (Air Quality)	<p>Recommends that study area is agreed with the relevant Environment Health Officers of the LPA.</p> <p>Existing baseline should be informed by a comprehensive and up-to-date data set. The SoS recommends the 11 monitoring locations are agreed with the relevant Environmental Health Officers of the LPAs and these agreements are documented within the ES. For ease of reference, Figure 8.1 should be updated in the ES to include the application site boundary and the tube ID numbers.</p> <p>Details of the diffusion tube colocation study (referred to in paragraph 8.10 of the Scoping Report) should be provided within the ES.</p> <p>ES should set out the baseline levels for PM<sub>10</sub> and PM<sub>2.5</sub> and detail the source and date of this data.</p> <p>The methodology for assessing construction phase impacts should be clearly set out in the ES.</p> <p>ES should provide clear cross referencing to where the traffic data relating to the dispersion modelling can be found</p> <p>SoS queries whether the four levels of significance identified in Paragraph 8.15 of the Scoping Report should be referring to the magnitude of effect as detailed in the Table 8.4 as they do not reflect the level of significance in Table 8.5. Care should be taken not to confuse terminology within the ES.</p> <p>ES should clearly identify the discrete receptor locations that will be assessed along with their sensitivities. ES should provide definitions for sensitivities of receptors; they have not been provided within the Scoping Report. With reference to Table 8.5 of the Scoping Report, the ES should set out what level of significance should be considered 'significant in EIA terms'.</p> <p>Any professional judgements made should be fully documented and justified.</p> <p>SoS considers that adverse change to air quality should be assessed in relation to</p>	<p>assessments.</p> <p>Addressed in <b>Chapter 9</b> 'Air Quality', with cross reference made to other relevant chapters as appropriate.</p>

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	<p>compliance with European air quality limit values and Northamptonshire Air Quality Management Area (AQMA). It would be useful for the full extent of the AQMAs to be visually displayed on a figure within the ES.</p> <p>SoS advises that potential impacts on the AQMA located along the M1 between Junctions 15 and 16 are considered within the ES (as refers South Northamptonshire Council).</p> <p>SoS considers that potential impacts on the A508, Roade village and the Towcester AQMA should be considered within the ES (as refers South Northamptonshire Council).</p> <p>Air quality and dust levels should be considered not only on site but also off site, including along access roads, local footpaths and other PROW.</p> <p>Cross reference should be made to the Highways and Transportation chapter in relation to dust arising from traffic movements.</p> <p>Consideration should be given to appropriate mitigation measures and to monitoring dust complaints.</p>	
3.36-3.38 (Agricultural Land)	<p>The existing baseline, of the assessment of impacts, should be informed by a comprehensive and up-to-date data set and therefore welcome the proposal to undertake new surveys as well as discussing the suitability of existing surveys with Natural England.</p> <p>ES should clearly set out the area of agricultural land to be lost including land within farm holdings.</p> <p>ES should take account of comments by Natural England and contain an assessment of the impact to agriculture and soils against the policy set out in the NPPF.</p>	Addressed in <b>Chapter 10</b> 'Agriculture', with cross reference made to other relevant chapters as appropriate.
3.39-3.45 (Archaeology and Cultural Heritage)	Welcomes the proposed consultation with Historic England and the Northamptonshire County Archaeologist and recommends the scope of the consultation discussions is extended to also include agreement on the study area	Addressed in <b>Chapter 11</b> 'Archaeology' and <b>Chapter 12</b> 'Built Heritage' with cross reference made to other relevant

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	<p>and methodology of assessment.</p> <p>Figures within the ES should identify the full extent of the Conservation Areas as opposed to a single indicative location.</p> <p>Take account of comments made by the Canal and River Trust and South Northamptonshire Council in relation to the assessment of Conservation Areas and the presence of the Grand Union Canal Conservation Area.</p> <p>Where the assessment identifies the need for detailed evaluations prior to, or during construction, a draft Written Scheme of Investigation should be submitted with the ES.</p> <p>It is unclear what the definitions of impact magnitude (Table 10.1 of the Scoping Report) are based upon. This should be included within the ES.</p> <p>ES should include an assessment of cumulative impacts.</p> <p>Reference to Historic England response, particularly in relation to the extent of the study area; the scope of the assessment; the assessment methodology; and the guidance to which the applicant should have regard.</p>	<p>chapters as appropriate.</p>
<p>3.46-3.56 (Ground Conditions)</p>	<p>Environment Agency should be consulted in addition to the Environmental Health Officer.</p> <p>The ES should clarify what is meant by the “<i>immediate surrounding area</i>” as referred to in the description of the study area. The study area should also be agreed with the relevant consultees.</p> <p>SoS recommends that the applicant considers the potential for land contamination and the existence or creation of pathways which could lead to effects on receptors in the area.</p> <p>ES should clearly reference specific guidance where the Scoping Report (paragraph 11.5) states that the “<i>walkover has been undertaken in accordance with best practice guidance</i>”. Attention to the comments made by Environment Agency.</p> <p>ES should include baseline information used to inform the Phase 1 Desk Study.</p>	<p>Addressed in <b>Chapter 13</b> ‘Ground Conditions’, with cross reference made to other relevant chapters as appropriate.</p>

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	<p>Should previous studies be relied upon, these should be provided as an appendix to the ES.</p> <p>Attention directed to South Northamptonshire Council's comments in relation to the location of part of the site in Minerals Safeguarding Area and to the need to consider minerals in the Ground Conditions chapter of the ES.</p> <p>ES should clearly set out what the potential effects of the proposed development would be.</p> <p>Definitions should be provided for the four levels of likelihood (high, moderate, low or unlikely) where referring to the sensitivity of receptors.</p> <p>Applicant should demonstrate a clear linkage between groundwater and surface water assessment to ensure that potential significant effects are identified and mitigated.</p> <p>Management plans proposed in paragraph 11.48 of the Scoping Report are welcomed. Any measures relied upon in the assessment should be demonstrated to be secured either by means of suitable requirement or within a draft version of the relevant management plan. The SoS advises that drafts of these plans are provided by the applicant and agrees with the comments of the Environment Agency in relation to details which should be provided within the plan.</p> <p>The need for any on-going monitoring should also be addressed and agreed with the relevant authorities to ensure that any mitigation measures are effective.</p>	
3.57-3.67 (Hydrology, Drainage and Flood Risk)	<p>The applicant should ensure that a thorough assessment of surface and ground water environment is undertaken within the ES. Appropriate cross-reference should be made between this chapter and the Ground Conditions chapter of the ES in order to avoid duplication. Scope of studies should be undertaken and reported on.</p> <p>The study area should be agreed with the relevant consultees (Environment Agency and Local Authority) and clearly explained and justified within the ES.</p>	Addressed in <b>Chapter 14</b> 'Hydrology, Drainage and Flood Risk', with cross reference made to other relevant chapters as appropriate.

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	<p>All features identified within the text of the ES to be clearly identified on a figure (e.g. the Milton Malsor Brook, Shoal Creek, the Grand Union Canal, the River Nene and the Anglian Water Sewage Treatment works). ES should also provide flood risk mapping for the application site. Attention to consultation comment of Blisworth Parish Council in relation to the flood zones in which the application site and surrounding area lie.</p> <p>Need to clearly identify which water features would be directly impacted by the proposed development, including details of any water body crossings, if required.</p> <p>ES should clearly set out the final land levels across the whole of the application site. The information should be presented on a figure with a comparative figure of the existing baseline situation.</p> <p>Recommendation to take into account comments by the Environment Agency in relation to historic landfill sites in the area; the potential for existence or creation of pathways which could lead to contamination of controlled waters; and to guidance for the assessment of land contamination.</p> <p>Welcomes the preparation of the flood risk assessment (FRA). Approach to the scope of the assessment and modelling should be discussed and agreed with the Environment Agency and Lead Local Flood Authority (LLFA). The assessment should take account of comments made by the Environment Agency in relation to the FRA, including the need to consider the Sequential and Exception Tests.</p> <p>The FRA should form an appendix to the ES, and ES should clearly state how flood risk from or to different elements of the proposed development has been evaluated.</p> <p>Where the FRA identifies the need for flood mitigation or compensation, the applicant should identify and assess such measures within the ES. These should be agreed with the Environment Agency and LLFA. The applicant may wish to consider working with the Environment Agency and LLFA regarding the potential to achieve a strategic solution for flood mitigation. Wherever possible, biodiversity</p>	

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	<p>enhancement opportunities should be considered as part of any flood prevention works.</p> <p>Any assessment based on professional judgement must clearly articulate how decisions regarding significance of effect have been made (e.g. paragraph 12.33). ES should set out tabulated assessments for each feature, clearly stating their assessed sensitivity, value, importance, magnitude and any predicted likely significant effect to show how these judgements have been derived.</p> <p>Applicant should ensure that the ES provides relevant assessments to address the requirements of the Water Framework Directive (WFD).</p>	
3.68-3.77 (Utilities)	<p>Welcomes the intention to assess the effects of the proposed development on utilities.</p> <p>There has been no justification for the conclusion that <i>“it is not anticipated that diversion of existing utility services or the provision of new utility services will have an environmental effect on any environmental receptor”</i>. If improvements to the infrastructure are required, the ES should assess impacts that may result from this, including works that may be required off site.</p> <p>The extent of the study area should be clearly defined and justified within the ES. Greater level of detail is expected on the assessment of methodology e.g. identification of documents and explanation of why proposed survey categories are appropriate.</p> <p>Consultation with relevant utilities providers is recommended to be undertaken to accurately define the existing baseline conditions assessment. Reference to comments of the Canal and River Trust which identify Sky Networks utilities as being present within the towpath along the Grand Union canal; the potential impacts on these utilities should be considered within the ES.</p> <p>Implication of the proposed development on the location of Blisworth Water Recycling Centre and Anglian Water existing foul sewerage network, sewage</p>	<p>Addressed in <b>Chapter 15</b> ‘Utilities’, with cross reference made to other relevant chapters as appropriate.</p>

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	<p>treatment and water services should be considered within the ES.</p> <p>Some criteria used in Table 13.2 and Table 13.3 of the Scoping Report are not clear in terms of whether they are derived from published guidance.</p> <p>Long term duration of effect is described in Table 13.2 as 10 years +, but described as 15 years and onwards in paragraph 13.16.</p> <p>Table 13.4 combines the categories of magnitude of effects with the sensitivity of the receptors to determine the significance of effects, however it only includes four categories of magnitude, and refers to 'moderate' effects; whereas Table 13.2 identifies five categories (including 'very high') and refers to 'medium' effects. The criteria on which the assessments are based should be clearly defined and consistently applied, and if derived from publish guidance the relevant sources should be references in the ES.</p> <p>Inconsistency of the use 'significant' and 'moderate'. Need to consider whether the definition of a significant effect should additionally consistently encompass moderate effects.</p> <p>The information provided on the proposed cumulative assessment does not clearly differentiate between cumulative effects as a result of the effects of the proposed development together with other schemes, and inter-related effects as a result of combined effects of the proposed development on particular receptors. The effects should be separately assessed and clearly differentiated in the ES.</p> <p>Recommendation to take account comments from National Grid, of potential effects on gas distribution assets within and in close proximity to the application site, and from HSE in respect of pipelines which appear to pass under the land and potential need for Hazardous Substance Consent, and advises that all such infrastructure beneath and around the site should be identified and considered.</p> <p>Comments from Environmental Health and Anglian Water of the need for water supply, wastewater, and sewage treatment services. Cross-reference should be</p>	

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	made in the ES between this chapter and the Hydrology chapter.	
3.78-3.89 (Biodiversity)	<p data-bbox="568 346 1563 564">Welcomes the intention to adhere to the guidance on ecological assessment provided by the Chartered Institute of Ecology and Environmental Management (CIEEM), and advises that in line with this guidance the ES should clearly identify and justify the ecological zone of influence for the proposed development. Note that CIEEM publish an updated guidance on terrestrial, freshwater and coastal ecological impact assessment in January 2016.</p> <p data-bbox="568 580 1563 644">Assumed that the reference in paragraph 14.50 of the Scoping Report to surveys undertaken in March 2014 is a typographical error.</p> <p data-bbox="568 660 1563 772">Additional field surveys are welcomed, the scope of which should be agreed with relevant consultees, including Natural England. New British Standards were published in October 2015 for bat surveying.</p> <p data-bbox="568 788 1563 852">Assumed error in paragraph 14.34 that states the proposed development ‘is likely to affect a European site’ is a typographical error.</p> <p data-bbox="568 868 1563 963">As per comments from Natural England, an assessment of potential impacts on bird populations from the Upper Nene Valley Grave Pits SSSI and SPA sites and their features are presented.</p> <p data-bbox="568 979 1563 1123">Application site is partially within Roade Cutting SSSI and advises that the ES assess the potential impacts on this designated site. Reiteration of the importance of ensuring the baseline environment is accurate, and recommend that it is agreed with the relevant consultees.</p> <p data-bbox="568 1139 1563 1203">The reasoning for excluding consideration of European and other sites such as SSSIs from the assessment should be fully explained and justified in the ES.</p> <p data-bbox="568 1219 1563 1369">Requirements of UK legislation and policy should be correctly identified and reflected in the ES. Table 14.3 states that candidate Special Areas of Conservation (cSACs) and proposed SPAs (pSPAs) are treated as European sites as a matter of UK policy. However, cSACs are protected by legislation (the Habitats Regulations),</p>	Addressed in <b>Chapter 16</b> ‘Biodiversity’, with cross reference made to other relevant chapters as appropriate.

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	<p>and it is pSPAs that are protected as a matter of policy.</p> <p>More comprehensive information should be provided for all non-statutory designated nature conservation sites identified within 2km of the application site and relevant plan(s) provided as appropriate to identify their location.</p> <p>Common names (not just Latin names) of all species of flora identified in this section should be provided. Reference to be made to comments made by Northamptonshire County Council in relation to current data sources for flora in the country.</p> <p>The “<i>standard mitigation practices</i>” referred to in Paragraph 14.31 should be clearly set out within the ES and should be adequately secured, for example through the provisions within the draft DCO, or included within a management plan (a draft of which should be provided with the application) which is secured through the draft DCO.</p> <p>The information provided on the proposed assessment of inter-related effects, and the cumulative assessment, confuses the two types of assessment. The EIA should separately consider impacts on single receptors as a result of combined impacts of the proposed development, and the potential cumulative effects of the proposed development together with other identified schemes.</p> <p>Proposals should address fully the needs of protecting and enhancing biodiversity. The assessment should cover habitats, species and processes within the site and surroundings. Attention should be drawn to comments made by Natural England and the Environment Agency in relation to green infrastructure and biodiversity enhancement.</p> <p>Assessment should take account of noise, vibration and air quality (including dust) impacts, and cross reference should be made to these topics in the ES Ecology chapter.</p> <p>Attention is drawn to comments made by Natural England particularly in respect of internationally and nationally designated sites, and protected species and</p>	

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	Habitats and Species of Principal Importance.	
3.90-3.98 (Landscape and Visual)	<p>None of the activities in the construction phase are included in the description of the proposed development in Section 1 of the report or referenced elsewhere. Cranes are mentioned in the operational phase but not mentioned in the landscape and visual section. Proposed development should be consistent throughout the ES and all elements that could give rise to significant effects should be identified and assessed consistently.</p> <p>The assessment methodology should be clearly and consistently detailed within the ES. Inconsistency between paragraphs 15.53 and 15.56.</p> <p>SoS welcomes confirmation that the Landscape and Visual Assessment (LVIA) will be based on a realistic worst case scenario, so that all potential significant effects will be identified and assessed.</p> <p>The Preliminary landscape and visual desk and site based assessments referenced in paragraph 15.4 of the Scoping Report to be included with the DCO application as technical appendices to the ES.</p> <p>Intention to consult local council and Natural England on the LVIA is welcomed. Natural England's comments in relation to the assessment of landscape and visual impacts should be taken into account by the applicant.</p> <p>It is recommended that the location of the 11 viewpoints is agreed with relevant consultees. As per comments from Canal and River Trust it is advised to consider the setting of the canal as a heritage asset and also views that will be experienced by users of the canal and the impact on recreation.</p> <p>The extent of visibility of the proposed development should be explained and illustrated in the ES. The ES should describe the model used, and provide information on the area covered, the timing of any survey work, and the methodology used for the surveys. The LVIA should include photomontages of the proposed development, taken from locations to be agreed with relevant bodies</p>	Addressed in <b>Chapter 17</b> 'Landscape and Visual', with cross reference made to other relevant chapters as appropriate.

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	<p>and stakeholders.</p> <p>The proposed development could potentially have a visual impact at night as well as during the day. Night-time views of the proposed development should be considered in the LVIA along with the provision of night-time photomontages. Cross reference should be made to the ES Biodiversity chapter and potential impacts on ecological receptors. SoS agrees that the lighting assessment should be provided within the ES.</p> <p>The landscape proposals and mitigation measures should be developed closely together with any ecological mitigation measures, and the landscape and visual chapter of the ES should provide appropriate cross-referencing between these topics, together with any other relevant ES topics, such as, for instance, Archaeology and Cultural Heritage. It is recommended that a landscape masterplan is provided within the ES.</p>	
3.99-3.109 (Noise and Vibration)	<p>It is recommended that the study area is agreed with relevant consultees and that the ES should justify the study area and state whether it is based on any particular guidance.</p> <p>The ES should provide details of the baseline noise monitoring undertaken and clearly explain where and why departures from such guidance have been made. Methodology and choice of noise receptors should also be agreed with the Environment Agency. The location of the noise receptors should be identified on a plan.</p> <p>Consideration should also be made in the assessment of the potential effects of operational noise on ecological features. The results from the noise and vibration assessments should inform the ecological assessments, and cross-reference should be made to information contained in the ES biodiversity chapter, in addition to that within any other relevant topic chapters, such as the transport chapter.</p>	Addressed in <b>Chapter 18</b> 'Noise and Vibration', with cross reference made to other relevant chapters as appropriate.

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	<p>Given the description of the application site, the statement in paragraph 16.37 of the Scoping Report about the <i>“nature of the noise associated with the Proposed Development being broadly similar in character to the existing noise environment”</i> has not been justified or explained.</p> <p>Information should be provided in the ES on the types and numbers of vehicles and plant to be used, and likely vehicle movements, during both the construction and operational phases of the proposed development.</p> <p>Classifications of potential receptors as proposed in paragraph 16.52 are welcomed.</p> <p>Assessment of noise impacts on people during all phases of the proposed development, and particularly any potential disturbance at night and other unsocial hours such as weekends and public holidays should be included. Attention is directed to comments made by the Canal and River Trust in relation to consideration of potential noise and vibration effects on the Grand Union Canal and its associated infrastructure, such as the marina. Uses of the canal should be considered as sensitive receptors in this report.</p> <p>It is unclear what vibration assessments are proposed to be included in the ES. The SoS notes that there may vibration impacts from piling during the construction phase. All potential significant impacts are expected to be assessed and a clear rationale provided for the approach taken.</p> <p>The noise and vibration assessment should take account of traffic movements along access routes, and as a result any temporary roadworks and diversion, especially during the construction phase.</p> <p>Consideration should be given to monitoring noise complaints during construction and when the development is operational.</p>	
3.109-3.121 (Highways and	Current and on-going consultation with Highways England and Northamptonshire County Council on the assessment of potential transport impacts of the proposed	Addressed in <b>Chapter 19</b> ‘Highways and Transportation’, with cross reference

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Transportation)	<p>development, including identification of the study area, as shown on the indicative plan at Appendix 9 of the Scoping Report.</p> <p>The list of matters to be included in the Transport Assessment does not make reference to potential effects on public rights of way (PROWs) and other footpaths etc. The assessment should take account of the location of footpaths and any PROW including bridleways and byways. The ES should clearly set out potential impacts on them including within the wider area. Consideration should be given to minimising hindrance to them where possible.</p> <p>Residential areas should also be considered in the assessment as a sensitive receptor.</p> <p>The '<i>key corridors</i>' referred to in paragraph 17.24 of the Scoping Report should be agreed with Highways England and Northamptonshire County Council.</p> <p>It is assumed that where paragraph 17.23 of the Scoping Report refers to junction capacity analysis modelling this is an error and that the assessment should be based on up to date data.</p> <p>It is expected that the ES will include information on the duration and programing of the works and on the activities that would take place in each phase.</p> <p>The ES should provide criteria definition for the sensitivity of receptors with reference to paragraph 17.47 of the Scoping Report.</p> <p>An outline Construction Traffic Management Plan (CTMP) should be provided with the DCO application documents or included in the Construction Environment Management Plans (CEMP), which should be the subject of the Requirement of the DCO.</p> <p>Details of likely vehicle movements, including the number of trips and routing in relation to the removal of waste during construction and operation, should be provided in the ES and used to inform the highways and transportation assessment.</p>	made to other relevant chapters as appropriate.

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	<p>The SoS refers the applicant to Planning Inspectorate Advice Note 9, and Section 4 of the Scoping Opinion, which provides further information on the development that should be considered in the cumulative assessments.</p> <p>The ES Highways and Transportation chapter should cross-reference to other topics as appropriate, such as, for example, air quality, noise and vibration, and biodiversity.</p> <p>The SoS is of the view that there are no highways and transportation matters that should be scoped out of this assessment, unless full justification is provided in the ES for doing so.</p> <p>Applicant needs to take into account the comments from Highways England, including the need for junction capacity assessments; Milton Keynes Council and Northamptonshire County Council in respect of potential impacts on the road and rail network and the need to consider HS2 in the assessment; and the South Northamptonshire Council, Bilsworth Parish Council and Milton Malsor Parish Council in relation to the potential impacts of the proposed development on the local highways network. Attention is also directed to comments from Network Rail in respect of potential impacts on the existing and future railway network.</p>	
3.122-3.125 (Socio-Economic)	<p>The types of jobs generated by the proposed development should be considered in the context of the available workforce in the area. This applies equally to the construction and operational stages. It is acknowledged that due to the scale of project the need to draw on a wider labour force than is currently available in South Northamptonshire is likely.</p> <p>There is inconsistency of the magnitude of effect in Table 18.3 and Table 18.1. Care should be taken to consistently apply throughout the topic chapter the same definitions of the criteria used to inform the assessment.</p> <p>Attention is directed to comments from Milton Keynes Council, particularly in relation to potential effects of the proposed development on employment</p>	Addressed in Chapter 20 ‘Socio-Economics’, with cross reference made to other relevant chapters as appropriate.

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	<p>opportunities; such an assessment should be included with the ES.</p> <p>Attention is also directed to the comments made by Northamptonshire Police in relation to crime and mitigation through design of the proposed development.</p>	
3.126-3.128 (Waste)	<p>The ES should clarify the types of all waste to be processed as a result of the proposed development and the effect of the proposal in terms of waste should be assessed and reported on in the ES.</p> <p>The environmental effects of the processing and removal of all wastes from the site should be considered. The ES will need to identify and describe the control processes, and any mitigation measures associated with storing waste onsite and transporting any waste offsite. All waste types should be quantified and classified.</p> <p>Attention is directed to comments from South Northamptonshire Council in relation to waste and resource efficiency.</p>	Addressed in <b>Chapter 22</b> 'Waste', with cross reference made to other relevant chapters as appropriate.
<b>Appendix 3 (Respondents to Consultation and Copies of Replies (including non-statutory/late responses))</b>		
Anglian Water	<p>Suggest that the ES should include reference to foul sewage network, sewage treatment and water services. Reference should be made in the ES to Anglian Water's Water Resource Management Plan. Clarity regarding location of assets needed. Would welcome further discussion with the applicant prior to the submission of the DCO, including wording of draft DCO and protective provisions (amongst other matters).</p>	Addressed in <b>Chapter 14</b> 'Hydrology Drainage and Flood Risk', and the draft DCO, with cross reference made to other relevant chapters as appropriate.
Aylesbury Vale District Council	No comments.	-
Bedford Borough Council	No objection. The aims of the Development Framework should not be compromised.	-
Blisworth Parish Council	<p>Request that the Application includes (in summary, and not limited to):</p> <ul style="list-style-type: none"> <li>- sustainability definition and a carbon impact assessment</li> </ul>	Primarily addressed in: <b>Non-Technical Summary; Chapter 3</b> 'Reasonable Alternatives'; <b>Chapter 5</b> 'Project

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	<ul style="list-style-type: none"> <li>- forecast methods to reduce road transport, and trends from road to rail freight over realistic projections; mitigation for amenity, quality of life and safety, and a contingency if the A43 or M1 become gridlocked; confirmation of why HGV trips through nearby settlements are unavoidable; statistics and current trends from the UK and Europe); details of linkages</li> <li>- details of mitigation measures (for example, landscape, noise and traffic mitigation).</li> <li>- further details of the alternatives considered</li> <li>- provision of a flood risk assessment based on realistic projections of future rainfall</li> <li>- environmental benefits</li> <li>- details of the Rochdale Envelope for this SFRI.</li> <li>- the methodology for establishing that a suitable workforce will be available within the local area.</li> <li>- details of studies to assess how the development will impact on wider issues of regional water stress</li> <li>- details of additional provisions might be for ensuring the safety of the local community.</li> <li>- pollution levels using appropriate projection accounting for natural population and traffic increase.</li> <li>- consideration of other developments either proposed or planned over the coming years.</li> </ul>	<p>Description’; <b>Chapter 7</b> ‘EIA Assessment Methodology; <b>Chapter 8</b> ‘Rail’; <b>Chapter 9</b> ‘Air Quality’; <b>Chapter 14</b> ‘Hydrology, Drainage and Flood Risk’; <b>Chapter 16</b> ‘Biodiversity’; <b>Chapter 17</b> ‘Landscape and Visual Impact Assessment’; <b>Chapter 18</b> ‘Noise and Vibration’; <b>Chapter 19</b> ‘Highways and Transportation’; <b>Chapter 20</b> ‘Socio-Economics’; <b>Chapter 23</b> ‘Climate Change’ (and Sustainability Appraisal); <b>Chapter 24</b> ‘Human Health’; Cumulative assessment and mitigation sections of all chapters, and <b>Chapter 26</b> ‘Cumulative Effects Summary’. Cross-reference made to other relevant chapters as appropriate.</p> <p>Matters also addressed within technical appendices, No Significant Effects Report, Rail Report, Sustainability Assessment, Design and Access Statement, Planning Statement and Health Impact Assessment.</p>
Canal & River Trust	<p>The scope needs to reflect the canal’s designated heritage asset status in the Archaeology chapter and other chapters such as Landscape and Visual. The canal will also become a sensitive receptor in respect of Highways and Transportation. Para 12.23 of the Scoping Report does not recognise that the canal is shown</p>	<p>Addressed in: <b>Chapter 2</b> ‘The Site and Surroundings’; <b>Chapter 5</b> ‘Project Description’; <b>Chapter 11</b> ‘Archaeology’; <b>Chapter 12</b> ‘Built Heritage’; <b>Chapter 14</b> ‘Hydrology, Drainage and Flood Risk’;</p>

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	<p>within the site on the location plan at Appendix 1. In addition the canal is not recognised in relation to the preceding paragraphs on Infrastructure Failure Flooding.</p> <p>Sky Networks is present within the towpath along the canal.</p> <p>We ask that you consider whether further viewpoints are required on the canal network particularly in respect of the canals conservation area status and the proposed grade separated junction with the A43, which is close to the Northampton Arm of the Grand Union Canal.</p> <p>Amenity areas do not appear to be defined and consideration should be given to the canal and its associated infrastructure in this regard, such as the marina and other mooring locations.</p> <p>We would also ask you to consider whether there are likely to be any vibration effects in respect of the canal infrastructure.</p> <p>The canals conservation area status will need to be acknowledged so that it is recognised as a sensitive receptor.</p>	<p><b>Chapter 15</b> ‘Utilities’; <b>Chapter 16</b> ‘Biodiversity’; <b>Chapter 18</b> ‘Noise and Vibration’; <b>Chapter 19</b> ‘Highways and Transportation’. Cross-reference made to other chapters as appropriate.</p>
Environment Agency	<p>Response includes advice in relation to:</p> <ol style="list-style-type: none"> <li>1) Managing flood risk</li> <li>2) Land contamination</li> <li>3) Water quality &amp; Water Framework Directive</li> <li>4) Land use – green infrastructure</li> <li>5) Environmental permitting and other regulation.</li> </ol> <p>Examples of the advice given include, but are not limited to:</p> <p>Full justification for the flood risk vulnerability of the development should be provided i.e. essential infrastructure or not.</p> <p>EA has not undertaken detailed modelling of the Milton Malsor Brook. The FRA should include an appropriate assessment to identify the extent of flooding to the</p>	<p>Addressed in: <b>Chapter 5</b> ‘Project Description’; <b>Chapter 13</b> Ground Conditions and Contamination; <b>Chapter 14</b> ‘Hydrology, Drainage and Flood Risk’; <b>Chapter 16</b> ‘Biodiversity’; <b>Chapter 17</b> ‘Landscape and Visual’; <b>Chapter 22</b> ‘Waste’; <b>Chapter 25</b> ‘Major Accidents and Disasters’. Cross-reference made to other chapters as appropriate.</p> <p>Details also provided in the Draft DCO, Construction Environmental Management Plan, Site Waste</p>

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	<p>site and any mitigation required so that flood risk is not increased by the proposed development and is where possible, reduced.</p> <p>Northamptonshire County Council as the Lead Local Flood Authority (LLFA) should provide comments on the surface water drainage arrangements.</p> <p>The ES should aim to assess any potential risk associated with the landfill sites (including migration of landfill gas) and any risk posed by Brownfield Land to controlled waters.</p> <p>Soakaways should not be located in potentially contaminated ground where this could increase the risk posed to groundwater. The use of infiltration drainage in any Brownfield Land and/or soakaways should be assessed as part of the ES.</p> <p>The ES should be informed by the West Northamptonshire Water Cycle Study (WCS) regarding water supply and waste water capacity.</p> <p>The ES should be informed by Anglian Water Services Ltd so that the development can demonstrate that the sewerage and sewage disposal systems serving the proposed development will have sufficient capacity to accommodate the flows, generated as a result of development, without causing pollution or flooding.</p> <p>As part of the Hydrology, Hydrogeology, Geology and Soils assessment, we recommend that the potential effects of the development on the Water Framework Directive status of the relevant waterbodies are assessed.</p> <p>The ES should consider how changes to tributaries of WFD water bodies may affect the WFD classifications of the main water body.</p> <p>Any temporary or permanent culverting of water courses should be fully assessed.</p> <p>The ES should consider the works necessary to maintain or improve water quality along the scheme of works; no deterioration of water quality should be seen as a result of the works.</p> <p>Biodiversity enhancement alongside improved access to greenspace should be sought wherever possible and opportunities should be taken to improve the</p>	<p>Management Plan, Pollution Prevention Method Statement, Mitigation Management Plan, and Green Infrastructure Plan.</p>

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	<p>landscape, visual amenity and ecology and wildlife value. The ES should consider the West Northamptonshire Water Cycle Strategy, Green Infrastructure Strategy, the EU Habitat Directive and UK Regional and local Biodiversity Action Plans.</p> <p>The ES should also consider Northampton Borough Council’s Green Infrastructure Plan for Northampton and related development.</p> <p>The ES should refer to the Woodlands for Water project to consider where planting could also reduce flood risk and achieve the objectives of the WFD.</p> <p>We also refer the applicant to BS42020:2013 Biodiversity Code of practice for planning and development.</p> <p>CEMP to include greater details of the following:</p> <ul style="list-style-type: none"> <li>• Pollution prevention method statement for the construction phase</li> <li>• Waste management plan for waste into and out of the development</li> <li>• Mitigation measures to be put in place for works in around or under watercourses.</li> </ul> <p>Advice provided in relation to relevant permits required.</p>	
Fulcrum Pipelines	<p>No objection. Recommend consulting again prior to undertaking any excavations. Other gas transporters may have plant in this locality which could be affected.</p>	<b>Chapter 15</b> ‘Utilities’
Highways England	<p>The following points should be addressed:</p> <p>An assessment of transport related impacts of the proposal should be carried out and reported as described in the Department for Transport ‘Guidance on Transport Assessment (GTA)’. It is noted that this guidance has been archived; however it still provides a good practice guide in preparing a Transport Assessment. In addition, DCLG also provide guidance on preparing Transport Assessments.</p> <p>Environmental impacts arising from any disruption during construction, traffic volume, composition or routing change and transport infrastructure modification</p>	<b>Chapter 17</b> ‘Highways and Transportation’. Cross-reference made to other chapters as appropriate, including <b>Chapter 9</b> ‘Air Quality’ and <b>Chapter 18</b> ‘Noise and Vibration’).

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	<p>should be fully assessed and reported.</p> <p>Adverse change to noise and air quality should be particularly considered, including in relation to compliance with the European air quality limit values and/or in local authority designated AQMAs.</p>	
Historic England	<p>Development is likely to have an impact upon a number of designated heritage assets and their settings in the area around the site. In general it is essential that the EIA provides a robust assessment of the impact of the proposed development, including associated activities, on the significance of all the potentially affected designated heritage assets, with particular emphasis on the significance they derive from their settings. We would also expect the EIA to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest.</p> <p>Concerns regarding the proposed methodology for the assessment of impact for heritage assets. In general we recommend that there should be a close relationship between the Landscape and Visual Impact Assessment and the Cultural Heritage Assessment.</p> <p>Study area of only 2km to be justified. To be considered in the context of the LVIA, such as the Zone of Theoretical Visibility.</p> <p>Recommend that the Examining Authority is guided by the advice of the Northamptonshire County Council Archaeologist in relation to the definition of the study area for non-designated archaeological remains.</p> <p>Assessment methodology to take reference from relevant published guidance and advice (e.g. Setting of Heritage Assets).</p> <p>We recommend that the approach taken is amended to take its cue from the sensitivity of individual assets and, where appropriate, groups of assets to change and their capacity to absorb the effects of such change within their settings.</p> <p>Recommend the inclusion of long views and any specific designed or historically</p>	<p>Addressed in: <b>Chapter 11</b> 'Archaeology'; <b>Chapter 12</b> 'Built Heritage'; <b>Chapter 17</b> 'Landscape and Visual'. Cross-reference made to other chapters as appropriate.</p> <p>Heritage Assets Plan also applicable.</p>

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	relevant views and vistas within historic landscapes whether under the Landscape and Visual Impact or Cultural Heritage Assessment.	
Health and Safety Executive	No comments. Advised to contact British Pipeline Agency regarding Kingsbury-Buncefield pipelines that appear to pass under the land.	Addressed in <b>Chapter 15</b> 'Utilities'; <b>Chapter 25</b> 'Major Accidents and Disasters'. Cross-reference made to other chapters as appropriate.
Leicestershire County Council	No comments	-
Milton Keynes Council	<p>The Council expects a comprehensive assessment of the impact of the proposed development on the local and national road network including the M1 and trunk road network and major road junctions to be undertaken. The Council would wish to see an assessment of the impact of the development on Junctions 13 to 15A of the M1 motorway in both directions. Additionally, this Council would want to see an assessment of the effects of the development on southbound traffic flows on the A5, A43 and A508 and the junction of the A508, A5 and A422 by Old Stratford.</p> <p>Milton Keynes Council would expect an assessment of the impact of the development on the rail network. Of particular concern to the Council is the impact of the proposed development on passenger services on the West Coast Mainline to and from railway stations in Milton Keynes, which include Milton Keynes Central, Bletchley and Wolverton stations. Also Milton Keynes Council would wish to be assured that train services serving the proposed development would not adversely affect train services which will be operating on the East–West railway line between Oxford, Aylesbury Bletchley, Milton Keynes Central and Bedford.</p> <p>The EIA should assess the employment effects of the scheme:</p> <ul style="list-style-type: none"> <li>- Number and type of jobs created.</li> <li>- The implications of the employment opportunities created by the scheme which</li> </ul>	Addressed in: <b>Chapter 8</b> 'Rail'; <b>Chapter 19</b> 'Highways and Transportation'; <b>Chapter 20</b> 'Socio-Economics'. Cross-reference made to other chapters as appropriate. Matters also addressed within Rail Report and Market Report.

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	<p>may attract people to live and work locally.</p> <ul style="list-style-type: none"> <li>- The effects of the proposal on commuting flows to and from the development.</li> <li>- An assessment of the amount of warehousing that exists and is either proposed or in the development pipeline along the M1 corridor. If the proposed scheme is granted development consent what effect will it and other consented schemes have on the property market for warehousing development along the M1 corridor?</li> </ul>	
Milton Malsor Parish Council	<p>Comments include but are not limited to:</p> <ul style="list-style-type: none"> <li>- Concern that the site is being assessed when the adopted West Northants Joint Core Strategy has not included it; that the development will be contrary to the Milton Malsor Neighbourhood Plan; that the development needs to take account of other planned developments; that Northampton town will spread west across the M1 leading to unchecked spread into the open countryside.</li> <li>- Suggests that DIRFT 3 will not come into full capacity for 17 more years.</li> <li>- It is important that the EIA covers not only the proposed Rail Freight Terminal but includes the effect of the extensive warehousing that accompanies it.</li> <li>- Visual impacts on Blisworth and Milton Malsor.</li> <li>- Concern that the site will be a terrorist target</li> <li>- Concern that junior school children will access the site.</li> <li>- Suggests that levels of air pollution monitored at junction M1 J15/ A43 are already at or near AQM intervention levels. Collingtree (less than 2km from the site) is designated an Air Quality Management Area. Towcester also has an AQM; extra traffic on the A43 will add to its problems. The proposed local increase in rail freight traffic will add to the pollution as goods trains are predominantly powered by diesel. As will increasing traffic on the M1 where 4 lanes will soon be possible. Lorries and employee cars arriving and leaving the freight terminal will contribute to the problem. Two huge new warehouses have just been completed at J15 for</li> </ul>	<p>Addressed in: <b>Non-Technical Summary</b>; <b>Chapter 3</b> 'Reasonable Alternatives'; <b>Chapter 5</b> 'Project Description'; <b>Chapter 6</b> 'Legislative and Policy Context'; <b>Chapter 7</b> 'EIA Assessment Methodology'; <b>Chapter 8</b> 'Rail'; <b>Chapter 9</b> 'Air Quality'; <b>Chapter 10</b> 'Agriculture'; <b>Chapter 14</b> 'Hydrology, Drainage and Flood Risk'; <b>Chapter 15</b> 'Utilities'; <b>Chapter 16</b> 'Biodiversity'; <b>Chapter 17</b> 'Landscape and Visual Impact Assessment'; <b>Chapter 18</b> 'Noise and Vibration'; <b>Chapter 19</b> 'Highways and Transportation'; <b>Chapter 20</b> 'Socio-Economics'; <b>Chapter 21</b> Lighting; <b>Chapter 23</b> 'Climate Change' (and Sustainability Appraisal); <b>Chapter 24</b> 'Human Health'; <b>Chapter 25</b> 'Major Accidents and Disasters'; Cumulative assessment and mitigation sections of all chapters, and <b>Chapter 26</b></p>

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	<p>which all access is from that junction. The Northamptonshire Major Road Strategy forecasts that by 2026 60,000 vehicles a day will use the A45 link to J15, with 12% being heavy goods vehicles. During the construction stage there will be extensive earth moving; dust pollution will affect the two villages.</p> <ul style="list-style-type: none"> <li>- Consideration to be given to 24/7 light pollution</li> <li>- There is already a major problem at Junction 15. Howdens, in their recently withdrawn warehouse proposal, planned to redesign the junction in an attempt to overcome the problems but failed to satisfy the Highways Agency. Traffic from the proposed terminal will further contribute to the congestion.</li> <li>- Highways Agency Report February 2011 states that part of the A45 around Northampton already has traffic movement exceeding 60,000 per 12 hours, most junctions are at or near design capacity; much of the RFT traffic will use the A45. The site is trapped within the two branches of railway line - much of it in cutting – which makes access difficult. The proposed and only connection with the A43 - which is a dual carriageway - would require a huge roundabout and grade separated interchange to allow traffic to leave in both north and south directions. North leads onto the awkward M1 Jt 15A, and south is towards Towcester where the A5 junction is badly congested and thousands of new homes are already approved - all of which exit onto the A43.</li> </ul> <p>Problems on the M1 and A45 lead to Collingtree village being used as a 'rat run' the same is likely to happen at Milton Malsor if the freight terminal goes ahead. This 'rat running' will become more dangerous when the size of HGV's on British roads is increased under the EU law that is now being considered.</p> <p>During construction of the rail terminal, site traffic will add problems to the local road system, to which access is difficult; a temporary connection to the A43 would be needed.</p> <ul style="list-style-type: none"> <li>- There is a major infrastructure, gas and petroleum pipeline which passes through or close to the site, with a ground level depot at Gayton.</li> </ul>	<p>'Cumulative Effects Summary'. Cross-reference made to other relevant chapters as appropriate.</p> <p>Matters also addressed within technical appendices, Rail Report, Sustainability Assessment, Design and Access Statement, Planning Statement and Health Impact Assessment.</p>

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	<p>- The terminal would swallow up good quality arable land that has been continuously farmed for centuries. Ancient hedgerows will be rooted out with a detrimental effect on already diminishing wildlife.</p> <p>There are Badgers living on the proposed site area and, possibly, Great Crested Newts in the wetlands by the stream, and bats in the farm buildings.</p> <p>- Milton Malsor village was flooded in 1998. Since that time there has been further development in the catchment and increased run off. There is concern that the proposed rail freight terminal and attached warehousing will add significant run off to the existing stream through the village, which then flows into the Wootton brook and will increase risk of flooding in West Hunsbury. There is concern that developers may plan to syphon additional run off into the Grand Union Canal and upset its balance. After the recent flooding Government has asked for a review of the UK's Flood Defence; the results of this review needs to be taken account of.</p>	
National Grid	Request that the potential impact of the proposed scheme on National Grid's existing assets and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application. Where the promoter intends to acquire land, extinguish rights, or interfere with any of National Grid apparatus, whether resulting in extinguishment or diversion and/or within public highway or third party land, protective provisions will be required in a form acceptable to it to be included within the DCO.	Addressed in <b>Chapter 15</b> 'Utilities'; <b>Chapter 25</b> 'Major Accidents and Disasters', and the draft DCO, with cross reference made to other relevant chapters as appropriate.

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Natural England	<p>General and Standing Advice provided in relation to: EIA; biodiversity and geology; designated landscapes and landscape character; access and recreation; soil and agricultural land quality; air quality; climate change and adaptation; contribution to local initiatives and priorities (noting that the applications site is partially within the Nene Valley which aims to create a more resilient ecological network, focusing on river corridors. There may be opportunities through this development proposals for habitat creation which contribute to the aims of the NIA); cumulative and in-combination effects.</p>	<p>Addressed in: <b>Chapter 9</b> 'Air Quality'; <b>Chapter 10</b> 'Agriculture'; <b>Chapter 12</b> 'Built Heritage'; <b>Chapter 13</b> 'Ground Conditions and Contamination'; <b>Chapter 14</b> 'Hydrology, Drainage and Flood Risk'; <b>Chapter 16</b> 'Biodiversity'; <b>Chapter 17</b> 'Landscape and Visual'; <b>Chapter 20</b> 'Socio-Economics'; <b>Chapter 21</b> Lighting; <b>Chapter 23</b> 'Climate Change' (and Sustainability Appraisal); <b>Chapter 24</b> 'Human Health'; <b>Chapter 25</b> 'Major Accidents and Disasters'; Cumulative assessment and mitigation sections of all chapters, and <b>Chapter 26</b> 'Cumulative Effects Summary'. Cross-reference made to other relevant chapters as appropriate.</p>
Network Rail	<p>The Highways and Transportation chapter needs to be expanded to consider the full impact of the proposal on the existing and future rail network both in terms of capacity and timetabling, with a detailed study scope to be agreed with Network Rail. Given that the location of the proposal is predicated on rail connectivity and the primary aim of the proposal is modal shift, detailed assessment of the impact of the proposal on the rail network at this early stage is crucial.</p> <p>Copy of Grip Stages 1 to 2 provided, and Minutes of Close Out Meeting on 08 November 2013, and follow-up letter of 06 December 2013 confirming Network Rail has no objection in principle to the developer of the Milton Malsor scheme deciding to progress to GRIP stage 3 (option selection), and at the promoter's risk.</p>	<p>Addressed in: <b>Chapter 8</b> 'Rail' (and Rail Report); <b>Chapter 19</b> 'Highways and Transportation'. Cross-reference made to other relevant chapters as appropriate.</p>
Northampton Borough	<p>Satisfied with the scope of information to be provided in the ES. NBC draws the</p>	<p>Addressed in <b>Chapter 9</b> 'Air Quality'.</p>

Sub-section / paragraph / reference	Summary of Overarching Comment / Theme	Where the comment has been / will be addressed
Council	applicant's attention to the AQMA along the M1 between Junctions 15 and 16.	
Northamptonshire County Council	<p>Rail: The Highways and Transport scoping for a rail freight terminal makes no reference to rail capacity and access issues. We would expect that the analysis would need to take account of the emerging conclusions of the study work that Network Rail is undertaking looking at capacity and usage of the southern section of the West Coast Main Line once HS2 is open.</p> <p>Ecology: Out of date county flora is being used: the 2012 edition should be being used. Important arable plants should be scoped in. Detailed surveys should not be needed over much of the site but there are likely to be some field margins – especially in less intensively-managed fields – which have them.</p>	Addressed in: <b>Chapter 8</b> 'Rail' (and Rail Report); <b>Chapter 16</b> 'Biodiversity'; <b>Chapter 19</b> 'Highways and Transportation'. Cross-reference made to other relevant chapters as appropriate.
Crime Prevention Design Advisor (Northampton, South Northants, Daventry)	<p>Issues of crime and disorder to be addressed in the assessment of socioeconomic impacts. The applicant should indicate how adverse effects will be mitigated by the application of the principles of Crime Prevention Through Environmental Design, an adherence to the key principles contained within the SPG on Planning out Crime, a willingness to develop both the site and the HGV lorry park to independently approved secure standards such as Secured by Design and Park Mark and compliance with policy S10 of the WNJCS. An awareness of the levels of crime on similar sites such as DIRFT and levels of crime associated with HGV's can provide base line data and this is available from the CPDA.</p> <p>In addition in the chapter on Highways and Transport the applicant should include the impact the development will have on diversionary routes such as the A5, the impact of the interlinkage with the existing and proposed industrial estates. When this is developed there will be major industrial development off every junction of the M1 as it travels through the county. The impact of the traffic this will generate plus that generated by events at Silverstone such as the Grand Prix should also be included and therefore the potential area of assessment as shown in Appendix 9 should be widened. The applicant should show how the impact of additional traffic on the existing road network will be mitigated.</p>	Addressed in: <b>Chapter 19</b> 'Highways and Transportation' and Chapter <b>20</b> 'Socio-Economics'. Cross-reference made to other relevant chapters as appropriate.  Information also contained in Design and Access Statement.

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	<p>Northamptonshire Fire and Rescue Service’s Chief Officer Adrian Davis requires a formal consultation at each stage of this development. This can be via Northamptonshire Police’s CPDA.</p>	
<p>South Northamptonshire Council</p>	<p>Request that the assessment also includes the chapters stated in the Scoping report (for which detailed comments have been provided by SNC), plus lighting, waste and resource efficiency, and minerals (within the ground conditions assessment).</p> <p><i>Lighting</i> - minimise trespass and glare by achieving the relevant zoning criteria recommended in the Institute of Lighting Engineers, Guidance Notes for the Reduction of Obtrusive Light, 2011. Supported, where possible, by details and specifications , lighting performance requirements and comparison with the criteria detailed in Institute of Lighting Engineers Guidance Notes for the</p> <p><i>Waste</i> - Provision of a Waste Management Statement. Consideration of waste hierarchy, hazardous waste, and waste management through all phases of the development.</p> <p><i>Minerals safeguarding</i> – should be addressed within the Ground Conditions chapter</p> <p><i>Policy</i> – Development Plan to be considered, in particular the adopted West Northamptonshire Joint Core Strategy.</p> <p><i>Air Quality</i> - assessment within this section does not include reference to the A508, the village of Roade and Towcester. Although the proposal does not include any direct links onto the A508 this is a route often used by vehicles travelling to/from Milton Keynes to avoid congestion on the M1, it is also likely to be utilised in the future by cars visiting/accessing the site. As such the traffic flows should be</p>	<p>The PEIR includes all requested chapters, including the additional information, provided primarily at <b>Chapter 13</b> ‘Ground Conditions’; <b>Chapter 21</b> ‘Lighting’; <b>Chapter 22</b> ‘Waste’; <b>Chapter 23</b> ‘Climate Change’.</p> <p>Details of cumulative assessment are provided in: <b>Chapter 7</b> ‘EIA Assessment Methodology’; the cumulative assessment section of all technical chapters; <b>Chapter 26</b> Cumulative Effects Summary.</p> <p>Details are also provided in the Site Waste Management Plan</p>

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	<p>modelled for the A508 and Roade village to establish whether there would be any increase in congestion in the village which would be detrimental to air quality. Similarly, it is also considered that the scoping study should include an assessment of the anticipated increased traffic volumes and the impact that this could have upon air quality in Towcester where there is an existing Air Quality Management Area (AQMA). The results from SNC’s diffusion tubes in these locations should be used in the modelling undertaken to validate the model and predict the impact of the development.</p>	
	<p><i>Archaeology, Built Heritage, Landscape and Visual, Ecology</i> - reference to the Grand Union Canal Conservation Area, Milton Malsor Conservation Area, and Blisworth Conservation Area required. Reference required to protected or important trees or historic hedgerows. Further evaluation works (geophysical survey, targeted trial trenching) will be required. Ecology section should include reference to invertebrates. Further discussion on content of Ecology chapter, and Landscaper and Visual chapter required. Final list of viewpoints required to be agreed. It is South Northamptonshire Council’s initial opinion that an additional consideration should take place in year 5, 7 or 10.</p>	
	<p><i>Ground Conditions</i> – the approach is satisfactory  <i>Noise &amp; Vibration</i> - methodologies confirmed to be satisfactory.  In relation to the matters proposed to be scoped out in paragraph 16.61 South Northamptonshire Council offers the following comments:  -Vibration from construction activities will be assessed in accordance with BS 5228-2:2009 Code of practice for noise and vibration control on construction and open sites as stated in paragraph 16.46.</p>	

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	<ul style="list-style-type: none"> <li>- Further assessment of the vibration impacts from rail and road traffic during the operational phase will be required to confirm the statement being made in paragraph 16.48 that vibration is highly unlikely to be an adverse impact.</li> <li>- Vibration baseline monitoring would not be required on the basis that any assessment of construction or operational vibration will be against an existing baseline of zero vibration.</li> <li>- Agree with the statement in 16.58 that it is not expected that climate change will influence the noise and vibration impacts, so no further assessment is required in respect of this.</li> </ul> <p>In relation to point 2 above, at this stage, the Council is not in a position to agree that the effects listed above should be scoped out, as insufficient information has been provided by the Applicant to justify such an approach.</p>	
	<p><i>Highways and Transportation</i> - the assessment within this section does not include reference to the A508 which runs in parallel to the A43 but is located to the east of the application site. As mentioned previously, although it is acknowledged that the proposal does not include any direct links onto the A508 this route is regularly used by vehicles travelling to/from Milton Keynes seeking to avoid congestion on the M1. It is contended that this route is also likely to be utilised in the future by cars visiting/accessing the site. Therefore, the A508 should be included within the Highways and Transportation assessment. It is also considered that the Environmental Statement should include an assessment of effects of the anticipated increased traffic volume using the Tove &amp; MacDonalds Roundabouts on traffic movement and pollution in the historic town of Towcester. South Northamptonshire Council's Strategic Transport Lead Officer considers that the key highway impact is likely to be the A43 by the abandoned service station. The land-take suggests a grade separated junction. This section of the A43 is very close to Blisworth Arm cottages and as such the Environmental Statement must</p>	

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	<p>include the potential impacts arising from this proposal. South Northamptonshire Council's Strategic Transport Lead Officer would expect Highways England to seek a grade-separated junction and Northamptonshire County Council to seek assurances that HGV traffic will not access from the A508. South Northamptonshire Council supports this restriction.</p>	
	<p><i>Cumulative Impact</i> - South Northamptonshire Council suggests that the following sites should be included as part of the cumulative impacts assessment:</p> <ul style="list-style-type: none"> <li>- Northampton Junction 16 Strategic Employment Site (Policy E8 of the West Northamptonshire Joint Core Strategy (JCS))</li> <li>- Land west of M1 Junction 15 and west of the A508 south of Collingtree (J15 proposal / Howdens) – withdrawn application. Although the Council is not currently in receipt of any formal pre-application inquiry it has been indicated that the potential of this site for employment generating purposes is still being investigated. More information (including the Environmental Statement) can be obtained via the Council's website using the application number S/2014/2468/EIA.</li> <li>- Daventry International Rail Freight Terminal (DIRFT) (Policy E4 of the JCS)</li> <li>- Northampton South SUE (Policy N5 of the JCS)</li> <li>- Northampton South of Brackmills SUE (Policy N6 of the JCS)</li> <li>- Towcester South SUE (Policy T3 of the JCS)</li> <li>- Silverstone Circuit (Policy E5 of the JCS)</li> <li>- Northampton West SUE (Policy N4 of the JCS)</li> <li>- Northampton Upton Park SUE (Policy N9 in the JCS)</li> <li>- Northampton Norwood Farm/Upton Lodge SUE (Policy N9A in JCS)</li> <li>- Weedon Depot (Policy BN6 in the JCS)</li> <li>- East Midlands Gateway Strategic Rail Freight Interchange</li> </ul>	

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- East Midlands Intermodal Park		
Collingtree Parish Council	<p>Supports the response from Milton Malsor Parish Council. Additionally, comments made regarding the change in the rural character of the area; disruption to local infrastructure including the Northampton Road, and rights of way; loss of productive farmland and businesses and homes that are sited on parts of the area. Concern that the proposed development might not be used or might cut down on some of the road-based logistic operations that might make recently developed distribution units partly redundant.</p>	<p>Addressed in: <b>Non-Technical Summary</b>; <b>Chapter 3</b> ‘Reasonable Alternatives’; <b>Chapter 5</b> ‘Project Description’; <b>Chapter 6</b> ‘Legislative and Policy Context’; <b>Chapter 7</b> ‘EIA Assessment Methodology’; <b>Chapter 8</b> ‘Rail’; <b>Chapter 9</b> ‘Air Quality’; <b>Chapter 10</b> ‘Agriculture’; <b>Chapter 14</b> ‘Hydrology, Drainage and Flood Risk’; <b>Chapter 15</b> ‘Utilities’; <b>Chapter 16</b> ‘Biodiversity’; <b>Chapter 17</b> ‘Landscape and Visual Impact Assessment’; <b>Chapter 18</b> ‘Noise and Vibration’; <b>Chapter 19</b> ‘Highways and Transportation’; <b>Chapter 20</b> ‘Socio-Economics’; <b>Chapter 21</b> Lighting; <b>Chapter 23</b> ‘Climate Change’ (and Sustainability Appraisal); <b>Chapter 24</b> ‘Human Health’; <b>Chapter 25</b> ‘Major Accidents and Disasters’; Cumulative assessment and mitigation sections of all chapters, and <b>Chapter 26</b> ‘Cumulative Effects Summary’. Cross-reference made to other relevant chapters as appropriate.</p> <p>Matters also addressed within technical appendices, Rail Report, Sustainability Assessment, Design and Access Statement, Planning Statement and</p>

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Northampton Inland Waterways Association	A section of the canal is within the application site. The branch wishes to see justification as to why this is so and detail of the impact of on the canal corridor (a Conservation Area) in the Environmental Statement. The branch wishes to establish at the outset that it opposes the inclusion of the canal within the boundary of the site.	Health Impact Assessment.  Addressed in: <b>Chapter 2</b> 'The Site and Surroundings'; <b>Chapter 12</b> 'Built Heritage'. Cross-reference made to other relevant chapters as appropriate.
GTC Engineering	No Comments	-
Roade Parish Council	<p>Concerns raised including:</p> <ol style="list-style-type: none"> <li>1. Traffic: The developer has stated that this site is expected to generate around 8,000 jobs. Unemployment in South Northamptonshire and Northamptonshire Borough Council's areas is thought to be around 6,000, a high proportion of which is unlikely to be suitable for employment at the site, once completed. The traffic generated by such a high number of consequent 'in-comers' travelling by road, especially from the south, east and west will inevitably impact on the A508 running through Roade as a conduit for accessing the site. This road is a major commuter and business traffic route between Northampton and Milton Keynes as well as a relief route for the M1, both north and southbound. It is already deemed to be at or near capacity with no prospect of near-term alleviation. In the short term, further traffic will be generated by the 400 dwellings either under construction or with planning approval for imminent construction in the village.</li> <li>2. Pollution: The A45 at J15 is already near or at AQM intervention levels. The A508 through Roade is already approaching intervention levels as an AQMA. The traffic generated by the planned new housing, together with natural traffic growth will inevitably exacerbate this. The added traffic from 8,000 new employees at the site needs very careful evaluation.</li> <li>3. Flooding: The Grand Union canal, which runs along the western edge of the site, appears as Flood Zone 3 on the EA Flood Zone Map for Planning (Rivers and Seas)</li> </ol>	Addressed in: <b>Non-Technical Summary</b> ; <b>Chapter 3</b> 'Reasonable Alternatives'; <b>Chapter 5</b> 'Project Description'; <b>Chapter 6</b> 'Legislative and Policy Context'; <b>Chapter 7</b> 'EIA Assessment Methodology'; <b>Chapter 8</b> 'Rail'; <b>Chapter 9</b> 'Air Quality'; <b>Chapter 10</b> 'Agriculture'; <b>Chapter 14</b> 'Hydrology, Drainage and Flood Risk'; <b>Chapter 15</b> 'Utilities'; <b>Chapter 16</b> 'Biodiversity'; <b>Chapter 17</b> 'Landscape and Visual Impact Assessment'; <b>Chapter 18</b> 'Noise and Vibration'; <b>Chapter 19</b> 'Highways and Transportation'; <b>Chapter 20</b> 'Socio-Economics'; <b>Chapter 21</b> Lighting; <b>Chapter 23</b> 'Climate Change' (and Sustainability Appraisal); <b>Chapter 24</b> 'Human Health'; <b>Chapter 25</b> 'Major Accidents and Disasters'; Cumulative assessment and mitigation sections of all chapters, and <b>Chapter 26</b>

Sub-section / paragraph / reference	Summary of Overarching Comment / Theme	Where the comment has been / will be addressed
	<p>– this is not mentioned in the Developer’s Application. Flood water entering the canal could have dire consequences over a large distance and needs to be assessed. 12.11 in the Scoping Report application states “small areas of the PDA immediately adjacent to the Milton Malsor Brook are shown to be at an increased risk with some land at high risk and within Flood Zone 3. The southern and eastern boundaries are rail lines mainly either in cuttings or built up above ground level and the M1 on the northern boundary is also below surrounding ground levels. 12.15 states that the underlying geology is “Dyrham Formation and the Whitby Mudstone” and both are “low in permeability”.</p> <p>The Environment Agency announced recently, following the repeated heavy downfalls across northern England, that the flood defences in UK are now “in need of a complete re-think”. They had previously announced that “nowhere is immune” from the effects of such climatic conditions.</p> <p>As a high proportion of the site will be hardstanding this increases the risk of ground water flooding. We are concerned that existing parameters for assessing flood risk are no longer adequate.</p> <p>4. Biodiversity: Several local wildlife sites and numerous potential ones have been identified by the developer. The constraints of the site suggest that wildlife is likely to be driven north and have to be contained within a significantly reduced area stopped by the M1. The report confirms the likely existence of wild life habitats with a “relatively high nature conservation value” (14.15). The destruction of wildlife habitat over such a wide area and bounded on all sides by impassable boundaries will inevitably have a considerable effect on local wildlife and the wildlife corridors that may now exist.</p> <p>It is stated in 14.34 “Ashfield Land and is not proposing to provide a report with the application for the purposes of the Conservation of Habitats Species Regulations 2010 (as amended)”. In view of the above and the fact the report states that access to much of the site was not available during the Preliminary</p>	<p>‘Cumulative Effects Summary’. Cross-reference made to other relevant chapters as appropriate.</p> <p>Matters also addressed within technical appendices, Rail Report, Sustainability Assessment, Design and Access Statement, Planning Statement and Health Impact Assessment</p>

Sub-section / paragraph / reference	Summary of Overarching Comment / Theme	Where the comment has been / will be addressed
	<p>Environmental Assessment in March 2015, this should now be included.</p> <p>5. Water: Section 12.10 of the Developer’s Application states that the “entire Anglian region has been designated as being an area of ‘serious’ water stress by the EA’s map of areas of relative water stress”. A site of this magnitude and location is likely to add significantly to this.</p> <p>6. Landscape destruction: The Planning Inspectorate assessed this site, ref SA49, when reviewing the now-adopted West Northamptonshire Joint Core Strategy Local Plan (Part 1). It was rejected for a number of reasons including that it “is classified as high-medium landscape sensitivity and therefore development could have a significant negative effect on landscape character”. 15.16 identifies local Conservation Areas within 5 kms. Roade is not included, probably because it has only very recently been ratified. Roade is under 2 kms from the site and should be included for consultation.</p> <p>We trust that all the above concerns will be fully covered in the Environmental Impact Assessment.</p>	

4.46 The Scoping Report and Scoping Opinion were undertaken/provided under the EIA Regulations 2009. Nevertheless, in order to provide a robust assessment, the final ES will be voluntarily submitted in accordance with the EIA Regulations 2017. Further details and rationale are provided at **Chapter 6** 'Legislative and Policy Context'.

## References

- Ref.4.1 Infrastructure Planning Commission, 2008, '*Planning Act 2008*'
- Ref. 4.2 Turley (2016), '*Preliminary Environmental Information report (PEIR): Stage 1, April 2016*'
- Ref.4.3 Rail Central project website. Available at: [www.railcentral.com](http://www.railcentral.com)
- Ref.4.4 Statutory Instrument 2017 No. 572 '*The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017*'
- Ref.4.5 Turley, letter dated 10 October 2015
- Ref.4.6 Statutory Instrument 2009 No. 2263 '*The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009*' (as amended by Statutory Instrument 2012 No. 787 '*The Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2012*')
- Ref. 4.7 Turley, 2015, '*Environmental Statement Scoping Report Rail Central December 2015*'
- Ref. 4.8 The Planning Inspectorate, '*Scoping Opinion: Proposed Rail Central Strategic Rail Freight Interchange January 2016*'