

'NorthamptonGateway@pins.gsi.gov.uk'

Rod Sellers

Ref. IP Reg. 20010547

Northampton Gateway TR050006

Written Representation (deadline 6th November 2018)

1. I object strongly to Roxhill's Northampton Gateway development application for the following reasons:

- It is entirely 'developer led' rather than 'plan led' and seeks to take advantage of existing land options rather than provide a genuine rail linked strategic benefit. It is yet another road based warehousing scheme dressed in SFRI clothing.
- It conflicts with all national and local planning legislation and guidance and most specifically with the West Northamptonshire Joint Core Strategy
- It would inflict enormous environmental damage on a substantial area of open countryside and arable farmland and would undermine the quality of life in several long established and growing communities.
- As a consequence, it would bring into disrepute, the role and intentions of the National Policy Statement for National Networks (NPSNN).

2. The Application documents refer to the West Northamptonshire Joint Core Strategy but fail to make clear that the J15 site is specifically excluded from the planning strategy for industrial development. This view was endorsed by the Planning Inspector at Public Inquiry. The impression is given in the consultation document that Northampton Gateway somehow complements the Core Strategy – it does not.

3. Roxhill secured options on the proposed site prior to the adoption of the WNJCS and subsequently sought planning consent for a road based Distribution and Warehouse development from South Northants District Council. This application was withdrawn after widespread opposition.

4. Roxhill are required under the Environmental Impact Assessment Directive, to examine and consider alternative sites. Other than referring to the adjoining site controlled by a rival applicant (Ashfield Land), they have failed to fulfil their obligation to consider alternative sites. The DIRFT facility only 18 miles away and Northampton Borough Council has written to the Secretary of State asking for an urgent review of policy guidelines on the location of SFRI's.

5. There are many aspects of Environmental impact that are of major concern including Air and Noise pollution flood risk and land stability.

6. Air quality is a major issue, particularly in Collingtree, and I believe that long term monitoring, both by NBC LA and Roxhill has been inadequate and understates both current baseline measures and the rate of dispersal of Nitrogen Dioxide emissions. I also believe that the modelling of future outcomes based on traffic forecasts and assumed modal shift are unrealistic.

7. The application site is close to two AQMA's, one being the length of the M1 bordering the site from Junction 15 to 16 and the other a section of the A45 less than 1 mile away. Almost two thirds of the additional HGV trips generated by Northampton Gateway would pass through one or both of these AQMA's. There is a further AQMA on the A5 in Towcester some miles to the south of the site which is likely to be impacted. In Collingtree Village, the direct impact will be on some 1370 households. There are 350 existing households and with planning consent for a further 1000 plus another 21 affordable homes to be built for the borough council. All these houses, both existing and consented, are within a short distance of the M1 which forms the northern boundary of the proposed SRFI and warehouse development.

8. In addition there are Allotment gardens, a Cricket Club, a Tennis Club, a junior football training ground and a primary school within 100 meters of this boundary.

The draft Northampton Borough Council Air Quality Report for 2017 sets out how the LA monitors AQ in line with its statutory obligations and within the resources available to it. The NBC Environmental Health Department has confirmed that *continuous automatic monitoring* is now only carried out at one location within the borough, some 7 miles from the proposed site. The NBC Environmental Health Department has also confirmed that monitoring of AQMA 1 (the M1 Motorway) is limited to one diffusion tube in Collingtree Village and one tube where the A43 crosses the M1 at the Three Counties Crematorium (3 miles from the proposed site).

Collingtree Parish Council has also recently undertaken its own measurements at 10 locations (results validated and adjusted by Gradko Ltd - the same laboratory used by NBC) that show validated results ranging from 54.34 at Collingtree High Street (50 metres from the motorway and well above the legal limit of 40) and reaching 26.50 outside Collingtree Primary School (100 metres).

9. A further concern is Land Stability. The area to the south of Northampton, forms part of the Nene River Valley and is noted for pockets of unstable land due to the particular geological formation. Given that the proposed development requires substantial earth moving and slope reduction, it is not clear that sufficient investigation has been carried out. The most thorough Land Stability by Tapsell Wade, carried out in 1983 on adjoining land, recommended 12 metre deep boreholes monitored over 12 months. It is not clear that this has been done on a site where there could be serious consequence for the M1 motorway, the West Coast Main line and drainage patterns for surrounding communities.

10. The NPSNN states that SRFI's 'allow rail to undertake the long-haul primary trunk journey with other modes (usually road) providing the final leg'. It also states that RFI's can 'optimise the use of rail in maximising long haul by rail and minimising the secondary leg by road'. Roxhill has provided little evidence that Northampton Gateway will optimise the use of rail, that rail trunk haul would be minimised, that secondary distribution would be minimised, that costs to rail users would be reduced and that overall trip mileage of freight on national and local networks would be reduced.

11. There is widespread concern in Collingtree and other communities surrounding the proposed site. Petitions signatures in excess of 12,000 both paper based and online have been obtained. In Collingtree alone 350 residents have signed a petition to our Member of Parliament. Every public meeting in this and adjoining parishes has roundly condemned the proposal. 500 people joined a Protest March across the site. Responses to Roxhill's Public Exhibitions have been largely critical. Thirty Parish Councils in the area surrounding the site have signed a declaration drawing attention to the requirement of Section 11 of the National Planning Framework which is aimed at preventing new developments creating adverse environmental effects.

12. The fundamental question I have is; Is this proposed development of such overriding national importance that it justifies destroying hundreds of acres of open countryside and wildlife habitat as well as overloading an already congested road network and blighting the lives of scores of local communities?