

Northampton Gateway Rail Freight Interchange (TR050006)

My reference: 20010209

I continue to strongly object to the supposed SRFI application known as Roxhill's Northampton Gateway.

In previous correspondence I have not touched upon climate change and the carbon dioxide debt caused by submerging viable and fertile soil within a tomb of concrete. As you are no doubt aware the cement industry is one of the primary producers of carbon dioxide, which is classified as a greenhouse gas. I did not identify any reference to mitigation against climate change within the documents submitted citing the impact of Roxhill's Northampton Gateway upon our fragile environment. I choose, at this stage, to focus upon air quality but would welcome examination of climate change implications in conjunction with air quality degradation.

I am very concerned about the potential impact upon local air quality and the health of local people, transient commuters and potential workers and visitors to the proposed site during the conversion of arable land to warehousing, throughout the operational phase and decommissioning.

Global concerns about air quality were highlighted at the first World Health Organisation (WHO) Conference on Air Pollution and Health which took place in Geneva last week.

The poster for the 'FIRST WHO GLOBAL CONFERENCE ON AIR POLLUTION AND HEALTH' features a blue and white color scheme. At the top, the title is in large, bold, blue letters. Below it, the subtitle 'IMPROVING AIR QUALITY, COMBATTING CLIMATE CHANGE - SAVING LIVES' is in smaller blue text. The dates '30 October - 1 November 2018' and location 'WHO Headquarters, Geneva, Switzerland' are on the left. The WHO logo and name are on the right. A central image shows a city skyline with a hazy, polluted atmosphere. Text on the right side reads: 'LET'S ACT TOGETHER BECAUSE THE COST IS FAR TOO HIGH Air pollution claims 7 million lives a year Air pollution is a major driver of the non-communicable disease epidemic Air pollution accelerates climate change AND WE HAVE SOLUTIONS Affordable and clean urban, transport, waste & household energy strategies Health, environment & development sectors can lead the way to change Organized in collaboration with'. At the bottom, logos for UN Environment, WHO, UNFCCC, UNEP, UNECE, and The World Bank are displayed.

Each plenary session is accessible via <http://www.who.int/airpollution/events/conference/en/>

During plenary session X participants pledged their commitment to improving worldwide air quality. This included UN representation. Pippa Powell is Director of the European Lung Foundation in the UK. She gave an impassioned commitment from 28 healthcare organisations as quoted below.

'As medical societies they pledge to include air quality in the educational programmes of their societies, specifically on how air quality impacts on the lives of people with chronic conditions. Secondly they pledge to ensure that clinical guidelines talk about air quality and provide advice for healthcare professionals on how to advise their patients. Thirdly, they will invest in research into the link between air quality and health and the implementation and evaluation of measures to reduce air pollution.'

Also as patient organisations they pledge to explain to their patient populations the impact of air quality on their condition using the best scientific evidence available... Most importantly both types of organisation pledge to raise awareness of the issue and make breathing clean air a priority for all...If we can mobilise the thousands of healthcare professionals and the millions of patients in these communities then we can effect real change’.

To facilitate the commitment to change Anne Stauffer from The Health & Environment Alliance concluded her pledges with,

‘We pledge to work with the WHO and the health ministries to push for health ministries to have adequate resources to engage in cleaner air for all of us and to make sure that health has a place at the table when economic decisions, when finance decisions, when transport decisions and agricultural decisions are made. All of these different sectors have impact upon air quality. Health needs to be there and needs to be involved.’

I hope that Roxhill has responded to The Planning Inspectorate’s targeted queries related to Air Quality measurement (documented in ExQ1 - issued 17 October 2018)? Surely additional information that they submit should be subject to a further public consultation when the pollution issues impact upon thousands of people? Roxhill’s Northampton Gateway would inflict additional air pollution within two long-standing Air Quality Management Areas (AQMA’s).

A future local venture - In order to address some of these concerns and to facilitate understanding of the current status quo, with regard to air quality, I plan to collect data from local residents who feel that fluctuating air quality impacts upon their ability to manage chronic illnesses. The outcome of this process will be presented at a future date in a confidential format to ensure that all GDPR and confidentiality advice is adhered to.

I also wish to raise awareness to the pertinent points below which I feel require further examination and intelligent questioning.

Within The Examining Authority’s written questions and requests for information (ExQ1) issued 17/10/2018 the following question was posed to Roxhill in ExQ1 – 1.1.4

‘Paragraph 9.4.3 indicates the stated justification provided for only assessing PM10 and NO2 effects on the environment is due to these pollutants being “the two main UKAQS pollutants of interest” Will the Applicant please justify why only PM10 and NO2 have been included in the air quality assessment even though there is a requirement in the EU Ambient Air Quality Directive and the associated UK regulations, and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 to assess the impact from other pollutants?’

The WHO air quality model confirms that 92% of the world’s population lives in places where air quality levels exceed “WHO’s Ambient Air quality guidelines” for annual mean of particulate matter with a diameter of less than 2.5 micrometres (PM_{2.5}). WHO guideline limits for annual mean of PM_{2.5} are 10 µg/m³ annual mean.

PM_{2.5} includes pollutants such as sulfate, nitrates and black carbon, which penetrate deep into the lungs and in the cardiovascular system, posing the greatest risks to human health - sourced from WHO 2018 via <http://www.who.int/news-room/detail/27-09-2016-who-releases-country-estimates-on-air-pollution-exposure-and-health-impact>

If the applicant and the examination process ignores the potential current presence and concentrations of the additional pollutants then an inadequate base line has been set and the health of local people may be further compromised. We want and need to be aware of current PM_{2.5} levels as well as the presence of sulphates, nitrates and black carbon.

Finally, we need to consider the health implications for potential employees and visitors to the proposed Northampton Gateway site.

The WHO state that The Universal Declaration on Human Rights proclaims that, *'Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment'*.

All of the 3.5 billion workers in the world have the right to breathe clean air at their workplaces, as well as at their homes, cities and villages.

Pollution of air at the workplace, being indoors in the work premises, or during work outdoors is harmful to health and can be prevented. For this reason the 13th WHO General Programme of Work (2019–2023) states that *"with respect to air pollution (i.e. outdoor, household and workplace air pollution) and climate change mitigation, WHO will scale up its work with different sectors – including transport, energy, housing, waste, labour and urban planning – at the national and local level to monitor air quality, develop strategies for transitioning to healthier technologies and fuels and for ensuring that all populations breathe air that meets the standards of WHO's air quality guidelines, and that scientific evidence will be translated into effective policies."* - sourced from WHO 2018 via http://www.who.int/airpollution/events/conference/Pre-conference-Workshops-Schedule_landscape_draft-final_26OCT2018.pdf?ua=1

We, the local parishioners, will inhale and subsequently suffer the impact of negative fluctuations in air quality due to the predicted increase in HGV and other vehicle movements to and from the proposed Northampton Gateway site. We implore you to consider, with immediate effect, the recommendations of the WHO so that health becomes pivotal in the argument against any justification of this capitalist venture.

Thank you.

Mrs Lyn Bird