

Attention Kate Mignola Planning Inspectorate

Northampton Gateway Application TRO50006

Comments on Inspectorate's Questions and Answers received from Applicant and others on Air Quality and Emissions.

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**EXQ 1.1.3** The question asks for a response from the Applicant and NBC & SNC to the recent legal challenge to the Government from 'Client Earth'. Roxhill say that Northampton Gateway will comply with all limit values under EU Directives and that any AQ impacts will not delay compliance. In their answer NBC cast doubt on this assertion. In their answer NBC also question the applicants use of the Institute of Air Quality practice of rounding down impacts of less than 0.5% to zero (and therefore classed as negligible) as this understates baseline data. NBC also state:

*The government's AQ plan for NO2 in UK states that Northampton will meet EU Limit values in 2018. However, local monitoring and Environmental Statements show that limit values will be exceeded for years to come. They also say that a key failure of National AQ Planning is the optimistic modelling that has meant unrealistic forecasts for fleet emissions. Buses in Northampton will not be Euro V1 compliant for some years. (This is repeated in answer to EXQ 1.1.28)*

SNC have not answered this question.

**EXQ 1.1.4** The question asks why pollutants other than NO2 and PM10 have not been assessed. The applicant says that LA's do not routinely monitor SO2 (sulphur dioxide) and in any case is not applicable to this location. NBC say that the assessment 'could' have included SO2.

**EXQ 1.1.5** In reply to the question NBC say that the AQ Assessment could/should have looked at levels of PM 2.5 which is a Public Health concern.

**EXQ 1.1.13** In answer to the question about assumed improvements in vehicle fleet emissions, the applicant says they are based on Defra's Emissions Factor Toolkit. However in their answer NBC say there are serious doubts about these assumptions based on their experience with buses in Northampton.

**EXQ 1.1.14** The question asks for the basis for the calculation that 23m miles of road vehicle trips would be saved by the operation of Northampton Gateway. The answer given is highly speculative and in any case would be a benefit dispersed nationally and therefore marginal.

**EXQ 1.1.17** This question queries the use by the applicant of the Streamlined Pollution Climate Model (SL-PCM) rather than the full PCM. The answer gives a reason based on achieving quicker results, which highlights the unreliability of assumptions made.

**EXQ 1.1.19** This question relates to the applicant disregarding construction traffic in assessing overall emissions. The answer given is that additional construction traffic on key routes would be small. This is unconvincing.

**EXQ 1.1.20** This question asks why AQ impact will only be considered if it results in non compliance in the East Midlands Zone. The applicant replies that locations adjacent to Junctions are not considered for EU Directive compliance. This cannot surely be justification for disregarding a site as large as this affecting so many communities.

**EXQ 1.1.23** This asks why diffusion tube measurements on the A45 AQMA show levels 16% above the EU AQ Standard. The applicant replies that the EU AQS does not apply as the tubes are in a roadside location.

This highlights the need for more detailed assessment in this location and the adequacy of monitoring methods. NBC EHO Officers have acknowledged the need for better tube locations for this AQMA and asked for suggested sites.

**EXQ 1.1.26** In response to this question the applicant concedes that there is limited AQ monitoring at locations around Northampton and that this has led to assumptions being made based on data from elsewhere. Again this raises further questions about the robustness of baseline data and consequently the modelled forecasts.

**EXQ 1.1.27** The question asks if LA's are satisfied that the applicant is correct in its assumptions about overall emissions based on UK AIR data. NBC has replied that it would have preferred for emissions during the construction phase to have been included. SNC has not replied to this question.

**EXQ 1.1.28** This asks the applicant if it is reasonable for them to state 'that a gradual improvement' in AQ has been assumed. NBC has replied as follows:

*"Predictions of the reduction in NO2 made in assessments for Northampton Gateway are optimistic".*

**EXQ 1.1.30** The question asked about the calculation of dust impact on residential receptors during construction. The applicant states that a very small number of properties close to the M! Site boundary would be affected. A better assessment would have included a substantial number of properties on Ash Lane/High Street South in Collingtree. The applicant has stated that noise and external lighting impacts on Collingtree residents 'should' not be significant during construction. This has been challenged by Collingtree Parish Council based on the everyday experience under current conditions. Due to the prevailing winds, even the current agricultural use of the site results in noise over and above the ambient noise from the motorway and during periods of harvest and fertiliser spreading, dust and airborne particles are deposited over a large part of the parish. This has always been accepted by the local community as an infrequent and understandable irritation; however the consequences of noise and dust from a 24 hour industrial site together with an Aggregates Depot may well create a health hazard.