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Stop Northampton Gateway Action Group  
Ref. IP Reg. 20011012  
Northampton Gateway TR050006  
Further Written Representation – Air Quality

As tabled at the Issue Specific Hearing on 19<sup>th</sup> December we are submitting this further Written Representation as an addendum to our full submission previously submitted together with supporting evidence and references.

Discussion about air quality and air pollution usually conducted in complex scientific and technical language and made difficult for us ordinary residents to understand - but basically, we all want to know whether our local air is fit to breathe and whether it is going to get better or worse.

The following background facts are well established:

- Polluted air is a major and growing health risk and its harmful effects are well documented.
- Most Planning guidance at all levels supports the principle set out in the National Planning Policy Framework that new developments should not make existing pollution levels any worse.
- The proposed site is bounded by two AQMA's, parts of which already exceed legal AQ limits.
- Traffic volume, particularly diesel HGV traffic is forecast to rise significantly on this stretch of the M1.
- The 'Smart' motorway will widen the M1 and traffic will move a lane nearer to residential areas.
- The proposed development will create a 20 metre high corridor along the M1 with the potential to deflect emissions from the M1 that are currently dispersed over open fields.

All these factors place a high burden of proof on the AQ baseline monitoring carried out in the local communities around the site and consequently the computer based forecasting of likely outcomes.

Defra in a recent reply to Andrea Leadsom MP, said that Northampton Borough Council must ensure that the monitoring sites and equipment used, are adequate enough *"to permit meaningful evaluation of local air quality."*

The Government website Gov. K states: *"Assessments should be proportionate to the nature and scale of development proposed and the level of concern about air quality, and because of this are likely to be locationally specific"*

### **Local Authority Monitoring**

South Northants Council has done little monitoring in the site area. It has only a few test locations because the site is farmland with few receptors other than wildlife habitat. South Northants District Council has never undertaken automatic monitoring in this area.

Northampton Borough Council does monitor the two AQMA' s, one being the length of the M1 Junction 15 to 16 and the other a section of the A45. Almost two thirds of the additional HGV traffic trips generated by Northampton Gateway would pass through one or both of these AQMA's.

The nearest community is Collingtree and the direct impact will be on some 1370 households both existing and with planning permission. All these houses together with Allotments, a Cricket Club, a Tennis Club, a junior football training ground and a primary school, are within 100 metres of the M1 and A45.

How all this is monitored is set out in the 2018 NBC AQ Status Report. The M1 AQMA is monitored by one diffusion tube in Collingtree Village. There is another tube three miles away on the A43. The most recent reading from this **one** tube, showed a measure close to the legal limit.

The same Status Report describes monitoring of the A45 AQMA and concludes as follows:

*“As the monitoring locations are not sited near or at locations of exposure, this has caused large disparities between the NO2 annual mean concentration before and after distance correction calculations were applied, and as a result a degree of uncertainty”.*

Defra recommends that tube readings be validated by Automatic Continuous Analysing Equipment at nearby locations. NBC decommissioned all but one of its Automatic Monitors some years ago on grounds of cost.

Therefore, monitoring of the site area is entirely dependent on diffusion tubes which are then adjusted using data from an automatic analyser 7 miles away. The nearest Defra automatic analyser is 10 miles away at Spring Park, Kingsthorpe.

Because of these limitations, Roxhill carried out its own tube monitoring at four locations in Collingtree and on the A508. Their results are shown in their Environmental Statement.

There is a growing belief that Environmental Impact Assessments have lost credibility over recent years and are seen by local communities as lacking in objectivity and biased in favour of the promoter of the development. Local communities expect that an EIA should be an objective scientific report whilst developers and consultants see it as part of the advocacy process for gaining planning consent.

The Institute of Environmental Management and Assessment has also said that it wants to see independent monitoring of developers Environmental Impact Assessments and an audit of outcomes.

It is difficult to have confidence in the objectivity of both NBC and Roxhill when a 106 agreement is being negotiated to fund AQ improvements in the town centre.

Some of the parishes most likely to be affected by Northampton Gateway have carried out their own local measurements.

Collingtree Parish Council monitored 10 locations and the results were validated by the same laboratory used by NBC. These show validated results considerably higher than both NBC and Roxhill and included locations further from the M1, such as the Primary School

AQ testing has also been carried out by Parish Councils at various receptors in the surrounding villages of Milton Malsor, Roade, Blisworth and Towcester. The results indicate that there are significant ‘hot spots’ all around the proposed site. All these figures and tables are contained in the Part A submission of the SNG Action group.

All this monitoring, whether by Local Authorities, the developer or local Parish Council’s, rely on measurements using diffusion tubes with a wide margin of error. This is a concern for Parliament. A combined report of House of Commons Environmental committees in March this year concluded as follows:

*The current approach to monitoring and modelling is not operating at its full potential and is overly focused on demonstrating compliance. The modelling process is subject to substantial (+/-29%) uncertainty.*

It went on to say

*Direct measurement of air pollution is much more accurate than estimation and modelling is likely to be. The Government should work with local government to obtain these more accurate measurements. Improved oversight of local monitoring stations by the responsible bodies is also needed to ensure they are properly sited and functioning.*

Those of us who live in this area believe that historic baseline monitoring of the site area has been inadequate and has under predicted Nitrogen Dioxide levels - and therefore the computer forecasts based on them are also likely to be 'inadequate'.

We want to be sure that the air that we breathe will be made better not made worse and we trust the Examination of the Northampton Gateway to be rigorous in this regard.

Rod Sellers On behalf of the Stop Northampton Gateway Action Group

19<sup>th</sup> December 2018