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Sent: 23 September 2019 16:28

To: Northampton Gateway <NorthamptonGateway@planninginspectorate.gov.uk>

Cc: [REDACTED]

Subject: TR5006 Northampton Gateway SRFI Comments on Roxhills environmental impact clarification

I am writing to object to the way that Roxhill have tried to mitigate the the environmental impacts of the construction and general operation of their scheme.

3.9 item. The effects of construction and mitigation are not fully explained.

3.10 item. The development of the site and road routes are NOT set away from sensitive receptors as they note. There are residential dwellings which will be in close proximity to the route. A quantitative assessment of traffic which includes existing and projected traffic flows from the development is therefore required

I find it unjustifiable that the impacts of the proposed Roade bypass on air quality is excluded as it is 'a significant distance from the construction route'. There are only 2 routes south of the proposed SRFI which have easy access to the site: the M1 and the A508 (of which the Roade bypass will form part), so to exclude Roade bypass is unacceptable. The A508 is already heavily congested during peak periods, when construction vehicles will be moving. Indeed, the volume of traffic already increases substantially when there are problems on the M1. I cannot see that Roxhill can ensure that all construction traffic uses the M1. What happens if the motorway is closed because of an accident (which since the smart motorway is happening almost daily)? The net result is to see additional heavy goods traffic on local village roads which were not built for it and are already under strain.

Table 2 appendix 1. I cannot see that this gives a realistic forecast of the combined impact of construction and off site emissions. Surely there must be some variance between the individual and combined impacts when none are showing? I would think that if off site and construction pollution was combined, pollution levels would be in excess of EU recommended pollution levels, and as the UK government has pledged to reduce emissions levels, the impact of the development is in contradiction to this pledge.

The assessment of the Roade bypass on sensitive receptors only takes into account the impact of the works and associated transport and not the CUMULATIVE effect of the overall increase in traffic and pollution.

Why has Roxhill used monitoring data from 2015 and 2017 and not commissioned their own study? This old data excludes the SIGNIFICANT increase in traffic and pollution already coming from the Smart motorway work on the M1. This has already caused a significant increase in emissions for residents living in the A508 corridor, as vehicles seek alternative routes home when the M1 is blocked.

Air Quality Models. Why is Roxhill using ADMS 5.2,2.0 for predicting emissions from NRMM for air quality but ADMS-Roads version 4.1.1 elsewhere to model emissions. This smacks of 'pick and mix' with Roxhill choosing the model which shows their development in the best light rather than accurately reflecting the negative impact of their SRFI on pollution. Why haven't they used actual local pollution measurement statistics? For example, Roxhills predictions fail to take into account the preliminary Nitrogen Diffusion Tube results for January to July 2019 undertaken by Northampton Borough Council. These show that in January 2019 Collingtree High street emissions EXCEEDED 40mg per cubic m of air, which is the EU standard to which the UK has signed up for, and this is BEFORE the SRFI works had begun.

Meteorological Data. Why was Bedford chosen as the data site? This is some 22 miles away and has different weather characteristics.. The meteorological parameters are therefore unsuitable for use in Roxhill's models.

Why was Northampton not used for modelling ADMS dispersal? I would also argue that data for the years up to 2017 is irrelevant given the acceleration of climate change since this time.

I strongly object the use of qualitative data in parts of Roxhills air quality assessment which fails to take into consideration the fact that existing areas close to the SRFI already have high concentration of pollution and there is no mitigation Roxhill can provide.

I note that Roxhill have been unable to confirm that 4+ freight trains a day will use the site. On this basis, the net effect is to substantially increase movements of HGVs and other associated traffic to the site on roads which are already congested. Regardless of their arbitrary statistics the net result of this scheme is to increase the level of pollution around the site and surrounding residential areas to unacceptable levels. Roxhill failed to obtain planning permission for warehousing on the same site previously and this is their way of circumventing the planning process and the wishes of the local population and local councils' strategic plans. I hope the Secretary of State will see the application for what it is: an unnecessary polluting development. This Development is opportunistic, strongly opposed to by the local population. It is not strategic - there is already a RFI at Daventry and another approved close to Kegworth. A site between Milton Keynes and Luton appears more appropriate in terms of national rail freight coverage and on the basis of the above I would hope that the Secretary of State decides to decline this application.

Christine Barrand