



East Hunsbury
Parish Council

National Infrastructure Planning
The Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

26th September 2022

Dear Sirs

**Northampton Gateway Rail Freight Interchange (SRFI) project 2019/No1358
Non-Material Change TR050006**

The applicant (SEGRO) has submitted an amendment application on the basis that this is a non-material change to the Development Consent Order ("DCO") in order to secure a change to requirement 3 of the DCO which would enable occupation of some of the warehousing floor space in advance of the rail connections to the mainline. The change relates to the terminal being *available for use*.

At a meeting with Kate Bedson, Senior Director, National Logistics and Ian Rigby, Director, Technical Development on 6th September 2022 they quoted figures allowing occupation in advance at East Midlands Gateway as a comparator. This comparison stated that all occupiers now used the rail terminal *to some extent*. This does not equate to a total modal shift to rail freight from road freight. The Junction 15 site was previously considered unsuitable for development because of the concerns regarding impact on the highways network but SEGRO was exceptionally given consent based on the National Infrastructure and Government Policy of **a modal shift of freight to rail**.

At 5.7 of the amendment document SEGRO state that *"there is no evidence or expectation that this delay will deter or prevent adoption of rail freight once it is available."* At the meeting on 6th September 2022 Kate Bedson stated that there is no contractual obligation on occupiers to use the rail freight terminal rather than road.

At 5.10 the applicant states that without the rail terminal in operation associated traffic levels will decrease as the rail freight terminal is a traffic generator. The applicant goes on to state at 5.11 that *"This modal shift to rail for long-haul journeys means that there is an overall reduction in HGV mileage and consequential reduction in carbon emissions brought about by the SRFI. However, it does result in increased road traffic local to the site."*

It is our belief that by allowing this amendment and the opening of 37% of the floorspace (2.5m sq. ft) in advance of the opening of the rail connection, it will actively encourage greater use of road freight. It is the Parish Council view that the current levels of traffic on the A45 have already increased during the development phase.

Many of the employees travelling to the site are likely to be more locally based, with one of the main travel arteries from the north to the SEGRO development being the A45. No mitigation work has taken place on this side of the development. All of the mitigation work has been carried out to the south of the site.

The M1 and A45 already carry high traffic levels and our view is that this will increase significantly, having a detrimental effect on the local road network, including the M1, A45 and roads through East Hunsbury.

Materiality

Paragraphs 9 to 16 of Government Guidance (Planning Act 2008: Guidance on changes to Development Consent Orders, December 2015) on whether a change being sought should be considered material or non-material state states:

Environmental Statement - a change would be considered material if it would require an updated Environmental Statement to take account of new, or materially different, significant effects on the environment.

Impact on Business or residents – the impact of a change on local people and businesses may be a consideration in some cases dependent upon the circumstances of the case.

At 5.22 SEGRO state *“given the lack of any material environmental impact or other adverse impact on businesses or residents the Applicant is confident that this application should be considered as seeking a non-material change.”*

It is our belief that significant impact will be felt by residents on either side of the A45 at East Hunsbury and Wootton which will be exacerbated by an increase in road freight during the period of delay to the rail network connection.

The A45 at Wootton and East Hunsbury is already an Air Quality Management Area (AQMA) hotspot and has been designated a Noise Important Area (NIA) which triggers necessary action to reduce environmental noise. National Highways route strategy report states the A45 is a key distributor route, a gateway to A43 and provides connection between the M1 and A14 (Felixstowe). The defined route for container HGVs from the docks at Felixstowe is via the A14 to A45 to the SEGRO site, therefore the addition of road freight to 2.5m sq. ft of warehousing will be considerable, increasing air pollution levels and increasing noise and light pollution along this route. No mitigation work has taken place, nor are we aware of any scheduled to take place, on the A45 in advance of this amendment.

Some work has been done recently to aid drainage from the A45 Junction 15 to the slip road at East Hunsbury. The works divert surface water and its pollutants, from the A45 downhill towards Wootton Brook, and through areas of wildlife abundance. Wootton Brook is an area at high risk of flooding. We believe this should also be a consideration in relation to the environmental statement as to materiality.

In summary

East Hunsbury Parish Council believe that the amendment to the DCO sought by SEGRO is a **material** change based on impact to the environment and business or residents and should not be permitted on this basis.

The amendment should not be allowed as the site was previously considered unsuitable due to the impact on the road network and was only permitted in order to fulfil the modal shift from road to rail freight which will not be achieved until the rail network is connected.

The mitigation is not in place to prevent damage to the environment and business or residents if the 37% occupation (2.5m sq. ft) of warehousing is permitted before completion of the rail link.

SEGRO cannot prove that road traffic will not increase during this period, and we believe the opposite is true as occupiers are not obliged to use the rail link even when it is completed. SEGRO have not proposed any measures to mitigate the environmental impact of noise and air pollution to the North of the development.

On this basis we ask that the amendment to the DCO sought by SEGRO (Junction 15) Limited is refused.

Yours sincerely,



Mrs Caroline Holgate
Clerk to the Council

cc.

Andrea Leadsom MP

Cllrs Andre Gonzalez de Savage, Pinder Chauhan, Suresh Patel – West Northamptonshire Council

Roade Parish Council

Blisworth Parish Council

Milton Malsor Parish Council

Grange Park Parish Council

Collingtree Parish Council